

STATE WAIVER REQUEST

1. Waiver Serial Number (if applicable):

2030035

2. Type of request:

Modification

3. Regulatory citation:

7 CFR 273.24

4. State:

Pennsylvania

5. Region:

MWRO

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 Commonwealth of Pennsylvania is requesting to exempt able-bodied adults without dependents (ABAWDs) in 30 counties and 20 cities and towns 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 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 are “designated as a Labor Surplus Area (LSA) by the Department of Labor's Employment and Training Administration (ETA)”.

The Commonwealth of Pennsylvania seeks a waiver for one area of contiguous counties based on their average unemployment rates for the 24-month period of July 2014 through June 2016. The national average unemployment rate for this 24-month period was 5.3 percent; 20 percent above this was 6.4 percent. The unemployment rate for these regions was also 6.4 percent for this period.

July 2014-June 2016		
County	Total Labor Force	Total Unemployment
Armstrong	801,856	53,045
Bedford	581,799	34,375
Cambria	1,498,503	97,866
Cameron	54,585	3,720
Carbon	760,303	45,633
Clearfield	876,734	59,050
Clinton	454,932	30,881
Fayette	1,406,210	105,283
Forest	45,509	3,524
Fulton	178,766	10,926
Greene	441,871	26,793
Huntingdon	474,232	32,723
Indiana	1,011,772	63,564
Jefferson	504,669	30,884
Lackawanna	2,558,819	148,608
Luzerne	3,807,897	244,804
Lycoming	1,464,962	88,233
McKean	457,188	27,680
Monroe	1,934,196	124,604
Northumberland	1,048,410	63,783
Pike	605,250	39,152
Potter	180,552	12,758
Schuylkill	1,641,608	101,659
Somerset	828,547	56,693
Sullivan	73,735	4,490
Tioga	491,796	32,091
Wayne	536,212	31,201
Wyoming	342,709	20,883
Total for Region	25,063,622	1,594,906
Unemployment Rate	6.4	

In addition, two counties that were not part of the contiguous region are eligible for a waiver based on the metropolitan division having an unemployment rate that was 20 percent above the national average 24-month period of July 2014 through June 2016, 5.3 percent.

July 2014-June 2016			
Metropolitan Division	Total Labor Force	Total Unemployment	Unemployment Rate
Philadelphia Metropolitan Division (Philadelphia and Delaware Counties)	23,767,889	1,517,251	6.4

Pennsylvania also identified eight minor civil divisions (MCD) that are eligible for a waiver based on their own unemployment rate that was 20 percent above the national average 24-month period of July 2014 through June 2016.

July 2014 - June 2016

INDIVIDUAL MINOR CIVIL DIVISIONS	Total Labor Force	Total Unemployment	Unemployment Rate
Berwick borough	128,082	9,310	7.3
Erie city	1,094,989	69,828	6.4
Harrisburg city	518,918	36,391	7.0
Lebanon city	281,620	19,412	6.9
Lewistown borough	84,427	5,832	6.9
New Castle	219,911	16,981	7.7
Oil City	104,907	6,756	6.4
Williamsport city	342,511	23,151	6.8

Additionally, five MCD that qualified on their own unemployment rates had contiguous areas whose combined unemployment rates qualified for waivers.

July 2014-June 2016

COMBINED MINOR CIVIL DIVISIONS	Total Labor Force	Total Unemployment
Allentown city	1,292,050	97,345
Easton city	286,289	19,601
Bethlehem city	256,168	12,069
Bethlehem township	311,420	13,969
Whitehall township	363,398	17,866
TOTAL MCD AREA	2,509,325	160,850
Unemployment rate for area		6.4
York city	428,829	37,658
Springettsbury township	313,420	15,456
TOTAL MCD AREA	742,249	53,114
Unemployment rate for area		7.2
Reading city	823,810	62,049
Muhlenberg township	263,050	11,970
TOTAL MCD AREA	1,086,860	74,019
Unemployment rate for area		6.8
McKeesport city	192,990	14,468
West Mifflin borough	243,559	14,149
TOTAL MCD AREA	436,549	28,617
Unemployment rate for area		6.6

Finally, Pennsylvania seeks a waiver for one county that was designated as a Labor Surplus Area (LSA), as defined by Department of Labor's ETA:

- Lancaster city in Lancaster County
 - from 2016_LSA_listsing.rtf - <https://www.doleta.gov/programs/lisa.cfm>

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 or have been designated as a LSA.

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

The caseload for these areas, as of August 2016, represents approximately 63 percent of the caseload for the state. There are no quality control procedures involved.

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

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

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:

Pennsylvania Department of Human Services
Office of Income Maintenance
Lourdes Padilla
Deputy Secretary

14. Signature and title of requesting official:



Deputy Secretary

NOV 3 2016

15. Date of request: _____

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

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