



Department of
Job and Family Services

John R. Kasich, Governor
Cynthia C. Dungey, Director

Susan Holzer, SNAP Director
Midwest Regional Office
77 W Jackson Blvd, 20th Floor
Chicago, IL 60604

August 15, 2016

Dear Ms. Holzer:

Attached please find a request to waive the time limits for able bodied adults without dependents described in 7 CFR 273.24(b) for sixteen Ohio counties.

In accordance with 7 CFR 274.24(f)(2), our request includes the data and methodology we relied upon when determining which Ohio counties would be subject to this waiver request.

If you have any questions or comments, please contact Benjamin Anderson at (614) 752-3531 or Benjamin.Anderson@jfs.ohio.gov.

Sincerely,

Benjamin Anderson, Chief
Bureau of Cash/Food Policy and Technical Support
Office of Families Assistance
Attachment

30 East Broad Street
Columbus, Ohio 43215
jfs.ohio.gov

An Equal Opportunity Employer and Service Provider

WAIVER REQUEST OUTLINE

1. **Waiver serial number:**
2. **Type of request:**
3. **Regulatory citation: 7 CFR 273.24(b)**
4. **Secondary regulation citation, if any:**
4. **State:** Ohio
5. **Region:** Midwest Region
6. **Regulatory requirements:** In accordance with the requirements described in 7 CFR 273.24(b), an individual is not eligible to participate in the Supplemental Nutrition Assistance Program (SNAP) as a member of any household if the individual received food assistance for more than three countable months during any three-year period. Exceptions to the time limit are described in 7 CFR 273.24(c).
8. **Proposed alternative procedures:** For individuals in sixteen Ohio counties that do not qualify for an exemption or an exception to the time limit described in 7 CFR 273.24(b), Ohio proposes to waive the time limit. The counties subject to the request are: Adams, Clinton, Coshocton, Gallia, Highland, Huron, Jackson, Jefferson, Meigs, Monroe, Morgan, Noble, Ottawa, Perry, Pike, and Scioto counties.
9. **Justification for request:** In accordance with 7 CFR 273.24(f)(3)(iii), a State may waive the work requirement for able-bodied adults without dependents (ABAWD) when data from the US Bureau of Labor Statistics, indicates that an area has a 24 month average unemployment rate that exceeds 120% of the national average for any 24-month period. For federal fiscal year (FFY) 2017, Ohio used this methodology to establish that sixteen counties qualified for a waiver. The counties are: Adams, Clinton, Coshocton, Gallia, Highland, Huron, Jackson, Jefferson, Meigs, Monroe, Morgan, Noble, Ottawa, Perry, Pike, and Scioto. The data utilized to make this determination was from the 24 month period between January 2014 and December 2015.

Methodology

For FFY 2017, Ohio used the same methodology from FFY 2016 to determine which counties meet the waiver requirement for FFY 2017. The counties are: Adams, Clinton, Coshocton, Gallia, Highland, Huron, Jackson, Jefferson, Meigs, Monroe, Morgan, Noble, Ottawa, Perry, Pike, and Scioto. Of the counties currently under a waiver, two (Brown and Ashtabula) will not qualify for a waiver in FFY 2017. The data utilized to make this determination was from the 24 month period between January 2014 and December 2015.

For each of Ohio's eighty-eight counties, we obtained unemployment and labor force data (that had not been seasonally adjusted) from the Bureau of Labor Statistics

(<http://data.bls.gov/pdq/SurveyOutputServlet>). Monthly labor force and unemployment numbers for a twenty-four month period (January 2014 to December 2015) are identified by county in columns D through AA of the attached spreadsheet.

For each county, we summed the labor force and unemployment numbers for the entire twenty-four month period. The twenty-four month total labor force and unemployment numbers for each county are identified in column AB of the attached spreadsheet.

For each of the three combined county collaborations that will be operating in Ohio as of the effective date of the waiver, we aggregated the labor force and unemployment numbers from each of the constituent counties. The county collaborations are: Collabor8 (consisting of Carroll, Delaware, Hancock, Holmes, Knox, Marion, Morrow, Sandusky, and Wood counties); Southern COG (consisting of Hocking, Ross, and Vinton counties); and Defiance/Paulding Consolidated (consisting of Defiance and Paulding counties). The aggregated labor force and unemployment totals for each county collaboration are identified in column AD of the attached spreadsheet.

We determined the average unemployment rate over the twenty-four month period for each county, by dividing the total unemployment number by the total labor force number and converting the quotient to a percentage. The average unemployment rate for the twenty-four month period for each county is identified in column AC of the attached spreadsheet. We determined the average unemployment rate over the twenty-four month period for each county collaboration, by dividing the total unemployment number by the total labor force number and converting the quotient to a percentage. The average unemployment rate for the twenty-four month period for each county collaboration is identified in column AE of the attached spreadsheet.

For each month in the twenty-four month period, we obtained the national unemployment rate (that had not been seasonally adjusted) from the Bureau of Labor Statistics (<http://data.bls.gov/pdq/SurveyOutputServlet>). The national unemployment rate for each month of the period is identified in row 180 of the attached spreadsheet. We then took the national unemployment average for each month and increased it by 20%; that amount is identified in row 181 of the attached spreadsheet. Next, we summed the 120% monthly national rates for the entire period and divided by twenty-four; the result was 120% of the average national unemployment rate over the twenty-four month period, which is identified in column AB, row 181 of the attached spreadsheet.

For each county that is not part of a county collaboration, we compared the percentage in column AC to the percentage in column AB, row 181. As a result, sixteen counties were identified as having a twenty-four month average that was higher than 120% of the national average. For each county collaboration, we compared the percentage in column AE to the percentage in column AB, row 181. As a result, we determined that none of the county collaborations have a twenty-four month average that was higher than 120% of the national average.

10. Anticipated impact on households and State agency operations: This waiver applies only to individuals who are receiving benefits in the specified counties. Individuals in these counties will not be subject to the time limits of 7 CFR 273.24(b). These individuals will still be required to participate in Ohio's Food Assistance Employment and Training Program.

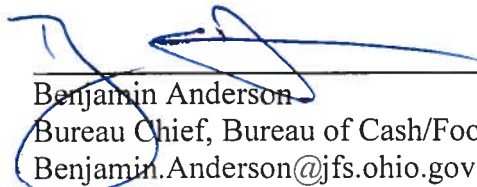
11. Caseload information, including percent, characteristics, and quality control error rate for affected portion: As of May 2016, Ohio had 1,676,062 individuals receiving SNAP. In FFY2015, we had 116,516 individuals that were identified as an ABAWD, which is less than 7% of the SNAP population. Only a small portion of the ABAWD population will be waived as a result of this waiver.

12. Anticipated implementation date and time period for which waiver is needed: October 1, 2016 through September 30, 2017

13. Proposed quality control review procedures: No special procedures will be required for this waiver. Cases will continue to be reviewed using standard review procedures contained in the FNS 310 Handbook.

14. State agency submitting waiver request and State contact person: Ohio Department of Job and Family Services, Betsy Suver.

15. Signature and title of requesting official:



Benjamin Anderson
Bureau Chief, Bureau of Cash/Food Policy and Technical Support
Benjamin.Anderson@jfs.ohio.gov

16. Date of request: 08/15/2016

17. State agency staff contact (name/email/telephone): Betsy Suver,
Betsy.Suver@jfs.ohio.gov, (614) 387-8302

18. Regional office contact person: Bridget Kearney, Bridget.Kearney@fns.usda.gov,