



**Department of
Job and Family Services**

John R. Kasich, Governor
Michael B. Colbert, Director

August 30, 2013

Trish Solis, Regional Director
USDA, Food and Nutrition Service
77 West Jackson Blvd., 20th Floor
Chicago, Illinois 60604-3591

Dear Ms. Solis:

In response to the comments we received on July 31, 2013, the source of the data used in the attached request was added to both the spreadsheet and the methodology section.

If you have any questions or comments, please contact Benjamin Anderson at (614) 752-3531 or Benjamin.Anderson@jfs.ohio.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Cunningham".

Matthew Cunningham, Esq.
Bureau Chief, Policy Initiatives
Office of Families Assistance
Attachment

30 East Broad Street
Columbus, Ohio 43215
jfs.ohio.gov

An Equal Opportunity Employer and Service Provider

WAIVER REQUEST OUTLINE

1. **Waiver serial number:**
2. **Type of request:** Initial
3. **Primary regulation citation:** 7 CFR 273.24(b)
4. **Secondary regulation citation, if any:** None
5. **State:** Ohio
6. **Region:** Midwest Region
7. **Regulatory requirements:** In accordance with the requirements described in 7 CFR 273.24(b), an individual is not eligible to participate in the food assistance program as a member of any household if the individual received food assistance for more than three countable months during any three-year period. Exceptions to the time limit are described in 7 CFR 273.24(c).
8. **Proposed alternative procedures:** For individuals in sixteen Ohio counties that do not qualify for an exemption or an exception to the time limit described in 7 CFR 273.24(b), Ohio proposes to waive the time limit. The counties subject to this request are: Adams, Brown, Clinton, Coshocton, Highland, Huron, Jefferson, Perry, Pike, Ottawa, Meigs, Monroe, Morgan, Muskingum, Noble, and Scioto.
9. **Justification for request:** In accordance with 7 CFR 273.24(f), Ohio has determined the affected counties do not have a sufficient number of jobs to provide employment for the individuals. Utilizing the methodology described below, Ohio has determined that during the 24-month period between January 2011 and December 2012, each of the identified counties had a 24-month average unemployment rate that was 20% above the national average for the same period.

Methodology

For each of Ohio's eighty-eight counties, we obtained unemployment and labor force data (that had not been seasonally adjusted) from the Bureau of Labor Statistics (<http://data.bls.gov/pdq/SurveyOutputServlet>). Monthly labor force and unemployment numbers for a twenty-four month period (January 2011 to December 2012) are identified by county in columns D through AA of the attached spreadsheet.

For each county, we summed the labor force and unemployment numbers for the entire twenty-four month period. The twenty-four month total labor force and unemployment numbers for each county are identified in column AB of the attached spreadsheet.

For each of the three combined project areas that will be operating in Ohio as of the effective date of the waiver, we aggregated the labor force and unemployment numbers from each of the constituent counties. The combined project areas are: Collabor8 (consisting of Delaware, Hancock, Knox, Marion, Morrow, Sandusky, and Wood counties); Southern COG (consisting of Hocking, Ross, and Vinton counties); and Defiance/Paulding Consolidated (consisting of Defiance and Paulding counties). The aggregated labor force and unemployment totals for each combined project area are identified in column AD of the attached spreadsheet.

We determined the average unemployment rate over the twenty-four month period for each county, by dividing the total unemployment number by the total labor force number and converting the quotient to a percentage. The average unemployment rate for the twenty-four month period for each county is identified in column AC of the attached spreadsheet. We determined the average unemployment rate over the twenty-four month period for each combined project area, by dividing the total unemployment number by the total labor force number and converting the quotient to a percentage. The average unemployment rate for the twenty-four month period for each combined project area is identified in column AE of the attached spreadsheet.

For each month in the twenty-four month period, we obtained the national unemployment rate (that had not been seasonally adjusted) from the Bureau of Labor Statistics (<http://data.bls.gov/pdq/SurveyOutputServlet>). The national unemployment rate for each month of the period is identified in row 179 of the attached spreadsheet. We then took the national unemployment average for each month and increased it by 20%; that amount is identified in row 180 of the attached spreadsheet. Next, we summed the 120% monthly national rates for the entire period and divided by twenty-four; the result was 120% of the average national unemployment rate over the twenty-four month period, which is identified in column AB, row 180 of the attached spreadsheet.

For each county that is not part of a combined project area, we compared the percentage in column AC to the percentage in column AB, row 180. As a result, sixteen counties were identified as having a twenty-four month average that was higher than 120% of the national average. For each combined project area, we compared the percentage in column AE to the percentage in column AB, row 180. As a result, we determined that none of the combined project areas have a twenty-four month average that was higher than 120% of the national average.

10. Anticipated impact on households and State agency operations: This waiver applies only to individuals who are receiving benefits in the specified counties. Individuals in these counties will not be subject to the time limits of 7 CFR 273.24(b). These individuals will still be required to participate in Ohio's Food Assistance Employment and Training Program.

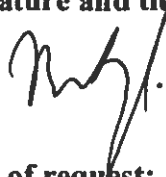
11. Caseload information, including percent, characteristics, and quality control error rate for affected portion: As of January 2013, Ohio had 1,845,325 individuals receiving food assistance. In FFY 2012 we had 178,456 individuals that were identified

as an ABAWD, which is less than 10% of the Food Assistance population. Only a small portion of the ABAWD population will be waived as a result of this waiver.

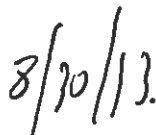
12. Anticipated implementation date and time period for which waiver is needed:
October 1, 2013 through September 30, 2014

13. Proposed quality control review procedures: No special procedures will be required for this waiver. Cases will continue to be reviewed using standard review procedures contained in the FNS 310 Handbook.

14. Signature and title of requesting official:

A handwritten signature in black ink, appearing to be "M. J.", written over the signature line of item 14.

15. Date of request:

A handwritten date "8/30/13" in black ink, written next to the date of request label for item 15.