



Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Transitional Assistance

CHARLES D. BAKER
Governor

MARYLOU SUDDERS
Secretary

KARYN POLITO
Lieutenant Governor

JEFF McCUE
Commissioner

September 10, 2015

Bonnie Brathwaite
SNAP Division Director
FNS/NERO
10 Causeway Street
Boston, Massachusetts 02222

Re: FFY 2016 ABAWD Geographic Waiver Request

Dear Ms. Brathwaite,

Enclosed is the Massachusetts Department of Transitional Assistance's (DTA) request modify and extend waiver number 2080005.

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. DTA requests to exempt able-bodied adults without dependents (ABAWDs) in 5 individual cities and towns, 4 regional groupings of multiple towns and cities, 1 individual county, 1 regional grouping of 2 counties, 2 individual New England City and Town Areas (NECTAs), 1 regional grouping of 2 NECTAs and 1 reservation, from SNAP time limits at 7 CFR 273.24 for Federal Fiscal Year 2016.

If you have questions or require additional information, please contact Lauren Arms-Ledwith, SNAP Director, at 617-348-5395 or email Lauren at Lauren.Arms-Ledwith@state.ma.us.

Sincerely,

Jeff McCue
Commissioner

Enclosures

cc: Martha Cavanaugh, FNS/NERO; Lauren Arms Ledwith, DTA



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STATE WAIVER REQUEST

1. Waiver Serial Number (if applicable): 2080005

2. Type of request: Modification and Extension

3. Regulatory citation: 7 CFR 273.24

4. State: Massachusetts

5. Region: NERO

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 Massachusetts is requesting to exempt able-bodied adults without dependents (ABAWDs) in 5 individual cities and towns, 4 regional groupings of multiple towns and cities, 1 individual county, 1 regional grouping of 2 counties, 2 individual New England City and Town Areas (NECTAs), 1 regional grouping of 2 NECTAs and 1 reservation, 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. They may also submit evidence that an area has an average unemployment rate for 3-month period that exceeds 10 percent.

The State of Massachusetts seeks a waiver for a regional group of 8 contiguous towns and cities based on the region's aggregate average unemployment rate for the 24-month period of Jan 2013 to December 2014. The average national unemployment rate for this period was 6.8 percent; 20 percent above this was 8.1 percent. The region's aggregate average unemployment rate for this period was 8.1 percent.

January 2013-December 2014		
Town or City	Total Unemployed	Total Labor Force
Ashburnham town, MA	5,229	83,950
Fitchburg city, MA	42,454	462,738
Gardner city, MA	19,054	227,583
Phillipston town, MA	1,713	22,650
Royalston town, MA	1,127	16,961
Templeton town, MA	7,318	102,990
Westminster town, MA	6,261	103,055
Winchendon town, MA	9,754	130,207
Total for Region	92,910	1,150,134
Combined Region Unemployment Rate	8.1 %	
20% Above National Average Threshold	8.1 %	

The State of Massachusetts seeks a waiver for a regional grouping of 4 contiguous towns and cities based on the region's aggregate average unemployment rate for the 24-month period of February 2013 to January 2015. The national average unemployment rate for this period was 6.7 percent; 20 percent above this was 8.0 percent. The region's aggregate average unemployment rate for this period was 8.0 percent.

February 2013-January 2015		
Town or City	Total Unemployed	Total Labor Force
Dudley town, MA	10,212	149,826
Southbridge Town city, MA	19,059	194,282
Sturbridge town, MA	7,065	119,237
Webster town, MA	16,903	206,147
Total for Region	53,239	669,492
Combined Region Unemployment Rate	8.0%	
20% Above National Average Threshold	8.0%	

The State of Massachusetts seeks a waiver for a regional grouping of 11 contiguous towns and cities based on the region's aggregate average unemployment rate for the 24-month period of March 2013 to February 2015. The national average unemployment rate for this period was 6.6 percent; 20 percent above this was 7.9 percent. The region's aggregate average unemployment rate for this period was 7.9 percent.

March 2013-February 2015		
Town or City	Total Unemployed	Total Labor Force
Barnstable Town city, MA	36,021	564,741
Brewster town, MA	7,456	120,694
Chatham town, MA	4,564	69,571
Dennis town, MA	13,134	158,925
Eastham town, MA	5,311	62,484
Harwich town, MA	10,688	145,150
Orleans town, MA	3,995	68,002
Provincetown town, MA	13,008	55,489
Truro town, MA	4,415	30,806
Wellfleet town, MA	4,674	40,394
Yarmouth town, MA	22,739	288,333
Total for Region	126,005	1,604,589
Combined Region Unemployment Rate	7.9%	
20% Above National Average Threshold	7.9%	

The State of Massachusetts seeks a waiver for a regional grouping of 4 contiguous towns and cities based on the region's aggregate average unemployment rate for the 24-month period of April 2013 to March 2015. The national average unemployment rate for this period was 6.5 percent; 20 percent above this was 7.8 percent. The region's aggregate average unemployment rate for this period was 7.8 percent.

April 2013-March 2015		
Town or City	Total Unemployed	Total Labor Force
Abington town, MA	13,603	211,442
Brockton city, MA	93,901	1,132,024
Holbrook town, MA	9,958	144,883
West Bridgewater town, MA	5,042	89,658
Total for Region	122,504	1,578,007
Combined Region Unemployment Rate	7.8%	
20% Above National Average Threshold	7.8%	

The State of Massachusetts seeks a waiver for the city of Lowell and for a regional grouping of 2 contiguous counties, Berkshire and Hampden, based on their aggregate average unemployment rates for the 24-month period of May 2013 to April 2015. The national average unemployment rate for this period was 6.4 percent; 20 percent above this was 7.7 percent. The average unemployment rate of the city of Lowell was 7.7 percent, and the average unemployment rate of the region composed of Berkshire and Hampden Counties was 7.7 percent for the same period.

May 2013-April 2015			
Individual Town or City	Total Unemployed	Total Labor Force	Unemployment Rate
Lowell city, MA	99,486	1,294,693	7.7%
20% Above National Average Threshold	7.7%		

May 2013-April 2015		
County	Total Unemployed	Total Labor Force
Berkshire County, MA	104,124	1,585,908
Hampden County, MA	426,331	5,335,174
Total for Region	530,455	6,921,082
Combined Region Unemployment Rate	7.7%	
20% Above National Average Threshold	7.7%	

The State of Massachusetts seeks a waiver for an individual county and three individual towns based on their average unemployment rates for the 24-month period of June 2013 to May 2015. The national average unemployment rate for this period was 6.3 percent; 20 percent above this was 7.6 percent. The average unemployment rate of Dukes County for this period was 7.8 percent. The individual average unemployment rates for Gloucester city, Monroe town, and Rowe town each exceeded 20 percent above the national average unemployment rate for the same period.

June 2013-May 2015			
County	Total Unemployed	Total Labor Force	Unemployment Rate
Dukes County, MA	17,589	224,433	7.8%
20% Above National Average Threshold	7.6%		

June 2013-May 2015			
Individual Town or City	Total Unemployed	Total Labor Force	Unemployment Rate
Gloucester city, MA	28,345	371,024	7.6%
Monroe town, MA	149	1,838	8.1%
Rowe town, MA	293	3,853	7.6%
20% Above National Average Threshold	7.6%		

The State of Massachusetts seeks a waiver for the individual New England City and Town Areas (NECTAs) of Athol, MA Micropolitan and the portion of Lawrence-Methuen Town-Salem, MA-NH NECTA Division that is located in Massachusetts, based on their individual average unemployment rates for the 24-month period of June to May 2015. The individual average unemployment rates for these two NECTAs each exceeded 20 percent above the national average unemployment rate for the same period.

The Athol MA Micropolitan NECTA is comprised of the towns of Athol, Orange, and Petersham. The part of the Lawrence-Methuen Town-Salem, MA-NH NECTA Division that is located in Massachusetts is comprised of Lawrence city, Methuen town city and North Andover town.¹

June 2013-May 2015			
Individual NECTAs	Total Unemployed	Total Labor Force	Unemployment Rate
Athol, MA Micropolitan NECTA	18,523	236,721	7.8%
Lawrence-Methuen Town-Salem, MA-NH NECTA Division, MA part	154,885	1,840,035	8.4%
20% Above National Average Threshold	7.6%		

The State of Massachusetts also seeks a waiver for a regional grouping of 2 contiguous NECTAs based on the region's aggregate average unemployment rates for the 24-month

¹ Information on the composition of the Massachusetts NECTAs is available at http://lmi2.detma.org/lmi/map_box.asp.

period of June 2013 to May 2015. The aggregate average unemployment rate for this region exceeded 20 percent above the national average unemployment rate for the same period. The New Bedford MA Metropolitan NECTA is comprised of Acushnet town, Dartmouth town, Fairhaven town, Mattapoisett town and New Bedford city. The part of the Providence-Warwick, RI-MA Metropolitan NECTA that is located in Massachusetts is comprised of several towns and cities: Attleboro city, Bellingham town, Blackstone town, Fall River city, Millville town, North Attleboro town, Plainville town, Rehoboth town, Seekonk town, Somerset town, Swansea town and Westport town.

June 2013-May 2015		
NECTA	Total Unemployed	Total Labor Force
New Bedford, MA Metropolitan NECTA	176,651	2,017,689
Providence-Warwick, RI-MA Metropolitan NECTA, MA part	249,412	3,448,320
Total for Region	426,063	5,466,009
Combined Region Unemployment Rate	7.8%	
20% Above National Average Threshold	7.6%	

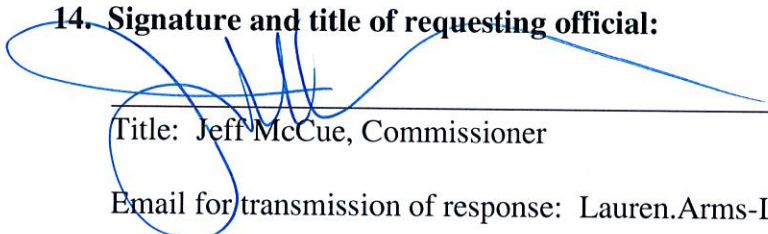
The State of Massachusetts seeks a waiver for one reservation, Wampanoag-Aquinnah Trust Land, based on its average unemployment rate for the 24-month period of June 2013 to May 2015. The reservation unemployment rate was calculated by applying 2013 5-year American Community Survey (ACS) share ratios to county-level BLS data for June 2013-May 2015.² The average unemployment rate for the Wampanoag-Aquinnah Trust Land exceeded 20 percent above the national average unemployment rate for the same period.

Wampanoag-Aquinnah Trust Land	Estimated Labor Force, June 2013-May 2015	Estimated Unemployment, June 2013-May 2015
Dukes County (part); Massachusetts (part); Wampanoag-Aquinnah Trust Land, MA	2,094	202
Total, Wampanoag-Aquinnah Trust Land	2,094	202
Unemployment Rate	9.7%	
20% Above the National Average Threshold	7.6%	

The State of Massachusetts seeks a waiver for Nantucket County/town, based on its average unemployment rate for the 3-month period of January 2015 to March 2015. The average unemployment rate in Nantucket during this period was 11.6 percent, exceeding the unemployment rate threshold of 10 percent for a 3-month period.

² These calculations are based on data from the 2009-2013 American Community Survey 5-Year Estimates.

January 2015-March 2015 (3 months)			
Individual Town	Total Unemployed	Total Labor Force	Unemployment Rate
Nantucket County/town, MA	1,928	16,609	11.6%
Unemployment Rate Threshold	10.0%		

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 ABAWD caseload for these areas, as of 7/1/2015, represents 0.02% of the total SNAP caseload for the state. We anticipate that this waiver will impact approximately 14,000 otherwise non-exempt ABAWDS. 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:**
14. **Signature and title of requesting official:**

 Title: Jeff McCue, Commissioner
 Email for transmission of response: Lauren.Arms-Ledwith@state.ma.us
15. **Date of request:** 9/9/2015
16. **State agency staff contact (name/email/telephone):** Lauren Arms Ledwith
Lauren.Arms-Ledwith@state.ma.us (617) 348-5395
17. **Regional office contact person (to be completed by FNS regional office):**

MA 2016 Waiver Eligibility

Towns

- Not Eligible (White)
- Individually Eligible (Dark Green)
- Eligible through Grouping (Light Green)

Counties

- Not Eligible (White)
- Individually Eligible (Dark Blue)
- Eligible through Grouping (Light Blue)

NECTA Divisions

- Individually Eligible (Dark Green)
- Eligible through Grouping (Light Green)

Counties

- Not Eligible (White)
- Individually Eligible (Dark Blue)
- Eligible through Grouping (Light Blue)

Towns

- Not Eligible (White)
- Individually Eligible (Dark Green)
- Eligible through Grouping (Light Green)

Counties

- Not Eligible (White)
- Individually Eligible (Dark Blue)
- Eligible through Grouping (Light Blue)

NECTA Divisions

- Individually Eligible (Dark Green)
- Eligible through Grouping (Light Green)

Counties

- Not Eligible (White)
- Individually Eligible (Dark Blue)
- Eligible through Grouping (Light Blue)