



United States Department of Agriculture
Food and Nutrition Service

Western Region

November 23, 2015

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

Subject: SNAP – Arizona Request to Waive Able-Bodied Adults without Dependents for 12 counties, one city, and 14 Native American Reservations from Time Limit

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

Attached is Arizona's request to modify and extend its current waiver to exempt Able-Bodied Adults without Dependents (ABAWD) from the time limits under 7 CFR 273.24 for the following areas and time periods:

- A 3-month waiver for Pima County for the period of January 1, 2016 through March 31, 2016;
- A 6-month waiver for Yavapai County for the period of January 1, 2016 through June 30, 2016; and
- A 12-month waiver for 12 counties, the city of Apache Junction, and all tribal nations for the period of January 1, 2016 through December 31, 2016.

Arizona is requesting to exempt residents in 12 counties, a city, and 14 Native American Reservations from the ABAWD time limit stipulated at 7 CFR 273.24 due to having insufficient jobs and a 24-month average unemployment rate greater than twenty (20) percent above the national average for the same 24-month period. The waiver extension request includes a copy of data from the Bureau of Labor Statistics (BLS) for the period of April 2013 to March of 2015.

We have verified the supporting documentation and recommend approval to extend Arizona's ABAWD time limits waiver as requested.

If you have any questions regarding the waiver request, please contact me at (415) 645-1923 or shahdy.monemzadeh@fns.usda.gov.

Sincerely,

Shahdy Monemzadeh
Acting Team Lead, Self Sufficiency & Access
Supplemental Nutrition Assistance Program

Attachment

CC: Maribelle Balbes, FNS WRO
Barbara Utuchian, FNS WRO



DEPARTMENT OF ECONOMIC SECURITY

Your Partner For A Stronger Arizona

Douglas A. Ducey
Governor

Timothy Jeffries
Director

November 20, 2015

Mr. Dennis Stewart
Division Director
Supplemental Nutrition Assistance Program
Western Regional Office
90 Seventh Street, Suite 10-100
San Francisco, California 94103

Dear Mr. Stewart:

The State of Arizona, Department of Economic Security requests an extension and modification to its able-bodied adults without dependents (ABAWD) waiver for Supplemental Nutrition Assistance Program (SNAP) benefits. Our current statewide waiver expires December 31, 2015.

The national average unemployment rate for the 24-month period of April 2013 through March 2015 is 6.6 percent with the 20 percent threshold allowed per 7 CFR 273.24(f)(2) representing 7.9 percent. Arizona has 14 counties that exceed the criteria to be eligible for a waiver. The combined regional unemployment rate for these counties is 9.07 percent. Arizona also has one city, Apache Junction, which exceeds the required threshold. This city overlaps two counties; one within the proposed waiver area and one county, Maricopa County, not included in the requested waiver area. During the 24-month period mentioned above, Apache Junction's unemployment rate is 14.0 percent and as such, will be included in the waived areas to simplify administration.

Arizona also has 16 Native American Reservations that individually exceed the required threshold of 7.9 percent. These unemployment rates were calculated by applying 2013 American Community Survey share ratios to county level Bureau of Labor Statistics data using the same two year period as above.

Based on the data noted above, Arizona seeks your approval to exempt ABAWDs in 14 counties, one city and 16 Native American Reservations which represents 47.4% of Arizona's caseload.

If you have any questions or require additional information, please feel free to contact Jutta Ulrich, Employment Administration Policy and Support Manager at (602) 542-2482 or via email at julrich@azdes.gov.

Sincerely,

Thomas L. Colombo
Assistant Director
Employment and Rehabilitation Services

Enclosure

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 970148

2. **Type of request:** Extension and Modification

3. **Regulatory citation:** 7 CFR 273.24

4. **State:** Arizona

5. **Region:** WRO

6. **Regulatory requirements:**

Under 7 CFR 273.24(b) individuals are not eligible to participate in the Supplemental Nutrition Assistance Program (SNAP) as a member of any household if the individual received program benefits for more than 3 months during any 3 year period in which the individual was subject to, but did not comply with, the SNAP work requirements. Regulations at 273.24(a) provide that fulfilling the work requirement means: working 20 hours or more per week, averaged monthly; participating in and complying with the requirements of a work program or a workfare program for at least 20 hours per week; or any combination of working and participating in a work program for a total of 20 hours per week.

Under 7 CFR 273.24(f), upon the request of a State agency, the Food and Nutrition Service (FNS) may waive the applicability of the time limit described above for any group of individuals in the State if FNS makes a determination that the area in which the individuals reside does not have a sufficient number of jobs to provide employment for the individuals.

7. **Description of alternative procedures:**

The State of Arizona is requesting to exempt able-bodied adults without dependents (ABAWDs) in 14 counties, one independent city and 16 Native American Reservations from SNAP time limits at 7 CFR 273.24. In addition, the State of Arizona is requesting to exempt ABAWDs in Pima County from January 1, 2016 to March 31, 2016; and ABAWDs in Yavapai County from January 1, 2016 to June 30, 2016.

The State of Arizona is requesting to stagger implementation of ABAWD SNAP time limits as follows:

- Maricopa County will implement ABAWD time limits on January 1, 2016;
- Pima County will begin implement ABAWD time limits on April 1, 2016; and
- Yavapai County will implement ABAWD time limits on July 1, 2016.

Arizona is requesting to apply the ABAWD waiver to Maricopa, Pima, and Yavapai counties until the first application filed after each implementation date.

8. **Justification for request:**

Under SNAP regulations at 7 CFR 273.24(f)(2), areas may qualify for an ABAWD time limit waiver if they have insufficient jobs. To support this claim, states may submit evidence that an area has an average unemployment rate for a 24-month time period that exceeds the national average for the same 24-month period by 20 percent. 7 CFR 273.24(f)(6) provides that States may define areas to be waived.

The State of Arizona request to waive 14 counties that are eligible for a waiver based on this region's average unemployment rate for the 24-month period of April 2013 through March 2015. During this time period, the national average for unemployment was 6.6 percent; 20 percent above this was 7.9 percent. The region's unemployment rate for this period was 9.07 percent.

April 2013 through March 2015		
County	Unemployed	Labor Force
Apache County	87,242	514,672
Gila County	45,026	509,497
Navajo County	121,700	1,002,573
Graham County	26,946	345,396
Greenlee County	6,883	111,928
Cochise County	106,058	1,225,975
Santa Cruz County	68,045	486,034
Pinal County	276,446	3,623,280
La Paz County	15,754	193,230
Mohave County	175,807	1,871,560
Yuma County	546,087	2,250,947
Coconino County	129,245	1,722,213
Pima County	706,414	11,063,136
Yavapai County	155,022	2,270,366
Total for Region	2,466,675	27,190,807
Combined Region Unemployment Rate	9.07%	
20% Above National Average Threshold	7.9%	

The State requests to waive one independent city based on having an unemployment rate that is 20 percent above the national average for the period of April 2013-March 2015. The city's unemployment rate was 14 percent, above the national average threshold for the same time period.

April 2013 through March 2015			
Area	Unemployed	Labor Force	Unemployment Rate
Apache Junction city, Maricopa County part, AZ	211	1,502	14.0%
20% Above National Average Threshold			7.9%

The State requests to waive the following reservations based on having average unemployment rates exceeding the national average for a recent 24-month period. The reservation unemployment rates were calculated by applying 2013 American Community Survey¹ share ratios to county-level Bureau of Labor Statistics data from April 2013-March 2015. The following table summarizes the calculations:

April 2013 through March 2015			
Reservations	Unemployed	Labor Force	Unemployment Rate
Yuma County (part); Arizona (part); Cocopah Reservation, AZ	3,353	4,018	45.5%

¹ These calculations are based on data from the 2009-2013 American Community Survey 5-Year Estimates.

Total Cocopah Reservation	3,353	4,018	45.5%
Reservations	Unemployed	Labor Force	Unemployment Rate
Apache County (part); Arizona (part); Fort Apache Reservation, AZ	1,627	4,340	37.5%
Gila County (part); Arizona (part); Fort Apache Reservation, AZ	3,308	12,333	26.8%
Navajo County (part); Arizona (part); Fort Apache Reservation, AZ	32,442	114,296	28.4%
Total Fort Apache Reservation	37,377	130,969	28.5%
Maricopa County (part); Arizona (part); Fort McDowell Yavapai Nation Reservation, AZ	848	7,683	9.9%
Total Fort McDowell Yavapai Nation Reservation	848	7,683	9.9%
Mohave County (part); Arizona (part); Fort Mojave Reservation and Off-Reservation Trust Land, AZ--CA--NV	1,128	7,573	13.0%
Total Fort Mojave Reservation	1,128	7,573	13.0%
Maricopa County (part); Arizona (part); Gila River Indian Reservation, AZ	3,693	17,611	21.0%
Pinal County (part); Arizona (part); Gila River Indian Reservation, AZ	16,993	83,625	20.3%
Total Gila River Reservation	20,686	101,236	20.4%
Coconino County (part); Arizona (part); Havasupai Reservation, AZ	282	2,702	9.4%
Total Havasupai Reservation	282	2,702	9.4%
Coconino County (part); Arizona (part); Hopi Reservation and Off-Reservation Trust Land, AZ	1,328	9,522	12.2%
Navajo County (part); Arizona (part); Hopi Reservation and Off-Reservation Trust Land, AZ	6,972	59,321	10.5%
Total Hopi Reservation	8,300	68,843	10.8%
Coconino County (part); Arizona (part); Hualapai Indian Reservation and Off-Reservation Trust Land, AZ	0	-	-
Mohave County (part); Arizona (part); Hualapai Indian Reservation and Off-Reservation Trust Land, AZ	1,144	8,894	11.4%
Yavapai County (part); Arizona (part); Hualapai Indian Reservation and Off-Reservation Trust Land, AZ	0	-	-
Total Hualapai Reservation	1,144	8,894	11.4%
Coconino County (part); Arizona (part); Kaibab Indian Reservation, AZ	0	-	-

Mohave County (part); Arizona (part); Kaibab Indian Reservation, AZ	406	2,116	16.1%
Total Kaibab Reservation	406	2,116	16.1%
Reservations	Unemployed	Labor Force	Unemployment Rate
Pinal County (part); Arizona (part); Maricopa (Ak Chin) Indian Reservation, AZ	1,774	10,461	14.5%
Total Maricopa Reservation	1,774	10,461	14.5%
Apache County (part); Arizona (part); Navajo Nation Reservation and Off- Reservation Trust Land, AZ--NM--UT	68,303	358,924	19.0%
Coconino County (part); Arizona (part); Navajo Nation Reservation and Off- Reservation Trust Land, AZ--NM--UT	37,596	217,769	17.3%
Navajo County (part); Arizona (part); Navajo Nation Reservation and Off- Reservation Trust Land, AZ--NM--UT	33,879	161,367	21.0%
Total Navajo Nation Reservation	139,778	738,060	18.9%
Pima County (part); Arizona (part); Pascua Pueblo Yaqui Reservation and Off-Reservation Trust Land, AZ	4,370	24,866	14.9%
Total Pascua Pueblo Yaqui Reservation	4,370	24,866	14.9%
Maricopa County (part); Arizona (part); Salt River Reservation, AZ	4,682	40,742	10.3%
Total Salt River Reservation	4,682	40,742	10.3%
Gila County (part); Arizona (part); San Carlos Reservation, AZ	8,665	34,070	20.3%
Graham County (part); Arizona (part); San Carlos Reservation, AZ	7,230	25,932	21.8%
Pinal County (part); Arizona (part); San Carlos Reservation, AZ	0	-	-
Total San Carlos Reservation	15,895	60,003	20.9%
Maricopa County (part); Arizona (part); Tohono O'odham Nation Reservation and Off-Reservation Trust Land, AZ	1,159	1,624	41.6%
Pima County (part); Arizona (part); Tohono O'odham Nation Reservation and Off-Reservation Trust Land, AZ	9,083	57,615	13.6%
Pinal County (part); Arizona (part); Tohono O'odham Nation Reservation and Off-Reservation Trust Land, AZ	1,654	5,748	22.4%
Total Tohono O'odham Nation Reservation	11,896	64,987	15.5%
Yavapai County (part); Arizona (part); Yavapai-Apache Nation Reservation, AZ	1,392	6,556	17.5%
Yavapai County (part); Arizona (part); Yavapai-Prescott Reservation, AZ	46	2,596	1.7%

Total Yavapai Nation Reservation	1,438	10,590	13.6%
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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 July 2015, represents 47.4% of the caseload for the state. There are no quality control procedures involved.

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

The State is requesting:

- A three month waiver for Pima County, effective for the period January 1, 2016 through March 31, 2016;
- A six month waiver for Yavapai County, effective for the period January 1, 2016 through June 30, 2016.
- A one year waiver for the remaining 12 counties, the city of Apache Junction and all tribal nations effective for the period January 1, 2016 through December 31, 2016.

12. Proposed quality control review procedures:

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

13. Signature and title of requesting official:



Thomas L. Colombo, Assistance Director
Arizona Department of Economic Security
Employment and Rehabilitation Services
1789 W. Jefferson Street, Site Code 901-A
Phoenix, AZ 85007
602.542.4910
tcolombo@azdes.gov

14. Date of request:

15. State agency staff contact (name/email/telephone):

Jutta Ulrich, Policy and Support Manager
Arizona Department of Economic Security
Employment and Rehabilitation Services – Employment Administration
602.542.2482
julrich@azdes.gov

16. Regional office contact person (to be completed by FNS regional office):