

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2130033
2. **Type of request:**
Amendment 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:** Vermont
6. **Region:**
NERO
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 Vermont is requesting to waive the ABAWD time limit at 7 CFR 273.24 in 1 county and 30 towns from October 1, 2016 through September 30, 2017.
9. **Justification for request:**
Under SNAP regulations at 7 CFR 273.24(f)(2), areas may support a claim of insufficient jobs by submitting evidence that an area has an average unemployment rate for a 24-month time period that exceeds the national average for the same 24-month period by 20 percent. 7 CFR 273.24(f)(6) provides that States may define areas to be waived.

The State of Vermont seeks a waiver for one county and 30 towns based on their average unemployment rates for the 24-month period of April 2014 through March

2016. During this time period, the national average for unemployment was 5.5 percent; 20 percent above this was 6.6 percent. As detailed in the following tables, Essex County and 30 towns qualify based upon having an unemployment rate or belonging to a region with an aggregate average unemployment rate 20 percent above the national average for the selected 24-month time period.

The State of Vermont seeks a waiver for Essex County based on the county's average unemployment rate for the 24-month period of April 2014 to March 2016. The county's average unemployment rate for this period was 6.7 percent.

Bureau of Labor Statistics Local Area Unemployment Data April 2014 through March 2016			
County	Unemployed Total	Labor Force Total	Unemployment Rate
Essex County	4,434	66,428	6.7%
20% Above National Average Threshold	6.6%		

The State of Vermont seeks a waiver for a regional group of 18 contiguous towns and cities based on the region's aggregate average unemployment rate for the 24-month period of April 2014 to March 2016. The region's aggregate average unemployment rate for this period was 6.6 percent.

Bureau of Labor Statistics Local Area Unemployment Data April 2014 through March 2016		
Town	Unemployed Total	Labor Force Total
Barton town	2,462	30,573
Belvidere town	301	4,396
Brownington town	849	13,222
Burke town	1,283	19,847
Coventry town	692	13,364
Derby town	3,060	55,010
Eden town	1,540	17,674
Enosburgh town	2,037	36,805
Glover town	805	13,327
Irasburg town	776	15,171
Jay town	591	7,354
Lowell town	713	10,583
Newport city	3,946	43,239
Richford town	1,563	27,009
Sheffield town	472	7,543
Sutton town	552	10,727

Waterville town	471	9,081
Westfield town	307	7,273
Combined Area Total	22,420	342,198
Combined Area Unemployment Rate	6.6%	
20% Above National Average Threshold	6.6%	

The State of Vermont also seeks a waiver for a regional group of 3 contiguous towns based on the region's aggregate average unemployment rate for the 24-month period of April 2014 to March 2016. The region's combined average unemployment rate for this period was 6.9 percent.

Bureau of Labor Statistics Local Area Unemployment Data April 2014 through March 2016		
Town	Unemployed Total	Labor Force Total
Bridgewater town	707	13,778
Killington town	1,227	12,597
Pittsfield town	387	7,298
Combined Area Total	2,321	33,673
Combined Area Unemployment Rate	6.9%	
20% Above National Average Threshold	6.6%	

The State of Vermont also seeks a waiver for an additional regional group of 3 contiguous towns based on the region's aggregate average unemployment rate for the 24-month period of April 2014 to March 2016. The region's aggregate average unemployment rate for this period was 6.8 percent.

Bureau of Labor Statistics Local Area Unemployment Data April 2014 through March 2016		
Town	Unemployed Total	Labor Force Total
Dover town	1,034	15,321
Glastenbury town	0	144
Searsburg town	124	1,492
Combined Area Total	1,158	16,957
Combined Area Unemployment Rate	6.8%	
20% Above National Average Threshold	6.6%	

The State of Vermont also seeks a waiver for 3 towns in the Manchester LMA based on the region's aggregate average unemployment rate for the 24-month period of April 2014 to March 2016. The Labor Market Area used in this waiver request is defined by the U.S.

Bureau of Labor Statistics.¹ The unemployment rate for the towns in the Manchester LMA for which Vermont is requesting the waiver was 6.7 percent.

Manchester VT LMA	Bureau of Labor Statistics Local Area Unemployment Data April 2014 through March 2016	
Town	Unemployed Total	Labor Force Total
Sandgate town	244	3,875
Stratton town	189	2,806
Wells town	742	10,767
Combined Area Total	1,175	17,448
Combined Area Unemployment Rate	6.7%	
20% Above National Average Threshold	6.6%	

The State of Vermont would also like to request that three towns be waived based on having individual unemployment rates that are 20 percent above the national average for the period of April 2014 – March 2016.

Bureau of Labor Statistics Local Area Unemployment Data April 2014 through March 2016			
Town	Unemployed Total	Labor Force Total	Unemployment Rate
Alburgh town	1,672	24,875	6.7%
Hancock town	239	3,261	7.3%
Ira town	417	5,877	7.1%
20% Above National Average Threshold	6.6%		

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 June 20, 2016, represent 0.9% of the caseload for the state. There are no quality control procedures involved.

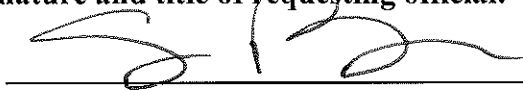
¹ Map available from the Vermont Department of Labor at <http://www.vtlni.info/lmadel2015.pdf>. Full listing of Labor Market Areas available from the Bureau of Labor Statistics: <http://www.bls.gov/lau/lmadir2015.xlsx>.

12. Anticipated implementation date and time period for which waiver is needed:
The State is requesting a one-year waiver, from October 1, 2016 through September 30, 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:
Patricia Duda
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802 241 0603

15. Signature and title of requesting official:



Sean P. Brown

Title: DCF/ESD Deputy Commissioner

Email for transmission of response: pat.duda@vermont.gov

16. Date of request: June 24, 2016

17. State agency staff contact (name/email/telephone):
Patricia Duda
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18. Regional office contact person (to be completed by FNS regional office):