



**CABINET FOR HEALTH AND FAMILY SERVICES
DEPARTMENT FOR COMMUNITY BASED SERVICES**

Steven L. Beshear
Governor

Commissioner's Office
275 East Main Street. 3W-A
Frankfort, KY 40621
Phone (502)564-3703
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Audrey Tayse Haynes
Secretary

August 5, 2014

Peggy Fouts
Regional Director
USDA, Food and Nutrition Service
Southeast Regional Office
61 Forsyth Street, S. W. Room 8T36
Atlanta, Georgia 30303

Dear Ms. Fouts:

Enclosed for your review is the (SNAP E&T) ABAWD waiver request. Kentucky is requesting to exempt able-bodied adults without dependents (ABAWDs) from the SNAP time limits at 7 CFR 273.24 from January 1, 2016 through September 30, 2016. The waiver will continue to exempt residents residing in 95 counties from the work requirements of 7 C.F.R.273.24 due to having insufficient jobs based on U.S. Department of Labor data. If approved by the Food and Nutrition Service, the requirement that Able-Bodied Adults Without Dependents (ABAWDs) must either work 20 hours weekly or participate in an unpaid work placement in order to receive Supplemental Nutrition Assistance Program (SNAP) benefits will be waived in the 95 counties as described in the waiver request.

If there are questions regarding this submittal, please contact Joey Holt, Division of Family Support, at (502) 564-3440 ext. 3706.

Sincerely,


Teresa C. James
Commissioner

Enclosure

TCJ/DCBS/DFS/JH

STATE WAIVER REQUEST

1. Waiver Serial Number (if applicable):

970046

2. Type of request:

Modification

3. Regulatory citation:

7 CFR 273.24

4. State:

Kentucky

5. Region:

SERO

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 Kentucky is requesting to exempt able-bodied adults without dependents (ABAWDs) in 95 counties 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. 7 CFR 273.24(f)(6) provides that States may define areas to be waived.

The State of Kentucky seeks a waiver for two areas that are eligible for a waiver based on their average unemployment rates for the 24-month period of January 2013 through December 2014. These areas are composed of contiguous counties. The first area includes four counties (Ballard, Fulton, Graves, and Hickman Counties). The national average unemployment rate for this 24-month period was 6.8 percent; 20 percent above this was 8.1 percent. The unemployment rate for this region was 8.2 percent for this period.

January 2013 through December 2014		
County	Unemployed	Labor Force
Ballard County, KY	7,697	90,219
Fulton County, KY	5,358	55,684
Graves County, KY	31,387	389,322
Hickman County, KY	3,464	51,500
Total for Region	47,906	586,725
Combined Region Unemployment Rate	8.2%	
20% Above National Average Threshold	8.1%	

The second area of contiguous counties is eligible for a waiver based on its unemployment rate. It includes 91 counties. During the 24-month period of January 2013 through December 2014, the unemployment rate for this region was 8.1 percent.

January 2013 through December 2014		
County	Unemployed	Labor Force
Adair County, KY	16,049	176,924
Allen County, KY	14,435	212,948
Barren County, KY	32,576	461,416
Bath County, KY	11,011	113,616
Bell County, KY	27,188	230,064
Boone County, KY	92,997	1,568,120
Bourbon County, KY	14,953	234,660
Boyd County, KY	38,319	462,210
Boyle County, KY	24,010	300,997
Bracken County, KY	8,172	93,017
Breathitt County, KY	13,847	104,012
Breckinridge County, KY	15,780	195,731
Butler County, KY	10,481	127,273
Caldwell County, KY	9,698	133,154
Campbell County, KY	69,066	1,158,725
Carroll County, KY	9,867	120,319
Carter County, KY	30,351	258,069
Casey County, KY	12,527	160,664
Christian County, KY	53,945	631,078
Clark County, KY	28,177	411,523
Clay County, KY	17,496	135,429
Clinton County, KY	9,502	97,113
Cumberland County, KY	6,606	71,952
Edmonson County, KY	10,803	118,467
Elliott County, KY	6,882	52,852

Estill County, KY	11,217	131,160
Fleming County, KY	13,461	154,290
Floyd County, KY	36,239	306,943
Franklin County, KY	34,983	584,538
Gallatin County, KY	7,475	93,267
Garrard County, KY	13,721	184,217
Grant County, KY	19,973	272,352
Grayson County, KY	24,903	264,973
Green County, KY	9,276	125,187
Greenup County, KY	31,721	347,341
Hancock County, KY	6,433	96,699
Harlan County, KY	34,818	216,690
Harrison County, KY	13,956	205,789
Hart County, KY	13,529	190,290
Hopkins County, KY	36,262	505,632
Jackson County, KY	13,108	113,603
Jessamine County, KY	35,386	598,371
Johnson County, KY	19,925	197,273
Kenton County, KY	127,457	2,020,146
Knott County, KY	17,261	128,567
Knox County, KY	28,570	247,873
Larue County, KY	10,142	139,150
Laurel County, KY	50,547	582,994
Lawrence County, KY	13,650	130,879
Lee County, KY	6,201	55,386
Leslie County, KY	12,301	80,078
Letcher County, KY	26,998	184,567
Lewis County, KY	13,724	125,526
Lincoln County, KY	22,668	232,796
Livingston County, KY	8,107	91,327
Lyon County, KY	5,514	73,091
Madison County, KY	65,237	1,088,252
Magoffin County, KY	14,730	92,994
Marion County, KY	15,917	220,144
Martin County, KY	8,138	85,533
Mason County, KY	16,399	186,184
McCreary County, KY	14,913	124,900
McLean County, KY	7,569	105,861
Meade County, KY	23,810	296,230
Menifee County, KY	6,410	58,208
Mercer County, KY	17,066	241,301
Metcalfe County, KY	7,100	102,002
Monroe County, KY	7,171	112,127
Montgomery County, KY	22,766	285,659
Morgan County, KY	11,946	118,657
Muhlenberg County, KY	25,842	305,185
Nelson County, KY	35,533	517,530
Nicholas County, KY	7,095	84,085
Ohio County, KY	19,376	232,367
Owsley County, KY	3,483	30,249
Pendleton County, KY	12,538	166,257
Perry County, KY	29,354	240,082
Pike County, KY	60,843	544,983
Powell County, KY	11,589	120,054
Pulaski County, KY	53,398	642,996

Robertson County, KY	1,834	19,859
Rockcastle County, KY	13,931	167,798
Rowan County, KY	19,483	257,157
Russell County, KY	17,693	165,121
Scott County, KY	34,776	627,185
Taylor County, KY	22,352	269,945
Trigg County, KY	11,356	143,187
Washington County, KY	9,291	147,099
Wayne County, KY	19,207	175,498
Whitley County, KY	31,612	328,128
Wolfe County, KY	6,380	49,879
Total for Region	1,990,402	24,664,024
Combined Region Unemployment Rate		8.1 %
20% Above 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 **DATE**, represent **XX %** 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 are no special quality control procedures needed in conjunction with this waiver.

13. State agency submitting waiver request and State contact person:

**KY Cabinet for Health and Family Services
Department for Community Based Services
275 East Main St
Frankfort, KY 40621
Joey Holt
Internal Policy Analyst III**

14. Signature and title of requesting official:

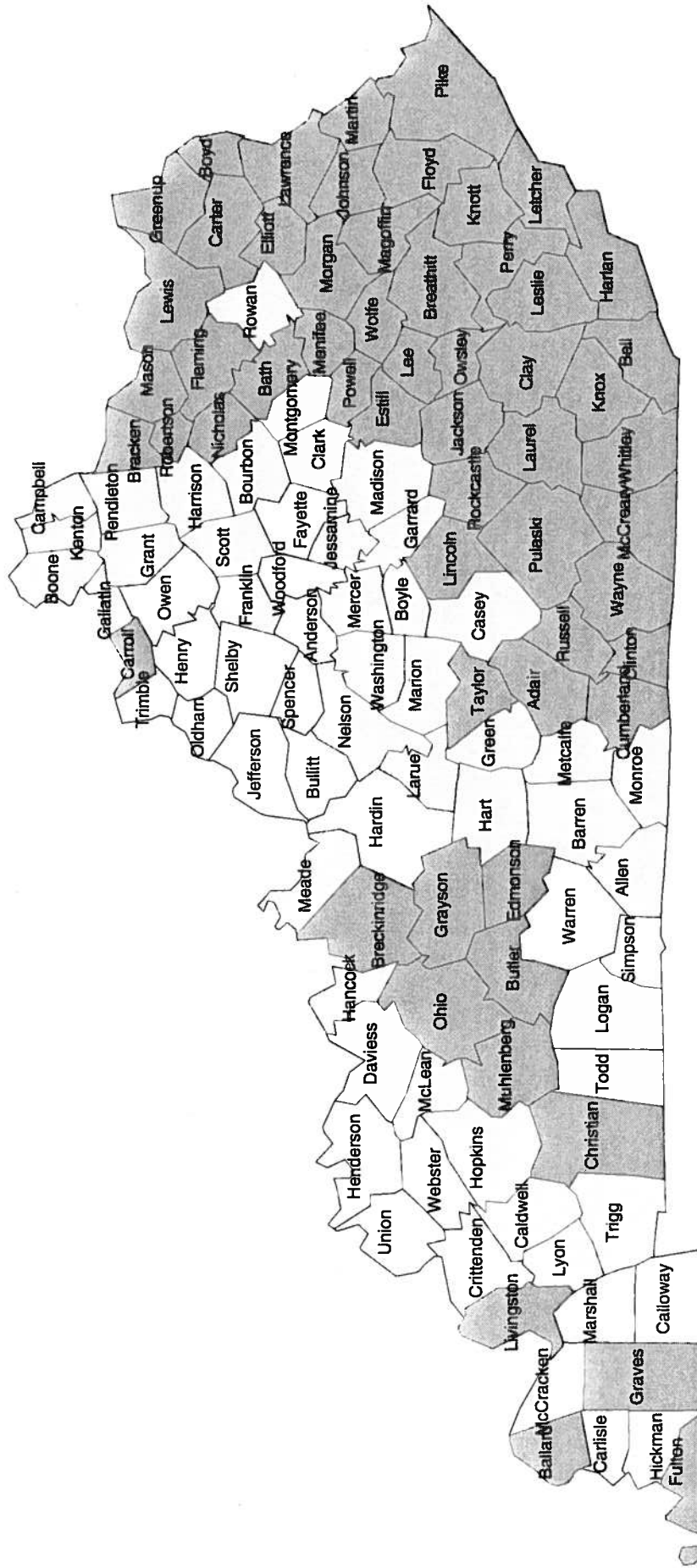

Title: **Commissioner**
Email for transmission of response:

15. Date of request: 8/3/15

16. State agency staff contact (name/email/telephone): Joey Holt/
josephs.holt@ky.gov / (502)564-3440 ext.3706

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

95 Counties in Kentucky are Eligible for a Waiver in FY 2016



Eligible based on 24-month average unemployment rate (58)

Eligible based on regional grouping (37)

**AREAS IN KENTUCKY THAT ARE ELIGIBLE FOR WAIVERS ON THE BASIS OF
JAN 2013 - DEC 2014
UNEMPLOYMENT RATES**

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

	from Step 2	from Step 4	
	JAN 2013 - DEC 2014	JAN 2013 - DEC 2014	JAN 2013 -
	Total	Total number	Aver
	labor force	of unemployed	Unemploy
			(unrou
Regional Grouping of Contiguous Counties			
Ballard County, KY	90,219	7,697	0.08531
Fulton County, KY	55,684	5,358	0.09622
Graves County, KY	389,322	31,387	0.08062
Hickman County, KY	51,500	3,464	0.06726
Total for Region	586,725	47,906	0.08165
Regional Grouping of Contiguous Counties			
Adair County, KY	176,924	16,049	0.09071
Allen County, KY	212,948	14,435	0.06779
Barren County, KY	461,416	32,576	0.07060
Bath County, KY	113,616	11,011	0.09691
Bell County, KY	230,064	27,188	0.11818
Boone County, KY	1,568,120	92,997	0.05930
Bourbon County, KY	234,660	14,953	0.06372
Boyd County, KY	462,210	38,319	0.08290
Boyle County, KY	300,997	24,010	0.07977
Bracken County, KY	93,017	8,172	0.08785
Breathitt County, KY	104,012	13,847	0.13313
Breckinridge County, KY	195,731	15,780	0.08062
Butler County, KY	127,273	10,481	0.08235
Caldwell County, KY	133,154	9,698	0.07283
Campbell County, KY	1,158,725	69,066	0.05961
Carroll County, KY	120,319	9,867	0.08201
Carter County, KY	258,069	30,351	0.11761
Casey County, KY	160,664	12,527	0.07797
Christian County, KY	631,078	53,945	0.08548
Clark County, KY	411,523	28,177	0.06847
Clay County, KY	135,429	17,496	0.12919
Clinton County, KY	97,113	9,502	0.09784
Cumberland County, KY	71,952	6,606	0.09181
Edmonson County, KY	118,467	10,803	0.09119
Elliott County, KY	52,852	6,882	0.13021
Estill County, KY	131,160	11,217	0.08552
Fleming County, KY	154,290	13,461	0.08724
Floyd County, KY	306,943	36,239	0.11806
Franklin County, KY	584,538	34,983	0.05985
Gallatin County, KY	93,267	7,475	0.08015
Garrard County, KY	184,217	13,721	0.07448
Grant County, KY	272,352	19,973	0.07334
Grayson County, KY	264,973	24,903	0.09398
Green County, KY	125,187	9,276	0.07410
Greenup County, KY	347,341	31,721	0.09133
Hancock County, KY	96,699	6,433	0.06653
Harlan County, KY	216,690	34,818	0.16068

Harrison County, KY	205,789	13,956	0.06782
Hart County, KY	190,290	13,529	0.07110
Hopkins County, KY	505,632	36,262	0.07172
Jackson County, KY	113,603	13,108	0.11538
Jessamine County, KY	598,371	35,386	0.05914
Johnson County, KY	197,273	19,925	0.10100
Kenton County, KY	2,020,146	127,457	0.06309
Knott County, KY	128,567	17,261	0.13426
Knox County, KY	247,873	28,570	0.11526
Larue County, KY	139,150	10,142	0.07289
Laurel County, KY	582,994	50,547	0.08670
Lawrence County, KY	130,879	13,650	0.10429
Lee County, KY	55,386	6,201	0.11196
Leslie County, KY	80,078	12,301	0.15361
Letcher County, KY	184,567	26,998	0.14628
Lewis County, KY	125,526	13,724	0.10933
Lincoln County, KY	232,796	22,668	0.09737
Livingston County, KY	91,327	8,107	0.08877
Lyon County, KY	73,091	5,514	0.07544
Madison County, KY	1,088,252	65,237	0.05995
Magoffin County, KY	92,994	14,730	0.15840
Marion County, KY	220,144	15,917	0.07230
Martin County, KY	85,533	8,138	0.09514
Mason County, KY	186,184	16,399	0.08808
McCreary County, KY	124,900	14,913	0.11940
McLean County, KY	105,861	7,569	0.07150
Meade County, KY	296,230	23,810	0.08038
Menifee County, KY	58,208	6,410	0.11012
Mercer County, KY	241,301	17,066	0.07072
Metcalfe County, KY	102,002	7,100	0.06961
Monroe County, KY	112,127	7,171	0.06395
Montgomery County, KY	285,659	22,766	0.07970
Morgan County, KY	118,657	11,946	0.10068
Muhlenberg County, KY	305,185	25,842	0.08468
Nelson County, KY	517,530	35,533	0.06866
Nicholas County, KY	84,085	7,095	0.08438
Ohio County, KY	232,367	19,376	0.08339
Owsley County, KY	30,249	3,483	0.11514
Pendleton County, KY	166,257	12,538	0.07541
Perry County, KY	240,082	29,354	0.12227
Pike County, KY	544,983	60,843	0.11164
Powell County, KY	120,054	11,589	0.09653
Pulaski County, KY	642,996	53,398	0.08305
Robertson County, KY	19,859	1,834	0.09235
Rockcastle County, KY	167,798	13,931	0.08302
Rowan County, KY	257,157	19,483	0.07576
Russell County, KY	165,121	17,693	0.10715
Scott County, KY	627,185	34,776	0.05545
Taylor County, KY	269,945	22,352	0.08280
Trigg County, KY	143,187	11,356	0.07931
Washington County, KY	147,099	9,291	0.06316
Wayne County, KY	175,498	19,207	0.10944
Whitley County, KY	328,128	31,612	0.09634
Wolfe County, KY	49,879	6,380	0.12791
Total for Region	24,664,024	1,990,402	0.08070
National Unemployment	3,735,732	252,915	0.06770
Threshold - 20% Above the National Average			

Source: Local Area Unemployment Statistics, Bureau of Labor Statistics, Dept. of Labor

Underlying data are available at www.bls.gov/lau/, and are attached.

Step 5		Step 6		Step 7	
DEC 2014	JAN 2013 - DEC 2014	JAN 2013 - DEC 2014	JAN 2013 - DEC 2014	JAN 2013 - DEC 2014	JAN 2013 - DEC 2014
age	Average	Average	Average	Average	Average
ment Rate	Unemployment Rate	Unemployment Rate	Unemployment Rate	Unemployment Rate	Unemployment Rate
ned)	(4 decimal places)	(multiply by 100)	(multiply by 100)	(one decimal place)	(one decimal place)
	0.0853	8.53		8.5	
	0.0962	9.62		9.6	
	0.0806	8.06		8.1	
	0.0672	6.72		6.7	
	0.0816	8.16		8.2	
	0.0907	9.07		9.1	
	0.0677	6.77		6.8	
	0.0706	7.06		7.1	
	0.0969	9.69		9.7	
	0.1181	11.81		11.8	
	0.0593	5.93		5.9	
	0.0637	6.37		6.4	
	0.0829	8.29		8.3	
	0.0797	7.97		8.0	
	0.0878	8.78		8.8	
	0.1331	13.31		13.3	
	0.0806	8.06		8.1	
	0.0823	8.23		8.2	
	0.0728	7.28		7.3	
	0.0596	5.96		6.0	
	0.0820	8.20		8.2	
	0.1176	11.76		11.8	
	0.0779	7.79		7.8	
	0.0854	8.54		8.5	
	0.0684	6.84		6.8	
	0.1291	12.91		12.9	
	0.0978	9.78		9.8	
	0.0918	9.18		9.2	
	0.0911	9.11		9.1	
	0.1302	13.02		13.0	
	0.0855	8.55		8.6	
	0.0872	8.72		8.7	
	0.1180	11.80		11.8	
	0.0598	5.98		6.0	
	0.0801	8.01		8.0	
	0.0744	7.44		7.4	
	0.0733	7.33		7.3	
	0.0939	9.39		9.4	
	0.0740	7.40		7.4	
	0.0913	9.13		9.1	
	0.0665	6.65		6.7	
	0.1606	16.06		16.1	

0.0678	6.78	6.8
0.0710	7.10	7.1
0.0717	7.17	7.2
0.1153	11.53	11.5
0.0591	5.91	5.9
0.1010	10.10	10.1
0.0630	6.30	6.3
0.1342	13.42	13.4
0.1152	11.52	11.5
0.0728	7.28	7.3
0.0867	8.67	8.7
0.1042	10.42	10.4
0.1119	11.19	11.2
0.1536	15.36	15.4
0.1462	14.62	14.6
0.1093	10.93	10.9
0.0973	9.73	9.7
0.0887	8.87	8.9
0.0754	7.54	7.5
0.0599	5.99	6.0
0.1583	15.83	15.8
0.0723	7.23	7.2
0.0951	9.51	9.5
0.0880	8.80	8.8
0.1193	11.93	11.9
0.0714	7.14	7.1
0.0803	8.03	8.0
0.1101	11.01	11.0
0.0707	7.07	7.1
0.0696	6.96	7.0
0.0639	6.39	6.4
0.0796	7.96	8.0
0.1006	10.06	10.1
0.0846	8.46	8.5
0.0686	6.86	6.9
0.0843	8.43	8.4
0.0833	8.33	8.3
0.1151	11.51	11.5
0.0754	7.54	7.5
0.1222	12.22	12.2
0.1116	11.16	11.2
0.0965	9.65	9.7
0.0830	8.30	8.3
0.0923	9.23	9.2
0.0830	8.30	8.3
0.0757	7.57	7.6
0.1071	10.71	10.7
0.0554	5.54	5.5
0.0828	8.28	8.3
0.0793	7.93	7.9
0.0631	6.31	6.3
0.1094	10.94	10.9
0.0963	9.63	9.6
0.1279	12.79	12.8
0.0807	8.07	8.1
0.0677	6.77	6.8
0.0812	8.12	8.1