

STATE WAIVER REQUEST

- 1. Waiver Serial Number (if applicable):**
- 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:**
Tennessee
- 6. Region:**
SERO
- 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 Tennessee is requesting to exempt able-bodied adults without dependents (ABAWDs) in 16 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 support a claim of counties designated as a Labor Surplus Area by the U.S. Department of Labor. 7 CFR 273.24(f)(6) provides that States may define areas to be waived.

The State of Tennessee seeks a waiver for a region of 16 contiguous counties based on these counties designation by the U.S. Department of Labor as a Labor Surplus Area.

Labor surplus (LSA) counties are those identified as having a low and declining employment-to-population ratio, lack of jobs in declining occupations or industries, or a 24-month average unemployment rate of 20 percent above the national average for the same 24-month period.

Distressed counties in Tennessee are identified by the Appalachian Regional Commission based on its rates of poverty and unemployment. As of July 2016, the Tennessee Department of Economic and Community Development listed these 16 counties in Tennessee as being economically distressed based on these criteria. The Distressed County Criteria ranks in the worst 10% of the nation's counties and meets three economic indicators. Those indicators are:

1. Three Year Average Unemployment Rates
2. Per Capita Market Income- Per capita income or average income measures the average income earned per person in a given area (city, region, country, etc.) in a specified year. It is calculated by dividing the area's total income by its total population and;
3. Poverty Rate-The poverty rate is computed by dividing the number of persons living below the poverty threshold by the number of persons for whom poverty status has been determined.

10. Anticipated impact on households and State agency operations:

This waiver will provide consistency for households and State agency operations in areas that are economically distressed by being identified as having a low and declining employment-to-population ratio, lack of jobs in declining occupations or industries, or a 24-month average unemployment rate of 20 percent above the national average for the same 24-month period.

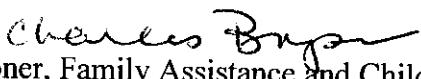
11. Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable):

The caseload for these areas, as of **June 2017**, represents 7.35% of the caseload for the state. There are no quality control procedures involved.

Labor Surplus & Economically Distressed Counties	
Contiguous Counties	SNAP Participating Individuals
Bledsoe County	2,934
Campbell County	10,533
Claiborne County	6,875
Cocke County	9,793
Fentress County	4,527
Grundy County	3,780
Hancock County	2,524

Hardeman County	5,287
Haywood County	4,548
Lake County	1,960
Lauderdale County	6,272
McNairy County	5,416
Perry County	1,574
Scott County	6,810
Van Buren County	1,017
Wayne County	2,405
Total Contiguous Counties SNAP Participating Individuals	76,255
Total State SNAP Participating Individuals	1,037,928

- 12. Anticipated implementation date and time period for which waiver is needed:**
The State is requesting a one-year waiver, from February 1, 2018 through February 28, 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:** Tennessee,
Lisa Cowell, Program Director 4, SNAP/EBT
- 15. Signature and title of requesting official:**

Name: Charles Bryson 
Title: Assistant Commissioner, Family Assistance and Child Support
Email for transmission of response: Charles.Bryson@tn.gov
- 16. Date of request:** August 2, 2017
- 17. State agency staff contact (name/email/telephone):** Lisa Cowell,
Lisa.Cowell@tn.gov, 615-741-5934
- 18. Regional office contact person (to be completed by FNS regional office):**

ABAWD Option Waiver Economically Distressed County Criteria Data

There are 17 Economically Distressed Counties in Tennessee for 2017 and 16 of which are Labor Surplus Counties based off Federal Regulation 7 CFR 273.24(f)(2). The three tabs below represent each of the economically distressed criteria that each county must contain. With this option 79 counties would be ABAWD counties and 16 counties would be waived.

Tab 1 - Unemployment rate per Economically Distressed County as of June 2017. In order to be a Labor Surplus County the unemployment rate must exceed 6%.

Tab 2 - Poverty level per Economically Distressed County based off USDA data as of 2015.

Tab 3 - Per Capita Market Income per Economically Distressed County from the Bureau of Economic Analysis for 2015.

****Please note that the fields highlighted in green on each of the worksheets represent the data that was compiled for each of the three economic indicators to be an Economically Distressed County.**

Economic Distress Criteria- Geographic Criteria: Year 2017 Month June

Source: <http://www.statsamerica.org/distress/distress.aspx> The Distress Tool

Distressed County	24 Month Unemployment	Threshold Calculation	BEA PCPI (Bureau of Economic Analysis Per Capita Personal Income)	Threshold Calculation	Census PCMI (2000) (Per Capita Money Income)	Threshold Calculation	ACS 5 Year PCMI (Per Capita Money Income)
Bledsoe	7.29%	2.37	\$20,719	43.1	\$13,889	64.3	\$18,061
Campbell	7.23%	2.31	\$30,981	64.4	\$13,301	61.6	\$18,117
Clalborne	6.55%	1.63	\$31,161	64.8	\$13,032	60.4	\$18,817
Cocke	6.91%	1.99	\$29,206	60.7	\$13,881	64.3	\$18,691
Fentress	6.41%	1.49	\$29,490	61.3	\$12,999	60.2	\$16,539
Grunddy	6.80%	1.88	\$28,975	60.2	\$12,039	55.8	\$16,356
Hancock	8.60%	3.68	\$23,733	49.3	\$11,986	55.5	\$15,169
Hardeman	6.64%	1.72	\$27,400	57.0	\$13,349	61.8	\$15,671
Haywood	7.06%	2.14	\$28,546	59.3	\$14,669	68.0	\$19,027
Lake	8.06%	3.14	\$24,256	50.4	\$10,794	50.0	\$12,810
Lauderdale	8.05%	3.13	\$26,617	55.3	\$13,682	63.4	\$15,769
McNairy	7.39%	2.47	\$29,105	60.5	\$16,385	75.9	\$17,751
Perry	6.58%	1.66	\$28,759	59.8	\$16,969	78.6	\$18,340
Scott	7.95%	3.03	\$27,231	56.6	\$12,927	59.9	\$18,709
Van Buren	6.59%	1.67	\$26,693	55.5	\$17,497	81.1	\$20,351
Wayne	6.76%	1.84	\$28,134	58.5	\$14,472	67.0	\$16,333

Economic Distressed Criteria- County Level Data Statistic for Poverty Levels from USDA: Source
https://data.ers.usda.gov/reports.aspx?ID=17826#P8e13b761cf4e49eae345c3e45bbb3f7_5_378iT4

			All People In Poverty (2015)		Children Ages 0-17 In Poverty (2015)		Labor Surplus County
FIPS	Distressed County	RUC Code	Percent	90% Confidence Interval of Estimate	Lower Bound	Upper Bound	
47007	Bledsoe	8	26.10%	20.3	31.9	42.1	Yes
47013	Campbell	2	26.20%	22.3	30.1	46.3	Yes
47025	Claiborne	6	21.60%	16.9	26.3	40.5	Yes
47029	Cocke	6	26.40%	21.9	30.9	48.0	Yes
47049	Fentress	9	25.70%	20.8	30.6	44.3	Yes
47061	Grundy	8	26.10%	20.8	31.4	44.8	Yes
47067	Hancock	8	30.10%	23.7	36.5	54.1	Yes
47069	Hardeman	6	24.20%	19.0	29.4	38.1	Yes
47075	Haywood	6	22.50%	18.0	27.0	40.2	Yes
47095	Lake	9	43.10%	33.3	52.9	57.8	Yes
47097	Lauderdale	6	26.20%	21.7	30.7	41.8	Yes
47109	McNairy	6	18.90%	15.1	22.7	33.4	Yes
47135	Perry	8	22.30%	18.0	26.6	40.2	Yes
47151	Scott	6	25.50%	20.6	30.4	41.2	Yes
47175	Van Buren	9	18.90%	14.8	23.0	37.5	Yes
47181	Wayne	8	25.40%	20.9	29.9	38.6	Yes

Economic Distressed Criteria- Per Capita Market Income				
County	Distressed County Name	Population	Per Capita Personal Income for 2015 (Bureau of Economic Analysis)	Labor Surplus County
4	Bledsoe	47,007	\$20,719.00	Yes
7	Campbell	47,013	\$30,981.00	Yes
13	Claiborne	47,025	\$31,161.00	Yes
15	Cocke	47,029	\$29,206.00	Yes
25	Fentress	47,049	\$29,490.00	Yes
31	Grundy	47,061	\$28,975.00	Yes
34	Hancock	47,067	\$23,733.00	Yes
35	Hardeman	47,069	\$27,400.00	Yes
38	Haywood	47,075	\$28,546.00	Yes
48	Lake	47,095	\$24,256.00	Yes
49	Lauderdale	47,097	\$26,617.00	Yes
65	McNairy	47,109	\$29,105.00	Yes
68	Perry	47,135	\$28,759.00	Yes
76	Scott	47,151	\$27,231.00	Yes
88	Van Buren	47,175	\$26,693.00	Yes
91	Wayne	47,181	\$28,134.00	Yes

Per Capita Personal Income- The personal income of a given area divided by the resident population of the area.

The definition of Per Capita Market Income- Per capita income or average income measures the average income earned per person in a given area (city, region, country, etc.) in a specified year. It is calculated by dividing the area's total income by its total population. Source: Google