



United States Department of Agriculture
Food and Nutrition Service

Western Region

November 19, 2015

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

Subject: SNAP – Hawaii Request to Extend Waiver for Able-Bodied Adults without Dependents for the Island of Molokai

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

Attached is Hawaii's request to extend its waiver to exempt Able-Bodied Adults without Dependents (ABAWD) from the time limits under 7 CFR 273.24 for the Island of Molokai through November 30, 2017. Hawaii's current waiver expires November 30, 2015.

Regulations at 7 CFR 273.24 stipulate that areas with unemployment rates greater than twenty (20) percent above the national average for the same 24-month period qualify for a waiver of ABAWD time limits. Hawaii is citing guidance suggesting that areas can be eligible for a two-year waiver if they have an unemployment rate greater than 20 percent above the national average for the same 36-month period. To support their request, Hawaii has submitted unemployment data from the Bureau of Labor Statistics (BLS) for the period of October 2012 to September 2015.

We have verified the supporting documentation for this request and recommend approval to extend Hawaii's ABAWD time limits waiver through November 30, 2017.

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

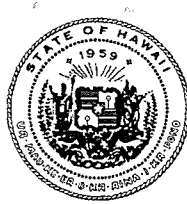
Sincerely,

SHAHDY MONEMZADEH
Acting Team Lead, Self Sufficiency & Access
Supplemental Nutrition Assistance Program

Attachment

cc: Casey McConnell, SNAP
Maribelle Balbes, WRO SNAP
Andy Riesenberg, WRO SNAP
Walter Zaumseil, WRO SNAP
Barbara Utuchian, WRO, SNAP

DAVID Y. IGE
GOVERNOR



RACHAEL WONG, DrPH
DIRECTOR

PANKAJ BHANOT
DEPUTY DIRECTOR

STATE OF HAWAII
DEPARTMENT OF HUMAN SERVICES

Benefit, Employment and Support Services Division
820 Mililani Street, Suite 606
Honolulu, Hawaii 96813-2936

November 19, 2015

Mr. Dennis Stewart, Regional Director
Food Stamp Program
U. S. Department of Agriculture, FNS
Western Region
90 Seventh Street, Suite 10-100
San Francisco, California 94103

RE: Waiver extension request (2150080)

Dear Mr. Stewart:

Hawaii is requesting a waiver from the "ABAWD" requirements for the island of Molokai. This area had an average unemployment rate of at least 20 percent above the national average during October 2012 through September 2015. The Hawaii Department of Labor and Industrial Relations data provides data that establishes Molokai Island had an unemployment average rate of 10.4% for October 2012 – September 2015. The supporting data is attached.

Under Federal regulations at 7 CFR 273.24(f)(4), the State may begin to operate a waiver at the time the request is submitted in areas for which the State certifies that data from the Bureau of Labor Statistics establishes the State has an unemployment rate over 10 percent.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Nakasone".

Scott Nakasone
Assistant Division Administrator

Enclosures

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2150080
2. **Type of request:** Extension
3. **Regulatory citation:** 7 CFR 273.24
4. **State:** Hawaii
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.

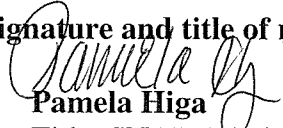
7. **Description of alternative procedures:** The State of Hawaii is requesting to exempt able-bodied adults without dependents (ABAWDs) on Molokai Island from the SNAP time limit at 7 CFR 273.24.
8. **Justification for request:** Under SNAP regulations at 7 CFR 273.24(f)(2), areas may qualify for a time limit waiver if they have insufficient jobs. To support this claim, states may submit evidence that an area has a 24-month unemployment rate average that exceeds the national average for this same 24-month time period by 20 percent. Guidance suggests that areas can be eligible for a two-year waiver if they have a 36-month average unemployment rate that is more than 20 percent above the national average, ending no earlier than 3 months prior to the request.¹

The Island of Molokai in the State of Hawaii is eligible for a two-year waiver based on the island's average unemployment rate for the 36-month period of October 2012-September 2015. Twenty percent above the U.S. national average for this period was

¹ Food and Nutrition Service, February 3, 2006. "FSP – 2-Year Approval of Waivers of the Work Requirements for ABAWDs under 7 CFR 273.24." <http://www.fns.usda.gov/sites/default/files/020306.pdf>

7.8 percent; the island's unemployment rate for this period was 10.5 percent. These unemployment rates are calculated from data obtained from the Hawaii Department of Labor and Industrial Relations (DLRI), since the national Bureau of Labor Statistics does not collect data for this island. The Hawaii DLRI collaborates with BLS to produce these estimates.²

Island	Labor Force Total, Oct 2012-Sep 2015	Unemployment Total, Oct 2012-Sep 2015	Unemployment Rate
Molokai Island	93,250	9,750	10.5
20 % Above National Average Threshold			7.8

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 September 30, 2015, represent 1.5% 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 two-year waiver, from December 1, 2015 through November 30, 2017
12. **Proposed quality control review procedures:** There are no special quality control procedures needed in conjunction with this waiver.
13. **State agency submitting waiver request and State contact person:**
14. **Signature and title of requesting official:**

Pamela Higa
Title: SNAP Administrator
Email for transmission of response: phiga@dhs.hawaii.gov
15. **Date of request:** 11/19/15
16. **State agency staff contact (name/email/telephone):** Pamela Higa, SNAP Administrator
phiga@dhs.hawaii.gov (808) 586-5722
17. **Regional office contact person (to be completed by FNS regional office):**

² The data used to support this request was downloaded from the Hawaii DLRI website:
<https://www.hawaii.org/gsipub/index.asp?docid=417>.