



IDAHO DEPARTMENT OF
HEALTH & WELFARE

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August 12, 2015

Dennis Stewart
Division Director, Western Region
Supplemental Nutrition Assistance Program
US Department of Agriculture, Food and Nutrition Service
90 Seventh Street, Suite 10 -100
San Francisco, California 94103

Dear Mr. Stewart,

Attached is our request for a Waiver from the ABAWD time limit for 16 counties and 4 Native American Reservations in Idaho. This request is for Calendar year 2016.

If you have any questions please contact Kristin Matthews at 208-334-5553.

Sincerely,

A handwritten signature in black ink, appearing to read "Lori A. Wolff". The signature is fluid and cursive.

Lori A. Wolff
Division Administrator

cc: Kristin Matthews
Malinda Reissig
Julie Hammon
Walter Zaumseil

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2010190

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

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

4. **State:** Idaho

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 Idaho is requesting to exempt able-bodied adults without dependents (ABAWDs) in 16 contiguous counties and 4 reservations from SNAP time limits at 7 CFR 273.24.

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.

The State of Idaho seeks a waiver for a region of 16 contiguous counties based on the region's aggregate average unemployment rate, and for 4 reservations based on their individual unemployment rates, for the 24-month period of January 2013 through December 2014.

The first region of contiguous counties includes Adams, Benewah, Boise, Bonner, Boundary, Butte, Clark, Clearwater, Custer, Gem, Idaho, Lemhi, Lewis, Shoshone, Valley and Washington Counties. The national average unemployment rate for the 24-month period from January 2013 to December 2014 was 6.8 percent (6.77 percent unrounded); 20 percent above this was 8.1 percent. The unemployment rate for this region was 8.2 percent for this period.

January 2013-December 2014		
County	Total Unemployed	Total Labor Force
Adams County	4,780	40,440
Benewah County	8,674	95,190
Boise County	4,888	70,187
Bonner County	34,560	436,894
Boundary County	8,276	117,508
Butte County	1,851	31,222
Clark County	556	10,380
Clearwater County	7,832	75,568
Custer County	3,916	51,929
Gem County	12,325	180,306
Idaho County	13,456	156,231
Lemhi County	6,965	81,526
Lewis County	1,788	38,616
Shoshone County	14,263	128,472
Valley County	9,647	108,611
Washington County	7,713	111,668
Total for Region	141,490	1,734,748
Combined Region Unemployment Rate	8.2%	
20% Above National Average Threshold	8.1%	

The state also seeks a waiver for 4 reservations: Coeur d'Alene, Duck Valley, Fort Hall, and Nez Perce Reservations. During the period of January 2013 to December 2014, each of these reservations had an average unemployment rate at least 20 percent higher than the national average unemployment rate, which was 8.1 percent during the same period. The reservation unemployment rates were calculated by applying 2013 5-year American Community Survey (ACS) share ratios to county-level BLS data for January 2013-December 2014.

Coeur d'Alene Reservation	Calculated Labor Force, Jan 2013-Dec 2014	Calculated Unemployment, Jan 2013-Dec 2014
Benewah County (part); Idaho (part); Coeur d'Alene Reservation, ID	44,686	4,386
Kootenai County (part); Idaho (part); Coeur d'Alene Reservation, ID	26,268	2,245
Total, Coeur d'Alene Reservation	70,954	6,631
Unemployment Rate, Coeur d'Alene Reservation	9.3	
20% Above the National Average Threshold	8.1	

Duck Valley Reservation	Calculated Labor Force,	Calculated Unemployment,
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	Jan 2013-Dec 2014	Jan 2013-Dec 2014
Owyhee County (part); Idaho (part); Duck Valley Reservation, NV--ID	1,783	323
Unemployment Rate, Duck Valley Reservation	18.1	
20% Above the National Average Threshold	8.1	

Fort Hall Reservation	Calculated Labor Force, Jan 2013-Dec 2014	Calculated Unemployment, Jan 2013-Dec 2014
Bannock County (part); Idaho (part); Fort Hall Reservation and Off-Reservation Trust Land, ID	2,185	276
Bingham County (part); Idaho (part); Fort Hall Reservation and Off-Reservation Trust Land, ID	5,798	1,176
Power County (part); Idaho (part); Fort Hall Reservation and Off-Reservation Trust Land, ID	22,728	2,529
Total, Fort Hall Reservation	30,711	3,981
Unemployment Rate, Fort Hall Reservation	13.0	
20% Above the National Average Threshold	8.1	

Nez Perce Reservation	Calculated Labor Force, Jan 2013-Dec 2014	Calculated Unemployment, Jan 2013-Dec 2014
Clearwater County (part); Idaho (part); Nez Perce Reservation, ID	49,024	4,975
Idaho County (part); Idaho (part); Nez Perce Reservation, ID	42,072	2,822
Lewis County (part); Idaho (part); Nez Perce Reservation, ID	38,383	1,701
Nez Perce County (part); Idaho (part); Nez Perce Reservation, ID	50,082	5,216
Total, Nez Perce Reservation	179,561	14,715
Unemployment Rate, Nez Perce Reservation	8.2	
20% Above the National Average Threshold	8.1	

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 August 6, 2015, represents 10.3% 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 one-year waiver, from January 1, 2016 through December 31, 2016.

12. Proposed quality control review procedures:

There is no special quality control procedure needed in conjunction with this waiver.

- 13. State agency submitting waiver request and State contact person: Idaho Department of Health and Welfare.** Kristin Matthews, SNAP Program Manager
208-334-5553

- 14. Signature and title of requesting official:**



Title: Administrator, Division of Welfare

Email for transmission of response: WolffL@dhw.Idaho.gov

- 15. Date of request:**

- 16. State agency staff contact (name/email/telephone):** Kristin Matthews, SNAP Program Manager 208-334-5553

- 17. Regional office contact person (*to be completed by FNS regional office*):**