



STATE OF HAWAII
DEPARTMENT OF HUMAN SERVICES
Benefit, Employment and Support Services Division
1010 Richards Street., Suite 512
Honolulu, Hawaii 96813

October 12, 2017

Mr. Dennis Stewart, Regional Director
Food Stamp Program
U. S. Department of Agriculture, FNS
Western Region
90 Seventh Street, Suite 10-100
San Francisco, California 94103

RE: Waiver extension request (2150080)

Dear Mr. Stewart:

Hawaii is requesting a waiver from the "ABAWD" requirements for the island of Molokai. The Hawaii Department of Labor and Industrial Relations data provides data that establishes Molokai Island had an unemployment average rate of 8.6%. The national average unemployment rate for the 36 month period of September 2014 through August 2017 was 6.0%. The supporting data is attached.

Under Federal regulations at 7 CFR 273.24(f)(2)(ii), the State may submit evidence that an area has a 24-month average unemployment rate 20% above the national average for the same 24-month period. Guidance issued by FNS in February 2006 states that areas can be eligible for two-year waivers if the State demonstrates that an area has an unemployment rate greater than 20% above the national average for a 36-month period, ending no earlier than three months prior to the request.

If there are any questions, please call Pamela Higa at 808-586-5722.

Sincerely,

A handwritten signature in blue ink that reads "Scott Nakasone".

Scott Nakasone
Assistant Division Administrator

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2150080
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:** Hawaii
6. **Region:** WRO
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 Hawaii is requesting to exempt able-bodied adults without dependents (ABAWDs) on the Island of Molokai from the SNAP time limit at 7 CFR 273.24.
9. **Justification for request:** This request to exempt the ABAWDs residing on the Island of Molokai from the time limit in 7 CFR 273.24 due to having insufficient jobs is based on the State having an average unemployment rate greater than 20 percent above the national average for the 36-month period of September 2014 through August 2017. 7 CFR 273.24 (f)(2)(ii) states that, "To support a claim of lack of sufficient jobs, a State may submit evidence that an area (...) has a 24-month average unemployment rate 20 percent above the national average for the same 24-month period." Guidance issued by FNS in February 2006 states that areas can be eligible for two-year waivers if they demonstrate that an area has "an unemployment rate greater than 20 percent above the national average for a 36-month period, ending no earlier than three months prior to the request".¹

¹ Memo dated February 3, 2006. "FSP – 2-Year Approval of Waivers of the Work Requirements for ABAWDs under 7 CFR 273.24." <https://fns-prod.azureedge.net/sites/default/files/snap/2-Year%20Approval%20of%20Waivers%20of%20the%20Work%20Requirements%20for%20ABAWDs.pdf>

The Island of Molokai in the State of Hawaii is eligible for a waiver based on the island's average unemployment rate for the 36-month period of September 2014 through August 2017. The national average unemployment rate for this 36-month period was 5.0 percent; 20 percent above this was 6.0 percent. The island's unemployment rate for this period was 8.6 percent. These unemployment rates are calculated from data obtained from the Hawaii Department of Labor and Industrial Relations (DLRI), since the national Bureau of Labor Statistics does not collect data for this island. The Hawaii DLRI collaborates with BLS to produce these estimates.²

Bureau of Labor Statistics Local Area Unemployment Data September 2014 through August 2017			
	Unemployed	Labor Force	Unemployment Rate
Island of Molokai	7,800	90,350	8.6%
20% Above National Average Threshold	6.0%		

- 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 September 30, 2017, represent 1.3% 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 two-year waiver, from December 1, 2017 through November 30, 2019.
- 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:**
- 15. Signature and title of requesting official:**

Pamela Higa

Title: SNAP Administrator

Email for transmission of response: phiga@dhs.hawaii.gov

- 16. Date of request: 10/06/17**

² The data used to support this request was downloaded from the Hawaii DLRI website:
<https://www.hiwi.org/gsipub/index.asp?docid=417>.

17. State agency staff contact (name/email/telephone): Pamela Higa, SNAP Administrator, phiga@dhs.hawaii.gov (808) 586-5722

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

**AREAS IN HAWAII THAT ARE ELIGIBLE FOR WAIVERS ON THE BASIS OF
SEP 2014 - AUG 2017
UNEMPLOYMENT RATES**

Step 1
Step 2
Step 3
Step 4

Please see worksheet entitled "Step 1" for monthly labor force numbers
Please see worksheet entitled "Step 2" for 24-month labor force totals
Please see worksheet entitled "Step 3" for monthly unemployed numbers
Please see worksheet entitled "Step 4" for 24-month unemployed totals

	from Step 2		from Step 4		Step 5		Step 6		Step 7	
	SEP 2014 - AUG 2017	SEP 2014 - AUG 2017	SEP 2014 - AUG 2017	SEP 2014 - AUG 2017	SEP 2014 - AUG 2017	SEP 2014 - AUG 2017	SEP 2014 - AUG 2017	SEP 2014 - AUG 2017	SEP 2014 - AUG 2017	SEP 2014 - AUG 2017
	Total labor force		Total number of unemployed		Average Unemployment Rate (unrounded)	Average Unemployment Rate (4 decimal places)	Average Unemployment Rate (multiply by 100)		Average Unemployment Rate (one decimal place)	
U.S. National Average	5,702,119		285,596		0.05009	0.0500	5.0		5.0	
Threshold - 20% Above the National Average						0.0600	6.0		6.0	
Island of Molokai	90,350		7,800		0.08633	0.0863	8.63		8.6	

Data from Hawaii Department of Labor and Industrial Relations, Research and Statistics Office, LAUS Program, available at <https://www.hiwi.org/gsipub/index.asp?docid=417>
Data are rounded to the nearest 50.

Labor Force Statistics from the Current Population Survey
Original Data Value

Series Id: LNU01000000, LNU03000000
 Not Seasonally Adjusted
 Series title: (Unadj) Civilian Labor Force Level, (Unadj) Unemployment Level
 Labor force stat Civilian labor force, Unemployed
 Type of data: Number in thousands
 Age: 16 years and over
 Years: 2014 to 2017

National 36-Month Unemployment Average						
Year	Month	Civilian labor force	Unemployment	Start date	End date	Civilian labor force
2014	Jan	154381	10855	Jan-14	Dec-16	5,666,867
2014	Feb	155027	10893	Feb-14	Jan-17	5,671,162
2014	Mar	155627	10537	Mar-14	Feb-17	5,675,617
2014	Apr	154845	9079	Apr-14	Mar-17	5,679,902
2014	May	155841	9443	May-14	Apr-17	5,684,874
2014	Jun	156997	9893	Jun-14	May-17	5,689,012
2014	Jul	157573	10307	Jul-14	Jun-17	5,693,352
2014	Aug	156434	9787	Aug-14	Jul-17	5,697,690
2014	Sep	155903	8962	Sep-14	Aug-17	5,702,119
2014	Oct	156616	8680			
2014	Nov	156297	8630			
2014	Dec	155521	8331			
2015	Jan	156050	9498			
2015	Feb	156213	9095			
2015	Mar	156318	8682			
2015	Apr	156554	7966			
2015	May	157719	8370			
2015	Jun	158283	8638			
2015	Jul	158527	8805			
2015	Aug	157390	8162			
2015	Sep	156607	7628			
2015	Oct	157313	7597			
2015	Nov	157340	7573			
2015	Dec	157245	7542			
2016	Jan	157347	8309			
2016	Feb	158279	8219			
2016	Mar	158854	8116			
2016	Apr	158488	7413			
2016	May	158800	7207			
2016	Jun	160135	8144			
2016	Jul	160705	8267			
2016	Aug	159600	7996			
2016	Sep	159636	7658			
2016	Oct	159783	7447			
2016	Nov	159451	7066			
2016	Dec	158968	7170			
2017	Jan	158676	8149			
2017	Feb	159482	7887			
2017	Mar	159912	7284			
2017	Apr	159817	6555			
2017	May	159979	6572			
2017	June	161337	7250			
2017	July	161911	7441			
2017	August	160863	7287			

Unemployment Rate (Rounded)	20% Above the National Average (Rounded)
5.4	6.5
5.4	6.5
5.3	6.4
5.3	6.3
5.2	6.3
5.2	6.2
5.1	6.1
5.1	6.1
5.0	6.0

Island of Molokai, Hawaii
Not Seasonally Adjusted
Current and Historical Labor Force Estimates & Unemployment Rates

Source: Hawaii Department of Labor and Industrial Relations, Research and Statistics Office, LAUS Program, available at <https://www.hawaii.gov/dli/laus/index.asp?docid=417>

		Molokai Island 36-Month Unemployment Average			
Year	Period	Civilian Labor Force			Percent of Labor Force
		Total	Employed	Unemployed	
(b) 2014	Jan	2,400	2,200	200	7.9
(b) 2014	Feb	2,450	2,150	250	10.8
(b) 2014	Mar	2,400	2,200	200	9.2
(b) 2014	Apr	2,450	2,200	250	9.4
(b) 2014	May	2,400	2,200	200	8.7
(b) 2014	Jun	2,600	2,250	350	14.1
(b) 2014	Jul	2,550	2,250	300	11.4
(b) 2014	Aug	2,650	2,300	400	14.1
(b) 2014	Sep	2,650	2,250	400	15.4
(b) 2014	Oct	2,600	2,250	350	13.3
(b) 2014	Nov	2,700	2,300	400	14.1
(b) 2014	Dec	2,600	2,300	300	10.9
(b) 2015	Jan	2,500	2,300	200	8.5
(b) 2015	Feb	2,500	2,250	200	9.0
(b) 2015	Mar	2,450	2,300	200	7.9
(b) 2015	Apr	2,450	2,250	200	8.8
(b) 2015	May	2,500	2,300	200	8.5
(b) 2015	Jun	2,550	2,300	300	10.8
(b) 2015	Jul	2,550	2,300	250	9.6
(b) 2015	Aug	2,450	2,250	250	9.9
(b) 2015	Sep	2,450	2,200	250	9.4
(b) 2015	Oct	2,550	2,300	250	9.8
(b) 2015	Nov	2,450	2,250	200	8.7
(b) 2015	Dec	2,500	2,350	150	6.4
(b) 2016	Jan	2,550	2,400	150	6.0
(b) 2016	Feb	2,550	2,350	200	7.8
(b) 2016	Mar	2,500	2,400	150	5.2
(b) 2016	Apr	2,450	2,300	150	5.7
(b) 2016	May	2,550	2,350	200	7.1
(b) 2016	Jun	2,650	2,400	300	10.7
(b) 2016	Jul	2,600	2,400	200	8.4
(b) 2016	Aug	2,500	2,300	200	7.3
(b) 2016	Sep	2,500	2,300	200	7.4
(b) 2016	Oct	2,650	2,400	250	9.6
(b) 2016	Nov	2,500	2,300	200	7.2
(b) 2016	Dec	2,550	2,400	150	5.3
(b) 2017	Jan	2,550	2,450	100	4.0
(t) 2017	Feb	2,350	2,250	100	4.5
(t) 2017	Mar	2,400	2,250	150	5.4
(t) 2017	Apr	2,400	2,250	150	5.8
(t) 2017	May	2,400	2,250	150	6.7
(t) 2017	Jun	2,350	2,100	250	11.2
(t) 2017	Jul	2,450	2,250	250	9.2
(p) 2017	Aug	2,450	2,300	200	7.6

NOTES: Except for percent unemployed, rounded to nearest 5/10.

Totals may not add due to rounding.

Data begins from 1990. Data not available prior to 1990 with the new redesign model.

(b) Data for 2012-2016 reflect adjustment to new Maui County control totals.

Data for 2015-2016 reflect revised inputs.

(r) revised

(p) preliminary

Labor Force Statistics from the Current Population Survey

Series Id: LNU01000000

Not Seasonally Adjusted

Series title: (Unadj) Civilian Labor Force Level

Labor force status: Civilian labor force

Type of data: Number in thousands

Age: 16 years and over

Download:

Series id	Year	Period	Value
LNU01000	2014	M01	154381(1)
LNU01000	2014	M02	155027
LNU01000	2014	M03	155627
LNU01000	2014	M04	154845
LNU01000	2014	M05	155841
LNU01000	2014	M06	156997
LNU01000	2014	M07	157573
LNU01000	2014	M08	156434
LNU01000	2014	M09	155903
LNU01000	2014	M10	156616
LNU01000	2014	M11	156297
LNU01000	2014	M12	155521
LNU01000	2015	M01	156050(1)
LNU01000	2015	M02	156213
LNU01000	2015	M03	156318
LNU01000	2015	M04	156554
LNU01000	2015	M05	157719
LNU01000	2015	M06	158283
LNU01000	2015	M07	158527
LNU01000	2015	M08	157390
LNU01000	2015	M09	156607
LNU01000	2015	M10	157313
LNU01000	2015	M11	157340
LNU01000	2015	M12	157245
LNU01000	2016	M01	157347(1)
LNU01000	2016	M02	158279
LNU01000	2016	M03	158854
LNU01000	2016	M04	158488
LNU01000	2016	M05	158800
LNU01000	2016	M06	160135
LNU01000	2016	M07	160705
LNU01000	2016	M08	159800

LNU01000	2016 M09	159636
LNU01000	2016 M10	159783
LNU01000	2016 M11	159451
LNU01000	2016 M12	158968
LNU01000	2017 M01	158676(1)
LNU01000	2017 M02	159482
LNU01000	2017 M03	159912
LNU01000	2017 M04	159817
LNU01000	2017 M05	159979
LNU01000	2017 M06	161337
LNU01000	2017 M07	161911
LNU01000	2017 M08	160863

1 : Data affected by changes in population controls.

Series Id: LNU03000000
Not Seasonally Adjusted
Series title: (Unadj) Unemployment Level
Labor force status: Unemployed
Type of data: Number in thousands
Age: 16 years and over

Download:

Series id	Year	Period	Value
LNU03000	2014	M01	10855
LNU03000	2014	M02	10893
LNU03000	2014	M03	10537
LNU03000	2014	M04	9079
LNU03000	2014	M05	9443
LNU03000	2014	M06	9893
LNU03000	2014	M07	10307
LNU03000	2014	M08	9787
LNU03000	2014	M09	8962
LNU03000	2014	M10	8680
LNU03000	2014	M11	8630
LNU03000	2014	M12	8331
LNU03000	2015	M01	9498
LNU03000	2015	M02	9095
LNU03000	2015	M03	8682
LNU03000	2015	M04	7966
LNU03000	2015	M05	8370
LNU03000	2015	M06	8638
LNU03000	2015	M07	8805

LNU03000	2015 M08	8162
LNU03000	2015 M09	7628
LNU03000	2015 M10	7597
LNU03000	2015 M11	7573
LNU03000	2015 M12	7542
LNU03000	2016 M01	8309
LNU03000	2016 M02	8219
LNU03000	2016 M03	8116
LNU03000	2016 M04	7413
LNU03000	2016 M05	7207
LNU03000	2016 M06	8144
LNU03000	2016 M07	8267
LNU03000	2016 M08	7996
LNU03000	2016 M09	7658
LNU03000	2016 M10	7447
LNU03000	2016 M11	7066
LNU03000	2016 M12	7170
LNU03000	2017 M01	8149
LNU03000	2017 M02	7887
LNU03000	2017 M03	7284
LNU03000	2017 M04	6555
LNU03000	2017 M05	6572
LNU03000	2017 M06	7250
LNU03000	2017 M07	7441
LNU03000	2017 M08	7287

