

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2130033
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:** Vermont
6. **Region:** NERO
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 Vermont is requesting to exempt able-bodied adults without dependents (ABAWDs) in one county and 34 towns 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 Vermont seeks a waiver for one county and 34 towns based on their average unemployment rates for the 24-month period of April 2015 through March 2017. During this time period, the national average for unemployment was 5.0 percent; 20 percent above this was 5.9 percent. As detailed in the following tables, Essex County and 34 towns qualify based upon having an unemployment rate or belonging to a region with an aggregate average unemployment rate 20 percent above the national average for the selected 24-month time period.

The State of Vermont seeks a waiver for Essex County based on the county's average unemployment rate for the 24-month period of April 2015 to March 2017. The county's average unemployment rate for this period was 6.0 percent.

Bureau of Labor Statistics Local Area Unemployment Data April 2015 through March 2017			
County	Unemployed Total	Labor Force Total	Unemployment Rate
Essex County	3,942	65,808	6.0%
20% Above National Average Threshold	5.9%		

The State of Vermont would also like to request a waiver for three towns based on having individual unemployment rates that are 20 percent above the national average for the period of April 2015 – March 2017.

Bureau of Labor Statistics Local Area Unemployment Data April 2015 through March 2017			
Town	Unemployed Total	Labor Force Total	Unemployment Rate
Buels gore	27	377	7.2%
Hancock town	220	3,236	6.8%
Ira town	390	5,823	6.7%
20% Above National Average Threshold	5.9%		

The State of Vermont seeks a waiver for a regional group of 2 contiguous towns based on the region's aggregate average unemployment rate for the 24-month period of April 2015 to March 2017. The region's aggregate average unemployment rate for this period was 6.2 percent.

Bureau of Labor Statistics Local Area Unemployment Data April 2015 through March 2017		
Contiguous Towns	Unemployed Total	Labor Force Total
Alburgh town	1,507	24,198
Isle La Motte town	347	5,779
Combined Area Total	1,854	29,977
Combined Area Unemployment Rate	6.2%	
20% Above National Average Threshold	5.9%	

The State of Vermont seeks a waiver for a regional group of 19 contiguous towns and cities based on the region's aggregate average unemployment rate for the 24-month period of April 2015 to March 2017. 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 Towns	Unemployed Total	Labor Force Total
Barton town	2,058	30,127
Belvidere town	262	4,396
Brownington town	904	13,247
Burke town	1,037	19,669
Coventry town	649	13,261
Derby town	2,907	54,953
Eden town	1,461	17,862
Glover town	679	13,152
Holland town	339	8,555
Irasburg town	759	15,082
Jay town	666	7,588
Lowell town	649	10,504
Newark town	300	6,604
Newport city	3,000	42,476
Richford town	1,323	26,799
Sheffield town	400	7,486
Sutton town	524	10,826
Waterville town	472	9,188
Westfield town	286	7,202
Combined Area Total	18,675	318,977
Combined Area Unemployment Rate	5.9%	
20% Above National Average Threshold	5.9%	

The State of Vermont also seeks a waiver for a regional group of 3 contiguous towns based on the region's aggregate average unemployment rate for the 24-month period of April 2015 to March 2017. 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 Towns	Unemployed Total	Labor Force Total
Bridgewater town	618	13,753

Killington town	1,097	12,535
Pittsfield town	271	7,163
Combined Area Total	1,986	33,451
Combined Area Unemployment Rate	5.9%	
20% Above National Average Threshold	5.9%	

The State of Vermont also seeks a waiver for an additional regional group of 3 contiguous towns based on the region's aggregate average unemployment rate for the 24-month period of April 2015 to March 2017. The region's aggregate average unemployment rate for this period was 6.4 percent.

Bureau of Labor Statistics Local Area Unemployment Data April 2015 through March 2017		
Contiguous Towns	Unemployed Total	Labor Force Total
Dover town	981	15,363
Glastenbury town	0	144
Searsburg town	107	1,503
Combined Area Total	1,088	17,010
Combined Area Unemployment Rate	6.4%	
20% Above National Average Threshold	5.9%	

The State of Vermont also seeks a waiver for 4 towns in the Manchester Labor Market Area based on the region's aggregate average unemployment rate for the 24-month period of April 2015 to March 2017. The Labor Market Area used in this waiver request is defined by the U.S. Bureau of Labor Statistics.¹ The unemployment rate for the towns in the Manchester LMA for which Vermont is requesting the waiver was 6.0 percent.

Bureau of Labor Statistics Local Area Unemployment Data April 2015 through March 2017		
Manchester Labor Market Area	Unemployed Total	Labor Force Total
Mount Tabor town	129	2,844
Sandgate town	208	3,843
Stratton town	203	2,819
Wells town	673	10,821
Combined Area Total	1,213	20,327
Combined Area Unemployment Rate	6.0%	
20% Above National Average Threshold	5.9%	

¹ Map available from the Vermont Department of Labor at <http://www.vtlmi.info/lmadef2015.pdf>. Full listing of Labor Market Areas available from the Bureau of Labor Statistics: <http://www.bls.gov/lau/lmadir2015.xlsx>.

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 6/20/2017, represent 9.47% 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 October 1, 2017 through September 30, 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:

Vermont Department for Children and Families, Economic Service Division,
Aletha Hayden, 802-241-0613

15. Signature and title of requesting official:

Title:

Email for transmission of response:

16. Date of request: 6/20/2017

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

Aletha Hayden, 802-241-0613

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