

Joyce
mw
2/25/03

Mr. Gilbert Camacho, Regional Director
Food Stamp Program
Southeast Region
USDA, Food and Nutrition Service
61 Forsyth Street, S.W., Suite 8T36
Atlanta, Georgia 30303

Dear Mr. Camacho:

Please find enclosed South Carolina's request for an extension of our waivers of 7 CFR 273.24(b) and 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. 104-93. The period we seek approval is March 1, 2003 - February 28, 2004.

Your consideration for granting this extension will be greatly appreciated. If you have any questions, please contact Ms. Sandy Allen of my staff at (803) 737-9238.

Sincerely,

Laurel R. Addy, Director
Family Nutrition Programs
Division of Family Independence

LRA/am

Enclosures

Addy/Allen/Taylor/Young/McFaddin/official
Saved:2003ABAWDWaivercoverletter:jm:e:1/6/03ic:

WAIVER REQUEST

1. **Waiver serial numbers:** 970044 and 970112
2. **Type of request:** Extension
3. **Primary regulation citation:** 7 CFR 273.24(b)
4. **Secondary 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.
5. **State:** South Carolina
6. **Region:** Southeast Region
7. **Regulatory requirements:** Regulations at 7 CFR 273.24(b) state that able-bodied adults are not eligible to participate in the Food Stamp (FS) Program as a member of any household if the individual received FS for more than three countable months during any three-year period, except that individual may be eligible for up to three additional countable months in accordance with paragraph (e) of this section.

Section 6(o) of the Food Stamp Act, as amended by Section 824 of PRWORA, P.L. 104-193 provides that no individual shall be eligible to participate in the FS Program as a member of any household if, during the preceding 36 month period, the individual received FS benefits for not less than three months during which the individual did not:

- a. work 20 hours or more per week, averaged monthly;
- b. participate in and comply with the requirements of a work program for 20 hours or more per week; or
- c. participate in and comply with requirements of a program under Section 20 or a comparable program established by the State.

Section 6(o) of the Food Stamp Act, as amended by Section 824 of the PRWORA, also provides that, upon the request of a State agency, the Secretary may waive the applicability of the above provision for any group of individuals in the State if the Secretary makes a determination that the areas in which the individuals reside has an unemployment rate of over 10%, or does not have a sufficient number of jobs to provide employment for the individuals.

8. **Proposed alternative procedures:** South Carolina is requesting a waiver to exempt individuals who reside in nine counties from the work requirement provision of Section 6(o) of the Food Stamp Act, as amended by Section 824 of the PRWORA. These counties had an annual average unemployment rate over 10% for the period of October 2001-September 2002. South Carolina is also requesting in this waiver to exempt individuals who live in 19 counties from the work requirement provision of Section 6(o) of the Food Stamp Act, as amended by Section 824 of the PRWORA as these areas have been identified as Labor Surplus Areas (LSA) by the Department of Labor, Employment and Training (ETA). South

Carolina's total exempted population is comprised of 20 counties. Please note that 8 of the counties with an annual average unemployment rate over 10% are also Labor Surplus counties.

9. **Justification for request:** Statistics secured from the South Carolina Employment Security Commission, a cooperating agency with the Bureau of Labor Statistics, show the following areas with an average unemployment rate of 10% or more for FFY 2002. The counties listed (with the exception of Laurens County) also appear on the DOL list of Labor Surplus counties.

**FFY 2002 S.C. Counties with 10 % Unemployment Rate
Covered by Waiver 97044**

County	Unemployment Rate	County	Unemployment Rate
Chester	11.6	Marlboro	10.3
Fairfield	11.7	Orangeburg	10.3
Laurens	10.1	Union	12.3
McCormick	11.5	Williamsburg	14.3
Marion	13.6		

Source: www.sces.org/Imi (S.C. Monthly Unemployment Rates)

Statistics secured from the U.S. Department of Labor, Employment and Training Administration show the following counties as labor surplus areas.

**FFY 2002 List of S.C. Labor Surplus Counties
Covered by Waiver 970112**

Allendale <i>DELETE</i>	Chesterfield	Georgetown	McCormick <i>10.1%</i>
Bamberg <i>DELETE</i>	Clarendon	Greenwood	Orangeburg <i>10.3%</i>
Barnwell	Darlington	Lee	Union <i>12.3%</i>
Calhoun <i>DELETE</i>	Dillon	Marion <i>13.6%</i>	Williamsburg <i>14.3%</i>
Chester <i>10.1%</i>	Fairfield <i>11.7%</i>	Marlboro <i>10.3%</i>	

Source: <http://workforcesecurity.doleta.gov/employ/lsa.asp>

10. **Anticipated impact on households and State agency operations:** The extension of this waiver will allow individuals who reside in areas with unemployment rates of 10% or more the opportunity to participate in the FS Program without being required to meet unrealistic work requirements. In addition, South Carolina will be able to exempt areas in which there are not enough jobs for groups of individuals who may be affected by the new time limits in the FS Program.
11. **Caseload information, including percent, characteristics, and quality of error rate for affected population:** An estimated number of 1,743 clients will be exempted due to unemployment rates of 10% or more or residence in labor surplus areas.
12. **Anticipated implementation date and time period for which waiver is needed:** These waivers are requested for a one-year time period to begin March 1, 2003 - February 28, 2004.

13. Proposed quality control review procedures: There are no special quality control procedures needed in conjunction with this waiver.

14. Signature and title of requesting official:

Laurel R. Addy, Director, Family Nutrition Programs

15. Date of Request:

South Carolina 10% Unemployment Data

Monthly Unemployment Rates
October 2001 to September 2002

COUNTY	Oct 01	Nov 01	Dec 01	Jan 02	Feb 02	Mar 02	Apr 02	May 02	Jun 02	Jul 02	Aug 02	Sep 02	Rate Average
Abbeville	8.8	8.1	9.1	8.1	7.5	7.2	8.1	7.3	9.2	9.5	11.3	9.2	8.6
Aiken	5.1	6.7	5.4	5.3	5.0	4.5	4.6	4.7	5.4	5.0	4.3	5.2	5.1
Allendale	4.4	4.8	5.0	4.9	5.2	4.8	4.3	4.0	4.4	4.8	4.4	4.7	4.6
Anderson	5.6	5.5	5.6	6.0	6.5	6.0	5.6	5.8	5.3	6.2	5.7	5.4	5.8
Bamberg	7.4	4.9	5.4	4.8	5.2	4.4	4.2	4.3	4.8	5.2	5.8	5.0	5.1
Barnwell	8.4	8.2	8.5	7.6	8.9	8.5	7.9	7.9	7.9	7.6	8.4	7.8	8.1
Beaufort	2.5	2.6	2.8	3.5	3.0	2.6	2.3	2.3	2.6	2.6	2.4	2.3	2.6
Berkely	4.0	3.5	3.8	4.1	4.1	3.4	3.5	3.8	4.1	3.8	3.5	3.2	3.7
Calhoun	10.1	5.6	6.1	5.6	5.6	5.4	5.6	5.9	5.8	7.1	8.9	8.7	6.7
Charleston	3.4	3.0	3.2	3.6	3.8	3.6	3.7	3.9	4.5	4.3	4.0	3.8	3.8
Cherokee	9.1	7.8	7.7	9.6	8.7	8.3	7.5	7.3	7.5	6.9	6.9	6.4	7.8
Chester	9.6	10.5	10.9	11.9	11.9	11.9	12.3	12.3	12.4	12.4	12.0	11.4	11.6
Chesterfield	9.2	8.6	8.6	8.0	7.8	7.4	6.3	6.3	7.5	7.0	7.4	6.6	7.6
Clarendon	8.0	7.5	8.1	8.5	8.7	7.9	7.6	7.6	8.0	8.4	7.3	6.9	7.9
Colleton	4.7	4.6	5.4	5.2	5.3	5.3	5.4	5.6	6.3	6.3	6.3	5.8	5.5
Darlington	6.7	6.6	7.3	7.4	7.5	6.9	6.6	7.3	8.0	7.8	7.8	7.2	7.3
Dillon	10.1	9.1	10.0	9.2	9.8	9.9	8.8	9.9	10.0	8.9	9.1	8.6	9.5
Dorchester	3.9	3.1	3.4	3.9	3.9	3.8	3.8	4.0	4.2	4.1	3.8	3.6	3.8
Edgefield	4.3	6.5	4.3	4.4	4.9	4.5	4.0	3.8	4.1	3.8	3.7	5.3	4.5
Fairfield	11.4	10.6	14.3	13.3	11.4	11.0	10.6	11.8	12.0	12.2	11.0	10.9	11.7
Florence MA	5.1	4.9	5.4	6.2	6.2	5.7	5.6	6.5	6.7	6.7	8.7	6.4	6.0
Georgetown	8.6	9.6	11.0	11.8	11.2	10.0	8.7	8.5	8.0	8.1	8.1	7.6	9.3
Greenville	3.3	3.2	3.3	3.8	3.9	3.8	3.8	4.3	4.3	4.2	4.6	4.3	3.9
Greenwood	11.3	8.5	9.4	9.8	9.9	9.1	9.0	9.7	10.0	9.8	9.4	9.8	9.6
Hampton	5.9	6.0	6.6	6.7	7.7	7.8	7.1	7.9	8.3	8.2	8.2	7.5	7.3
Horry	4.0	4.8	5.7	7.1	5.9	4.5	3.8	3.7	3.4	3.2	3.4	3.4	4.4
Jasper	3.4	3.6	4.2	4.6	4.3	4.4	4.1	5.2	5.4	4.5	3.8	3.8	4.3
Kershaw	6.3	5.5	6.5	7.5	6.2	6.3	6.7	7.0	7.0	7.4	7.5	7.3	6.8
Lancaster	5.4	5.4	6.0	6.7	6.6	6.2	6.1	6.2	6.6	6.2	6.7	6.3	6.2
Laurens	10.8	9.9	10.4	10.0	10.3	10.1	9.4	9.9	10.1	10.2	10.6	9.6	10.1
Lee	7.0	6.8	8.5	7.5	6.7	7.0	6.6	7.0	7.6	8.0	7.7	7.3	7.3
Lexington	2.5	2.4	2.6	2.8	2.8	2.8	2.7	2.9	3.2	3.0	3.0	2.9	2.8
McCormick	15.1	11.5	12.8	13.6	12.1	10.5	9.4	9.4	11.0	11.4	9.9	10.9	11.5
Marion	14.3	13.9	14.3	15.0	14.8	13.8	13.1	13.6	13.1	12.9	12.7	11.8	13.6
Marlboro	11.1	10.6	10.3	10.2	11.0	10.6	8.6	8.8	11.1	9.9	11.8	10.1	10.3
Newberry	6.9	6.8	7.3	7.2	7.7	7.2	6.9	7.5	7.7	7.7	7.1	6.5	7.2
Oconee	5.9	5.9	6.3	6.7	7.2	7.6	7.2	7.8	6.9	7.5	7.5	6.8	6.9
Orangeburg	15.3	9.5	9.3	9.5	9.2	8.5	8.0	8.6	9.3	11.9	12.6	12.2	10.3
Pickens	5.6	4.1	4.6	5.5	6.3	5.6	5.2	5.4	5.0	5.5	5.7	4.9	5.3
Richland	3.1	2.9	3.3	3.8	3.7	3.9	3.6	4.0	4.0	3.9	3.9	3.7	3.7
Saluda	5.8	6.3	6.4	5.1	5.7	6.0	4.9	4.8	6.2	5.3	5.2	5.1	5.5
Spartanburg	5.3	4.8	5.1	6.1	6.6	6.1	6.0	6.6	7.0	6.8	6.0	5.5	6.0
Sumter	7.2	6.6	7.2	7.3	7.4	7.2	7.0	7.2	7.4	7.4	7.0	6.7	7.1
Union	12.5	10.6	12.1	12.8	13.5	12.8	12.7	12.6	12.1	11.3	12.4	11.7	12.3
Williamsburg	13.4	14.4	15.9	17.5	16.6	14.1	12.8	14.7	12.6	13.5	13.4	12.8	14.3
York	4.9	5.0	5.4	6.3	5.5	5.5	6.0	6.1	6.9	6.1	6.5	5.2	5.8

Pack, Joyce

From: Shedd, Russell
Sent: Thursday, February 27, 2003 2:47 PM
To: Pack, Joyce
Cc: Taylor, Julie; McMillan, Nora
Subject: RE: SC ABAWD Waiver Request - 970044 and 970112

I have spoken with staff at South Carolina. The answers to your questions are;

1. I had South Carolina e-mail the document then I scanned it in and attached it below. Please call or e-mail a fax number to me if for some reason you cannot open this version and I will fax it to you

While not identified on the document itself, the source of the data for the unemployment rates is The South Carolina Employment Security Commission (State DOL Agency). I checked the documentation for both the 10% unemployment and Labor Surplus Area (LSA) requests. Documentation supports both requests and we recommend their approval.

2. South Carolina prefers for Union and Williamsburgh Counties to be approved as LSA counties. *No*

3. Allendale, Bamberg and Calhoun counties no longer qualify as LSA's. South Carolina understands that they will be removed as waived counties when this waiver is modified.

If you have any other questions or need any further assistance, please call me at 404-562-7034.

Tim Shedd
Policy and Analysis
SERO Food Stamp Program



SC Unemployment
Data.pdf

-----Original Message-----

From: Pack, Joyce
Sent: Thursday, February 27, 2003 1:12 PM
To: Shedd, Russell
Subject: FW: SC ABAWD Waiver Request

Russell/Tim, Here is the waiver request.

Problems: 1) Attachment that documents 10% portion of the request cannot be opened.

2) Counties, Union and Williamsburg the State has entered as an LSA and as a 10% which do they want?

3) Allendale, Bamberg, and Calhoun counties are not on the LSA list, what does the State want to do?

-----Original Message-----

From: Woodhead, Dan
Sent: Monday, February 24, 2003 2:45 PM
To: Zumwalt, Barbara
Cc: Waldron, Patrick; Robinson, Vicky; Pack, Joyce
Subject: FW: SC ABAWD Waiver Request

Hi Barbara,

-----Original Message-----

From: Zumwalt, Barbara
Sent: Tuesday, January 14, 2003 1:55 PM

To: Woodhead, Dan
Subject: SC ABAWD Waiver Request

Dan, I am not sure exactly who to forward this to but know you'll see it gets where it belongs. I can't open the 3rd one; if you all can't let me know and I will fax it to whoever works on this one. Thanks BZ

<< File: 2003 ABAWD WAIVER COVER Letter.doc >> << File: 2003 ABAWD WAIVER REQUEST-A.doc >> << File: S.C. 10% Unemployment Data for 2003 ABAWD Waiver.123 >>