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February 13, 2002

Allan C. Nickels
Regional Director
Food Stamp Program
USDA Food and Nutrition Service
Mountain Plains Region
1244 Speer Boulevard
Denver, Colorado 80204-3585

Dear Mr. Nickels:

Information recently received indicates Missouri's request to waive counties from the three-month eligibility restriction for able-bodied adults without dependents in which the unemployment rate exceeds the national average by 10% will be denied.

At the time of our request, unemployment rate information was available through the month of September 2001. We now have unemployment rate information through the month of November 2001. Because federal guidance states we may use a most recent two-year period, we are submitting justification to support approval to waive two additional counties with an unemployment rate in excess of 20% of the national average for the 24-month period ending November 2001.

Three other counties have an unemployment rate of 5.0% for this same period of time. Although they do not meet the criteria of being in excess of the national average, they have shown an increase in the unemployment rate for the past several months. Based on current economic conditions and the probability of those conditions continuing, our belief is these counties will continue to show an increase in the unemployment rate.

Allan C. Nickels

We are requesting you review the information attached to justify our request to waive these additional counties from the three month food stamp eligibility restriction for certain able-bodied adults without dependents age 18 to 50.

If you have any questions, please contact Jody Cornwell at (573) 751-3178 or by e-mail at jcornwel@mail.state.mo.us.

Sincerely,



Denise Cross
Director

DC/JW/he

STATE AGENCY: Ms. Janel R. Luck, IM Deputy Director
Missouri Division of Family Services
PO Box 88
Jefferson City, Missouri 65103
(573) 751-3124

AREAS COVERED BY THE REQUEST:

Areas with unemployment rates 20% above the national average for the period ending November 2001:

Bollinger
Morgan

Areas with unemployment rates of 5% for the period ending November 2001 and data indicating their unemployment rates are rising.

Bates
Caldwell
Chariton

See attached Bureau of Labor Statistics Data (BLS) listing unemployment statistics for calendar years beginning January 1998 through September 2001.

CATEGORY UNDER WHICH WAIVER IS BEING REQUESTED:

Request due to lack of sufficient jobs i.e.: Areas with unemployment rates that exceed 20% of the national average in a recent 24-month period.

Due to current economic conditions, Missouri is also requesting a waiver for counties in which the unemployment rate is currently at 5% and rising.

DURATION OF WAIVER: One year, March 1, 2002, through February 28, 2003.

BASIS FOR REQUEST: Current regulations at 273.24(f)(1)(ii) allow FNS to waive the time limit for individuals if it is determined the area in which the individuals reside does not have a sufficient number of jobs to provide employment.

Areas with an insufficient number of jobs to provide employment are defined as those with unemployment rates that exceed the national average by 20%. BLS data indicates the national average unemployment rate for the period December 1999 through November 2001 is 4.3%. Therefore, 5.2%, was used to determine which areas

in Missouri had unemployment rates in excess of 120% of the national average.

Areas with an unemployment rate of 5% were reviewed. These areas show the unemployment rate has risen in the past several months. Current economic conditions indicate a probability of these conditions continuing, causing the unemployment rate in these counties to continue to rise.

BLS data is submitted to support Missouri's request to waive the individuals in the counties listed.