



**STATE OF TENNESSEE
DEPARTMENT OF HUMAN SERVICES**

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BILL HASLAM
GOVERNOR

RAQUEL HATTER, MSW, Ed.D.
COMMISSIONER

January 6, 2017

Ms. Peggy Fouts, Regional Director
SNAP SERO
U.S. Department of Agriculture
61 Forsyth Street, NW
Suite 8T36
Atlanta, Georgia 30303

Dear Ms. Fouts,

The SNAP program, within the Department of Human Services, which determines initial and ongoing SNAP eligibility requirements for Able Bodied Adults without Dependent (ABAWD) participants, is submitting a request to extend the exemption of SNAP time limits for Able Bodied Adults without Dependents (ABAWDs) beginning March 1, 2017. We respectfully request the right to re-evaluate and remove ourselves from the waiver at any point with written notice to your agency. The State Waiver Request is attached.

Questions regarding this waiver should be addressed to Keisha Malone, Director of Operations, Family Assistance at 615-313-5292.

Sincerely,

A handwritten signature in blue ink, appearing to be "Keisha Malone", with a long, sweeping horizontal line extending to the right.

Keisha Malone
Director of Operations,
Family Assistance

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of Request:** Extension
3. **Regulatory citation:** 7 CFR 273.24
4. **State:** Tennessee
5. **Region:** SERO
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 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 above provision for any group of individuals in the State if the FNS 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.

7. **Description of alternative procedures:** The State of Tennessee is requesting to exempt able-bodied adults without dependents (ABAWDs) from SNAP time limits at 7 CFR 273.24. We respectfully request the right to re-evaluate and remove ourselves from the waiver at any point with written notice to your agency.

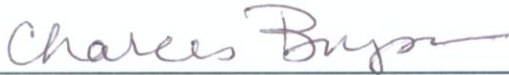
We have been operating without a waiver in nine (9) counties for the past nine (9) months. During this time, DHS has had a focus on outreach and educating participants on available volunteer or work opportunities. Our intent is to continue to make a balanced decision that is reflective of the circumstances that any particular individual may be facing, while also encouraging a path toward self-sufficiency. Additionally, we want to continue to assist those who may qualify for an exemption yet are capable of being engaged in available opportunities and resources such as TN Reconnect and Vocational Rehabilitation.

We see this as a fluid issue that we are studying on a constant basis while also monitoring the potential risk for proposed legislation to permanently ban the state's ability to have any type of waiver. It is our intent to retain the option of a waiver, use the option judiciously and in specific circumstances.

We respectfully request for the waiver to go into effect beginning March 1, 2017 for all counties except: Cheatham, Davidson, Knox, Lincoln, Robertson, Rutherford, Sumner, Williamson, and Wilson. All other counties within the State were identified as qualifying

for the Labor Surplus Area (LSA) ABAWD waiver as reported in the Center on Budget and Policy Priorities (CBPP) Analysis (see attached Excel spreadsheet and Option map).

Customers will be notified by mail concerning any change in their benefit eligibility relative to their ABAWD status. This is a very sensitive matter in the state and we are making every effort to navigate through this fluid matter in a manner that reflects the interest of those we serve as well as the state as a whole.

8. **Anticipated impact on households and State agency operations:** This waiver will provide consistency for households and State agency operations.
9. **Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable):** This waiver applies to 86 of the 95 counties in Tennessee. The counties that will remain subject to the ABAWD 3 month time limit would be: Cheatham, Davidson, Knox, Lincoln, Robertson, Rutherford, Sumner, Williamson and Wilson counties. The number of proposed SNAP Participants that would be covered by the waiver is 79%. This information is based off of data provided by the Center for Budget and Policy Priorities (see attached Excel spreadsheet and Option map).
10. **Anticipated implementation date and time period for which waiver is needed:** The State is requesting a waiver extension beginning March 1, 2017. We respectfully request the right to re-evaluate and remove ourselves from the waiver at any point with written notice to your agency.
11. **Proposed quality control review procedures:** There are no special quality control procedures needed in conjunction with this waiver.
12. **State agency submitting waiver request and State contact person:** Charles Bryson, Assistant Commissioner, Child Support and Family Assistance
13. **Signature and title of requesting official:**


Title: Assistant Commissioner, Child Support and Family Assistance
14. **Date of Request:** January 6, 2017
15. **State agency staff contact (name/email/telephone):** Lisa Cowell, SNAP Program
Director 4, Lisa.Cowell@tn.gov, 615-741-5934.
16. **Regional office contact person (to be completed by FNS regional office):**

