



Department for Children and Families
Economic Services Division
103 South Main Street
Waterbury, VT 05671-1201

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Alison Mickiewicz
Supplemental Nutrition Assistance Program
USDA/FNS Northeast Region
Thomas P. O'Neill Federal Building
10 Causeway Street, Room 501
Boston, MA 02222

July 18, 2014

Re: WAIVER 970228 (ABAWD FFY 2015)

Dear Ms. Mickiewicz,

Vermont submits the enclosed waiver request for your review. Also enclosed, you will find the necessary supporting documentation for the request.

If you have any questions or suggested revisions, please feel free to contact me and I will promptly take action.

Sincerely,

A handwritten signature in cursive script that reads "Patricia Duda".

Patricia Duda
Director, Food and Nutrition Programs
Agency of Human Services
DCF/ESD
103 South Main Street
Waterbury, Vermont 05674-1201

Enclosures: Waiver Request 970228
Summary of Unemployment Rates for Eligible Towns
Map of Eligible Towns

Cc: Sean Brown, ESD Deputy Commissioner



WAIVER REQUEST

1. **Waiver serial number:**
970228
2. **Type of request:**
Extension
3. **Primary regulation citation, if any:**
Section 6(o) of the Food Stamp Act, as amended by Section 824 of the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996, P.L. 104-193
4. **Secondary regulation citation, if any:**
7 CFR 273.24 (f)(3)(iii)
7 CFR 273.24 (f)(2)(i)
5. **State:**
Vermont
6. **Region:**
NERO
7. **Regulatory requirements:**
Section 6(o) of the Food Stamp Act, as amended by Section 824 of the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA), P.L. 104-193, 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 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 requirement of a work program for 20 hours or more per week; or did not participate in and comply with requirements of a program under section 20 or a comparable program established by the State.

Section 6(o) of the Food Stamp Act, as amended by Section 824 of PRWORA, 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. For a waiver based on 10 percent unemployment, 7 CFR 273.24 (f)(2)(i) allows states to use evidence that an area has a "recent 12 month average unemployment rate over 10 percent; a recent three month average unemployment rate over 10 percent; or an historical seasonal unemployment rate over 10 percent". 7 CFR 273.24 (f)(3)(iii) permits states to use "data from the BLS or the BLS cooperating agency that an area has a 24-month average

unemployment rate that exceeds the national average by 20 percent for any 24-month period no earlier than the same periods the ETA used to designate LSAs for the current fiscal year.”

8. Proposed procedures:

The State of Vermont is requesting to exempt from these requirements individuals residing in the following 6 towns. These areas are eligible based on having, or belonging to a region with, average unemployment rates of at least 20 percent above the national average during May 2012 through April 2014. These areas had an average unemployment rate of at least 8.9 percent during May 2012 through April 2014, or were part of a group of contiguous towns with an aggregate average exceeding 20 percent above the national average for this time period. The national average plus 20 percent during May 2012 through April 2014 was 8.9.

AREA	UNEMPLOYMENT RATE, MAY 12 – APR 14
Northeastern Vermont Region	
Barton town	9.1
Newport city	10.8
Coventry town	2.9
Sheffield town	8.3
Total for contiguous towns	9.0
Individual towns:	
Killington town	9.9
Norton town	24.9
U.S. National Average	7.4
20% Threshold	8.9

Newport city, Barton, Coventry, and Sheffield towns are eligible based on the aggregate average unemployment rate for the region. These are all contiguous towns in the Northeastern Region of Vermont. Vermont has 11 Regional Planning Commissions (RPCs) that work in regions of the state made up of municipalities. All of these towns are in the region corresponding to the Northeastern Vermont Development Association. The aggregate average unemployment rate for this group of towns was 9.0 percent for the 24-month period of May 2012-April 2014. The national average plus 20 percent for this same period was 8.9 percent.

Killington and Norton towns also qualify for a waiver on both having individual average unemployment rates at least 20 percent above the national average for the 24-month period of May 2012-April 2014. Killington’s average unemployment rate for this period was 9.9 percent, and Norton’s was 24.9 percent. The national average for May 2012-April 2014 was 8.9 percent.

Eden town qualifies for a waiver on the basis of having an unemployment rate for the three-month period of February-April 2014 that exceeds 10 percent. Its

unemployment rate for this period was 10.6 percent. Its 3-month average unemployment rate for the past three 3-month periods has exceeded 10 percent.

	Unemployment rate, DEC 2013- FEB 2014	Unemployment rate, JAN 2014- MAR 2014	Unemployment rate, FEB 2014- APR 2014
Eden town	10.7	11.3	10.6

9. Justification for request:

As stated in number 8 above, 6 towns requested have an average unemployment rate of at least 20 percent above the national average during a recent 24-month period, or are part of a region of contiguous towns with an aggregate average unemployment rate exceeding 20 percent above the national average for a recent 24-month period. One town has an average unemployment rate exceeding 10 percent for a recent 3-month period. All of the raw data supporting our numbers that we have used are 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 State agency operations in areas where unemployment remains higher than the national average.

11. Caseload information, including percent, characteristic, and quality control error rate for affected portion:

The caseload for these areas, as of June 1, 2014, represents 3.369% of the caseload for the State. There are no quality control procedures involved.

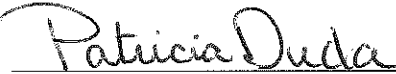
12. Anticipated implementation date and time period for which waiver is needed:

The State is requesting a one-year waiver from October 1, 2014 through September 30, 2015.

13. Proposed quality control review procedures:

There are no special quality control procedures needed in conjunction with this waiver.

14. Signature and title of requesting official:



Patricia Duda, Economic Services Food and Nutrition Programs Director

15. Date of request:

7/18/14

**AREAS IN VERMONT THAT ARE ELIGIBLE FOR WAIVERS ON THE BASIS OF
MAY 2012- APR 2014
UNEMPLOYMENT RATES**

Please see worksheet entitled "Step 1" for monthly labor force numbers
Please see worksheet entitled "Step 2" for 24-month labor force totals
Please see worksheet entitled "Step 3" for monthly unemployed numbers
Please see worksheet entitled "Step 4" for 24-month unemployed totals

	from Step 2	from Step 4	Step 5	Step 6	Step 7
	MAY 2012- APR 2014	MAY 2012- APR 2014	MAY 2012- APR 2014	MAY 2012- APR 2014	MAY 2012- APR 2014
	Total labor force	Total number of unemployed	Average Unemployment Rate (unrounded)	Average Unemployment Rate (multiply by 100)	Average Unemployment Rate (one decimal place)
Northeastern Vermont region					
Barton town	35,963	3,290	0.09148	9.14	9.1
Newport city	49,831	5,400	0.10837	10.83	10.8
Coventry town	14,962	433	0.02894	2.89	2.9
Sheffield town	7,919	661	0.08347	8.34	8.3
Total for contiguous towns	108,675	9,784	0.09003	9.00	9.0
Individual towns:					
Killington town	14,383	1,424	0.09901	9.90	9.9
Norton town	666	166	0.24925	24.92	24.9
U.S. National Average	#####	277,164,000	0.07434	7.43	7.4
20% Threshold			0.08916	8.92	8.9

Source: Local Area Unemployment Statistics, Bureau of Labor Statistics, Dept. of Labor
Underlying data are available at www.bls.gov/lau/, and are attached.

**AREAS IN VERMONT THAT ARE ELIGIBLE FOR WAIVERS ON THE BASIS OF
FEB 2014- APR 2014
UNEMPLOYMENT RATES**

Step 1	Please see worksheet entitled "Step 1" for monthly labor force numbers									
Step 2	Please see worksheet entitled "Step 2 3 Month" for 3-month labor force totals									
Step 3	Please see worksheet entitled "Step 3" for monthly unemployed numbers									
Step 4	Please see worksheet entitled "Step 4 3 Month" for 3-month unemployed totals									
			from Step 2 3 Month	from Step 4 3 Month	Step 5	Step 6	Step 7			
			MAY 2012- APR 2014	MAY 2012- APR 2014	MAY 2012- APR 2014	MAY 2012- APR 2014	MAY 2012- APR 2014	MAY 2012- APR 2014	MAY 2012- APR 2014	MAY 2012- APR 2014
			Total labor force	Total number of unemployed	Average Unemployment Rate (unrounded)	Average Unemployment Rate (4 decimal places)	Average Unemployment Rate (multiply by 100)	Average Unemployment Rate (one decimal place)		
Eden town			2,318	246	0.10613	0.1061	10.61	10.6		

Source: Local Area Unemployment Statistics, Bureau of Labor Statistics, Dept. of Labor
Underlying data are available at www.bls.gov/lau/, and are attached.

Vermont towns eligible for waivers in FY 2015

