

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2140013
2. **Type of request:** Modification and extension
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:** Section 6(o) of the Food and Nutrition Act of 2008, as amended, provides that no able-bodied adult without dependents (ABAWD) shall be 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 ABAWD work requirement. Section 6(o) also provides that, upon the request of the State agency, the Secretary may waive the applicability of the 3-month ABAWD time limit for any group of individuals in the State if the Secretary makes a determination that the area in which the individuals reside has an unemployment rate of over 10 percent, or 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 16 counties and 6 reservations from SNAP time limits at 7 CFR 273.24. This request would modify the state's waiver approved for 2017 by adding Fort Peck Indian Reservation and two counties, Lake and Prairie counties, to the group of approved counties and reservations.
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 the 24-month period of August 2014 through July 2016. The first region includes 11 counties that are eligible for a waiver. The national average unemployment rate for

this 24-month period was 5.3 percent; 20 percent above this was 6.3 percent. The average unemployment rate for this region was 6.3 percent for the same time period.

Bureau of Labor Statistics Local Area Unemployment Data August 2014 through July 2016		
County	Total Unemployed	Total Labor Force
Flathead County	62,220	1,078,344
Glacier County	13,242	141,136
Granite County	2,294	37,543
Lake County	15,187	306,359
Liberty County	679	23,897
Lincoln County	18,719	188,760
Mineral County	3,475	41,872
Pondera County	3,104	69,749
Powell County	3,371	71,513
Sanders County	9,392	113,492
Toole County	1,842	55,502
Total for Region	133,525	2,128,167
Combined Region Unemployment Rate	6.3%	
20% Above National Average Threshold	6.3%	

The State also seeks a waiver for a second region of 5 contiguous counties based on its average unemployment rate that is 20 percent above the national average for the 24-month period of August 2014 through July 2016. The region's unemployment rate was 6.3 percent for the same time period.

Bureau of Labor Statistics Local Area Unemployment Data August 2014 through July 2016		
County	Total Unemployed	Total Labor Force
Big Horn County	9,924	134,903
Petroleum County	334	7,016
Prairie County	503	12,699
Rosebud County	5,456	100,555
Treasure County	410	8,649
Total for Region	16,627	263,822
Combined Region Unemployment Rate	6.3%	
20% Above National Average Threshold	6.3%	

The State requests to waive the following reservations based on having an average unemployment rate exceeding the national average for a recent 24-month period. The reservation unemployment rate was calculated by applying 2014 American

Community Survey¹ share ratios to county-level Bureau of Labor Statistics data from August 2014 – July 2016. The following table summarizes the calculations:

American Community Survey and Bureau of Labor Statistics Data August 2014 through July 2016			
Reservations	Unemployed	Labor Force	Unemployment Rate
Glacier County (part); Montana (part); Blackfeet Indian Reservation and Off-Reservation Trust Land, MT	12,542	100,787	12.4%
Pondera County (part); Montana (part); Blackfeet Indian Reservation and Off-Reservation Trust Land, MT	1,171	7,799	15.0%
Total Blackfeet Reservation	13,713	108,587	12.6%
Big Horn County (part); Montana (part); Crow Reservation and Off-Reservation Trust Land, MT	6,887	66,174	10.4%
Treasure County (part); Montana (part); Crow Reservation and Off-Reservation Trust Land, MT	0	0	-
Yellowstone County (part); Montana (part); Crow Reservation and Off-Reservation Trust Land, MT	180	5,030	3.6%
Total Crow Reservation	7,067	71,204	9.9%
Blaine County (part); Montana (part); Fort Belknap Reservation and Off-Reservation Trust Land, MT	1,884	20,131	9.4%
Phillips County (part); Montana (part); Fort Belknap Reservation and Off-Reservation Trust Land, MT	688	1,428	48.2%
Total Fort Belknap Reservation	2,572	21,559	11.9%
Daniels County (part); Montana (part); Fort Peck Indian Reservation and Off-Reservation Trust Land, MT	0	335	0.0%
Roosevelt County (part); Montana (part); Fort Peck Indian Reservation and Off-Reservation Trust Land, MT	5,631	90,614	6.2%
Sheridan County (part); Montana (part); Fort Peck Indian Reservation and Off-Reservation Trust Land, MT	97	1,506	6.5%
Valley County (part); Montana (part); Fort Peck Indian Reservation and Off-Reservation Trust Land, MT	830	11,248	7.4%
Total Fort Peck Indian Reservation	6,558	103,703	6.3%

¹ These calculations are based on data from the 2010-2014 American Community Survey 5-Year Estimates.

Big Horn County (part); Montana (part); Northern Cheyenne Indian Reservation and Off-Reservation Trust Land, MT--SD	1,608	10,643	15.1%
Rosebud County (part); Montana (part); Northern Cheyenne Indian Reservation and Off-Reservation Trust Land, MT--SD	4,149	26,191	15.8%
Total Northern Cheyenne Indian Reservation	5,757	36,834	15.6%
Chouteau County (part); Montana (part); Rocky Boy's Reservation and Off-Reservation Trust Land, MT	898	8,802	10.2%
Hill County (part); Montana (part); Rocky Boy's Reservation and Off-Reservation Trust Land, MT	3,297	19,951	16.5%
Total Rocky Boy's Reservation	4,195	28,754	14.6%

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):

The caseload for these areas, as of DATE, represent **43.92%** of the caseload for the state. 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.

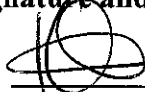
13. Proposed quality control review procedures:

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:



Kathe Quittenton
Bureau Chief
kquittenton@mt.gov

16. Date of request: November 4, 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*):