



COMMONWEALTH of VIRGINIA

DEPARTMENT OF SOCIAL SERVICES

July 9, 2014

Mr. Eric Ratchford, Regional Director
Supplemental Nutrition Assistance Program
USDA Mid-Atlantic Region
Mercer Corporate Park
300 Corporate Boulevard
Robbinsville, NJ 08691-1598

Dear Mr. Ratchford:

We previously submitted a waiver request to exempt residents in certain Virginia localities from the work requirement and time-limited benefits. We have revised the request after discussions with members of your staff. The revised waiver request is enclosed. Supporting data will be submitted electronically.

Please contact Faye Palmer, Acting SNAP Manager, at (804) 726-7938, or by e-mail at faye.palmer@dss.virginia.gov for additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "T. Steinhauser".

Thomas J. Steinhauser
Director
Division of Benefit Programs

c: Faye Palmer

Enclosure

Waiver Request

1. **Waiver serial number:** 970283
2. **Type of request:** Modification and extension
3. **Primary regulation citation:** §7 CFR 273.24
4. **Secondary regulation citation:** Not applicable
5. **State:** Virginia
6. **Region:** Mid-Atlantic
7. **Regulatory requirements:** Supplemental Nutrition Assistance Program (SNAP) regulations at §7 CFR 273.24 provide that household members may not receive benefits beyond a three-month period within a 36-month period unless the members participate in a work activity for a minimum of 20 hours per week. There are exceptions allowed to the time-limited benefits.

Regulations at §7 CFR 273.24(f) also provide that the Secretary may waive the work requirement for any area that has an unemployment rate of 10 percent or higher, an area designated as a "labor surplus area," (LSA), or an area that has a 24-month unemployment rate that exceeds the national average by 20 percent. For the 24-month evaluation, the period used must be no earlier than the same periods the ETA used to designate LSAs for the current fiscal year

8. **Proposed alternative procedures:** Virginia requests a waiver for SNAP recipients who reside in areas or regions of the state that do not have sufficient jobs to provide employment opportunities for individuals who are subject to the time-limited benefits provisions.

Virginia requests to exempt individuals in certain areas, primarily in the southern part of Virginia based on the collective unemployment rate that is at least 20 percent above the national average for the period of November 2011 through October 2013. The national unemployment rate for this reference period is 7.9 percent and the threshold for the exemption is 9.4 percent. The reference period may not be earlier than the period used by the Employment and Training Administration (ETA) uses in identifying labor surplus areas. The period used by ETA for LSA list for October 1, 2013 through September 30, 2014 is January 2011 through December 2012.

The chart below provides the labor force and unemployment information for the selected localities.

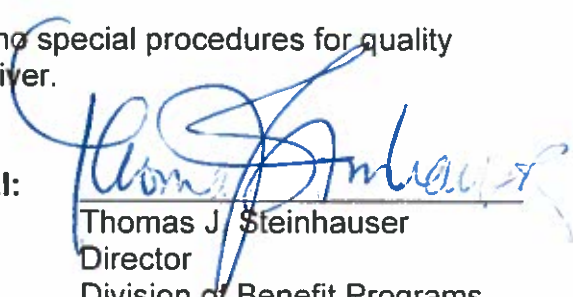
	Average unemployment rate, November 2011-October 2013
Brunswick County*	10.4
Carroll County	8.2
Charlotte County	8.2
Danville City*	10.3
Emporia City*	11.5
Franklin City*	10.0
Galax City	9.1
Grayson County*	9.5
Greensville County	9.0
Halifax County*	9.4
Henry County*	9.6
Lunenburg County	8.3
Martinsville City*	15.4
Mecklenburg County*	9.8
Patrick County	7.8
Prince Edward	8.7
Smyth County	8.8
Surry County	7.2
Sussex County	8.2
TOTAL FOR COMBINED REGION	9.4
National unemployment plus 20%	9.4

In addition to the areas identified above, Virginia requests to waive additional areas because the average unemployment rate is at least 20 percent above the national average during the period November 2011 through October 2013. The calculated threshold for the reference period is 9.4 percent.

	Average unemployment rate, November 2011-October 2013
Dickenson County	9.6
Page County*	9.8
Petersburg City*	11.1
Williamsburg City*	12.9

*2014 LSA

Areas designated as LSA localities for 2014 are included in either table above except Lexington City. Because Lexington is covered by a local office that administers programs and services for other cities and counties, this waiver request does not include Lexington.

9. **Justification for request:** The 23 counties and independent cities listed above, represent 21 local social services agencies. These localities have an aggregate unemployment rate that is at least 20 percent above the national average for the period November 2011 through October 2013. Many of the areas are also designated as labor surplus for 2014. Raw data supporting this request is from the Bureau of Labor Statistics (BLS) website.
10. **Anticipated impact on households and State agency operations:** This waiver will provide consistency for households and agency operations in areas where unemployment remains higher than the national average.
11. **Anticipated Implementation date:** We ask for this waiver to be effective upon approval for one year. We do not request retroactive approval.
12. **Quality control procedures:** There are no special procedures for quality control needed in conjunction with this waiver.
13. **Signature and title of requesting official:** 
Thomas J. Steinhauser
Director
Division of Benefit Programs
14. **Date of request:** July 9, 2014