



FAMILY INVESTMENT ADMINISTRATION

July 29, 2015

Eric Ratchford, Regional Director
Supplemental Nutrition Assistance Program
United States Department of Agriculture
Food and Nutrition Service
Mid-Atlantic Region
300 Corporate Boulevard
Robbinsville, New Jersey 08691-1598

Dear Mr. Ratchford:

Attached is Maryland's waiver request to exempt able-bodied adults without dependants (ABAWDs) in specific jurisdictions within the State from the ABAWD time limit.

The waiver of time limits for ABAWD clients is based on evidence showing counties or regions of the State with average unemployment rates that are 20 percent above the national average and counties or regions with low and declining employment-to-population ratios. These data were compiled for us by the Center for Budget and Policy Priorities (CBPP) based on recent Bureau of Labor statistics.

Thank you for your consideration of Maryland's waiver request. If you have any questions, please contact me at (410) 767-7338 or Vince Kilduff at (410) 767-7187.

Sincerely,


Rosemary Malone
Executive Director

Enclosure

cc: Tracey Paliath
Vince Kilduff
Sara Muempfer
Emily Wilson
Marilyn Lorenzo

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** Extension and Modification
3. **Regulatory citation:** 7 CFR 273.24(f)
4. **State:** Maryland
5. **Region:** MARO
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 three months during any three 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 Maryland is requesting to exempt able-bodied adults without dependents (ABAWDs) in 14 counties from the 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 is at least 20 percent above the national average for the same 24-month period. 7 CFR 273.24(f)(6) provides that States may define areas to be waived. 7 CFR 273.24(f)(2)(ii) also specifies that states can request a waiver for areas that can show "low and declining employment-to-population ratios" as evidence of insufficient jobs.

The state of Maryland seeks a waiver for two clusters of counties in economic regions with average unemployment rates that are 20 percent above the national average for the 24-month period of April 2013-March 2015. The national average

unemployment rate for this 24-month period was 6.5 percent; 20 percent above this was 7.8 percent.

The Eastern Shore, made up of nine counties in the eastern part of the state, is recognized by the State of Maryland as an economic region.¹ The State would like to request a waiver for seven of these counties based on having an average unemployment rate of 7.9 percent for April 2013- March 2015:

<u>Eastern Shore Region</u>	Total Labor Force, April 2013-March 2015	Total Unemployment, April 2013-March 2015
Caroline County	421,608	27,725
Cecil County	1,251,328	86,980
Dorchester County	380,673	34,142
Queen Anne's County	631,914	34,230
Somerset County	227,925	22,625
Wicomico County	1,197,320	95,202
Worcester County	617,059	72,075
TOTAL FOR COMBINED REGION	4,727,827	372,979
Unemployment Rate, April 2013-March 2015	7.9	
20% Above the National Average Threshold, April 2013-March 2015	7.8	

The state would also like to request a waiver for two counties in the Baltimore Metropolitan Region² based on having an average unemployment rate of 7.9 percent for April 2013- March 2015:

<u>Eastern Shore Region</u>	Total Labor Force, April 2013-March 2015	Total Unemployment, April 2013-March 2015
Baltimore City	7,080,883	637,770
Harford County	3,245,044	196,536
TOTAL FOR COMBINED REGION	10,325,927	840,306
Unemployment Rate, April 2013-March 2015	8.1	
20% Above the National Average Threshold, April 2013-March 2015	7.8	

¹ For example, see "A Shore for Tomorrow", a planning report produced by Maryland Department of Planning:

http://planning.maryland.gov/pdf/ourproducts/publications/otherpublications/shore_for_tomorrow.pdf.

² For example, see <http://www.baltometro.org/about-bmc/about-the-region>.

The state also requests a waiver for five counties based on low and declining employment-population ratios. The state reached this conclusion by calculating the annual ratio of employed people, from an average of employment data from the Bureau of Labor Statistics labor force data for counties, to estimates of the civilian, non-institutionalized population ages 16 and up for counties. We calculated these population estimates by applying county shares of the state civilian population ages 16 and up from the American Community Survey to BLS estimates for the state civilian, non-institutionalized population ages 16 and up. All of these counties have employment-population ratios that have declined by at least three percentage points between 2010 and January-May 2015. These counties all have ratios that are below both the state and United States averages in most or all years. (While Garrett, Kent, and Washington counties had higher rates than the United States average in 2010, their rates declined more than that of the U.S., so their January-May 2015 rates are all lower than the U.S.) These low and declining employment-population ratios demonstrate insufficient jobs in those counties.

Areas in Maryland that are Eligible for a Waiver Based on Having a Low and Declining Employment-Population Ratio 2010 to 2015							
Annual Average Employment-Population Ratios							Percentage Point Difference, 2010 to 2015
	2010	2011	2012	2013	2014	Jan- May 2015	
United States	58.5%	58.4%	58.6%	58.6%	59.0%	59.1%	0.6%
Maryland	63.2%	63.0%	63.0%	62.7%	62.6%	62.6%	-0.6%
Allegany County	51.2%	50.1%	49.3%	48.6%	48.3%	48.1%	-3.1%
Garrett County	60.3%	59.7%	59.2%	58.4%	57.7%	57.0%	-3.3%
Kent County	58.5%	58.8%	57.7%	55.8%	55.1%	52.6%	-5.8%
Talbot County	58.3%	57.9%	57.3%	56.4%	56.4%	55.3%	-3.0%
Washington County	59.5%	59.7%	60.2%	59.9%	59.3%	58.9%	-0.6%
Difference from MD:							
Allegany County	12.1%	12.9%	13.7%	14.1%	14.3%	-14.5%	
Garrett County	-3.0%	-3.3%	-3.8%	-4.4%	-4.9%	-5.6%	
Kent County	-4.8%	-4.2%	-5.3%	-6.9%	-7.5%	-10.0%	
Talbot County	-4.9%	-5.1%	-5.7%	-6.3%	-6.2%	-7.3%	
Washington County	-3.7%	-3.3%	-2.8%	-2.9%	-3.2%	-3.7%	
Difference from US:							
Allegany County	-7.3%	-8.3%	-9.3%	10.0%	10.7%	-11.1%	
Garrett County	1.8%	1.3%	0.7%	-0.2%	-1.3%	-2.1%	
Kent County	0.0%	0.4%	-0.8%	-2.8%	-3.9%	-6.5%	
Talbot County	-0.2%	-0.5%	-1.2%	-2.2%	-2.6%	-3.9%	
Washington County	1.0%	1.3%	1.7%	1.3%	0.3%	-0.2%	

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 size for ABAWDs in the state of Maryland is 36,352. The ABAWD caseload is 18% of SNAP E&T work registrants and 23% of mandatory E&T participants¹ in Maryland for Federal Fiscal Year 2015.

Maryland ABAWD Caseload 36,352

¹

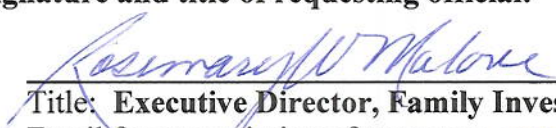
Baltimore Metro	ABAWD	% of ABAWD Caseload
Baltimore City	11,862	32.63%
Harford County	899	2.47%

Eastern Shore	ABAWD	% of ABAWD Caseload
Caroline County	205	0.56%
Cecil County	773	2.13%
Dorchester County	472	1.30%
Queen Anne's County	237	0.65%
Somerset County	263	0.72%
Wicomico County	907	2.50%
Worcester County	232	0.64%

Low And Declining Employment Populations Counties	ABAWD	% of ABAWD Caseload
Allegany County	575	1.58%
Garrett County	60	0.17%
Kent County	157	0.43%
Talbot County	158	0.43%
Washington County	885	2.43%

Total	17,685	48.65%
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¹Maryland Supplemental Nutrition Assistance Program Employment and Training Program State Plan of Operations

- 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:**
Maryland Department of Human Resources
Rosemary Malone, FIA Executive Director
- 14. Signature and title of requesting official:**

Title: Executive Director, Family Investment Administration
Email for transmission of response: rosemary.malone@maryland.gov
- 15. Date of request:**
July 28, 2015
- 16. State agency staff contact (name/email/telephone):**
Rosemary Malone, rosemary.malone@maryland.gov, 410-767-7338
- 17. Regional office contact person (to be completed by FNS regional office):**