



Department of Public Health and Human Services

Human and Community Services Division ♦ PO Box 202925 ♦ Helena, MT 59620-2925

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Steve Bullock, Governor

Richard H. Opper, Director

August 9, 2016

Cheryl Kennedy, Regional Director
Supplemental Nutrition Assistance Program
1244 Speer Blvd, Ste 903
Denver CO 80204-3585

Dear Ms. Kennedy,

Attached is Montana's 2017 Abled Bodied Adults Without Dependents (ABAWD) geographic waiver request.

Due to unemployment rates being at least 20% above the national average for a 24-month period, Montana is requesting to exempt 14 counties and 5 reservations from ABAWD time-limited eligibility. The caseload for these areas represents 38.03% of Montana's statewide SNAP caseload.

We are requesting a one-year waiver, beginning January 1, 2017 through December 31, 2017.

Please let me know if you have any questions or need additional information.

Sincerely,

Christie Twardoski
Associate Administrator

cc: Phil Fraley, FNS
Kathe Quittenton, Bureau Chief

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2140013
2. **Type of request:** Extension and modification
3. **Statutory citation:** Section 6(o) of the Food and Nutrition Act of 2008, as amended
4. **Regulatory citation:** 7 CFR 273.24
5. **State:** Montana
6. **Region:** MPRO

7. **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.

8. **Description of alternative procedures:**

The State of Montana is requesting to exempt able-bodied adults without dependents (ABAWDs) in 14 counties and 5 reservations from SNAP time limits at 7 CFR 273.24.

9. **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.

The State of Montana seeks a waiver for two regions of contiguous counties based on their average unemployment rates that are 20 percent above the national average for

Glacier County (part); Montana (part); Blackfeet Indian Reservation and Off-Reservation Trust Land, MT	12,757	103,174	12.4%
Pondera County (part); Montana (part); Blackfeet Indian Reservation and Off-Reservation Trust Land, MT	1,191	8,312	14.3%
Total Blackfeet Reservation	13,947	111,486	12.5%
Big Horn County (part); Montana (part); Crow Reservation and Off-Reservation Trust Land, MT	7,126	70,133	10.2%
Treasure County (part); Montana (part); Crow Reservation and Off-Reservation Trust Land, MT	0	0	0%
Yellowstone County (part); Montana (part); Crow Reservation and Off-Reservation Trust Land, MT	180	5,014	3.6%
Total Crow Reservation	7,306	75,147	9.7%
Blaine County (part); Montana (part); Fort Belknap Reservation and Off-Reservation Trust Land, MT	1,945	21,331	9.1%
Phillips County (part); Montana (part); Fort Belknap Reservation and Off-Reservation Trust Land, MT	686	1,368	50.2%
Total Fort Belknap Reservation	2,632	22,699	11.6%
Big Horn County (part); Montana (part); Northern Cheyenne Indian Reservation and Off-Reservation Trust Land, MT--SD	1,664	12,255	13.6%
Rosebud County (part); Montana (part); Northern Cheyenne Indian Reservation and Off-Reservation Trust Land, MT--SD	4,155	28,754	14.4%
Total Northern Cheyenne Indian Reservation	5,819	41,009	14.2%
Chouteau County (part); Montana (part); Rocky Boy's Reservation and Off-Reservation Trust Land, MT	893	9,035	9.9%
Hill County (part); Montana (part); Rocky Boy's Reservation and Off-Reservation Trust Land, MT	3,409	19,891	17.1%
Total Rocky Boy's Reservation	4,302	28,927	14.9%

10. 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.

11. Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable):

As of July 31, 2016, the caseload for these areas represents 38.03% of the state caseload. There are no quality control procedures involved.

12. Anticipated implementation date and time period for which waiver is needed:

The State is requesting a one-year waiver, from January 1, 2017 through December 31, 2017.

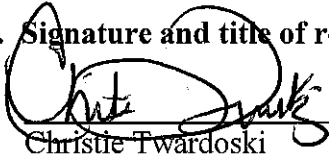
13. Proposed quality control review procedures:

There are no special quality control procedures needed in conjunction with this waiver.

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

State Agency: Montana Department of Public Health & Human Services
State Contact: Kathe Quittenton, Bureau Chief

15. Signature and title of requesting official:



Christie Twardoski
Associate Administrator
ctwardoski@mt.gov

16. Date of request: August 9, 2016

17. State agency staff contact (name/email/telephone):

Kathe Quittenton, Bureau Chief
kquittenton@mt.gov
(406) 444-9022

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