

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2130031
2. **Type of request:** Modification and renewal
3. **Regulatory citation:** 7 CFR 273.24(f)(1)
4. **State:** Minnesota
5. **Region:** Midwest Region
6. **Regulatory requirements:** 7 CFR 273.24 provides that no individual 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 food benefits for not less than three 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 requirements of a work program for 20 hours or more per week; did not participate in and comply with requirements of a program under Section 20 of the Food and Nutrition Act or a comparable program established by the State; or was exempt from these requirements.

7 CFR 273.24(f), allows states to contact the Food and Nutrition Service (FNS) about the ABAWD work provisions for any group of individuals in the State if the FNS 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.

7. **Description of alternative procedures:** Minnesota requests to exempt individuals residing in two counties which are designated as Labor Surplus Areas by the Department of Labor for FFY 2014: Clearwater County and Kanabec County.

In addition, the State also requests to waive the following reservation areas based on their average unemployment rate exceeding 10% for a recent 12-month period. The reservation unemployment rates were calculated based on shares of population and employment and unemployment. The previous method was based on Census 2000 data, and the structure of Census 2010 and ACS data doesn't quite match the old formats.

The following tables summarize our calculations:

	DA July2012- June2014 Employed	DA July2012- June2014 Unemployment Rate	Reservation Unemployment Rate
Indian Reservation Areas			
Bois Forte Res Itasca County part	42331	3399	8.4
Bois Forte Res Koochiching County part	11948	1143	12.1
Bois Forte Res St. Louis County part	109598	7893	7.8
Total Bois Forte Reservation			10.6
Fond du Lac Res Carlton County part	33419	2243	9.5
Fond du Lac Res St. Louis County part	109598	7893	9.6
Total Fond du Lac Res			9.5
Grand Portage Reservation (Cook County, MN)	6163	364	9.7
Leech Lake Reservation – Cass County part	25736	2268	12.6
Leech Lake Reservation- Hubbard County part	17268	1422	13.2
Leech Lake Reservation- Itasca County part	42331	3399	11.8
Leech Lake Reservation- Bemidji, MN Micropolitan Statistical Area	41617	2979	9.6
Total Leech Lake Reservation			12.0
Lower Sioux Indian Community (Redwood County, MN)	7990	863	28.8
Mille Lacs Reservation-Aitkin County part	13548	1045	8.4
Mille Lacs Reservation-Crow Wing County part	62023	4667	0.0
Mille Lacs Reservation-Mille Lacs County part	22580	2031	14.9
Mille Lacs Reservation-Pine County part	26696	2172	0.0
Total Mille Lacs			14.8
Prairie Island Indian Community Red Wing, MN	48861	2549	2.6
Red Lake Reservation- Clearwater County part	7614	981	25.9
Red Lake Reservation- Koochiching County part	11948	1143	34.0
Red Lake Reservation-Lake of the Woods County part	4446	268	27.0
Red Lake Reservation- Marshall County part	10572	821	0.0

Indian Reservation Areas	DA July2012- June2014 Employed	DA July2012- June2014 Unemployment Rate	Reservation Unemployment Rate
Red Lake Reservation-Pennington County part	18200	1065	0.0
Red Lake Reservation-Polk County part	34241	1689	0.0
Red Lake Reservation-Red Lake County part	4350	302	0.0
Red Lake Reservation-Roseau County part	17530	767	27.8
Red Lake Res.-Bernidji part	41617	2979	21.5
Total Red Lake Reservation			23.3
Shakopee Mdewakanton Sioux Community	43024	2082	20.3
White Earth Reservation-Becker County part	34173	1978	7.1
White Earth Reservation-Clearwater County part	7614	981	9.1
White Earth Reservation-Mahnomen County part	4670	299	7.4
Total White Earth Reservation			7.5

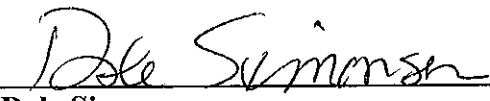
8. **Justification for request:** The two counties listed above were designated as Labor Surplus Areas by the Department of Labor for FY 2014. 7 CFR 273.24 (f)(2)(ii) states that evidence that an area "is designated as a Labor Surplus Area (LSA) by the Department of Labor's Employment and Training Administration (ETA)" and is used to support our claim of insufficient jobs. A copy of the FY 2014 DOLETA Labor Surplus Areas is enclosed with this request.

7 CFR 273.24 (f)(3)(i) states that a waiver can be readily approvable if "Data from the BLS or the BLS cooperating agency that shows an area has a most recent 12 month average unemployment rate over 10 percent". Due to the Federal UI rates dropping this past year, the 120% rate for exemption lowered as well. For the Indian Reservation areas listed above almost all have average unemployment rates exceeding the cut of 8.76%. All of the raw data supporting our numbers that we have used are from the Bureau of Labor Statistics (BLS) website. The reservation shares of the county population are based on data from the U.S. Census Bureau. All of this data is enclosed with this request. So for the Indian Reservations listed in #7 above we are requesting exemptions from the ABAWD time limits for those living on the following nine reservations:

Bois Forte, Fond du Lac, Grand Portage, Leech Lake, Lower Sioux, Mille Lacs, Red Lake, Shakopee Mdewakanto, and White Earth Reservation.

We recognize the average unemployment rate for the White Earth reservation is below the threshold, however the entire White Earth Nation (WEN) recently became a service area (similar to a county) and with state merit system staff, determines SNAP eligibility. Because this is a new service area, there is insufficient data during the past 24 months so we

are requesting a continuation of the existing exemption for this reservation.

9. **Anticipated impact on households and State agency operations:** This waiver will provide consistency for households and State agency operations in areas where unemployment remains higher than the national average.
10. **Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable):**
The caseload for these areas, as of 8/19/2014, represents approximately 7.5 % of the caseload for the state.
11. **Anticipated implementation date and time period for which waiver is needed:**
The State is requesting a waiver effective October 1, 2014 through September 30, 2014.
12. **Proposed quality control review procedures:**
There are no special quality control procedures involved with this waiver request.
13. **Signature and title of requesting official:**

Dale Simonson
Title: Economic Assistance and Employment Supports Division Deputy Director
Email for transmission of response: dale.simonson@state.mn.us
14. **Date of request:** August 25, 2014.
15. **State agency staff contact (name/email/telephone):** Karen Nelsen-Huss; Karen.nelsen-huss@state.mn.us; 651-431-4027; or Steve Erbes; steve.erbes@state.mn.us; 651-259-7539.
16. **Regional office contact person (to be completed by FNS regional office):**