



GOVERNMENT OF GUAM



DEPARTMENT OF PUBLIC HEALTH & SOCIAL SERVICES
(DIPATTAMENTON SALUT PUPBLEKO YAN SETBISION SUSIAT)
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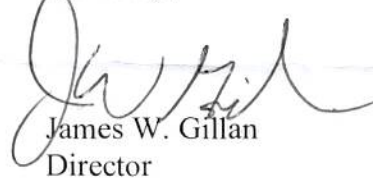
Mr. Dennis Stewart
Regional Director
Food Stamp Program
Western Region
90 Seventh St. #10-100
San Francisco, CA 94108

Dear Mr. Stewart:

Enclosed is Guam Department of Public Health and Social Services' FY 2015 Able Bodied Adult without Dependents (ABAWD) request to exempt certain individuals island-wide from the work provisions of 7 CFR 273.24 for your review and approval. As part of this ABAWD waiver request, the data (provided through the Guam Department of Labor, Bureau of Labor Statistics) is included as required and as supporting documentation to Guam's claim of high unemployment.

Should you have any questions or concerns regarding this matter, please contact Ms. Theresa L. Arcangel, Chief, Division of Public Welfare at (671) 735-7300 or email at theresa.arcangel@dphss.guam.gov.

Sincerely,


James W. Gillan
Director

cc: Theresa L. Arcangel, Chief, DPW
Annie Gozum-Soto, BES Administrator

Enclosures

WAIVER RENEWAL/EXTENSION REQUEST

1. Waiver Serial Number:
2. Type of Request: WAIVER REQUEST
3. Primary Regulation Citation
4. Secondary Regulation Citation, if any: N/A
5. State: Territory of Guam
6. Region: Western
7. Regulatory Requirements: 7 CFR 273.24 provide that no individual, who is able bodied without a dependent (ABAWD), shall be eligible to participate in the Supplemental Nutrition Assistance Program (SNAP) as a member of any household if, during the preceding 36-month period, the individual received SNAP 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 work requirements of a work program of 20 hours or more per week; did not participate in and comply with the requirements of a program under Section 20 of the Act or comparable program established by the state; or received benefits because they were exempt from these requirements.

7 CFR 273.24 (f) 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 area in which the individuals reside has an unemployment rate of over 10 percent, or does not have a sufficient number of jobs to provide employment for the individuals.

8. Proposed Alternative Procedures: The Territory of Guam, Department of Public Health and Social Services, is requesting an island-wide waiver to exempt its ABAWD population from the work requirements of 7 CFR 273.24 based on the high unemployment rate. Labor data is derived from sample surveys of households conducted by the Guam Department of Labor's Bureau of Labor Statistics (BLS) (<http://dol.guam.gov>). These are periodic surveys where field interviews are conducted inquiring about activity or status during the calendar week. Guam does not issue unemployment benefits to residents.

To support Guam's claim of high unemployment, Guam combined labor force and unemployment data collected in the months of September 2013, June 2013, March 2013, December 2012, September 2012, June 2012, March 2012 compared the results to U.S. BLS (<http://www.bls.gov/data/>) data for the corresponding months as follows. September 2013 is the most current survey conducted by Guam's Department of Labor as confirmed by Ms. Nellie Asanoma of Guam's DOL.

Combined National Unemployment Rate

Month	Year	Labor Force	Unemployed	UER	20 Percent Threshold
September	2013	155,536,000	11,203,000	7.2	
June	2013	157,089,000	11,747,000	7.5	
March	2013	155,028,000	11,627,100	7.5	
December	2012	155,511,000	12,285,369	7.9	
September	2012	155,056,000	12,094,368	7.8	
June	2012	155,149,000	12,722,218	8.2	
March	2012	154,707,000	12,685,974	8.2	

Total		775,451,000	61,415,029	7.8	9.31
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Guam Unemployment Rate

Month	Year	Labor Force	Unemployed	UER
September	2013	71,430	7,160	10.0
June	2013	70,420	10,310	14.6
March	2013	73,170	9,730	13.3
December	2012	72,560	7,800	10.7
September	2012	72,980	7,970	10.9
June	2012	72,890	10,190	14.0
March	2012	68,400	8,060	11.8
Total		360,000	43,811	12.14

9. Action and Reason for Request: Guam is seeking relief from the requirement that ABAWDs meet the 20 hours per week work participation requirement due to the lack of sufficient jobs on the island. The Territory's FY 2013 unemployment rate for FY 2013 is at 12.15%

Based on data from other ABAWD approved waivers, the average national unemployment rate, when increased by 20 percent, inflate to 9.03%. Guam's latest data (last five quarters) rate of 11.9% still exceeds the national inflated rate by 2.87%.

The highest threshold for 20% above the national average from recently approved ABAWD waivers is 7.22%. The last time Guam's unemployment rate was below 7.22% was in March 2006.

10. Regulatory or Legislative Basis for Action: This waiver request is requested pursuant to 7 CFR 273.24

{f}(1)(ii), which allows FNS to waive the applicability of the work requirement provision of 7 CFR 273.24 for any group of individuals in the State if FNS determines that the area in which the individuals reside does not have a sufficient number of jobs to provide employment for the affected individuals, or the area exceeded the national average unemployment average by 20 percent for 24 consecutive months.

11. Conditions and Reasons:
12. Information Required for Request: Guam is submitting Department of Labor data as required reflecting the most current unemployment rate of 12.15% to support claim of insufficient jobs to provide employment in the territory.
13. Expiration Date:
14. Limitation on Regional Office Approval of Like Requests:
15. Quality Control Procedures:
16. Date of National Office Action:
17. Date of State Agency's Request:
18. Date of Regional Office Transmittal to the National Office:
19. Date of Regional Transmittal to the State Agency:
20. Date of Implementation by State Agency: