



FAMILY INVESTMENT ADMINISTRATION

July 11, 2017

Eric Ratchford, Regional Director
Supplemental Nutrition Assistance Program
United States Department of Agriculture
Food and Nutrition Service
Mid-Atlantic Region
300 Corporate Boulevard
Robbinsville, New Jersey 08691-1598

Dear Mr. Ratchford:

Attached is Maryland's waiver request to exempt able-bodied adults without dependants (ABAWDs) in specific jurisdictions within the State from the ABAWD time limit.

The waiver of time limits for ABAWD clients is based on evidence showing counties or regions of the State with average unemployment rates that are 20 percent above the national average and counties or regions with low and declining employment-to-population ratios. These data were compiled for us by the Center for Budget and Policy Priorities (CBPP) based on recent Bureau of Labor Statistics.

Thank you for your consideration of Maryland's waiver request. If you have any questions, please contact me at 410-767-7338 or Ann Flagg at 410-767-2346.

Sincerely,

Nicholette Smith-Bligen,
Acting Executive Director

Enclosures

cc: Ann Flagg
Kim Lightfoot
Carrie Durham
Shomare Braxton
Erica Kea-Muhammad
Sean Washington



STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2150044
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:** Maryland
6. **Region:** MARO
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 Maryland is requesting to exempt able-bodied adults without dependents (ABAWDs) in 13 counties and two cities from the 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 Maryland seeks a waiver for three clusters of counties with average unemployment rates that are 20 percent above the national average for the 24-month period of April 2015 to March 2017. The national average unemployment rate for this 24-month period was 5.0 percent; 20 percent above this was 5.9 percent.

The State of Maryland would like to request a waiver for 9 contiguous counties in the Eastern Shore Region based on having an average unemployment rate of 5.9 percent for April 2015 - March 2017:

Bureau of Labor Statistics Local Area Unemployment Data April 2015 through March 2017		
Eastern Shore Region	Unemployed Total	Labor Force Total
Caroline County	20,673	423,502
Cecil County	67,674	1,264,308
Dorchester County	24,169	381,947
Kent County	12,240	250,869
Queen Anne's County	25,809	644,211
Somerset County	16,527	222,668
Talbot County	20,283	467,995
Wicomico County	75,787	1,214,834
Worcester County	57,621	611,445
Combined Area Total	320,783	5,481,779
Combined Area Unemployment Rate	5.9%	
20% Above National Average Threshold	5.9%	

In addition, the State of Maryland would like to request a waiver for 2 counties in the Baltimore Metropolitan Region¹ based on having an average unemployment rate of 5.9 percent for the period of April 2015 to March 2017:

Bureau of Labor Statistics Local Area Unemployment Data April 2015 through March 2017		
Baltimore Region	Unemployed Total	Labor Force Total
Baltimore City	473,530	7,082,027
Harford County	142,825	3,287,464
Combined Area Total	616,355	10,369,491
Combined Area Unemployment Rate	5.9%	
20% Above National Average Threshold	5.9%	

¹ A map of the Baltimore Metropolitan region is available at <http://www.baltometro.org/about-bmc/about-the-region/map/>.

The State of Maryland would also like to request a waiver for 2 contiguous counties in the Western Maryland Region based on having an average unemployment rate of 6.2 percent for the period of April 2015 to March 2017:

Bureau of Labor Statistics Local Area Unemployment Data April 2015 through March 2017		
Western Maryland Region	Unemployed Total	Labor Force Total
Allegany County	49,436	776,606
Garrett County	21,624	375,256
Combined Area Total	71,060	1,151,862
Combined Area Unemployment Rate	6.2%	
20% Above National Average Threshold	5.9%	

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 size for ABAWDs in the state of Maryland is 61,977. The ABAWD caseload is 45% of SNAP E&T work registrants in Maryland for Federal Fiscal Year 2017.

Maryland ABAWD Caseload 61,977

Baltimore Metro	# of ABAWDs	% of ABAWD Caseload
Baltimore City	21,907	35.35%
Harford County	1,637	2.64%
Eastern Shore		
Caroline County	512	0.83%
Cecil County	1,400	2.26%
Dorchester County	797	1.29%
Kent County	264	0.43%
Queen Anne's County	338	0.55%
Somerset County	518	0.84%
Talbot County	363	0.59%
Wicomico County	1,644	2.65%
Worcester County	566	0.91%
Western Maryland		
Allegany County	1,747	2.82%
Garrett County	376	0.61%
Total	32,069	51.74%

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

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

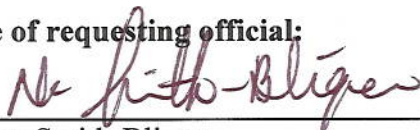
13. Proposed quality control review procedures: There are no special quality control procedures needed in conjunction with this waiver.

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

Maryland Department of Human Resources

State Contact: Nicholette Smith-Bligen

15. Signature and title of requesting official:



Name: Nicholette Smith-Bligen

Title: Acting Executive Director of the Family Investment Administration

Email for transmission of response: nicholette.smith-bligen@maryland.gov

15. Date of request: July 11, 2017

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

Name: Kim Lightfoot, Acting Deputy Executive Director of Programs

Email: kim.lightfoot@maryland.gov

Telephone: 410-767-7028

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