

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2140013
2. **Type of request:** 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:** Montana
6. **Region:** MPRO
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 Montana is requesting to exempt able-bodied adults without dependents (ABAWDs) in 25 counties and 6 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 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 Montana seeks a waiver for two regions of contiguous counties based on their average unemployment rates that are 20 percent above the national average for

the 24-month period of June 2015 through May 2017. The first region includes 14 counties that are eligible for a waiver. The national average unemployment rate for this 24-month period was 4.9 percent; 20 percent above this was 5.8 percent. The average unemployment rate for this region was 5.8 percent for the same period.

Bureau of Labor Statistics Local Area Unemployment Data June 2015 through May 2017		
Counties	Unemployed Total	Labor Force Total
Blaine County, MT	2,567	56,971
Chouteau County, MT	2,175	61,033
Flathead County, MT	60,924	1,100,933
Glacier County, MT	11,805	139,350
Granite County, MT	2,312	38,745
Lake County, MT	14,794	314,166
Liberty County, MT	697	23,810
Lincoln County, MT	17,281	190,425
Mineral County, MT	3,173	40,827
Pondera County, MT	2,871	69,537
Powell County, MT	3,317	69,971
Sanders County, MT	8,819	113,288
Teton County, MT	2,602	68,775
Toole County, MT	1,822	54,389
Combined Area Total	135,159	2,342,220
Combined Area Unemployment Rate	5.8%	
20% Above National Average Threshold	5.8%	

The State also seeks a waiver for a second region of 11 contiguous counties based on its average unemployment rate that is 20 percent above the national average for the 24-month period of July 2015 through June 2017. The region's unemployment rate was 5.8 percent for the same period.

Bureau of Labor Statistics Local Area Unemployment Data July 2015 through June 2017		
Contiguous towns and cities	Unemployed Total	Labor Force Total
Big Horn County, MT	11,247	135,702
Garfield County, MT	523	18,532
Golden Valley County, MT	415	9,194

Musselshell County, MT	2,661	55,911
Petroleum County, MT	318	6,579
Powder River County, MT	614	25,905
Prairie County, MT	452	12,716
Rosebud County, MT	5,323	99,238
Treasure County, MT	374	8,521
Wheatland County, MT	939	19,203
Wibaux County, MT	460	12,669
Combined Area Total	23,326	404,170
Combined Area Unemployment Rate	5.8%	
20% Above National Average Threshold	5.8%	

The State requests to waive the following reservations based on having an average unemployment rate exceeding the national average for a recent 24-month period. The reservation unemployment rate was calculated by applying 2015 American Community Survey¹ share ratios to county-level Bureau of Labor Statistics data from July 2015 through June 2017. The following table summarizes the calculations:

American Community Survey and Bureau of Labor Statistics Data July 2015 through June 2017			
Reservations	Unemployed	Labor Force	Unemployment Rate
Glacier County (part); Montana (part); Blackfeet Indian Reservation and Off-Reservation Trust Land, MT	10,873	97,991	11.1%
Pondera County (part); Montana (part); Blackfeet Indian Reservation and Off-Reservation Trust Land, MT	1,103	7,505	14.7%
Total Blackfeet Reservation	11,976	105,496	11.4%
Big Horn County (part); Montana (part); Crow Reservation and Off-Reservation Trust Land, MT	7,695	70,630	10.9%
Treasure County (part); Montana (part); Crow Reservation and Off-Reservation Trust Land, MT	0	0	-
Yellowstone County (part); Montana (part); Crow Reservation and Off-Reservation Trust Land, MT	242	5,141	4.7%
Total Crow Reservation	7,936	75,770	10.5%
Blaine County (part); Montana (part); Fort Belknap Reservation and Off-Reservation Trust Land, MT	1,825	19,610	9.3%

¹ These calculations are based on data from the 2011-2015 American Community Survey 5-Year Estimates.

Phillips County (part); Montana (part); Fort Belknap Reservation and Off-Reservation Trust Land, MT	543	1,368	39.7%
Total Fort Belknap Reservation	2,368	20,977	11.3%
Daniels County (part); Montana (part); Fort Peck Indian Reservation and Off-Reservation Trust Land, MT	0	217	0.0%
Roosevelt County (part); Montana (part); Fort Peck Indian Reservation and Off-Reservation Trust Land, MT	5,561	88,264	6.3%
Sheridan County (part); Montana (part); Fort Peck Indian Reservation and Off-Reservation Trust Land, MT	53	1,515	3.5%
Valley County (part); Montana (part); Fort Peck Indian Reservation and Off-Reservation Trust Land, MT	1,047	11,133	9.4%
Total Fort Peck Indian Reservation	6,661	101,129	6.6%
Big Horn County (part); Montana (part); Northern Cheyenne Indian Reservation and Off-Reservation Trust Land, MT--SD	1,674	11,843	14.1%
Rosebud County (part); Montana (part); Northern Cheyenne Indian Reservation and Off-Reservation Trust Land, MT--SD	4,071	26,787	15.2%
Total Northern Cheyenne Indian Reservation	5,745	38,630	14.9%
Chouteau County (part); Montana (part); Rocky Boy's Reservation and Off-Reservation Trust Land, MT	930	7,937	11.7%
Hill County (part); Montana (part); Rocky Boy's Reservation and Off-Reservation Trust Land, MT	3,383	19,639	17.2%
Total Rocky Boy's Reservation	4,313	27,576	15.6%

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 **March 31, 2017**, represent **34%** 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:

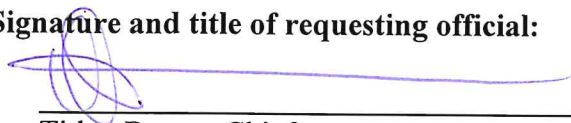
The State is requesting a one-year waiver, from January 1, 2018 through December 31, 2018.

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: Kathe Quittenton

15. Signature and title of requesting official:



Title: Bureau Chief

Email for transmission of response: kquittenton@mt.gov

16. Date of request: September 6, 2017

17. State agency staff contact (name/email/telephone): (406) 444-9022

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