

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2150040
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:** Idaho
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 Idaho is requesting to exempt able-bodied adults without dependents (ABAWDs) in 16 counties and 4 reservations from SNAP time limits at 7 CFR 273.24.
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 Idaho seeks a waiver for a region of 16 contiguous counties based on the region's aggregate average unemployment rate for the 24-month period of April 2015 through March 2017. The national average unemployment rate for this period was 5.0 percent; 20 percent above this was 5.9 percent. The region's aggregate average unemployment rate for this period was 5.9 percent.

Bureau of Labor Statistics Local Area Unemployment Data April 2015 through March 2017		
Contiguous Counties	Unemployed Total	Labor Force Total
Adams County	2,978	41,726
Benewah County	6,185	96,938
Boise County	4,338	74,921
Bonner County	24,888	449,956
Boundary County	6,599	122,100
Butte County	1,284	31,146
Clark County	331	9,520
Clearwater County	5,757	73,774
Custer County	2,853	51,225
Gem County	9,052	184,698
Idaho County	9,049	153,837
Lemhi County	5,296	81,399
Lewis County	2,443	38,570
Shoshone County	9,129	122,415
Valley County	6,621	117,169
Washington County	6,282	109,637
Combined Area Total	103,085	1,759,031
Combined Area Unemployment Rate	5.9%	
20% Above National Average Threshold	5.9%	

The state also seeks a waiver for 4 reservations: Coeur d'Alene, Duck Valley, Fort Hall, and Nez Perce Reservations. During the period of April 2015 through March 2017, each of these reservations had an average unemployment rate 20 percent higher than the national average unemployment rate during the same period. The reservation unemployment rates were calculated by applying 2011-2015 5-year American Community Survey (ACS) share ratios to county-level Bureau of Labor Statistics data for April 2015 – March 2017.

Bureau of Labor Statistics Local Area Unemployment/Census Bureau Data April 2015 through March 2017			
	Unemployed	Labor Force	Unemployment Rate
Benewah County (part); Idaho (part); Coeur d'Alene Reservation, ID	3,512	49,696	7.1%

Kootenai County (part); Idaho (part); Coeur d'Alene Reservation, ID	2,182	27,264	8.0%
Coeur d'Alene Reservation	5,694	76,959	7.4%

Owyhee County (part); Idaho (part); Duck Valley Reservation, NV--ID	718	2,706	26.5%
Duck Valley Reservation	718	2,706	26.5%

Bannock County (part); Idaho (part); Fort Hall Reservation and Off-Reservation Trust Land, ID	3,128	24,110	13.0%
Bingham County (part); Idaho (part); Fort Hall Reservation and Off-Reservation Trust Land, ID	3,337	28,377	11.8%
Caribou County (part); Idaho (part); Fort Hall Reservation and Off-Reservation Trust Land, ID	0	0	-
Power County (part); Idaho (part); Fort Hall Reservation and Off-Reservation Trust Land, ID	548	9,706	5.7%
Fort Hall Reservation	7,014	62,194	11.3%

Clearwater County (part); Idaho (part); Nez Perce Reservation, ID	3,813	45,422	8.4%
Idaho County (part); Idaho (part); Nez Perce Reservation, ID	3,050	38,215	8.0%
Lewis County (part); Idaho (part); Nez Perce Reservation, ID	2,443	38,570	6.3%
Nez Perce County (part); Idaho (part); Nez Perce Reservation, ID	4,186	51,716	8.1%
Nez Perce Reservation	13,492	173,923	7.8%

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 2017, represent 10.003% of the caseload for the state. There are no quality control procedures involved.

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

The State is requesting a one-year waiver, from January 1, 2018 through December 31, 2018.

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:



Julie A. Hammon
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Email for transmission of response: Julie.Hammon@dhw.idaho.gov

16. Date of request: August 7, 2017

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

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