



United States  
Department of  
Agriculture

Date: April 14, 2015

Food and  
Nutrition Service

Subject: SNAP - Virginia ABAWD Time Limit Waiver Extension Request

Mid-Atlantic Region

300 Corporate Blvd  
Robbinsville, NJ  
08691-1598

To: Lizbeth Silbermann  
Director  
Program Development Division

Attached is a request from the Commonwealth of Virginia to extend and modify their waiver #970283 to exempt Able-bodied Adults without Dependents (ABAWDs) Time Limits within certain localities. Currently, the Commonwealth has a waiver covering 22 jurisdictions representing 20 local agencies which will expire May 1, 2015. Virginia is asking for an extension waiver of ABAWD time limits for 39 jurisdictions representing 37 local agencies (a few jurisdictions are combined):

|                  |                    |                      |                   |
|------------------|--------------------|----------------------|-------------------|
| Bristol City     | Grayson County     | Patrick County       | Sussex County     |
| Brunswick County | Greensville County | Petersburg City      | Washington County |
| Buchanan County  | Halifax County     | Pittsylvania County  | Wise County       |
| Carroll County   | Henry County       | Prince Edward County | Wythe County      |
| Charlotte County | Hopewell County    | Prince George County | Covington City    |
| Danville City    | Lee County         | Russell County       | Lexington City    |
| Dickenson County | Lunenburg County   | Scott County         | Page County       |
| Emporia City     | Martinsville City  | Smyth County         | Richmond County   |
| Franklin City    | Mecklenburg County | Southampton County   | Williamsburg City |
| Galax City       | Norton City        | Surry County         |                   |

Please note, Covington City and Lexington City are both part of a combined local agency: Alleghany-Covington Department of Social Services and Rockbridge-Buena Vista-Lexington Area Social Services. Virginia explains that, if approved, the waiver will apply only to the residents of those specific cities. The local agencies will identify and apply the waiver by zip code and locality codes. Virginia is requesting for the waiver to be effective for one-year beginning upon approval.

While Virginia lists to several of the jurisdictions as entitled to a waiver of ABAWD time limits due to their status as Labor Surplus Areas (LSA) for FY15, they have combined the LSA jurisdictions with other counties and cities in order to qualify for a waiver based on the collective unemployment rate of the southern region of Virginia. In addition, Virginia requests the waiver to the ABAWD time limits in Covington City, Lexington City, Page County, Richmond County and Williamsburg City not located in southern Virginia but with a combined unemployment rate 20 percent above the national unemployment rate. We recommend approval of a one year waiver for 37 local agencies, based on their aggregate average unemployment rate for the time period January 2013 –

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December 2014, which is 20% above the national average for the same time period. Virginia's spreadsheet showing all calculations and data from the Bureau of Labor Statistics (BLS) website is attached and has been reviewed by my staff. We find it to meet FNS requirements of acceptable documentation to support their request.

If you have any questions, please do not hesitate to contact Geraldine Alphe-Igiehon at (609) 259-5110 or [Geraldine.Alphe-Igiehon@fns.usda.gov](mailto:Geraldine.Alphe-Igiehon@fns.usda.gov) or Alyssa Hayes at (609) 259-5055.

Sincerely,



Eric Ratchford  
Regional Director  
Supplemental Nutrition Assistance Program

ecc: Alyssa Hayes, Geraldine Alphe, Sasha Gersten-Paal , Casey McConnell



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF SOCIAL SERVICES

March 27, 2015

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:

I am writing to request an extension of Waiver 970283. This waiver allows an exemption from the time-limited benefits required with the work requirement for the able-bodied population for residents in certain Virginia localities. The current waiver expires April 30, 2015.

The waiver request is enclosed and supporting data will be submitted electronically. Please contact Nikole Cox, SNAP Manager, at (804) 726-7270, or by e-mail at [Nikole.Cox@dss.virginia.gov](mailto:Nikole.Cox@dss.virginia.gov) for additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "TJ Steinhauser".

Thomas J. Steinhauser, Director  
Division of Benefit Programs

c: Nikole Cox

Enclosure

## **Waiver Request**

1. **Waiver Serial Number:** 970283
2. **Type of request:** Extension
3. **Regulatory citation:** §7 CFR 273.24
4. **State:** Virginia
5. **Region:** Mid-Atlantic
6. **Regulatory requirements:** Regulations at §7 CFR 273.24(b) limit the receipt of Supplemental Nutrition Assistance Program (SNAP) benefits to three months for individuals who are not employed or otherwise exempt from the work requirement. These individuals may not receive benefits as part of any household beyond three months during a three-year period unless they meet the work requirement. Nonexempt individuals may meet the work requirement, which is defined at §273.24(a) as working in varying degrees for wages or other compensation/ services for 20 hours or more per week or comply with work program requirements,  
  
Regulations at §7 CFR 273.24(f) allow waivers from time-limited benefits for areas with insufficient job opportunities. Waivers may be provided for areas with 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.
7. **Proposed alternative procedures:** Virginia requests to exempt residents in certain counties and independent cities from time-limited benefits of §7 CFR 273.24. The selected areas are primarily in the southern part of the state based on the collective unemployment rate that is at least 20 percent above the national average for the period January 2013-December 2014.
8. **Justification for request:** Data from the Bureau of Labor Statistics support the request that the selected localities have insufficient job opportunities for residents. This is represented by an aggregate unemployment rate that is 20 percent above the national rate for the 24-month period January 2013-December 2014. Ten of the localities in the southern section are also listed as LSA for 2015. The region’s unemployment rate for this period was 8.1 percent (20 percent above the national unemployment average of 6.77%).

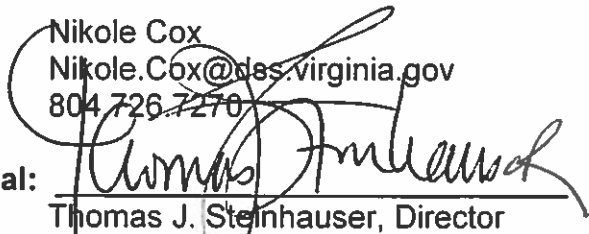
| <b>Southern Region (Contiguous Counties)</b>    |                                                                   |                                                                    |
|-------------------------------------------------|-------------------------------------------------------------------|--------------------------------------------------------------------|
| <b>County</b>                                   | <b>Labor Force<br/>Total, January<br/>2013- December<br/>2014</b> | <b>Unemployment<br/>Total, January<br/>2013- December<br/>2014</b> |
| Bristol City                                    | 192,745                                                           | 14,436                                                             |
| Brunswick County                                | 157,083                                                           | 15,082                                                             |
| Buchanan County                                 | 216,409                                                           | 21,055                                                             |
| Carroll County                                  | 321,993                                                           | 24,226                                                             |
| Charlotte County                                | 121,636                                                           | 9,323                                                              |
| Danville City                                   | 448,165                                                           | 41,463                                                             |
| Dickenson County                                | 135,721                                                           | 13,535                                                             |
| Emporia City                                    | 55,681                                                            | 5,261                                                              |
| Franklin City                                   | 87,436                                                            | 7,103                                                              |
| Galax City                                      | 71,839                                                            | 5,737                                                              |
| Grayson County                                  | 154,880                                                           | 14,161                                                             |
| Greensville County                              | 95,159                                                            | 8,155                                                              |
| Halifax County                                  | 372,803                                                           | 32,865                                                             |
| Henry County                                    | 552,508                                                           | 47,993                                                             |
| Hopewell City                                   | 246,308                                                           | 20,350                                                             |
| Lee County                                      | 215,900                                                           | 19,424                                                             |
| Lunenburg County                                | 120,298                                                           | 9,115                                                              |
| Martinsville City                               | 125,674                                                           | 14,703                                                             |
| Mecklenburg County                              | 289,611                                                           | 27,170                                                             |
| Norton City                                     | 41,340                                                            | 3,629                                                              |
| Patrick County                                  | 199,111                                                           | 13,789                                                             |
| Petersburg City                                 | 333,386                                                           | 33,015                                                             |
| Pittsylvania County                             | 754,012                                                           | 51,040                                                             |
| Prince Edward County                            | 223,648                                                           | 19,815                                                             |
| Prince George County                            | 366,699                                                           | 21,950                                                             |
| Russell County                                  | 266,689                                                           | 23,163                                                             |
| Scott County                                    | 235,960                                                           | 16,268                                                             |
| Smyth County                                    | 338,075                                                           | 27,295                                                             |
| Southampton County                              | 186,403                                                           | 12,567                                                             |
| Surry County                                    | 87,138                                                            | 5,771                                                              |
| Sussex County                                   | 105,047                                                           | 7,760                                                              |
| Washington County                               | 672,433                                                           | 44,389                                                             |
| Wise County                                     | 413,661                                                           | 35,516                                                             |
| Wythe County                                    | 361,021                                                           | 23,805                                                             |
| <b>Total for Region</b>                         | <b>8,566,472</b>                                                  | <b>690,929</b>                                                     |
| <b>Combined Region<br/>Unemployment Rate</b>    | <b>8.1%</b>                                                       |                                                                    |
| <b>20% Above National<br/>Average Threshold</b> | <b>8.1%</b>                                                       |                                                                    |

In addition, Virginia requests inclusion of five localities in the waiver beyond the southern region based on unemployment rates that are 20 percent above the national average for the period of January 2013-December 2014. It is unlikely that the local departments of social services for Covington and Lexington will elect to utilize the waiver, since these areas have additional jurisdictions to cover administratively.

| County                                      | Labor Force Total, January 2013- December 2014 | Unemployment Total, January 2013- December 2014 | Unemployment Rate |
|---------------------------------------------|------------------------------------------------|-------------------------------------------------|-------------------|
| Covington City                              | 57,748                                         | 5,176                                           | 9.0               |
| Lexington City                              | 57,810                                         | 5,679                                           | 9.8               |
| Page County                                 | 270,352                                        | 24,604                                          | 9.1               |
| Richmond County                             | 82,385                                         | 6,714                                           | 8.1               |
| Williamsburg City                           | 150,331                                        | 12,281                                          | 8.2               |
| <b>20% Above National Average Threshold</b> |                                                |                                                 | <b>8.1</b>        |

9. **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. Twenty-three of the localities included in this waiver request were exempt from the work requirement for the previous waiver.
10. **Caseload information, including percent, characteristics, and quality control error rate for affection portion:** The caseload for the localities identified represents approximately 21 percent of the caseload for Virginia as of January 2015 and approximately 19 percent of the benefits issued for this period. These localities also represent 11 percent of the quality control negative case error rate and 20 percent of the payment error rate for 2014.
11. **Anticipated implementation date and time period for which waiver is needed:** We ask for this waiver for the period May 1, 2015 through April 30, 2016.
12. **Quality control review procedures:** There are no special quality control procedures needed in conjunction with this waiver.
13. **State agency staff contact:**

Nikole Cox  
Nikole.Cox@dss.virginia.gov  
804.726.7270
14. **Signature and title of requesting official:**

  
Thomas J. Steinhauser, Director  
Division of Benefit Programs  
tom.steinhauser@dss.virginia.gov
15. **Date of request:** March 24, 2015

**virginia**

## 2015 Eligibility

**Not Eligible with this Grouping (95)**

Eligible (County or Part of Region) (39)

