



Attachment

RD:SR

Richard Dobbs, Director
Food Stamp Policy

Sincerely,

If you or your staff have any questions, please feel free to contact me at (615) 313-5652.

Your expeditious processing of this request is appreciated.

Attached you will find a request for an extension and modification of waiver 970084. This waiver is requesting Section 6(o) of the Food Stamp Act, as amended by Section 824 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, P.L. 104-193, be waived. The waiver exempts individuals residing in certain counties due to their unemployment rate being over 10 percent from the ABAWD work requirement.

Dear Mr. Carnacho:

Gilbert Carnacho, Regional Director
Southeast Region, Food and Nutrition Services
United States Department of Agriculture
61 Forsyth Street, Suite 8T36
Atlanta, Georgia 30303

December 14, 2001

DON SUNDQUEST
GOVERNOR

NATASHA K. METCALF
COMMISSIONER

STATE OF TENNESSEE
DEPARTMENT OF HUMAN SERVICES
CITIZENS PLAZA BUILDING
400 DEADRICK STREET
NASHVILLE, TENNESSEE 37248
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Pat Waldron
Certification
Plan Branch
FSP-
Washington

WAIVER RESPONSE

1.	Waiver Serial Number:	970084	
2.	Type of Request:	Extension and Modification	
3.	Primary Regulation Citation:	Section 6(o) of the Food Stamp Act, as amended by Section 824 of the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996, P.L. 104-193.	
4.	Secondary Regulation Citation:	N/A	
5.	State:	Tennessee	
6.	Region:	Southeast	
7.	Regulatory Requirement:	Section 6(o) of the Food Stamp Act, as amended, by Section 824 of the PRWORA, provides that no individual shall be eligible to participate in the Food Stamp Program as a member of any household if, during the preceding 36 month period, the individual received food stamp benefits for not less than 3 months (consecutive or otherwise), during which the individual did not work 20 hours or more per week, averaged monthly; did not participate in and comply with the requirements of a work program for 20 hours or more per week; did not participate in and comply with requirements of a program under Section 20 or a comparable program established by the State; or received benefits because they were exempt from these requirements.	
8.	Description of Proposed Alternative Procedures:	Under the current waiver, Tennessee is approved until January 31, 2002, to exempt individuals residing in three (3) counties from the time limits of Section 6(o) of the PRWORA based on unemployment rates above 10 percent. This exemption covers the counties of Carroll, Clay and Lawrence. Information provided by the Tennessee Department of Labor and Workforce Development for October 2000 through September 2001 shows the counties of Fentress and Lawrence as having an average unemployment rate higher than 10 percent. Tennessee is requesting the extension of this waiver for Lawrence County, the addition of Fentress County and the removal of Carroll and Clay Counties.	

9. **Justification for Request:** As stated in number 8 above, the two counties of Fentress and Lawrence have an unemployment rate above 10 percent. This is verified by the Tennessee Department of Labor and Workforce Development figures for the period from October, 2000 through September, 2001. (See the attached chart and verification from TDLWD). Employment prospects for these individuals are greatly diminished and usually the individuals have little work history.

10. **Anticipated Impact on Households and State Agency:** The household with able-bodied adults without dependents will benefit through continued eligibility if otherwise eligible. These able-bodied individuals will be able to continue to receive benefits longer than the three month period (five months using the 15% exemption) and a longer period of time to obtain either employment or training as the caseworker will have longer to assist them in achieving this goal. The individuals will not have what, in many instances, is their only source of assistance terminated.

11. **Caseload Information:** The waiver will affect two counties out of ninety-five. In each county the percentage of the Food Stamp population will be minimal. Quality Control will not be affected, as QC will exempt these counties from the able-bodied requirement.

12. **Time Period:** Tennessee is requesting the waiver of the able-bodied requirement for the two counties to be for one year. The waiver will be through January 31, 2003. All counties will be re-evaluated to determine their eligibility based upon the unemployment rate at the end of the waiver.

13. **Signature and Title of Requesting Official:**



Richard Dobbs, Director

Food Stamp Policy

Tennessee Department of Human Services

14. **Date of Request:** December 14, 2001