



**CABINET FOR HEALTH AND FAMILY SERVICES
OFFICE OF THE SECRETARY**

Matthew G. Bevin
Governor

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Vickie Yates Brown Glisson
Secretary

December 6, 2017

Peggy Fouts
Regional Director
USDA, Food and Nutrition Service
Southeast Regional Office
61 Forsyth Street, S.W. Room 8T36
Atlanta, Georgia 30303

Dear Ms. Fouts,

Enclosed for your review is the Supplemental Nutritional Assistance Program (SNAP) Able-Bodied Adults Without Dependents (ABAWD) time limit waiver extension request. Kentucky is requesting to exempt ABAWDs from the SNAP time limits at 7 CFR 273.24 from January 1, 2018 through December 31, 2018.

If you have any questions regarding this waiver request, please contact Leitha Harris at (502) 564-3440. Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Adria Johnson".

Adria Johnson
Commissioner

Enclosure

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2150037
2. **Type of request:**
Extension and modification
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:**
Kentucky
6. **Region:**
SERO
7. **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 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.
8. **Description of alternative procedures:**
The State of Kentucky is requesting to exempt able-bodied adults without dependents (ABAWDs) in 100 counties 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 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.

The State of Kentucky seeks a waiver for a region of contiguous counties based on its average unemployment rate that is 20 percent above the national average for the 24-month period of September 2015 through August 2017. The national average unemployment rate for this 24-month period was 4.8 percent; 20 percent above this was 5.7 percent. The unemployment rate for the region was 6.0 percent for the same time period. (Chart of data and Map attached)

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 affected portion (if applicable):

The caseload for these areas, as of **August 15th, 2017** represent **70%** 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 an eleven-month waiver, from January 1, 2018 through December 31, 2018.

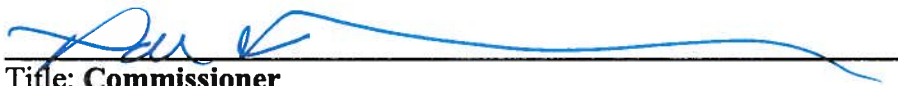
13. Proposed quality control review procedures:

There are no special quality control procedures needed in conjunction with this waiver.

14. State agency submitting waiver request and State contact person:

**KY Cabinet for Health and Family Services
Department for Community Based Services
275 East Main St
Frankfort, KY 40621
Leitha Harris
Program Support Section Supervisor**

15. Signature and title of requesting official:



Title: Commissioner

Email for transmission of response:

16. Date of request: 12/6/17

**17. State agency staff contact (name/email/telephone): Leitha Harris/
Leitha.harris@ky.gov/ (502) 564-3440 ext.3669**

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

AREAS IN KENTUCKY THAT ARE ELIGIBLE FOR WAIVERS ON THE BASIS OF
SEP 2015 - AUG 2017
UNEMPLOYMENT RATES

18-Jan

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

	from Step 2 9/15-8/17	from Step 4 9/15-8/17	Step 5 9/15-8/17 Average Unemployment Rate (unrounded)	Step 5 9/15-8/17 Average Unemployment Rate (4 decimal places)	Step 6 9/15-8/17 Average Unemployment Rate (multiply by 100)	Step 7 8/15-9/17 Average Unemployment (one decimal)
Regional Grouping of Counties						
Adair County, KY	183,045	11,049	0.06777	0.0677	6.77	6.8
Allen County, KY	213,157	9,201	0.04317	0.0431	4.31	4.3
Ballard County, KY	88,534	7,249	0.08188	0.0818	8.18	8.2
Barren County, KY	458,529	21,820	0.04780	0.0477	4.77	4.8
Bath County, KY	114,544	8,655	0.07556	0.0755	7.55	7.6
Bell County, KY	208,006	18,513	0.08900	0.0890	8.90	8.9
Boone County, KY	1,593,343	63,033	0.03956	0.0395	3.95	4.0
Bourbon County, KY	238,369	11,539	0.04841	0.0484	4.84	4.8
Boyd County, KY	437,431	34,328	0.07848	0.0784	7.84	7.8
Boyle County, KY	294,581	15,192	0.05157	0.0515	5.15	5.2
Bracken County, KY	90,430	5,558	0.06146	0.0614	6.14	6.1
Breathitt County, KY	93,729	8,876	0.09470	0.0946	9.46	9.5
Breckinridge County, KY	190,690	11,709	0.06140	0.0614	6.14	6.1
Butler County, KY	125,335	6,916	0.05518	0.0551	5.51	5.5
Caldwell County, KY	130,484	7,098	0.05440	0.0543	5.43	5.4
Carlisle County, KY	65,402	3,974	0.06076	0.0607	6.07	6.1
Carroll County, KY	122,739	6,188	0.05042	0.0504	5.04	5.0
Carter County, KY	243,296	24,905	0.10237	0.1023	10.23	10.2
Casey County, KY	165,542	8,021	0.04845	0.0484	4.84	4.8
Christian County, KY	599,321	37,389	0.06239	0.0623	6.23	6.2
Clark County, KY	409,774	19,899	0.04856	0.0485	4.85	4.9
Clay County, KY	136,780	12,936	0.09458	0.0945	9.45	9.5
Clinton County, KY	90,645	6,820	0.07524	0.0752	7.52	7.5
Crittenden County, KY	98,507	5,169	0.05247	0.0524	5.24	5.2
Cumberland County, KY	70,188	3,913	0.05575	0.0557	5.57	5.6
Edmonson County, KY	114,987	7,249	0.06305	0.0630	6.30	6.3
Elliott County, KY	52,178	5,661	0.10849	0.1084	10.84	10.8
Estill County, KY	128,806	7,621	0.05926	0.0592	5.92	5.9
Fleming County, KY	145,882	8,956	0.06139	0.0613	6.13	6.1
Floyd County, KY	279,225	28,431	0.10182	0.1018	10.18	10.2
Fulton County, KY	49,911	3,650	0.07313	0.0731	7.31	7.3
Gallatin County, KY	93,209	4,552	0.04884	0.0488	4.88	4.9
Garrard County, KY	183,838	9,012	0.04907	0.0490	4.90	4.9
Grant County, KY	268,815	13,577	0.05051	0.0505	5.05	5.1
Graves County, KY	374,358	22,937	0.06127	0.0612	6.12	6.1
Grayson County, KY	262,916	16,998	0.06465	0.0646	6.46	6.5
Green County, KY	121,820	5,700	0.04679	0.0467	4.67	4.7
Greenup County, KY	327,835	27,499	0.08388	0.0838	8.38	8.4
Hancock County, KY	94,289	5,127	0.05438	0.0543	5.43	5.4
Harlan County, KY	171,552	19,992	0.11654	0.1165	11.65	11.7
Harrison County, KY	205,829	9,751	0.04737	0.0473	4.73	4.7
Hart County, KY	192,340	9,038	0.04699	0.0469	4.69	4.7
Hickman County, KY	48,370	3,005	0.06213	0.0621	6.21	6.2
Hopkins County, KY	480,579	25,948	0.05399	0.0539	5.39	5.4
Jackson County, KY	103,150	8,200	0.07950	0.0794	7.94	7.9
Johnson County, KY	176,472	16,264	0.09216	0.0921	9.21	9.2
Kenton County, KY	2,019,573	84,906	0.04204	0.0420	4.20	4.2
Knott County, KY	109,964	11,699	0.10639	0.1063	10.63	10.6
Knox County, KY	237,950	19,116	0.08034	0.0803	8.03	8.0
Larue County, KY	144,153	6,829	0.04737	0.0473	4.73	4.7
Laurel County, KY	572,343	35,436	0.06191	0.0619	6.19	6.2
Lawrence County, KY	123,486	12,420	0.10058	0.1005	10.05	10.1
Lee County, KY	48,190	4,424	0.09180	0.0918	9.18	9.2
Leslie County, KY	67,437	8,201	0.12161	0.1216	12.16	12.2
Letcher County, KY	157,378	17,961	0.11413	0.1141	11.41	11.4
Lewis County, KY	119,674	10,966	0.09163	0.0916	9.16	9.2
Lincoln County, KY	220,856	13,525	0.06124	0.0612	6.12	6.1
Livingston County, KY	89,311	6,590	0.07379	0.0737	7.37	7.4
Lyon County, KY	73,700	4,258	0.05777	0.0577	5.77	5.8
Madison County, KY	1,066,813	46,007	0.04313	0.0431	4.31	4.3
Magoffin County, KY	76,849	13,846	0.18017	0.1801	18.01	18.0
Marion County, KY	228,848	9,840	0.04300	0.0429	4.29	4.3
Marshall County, KY	359,923	20,947	0.05820	0.0581	5.81	5.8
Martin County, KY	73,883	7,257	0.09822	0.0982	9.82	9.8
Mason County, KY	175,083	10,889	0.06219	0.0621	6.21	6.2
McCracken County, KY	697,333	41,306	0.05923	0.0592	5.92	5.9
McCreary County, KY	114,523	8,787	0.07673	0.0767	7.67	7.7
McLean County, KY	103,052	5,224	0.05069	0.0506	5.06	5.1
Meade County, KY	290,583	15,265	0.05253	0.0525	5.25	5.3
Menifee County, KY	57,715	5,046	0.08743	0.0874	8.74	8.7
Mercer County, KY	239,873	11,758	0.04902	0.0490	4.90	4.9
Metcalfe County, KY	99,164	4,512	0.04550	0.0455	4.55	4.6
Monroe County, KY	114,081	4,698	0.04118	0.0411	4.11	4.1
Montgomery County, KY	286,275	18,540	0.06476	0.0647	6.47	6.5

Morgan County, KY	109,107	8,672	0.07948	0.0794	7.94	7.9
Muhlenberg County, KY	278,894	19,898	0.07134	0.0713	7.13	7.1
Nelson County, KY	522,992	24,166	0.04621	0.0462	4.62	4.6
Nicholas County, KY	80,979	4,599	0.05679	0.0567	5.67	5.7
Ohio County, KY	229,546	15,150	0.06600	0.0659	6.59	6.6
Owsley County, KY	27,467	2,626	0.09561	0.0956	9.56	9.6
Pendleton County, KY	161,620	8,043	0.04976	0.0497	4.97	5.0
Perry County, KY	206,166	20,449	0.09919	0.0991	9.91	9.9
Pike County, KY	481,411	48,805	0.10138	0.1013	10.13	10.1
Powell County, KY	120,024	8,451	0.07041	0.0704	7.04	7.0
Pulaski County, KY	614,571	34,218	0.05568	0.0556	5.56	5.6
Robertson County, KY	19,618	1,254	0.06392	0.0639	6.39	6.4
Rockcastle County, KY	161,736	9,845	0.06087	0.0608	6.08	6.1
Rowan County, KY	257,592	14,566	0.05655	0.0565	5.65	5.7
Russell County, KY	147,002	12,605	0.08575	0.0857	8.57	8.6
Scott County, KY	655,716	25,353	0.03866	0.0386	3.86	3.9
Taylor County, KY	279,636	14,747	0.05274	0.0527	5.27	5.3
Todd County, KY	132,666	5,799	0.04371	0.0437	4.37	4.4
Trigg County, KY	138,095	8,041	0.05823	0.0582	5.82	5.8
Trimble County, KY	93,929	5,022	0.05347	0.0534	5.34	5.3
Union County, KY	148,134	9,920	0.06697	0.0669	6.69	6.7
Washington County, KY	149,380	6,292	0.04212	0.0421	4.21	4.2
Wayne County, KY	180,925	13,915	0.07691	0.0769	7.69	7.7
Webster County, KY	139,903	7,970	0.05697	0.0569	5.69	5.7
Whitley County, KY	320,377	20,796	0.06491	0.0649	6.49	6.5
Wolfe County, KY	47,526	4,678	0.09843	0.0984	9.84	9.8
Total for Region	23,989,167	1,445,249	0.06025	0.0602	6.02	6.0
National Unemployment	3,820,728	181,777	0.04758	0.0475	4.75	4.8
Threshold - 20% Above the National Average				0.0570	5.70	5.7

Source: Local Area Unemployment Statistics, Bureau of Labor Statistics, Dept. of Labor
Underlying data are available at www.bls.gov/lau/, and are attached.

