



United States Department of Agriculture
Food and Nutrition Service

Western Region

December 8, 2014

Reply to
Attn of: SNAP – 10-6-HI /Waiver

Subject: SNAP- HI Request to extend waiver #970050, covering Able-Bodied Adults without Dependents (ABAWD), through Fiscal Year 2015

To: Sasha Gersten-Paal, Branch Chief
Certification Policy Branch
Supplemental Nutrition Assistance Program

Attached is Hawaii's request to extend waiver # 970050 for the Island of Molokai for a two-year period. Hawaii wishes to waive 7 CFR 273.24(b), which limits ABAWD participation in the Supplemental Nutrition Assistance Program (SNAP), if the individual received SNAP benefits for not less than 3 months in a 36-month period and the individual did not work 20 hours or more per week; participate in and comply with the requirements of a work program for 20 hours or more per week; or participate in and comply with the requirements of a program under Section 20 or a comparable program established by the State. The Island of Molokai's current waiver, as part of the statewide extension, expires on November 30, 2014?

The reason for the request for extension of the existing waiver is in support for the lack of sufficient jobs. In order for a State to support this claim 7CFR 273.24 (f) (i) (ii) states:

"To support a claim of lack of sufficient jobs, a State may submit evidence that an area: is designated as a Labor Surplus Area (LSA) by the Department of Labor's Employment and Training Administration (ETA); is determined by the Department of Labor's Unemployment Insurance Service as qualifying for extended unemployment benefits; has a low and declining employment-to-population ratio; has a lack of jobs in declining occupations or industries; is described in an academic study or other publications as an area where there are lack of jobs; has a 24-month average unemployment rate 20 percent above the national average for the same 24-month period. This 24-month period may not be any earlier than the same 24-month period the ETA uses to designate LSAs for the current fiscal year."

The Island of Molokai's request is based on having a monthly unemployment rate 20 percent above the national average for a period of 24 months from October 2012 – September 2014. In reviewing the data provided by the Island of Molokai, and using the calculation method required by the 04/22/2004 Policy Memo on Waivers Based on a 24-Month Average Unemployment Rate 20 Percent Above the National Unemployment rate, it appears that the average unemployment rate for the provided 24 months is 11%.

Given this information, the Island of Molokai would qualify for and exemption based on the following:

7CFR 273.24 (f) and 7CFR 273.24 “ *Waivers*—(1) *General*. On the request of a State agency, FNS may waive the time limit for a group of individuals in the State if we determine that the area in which the individuals reside:

(i) Has an unemployment rate of over 10 percent”

Approval of this waiver will provide the Island of Molokai consistency for households and State agency operations. I recommend approval of this request with a one-year extension.

If you have any questions regarding the waiver request, please contact Jodi Schroeder at 415- 705-1358, or at jodi.schroeder@fns.usda.gov

Sincerely,



WALTER ZAUMSEIL
Team Lead, Policy and Integrity
Supplemental Nutrition Assistance Program
Western Region

Attachment

cc: Lisa Kim, PIB, SNAP, WRO
Walter Zaumseil, PIB, SNAP, WRO (State Team Lead)