



United States
Department of
Agriculture

Date: October 25, 2017

Food and
Nutrition Service

Mid-Atlantic Region

300 Corporate Blvd
Robbinsville, NJ
08691-1598

Subject: SNAP – West Virginia Waiver Request for extended suspension of time limits for Able Bodied Adults without Dependents (ABAWD) into FY2018 for certain counties

To: Lizbeth Silbermann
Director
Program Development Division

Attached please find a waiver request from West Virginia. The State agency has requested an extension of its current statewide waiver for ABAWD time limits. West Virginia would like to suspend the time limits through December 31, 2018 in 46 counties and institute time limits for ABAWDs in 9 counties. The 9 counties that will continue implement the time limits for ABAWDs are Berkeley, Cabell, Harrison, Jefferson, Kanawha, Marion, Monongalia, Morgan and Putman.

The extension request for the 46 counties is based upon having an unemployment rate that is twenty percent above the national average for a period of 24 months. The average monthly national unemployment rate for the June 2015 to May 2017 period was 4.9 percent. Twenty percent above this is 5.8 percent, the threshold to qualify for a waiver. West Virginia's average unemployment rate over this period was 6.0 percent. WV has provided relevant data for the time period which supports this request. Therefore, we recommend approval of this waiver.

If you have any questions, please contact Kelly Boger of my staff at (609) 259-5009 or Kelly.Boger@fns.usda.gov.

A handwritten signature in black ink, appearing to read "David Gagliardi", is located below the text of the letter.

DAVID GAGLIARDI
Branch Chief
Program Operations
Supplemental Nutrition Assistance Program

Attachment

e-cc: Daiquiri Anderson, Kelly Boger, Derrick Dolphin, Eric Ratchford

WAIVER REQUEST

Waiver of Reinstatement

1. **Waiver Serial Number:** 2150031
2. **Type of Request:** Extension
3. **Regulatory Citation:** 7 CFR 273.24
4. **State:** West Virginia
5. **Region:** MARO

6. Regulatory Requirements:

Under 7 CFR 273.24(b), certain 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 countable months during any three year period in which the individual was subject to, but did not comply with, the SNAP ABAWD 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.

7. Description of Alternative Procedures:

The State of West Virginia is requesting to exempt Able-Bodied Adults Without Dependents (ABAWDs) in 46 of the 55 counties in the state. The ABAWD time limits will be operated in the following nine counties: Berkeley, Cabell, Harrison, Jefferson, Kanawha, Marion, Monongalia, Morgan and Putnam.

8. Justification for Request:

West Virginia is requesting this waiver to exempt residents residing in the 46 counties of the State from the time limit due to having insufficient jobs. Under 7 CFR 273.24(f)(3)(iii), a State can support a claim of a lack of jobs in the State by providing evidence that the State "...has a 24 month average unemployment rate that exceeds the national average by 20 percent for any 24-month period no earlier than the same

period the ETA uses designate LSAs for the current fiscal year.” The average unemployment rate for West Virginia from June, 2015 – May, 2017 was 6.0%, with the national average over the same time period 4.9%. This places West Virginia more than 20% above the national average in terms of unemployment rates.

9. 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.

10. Caseload Information, Including Percent, Characteristics, and Quality Control Error Rate for Affection Portion (If Applicable):

The caseload for these areas, as of May 31, 2017, represents 71% of the ABAWD population caseload for the State. There are no quality control procedures involved.

11. 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.

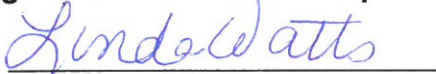
12. Proposed Quality Control Review Procedures:

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

13. State Agency Submitting Waiver Request and State Contact Person:

The State of West Virginia, Department of Health and Human Resources.
State contact person: Monica Hamilton

14. Signature and Title of Requesting Official:



Linda Watts, Commissioner
Bureau for Children and Families
West Virginia Department of Health and Human Resources

15. Date of Request: October 2, 2017

16. State Agency Staff Contact (Name/Email/Telephone):

Monica Hamilton, Monica.A.Hamilton@wv.gov, (304) 356-4620

17. Regional Office Contact Person (to be completed by FNS Regional office):

WEST VIRGINIA IS ELIGIBLE FOR WAIVERS ON THE BASIS OF
JUN 2015 - MAY 2017
UNEMPLOYMENT RATES

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

	from Step 2	from Step 4	Step 5		Step 6	Step 7
	JUN 2015 - MAY 2017	JUN 2015 - MAY 2017	JUN 2015 - MAY 2017 Average Unemployment Rate (unrounded)	JUN 2015 - MAY 2017 Average Unemployment Rate (4 decimal places)	JUN 2015 - MAY 2017 Average Unemployment Rate (multiply by 100)	JUN 2015 - MAY 2017 Average Unemployment Rate (one decimal place)
	Total labor force	Total number of unemployed				
West Virginia	18,778,013	1,119,063	0.059594	0.0595	5.95	6.0
National Unemployment	3,810,817	185,404	0.048652	0.0486	4.86	4.9
Threshold - 20% Above the National Average				0.0583	5.83	5.8

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

Labor Force Statistics from the Current Population Survey
Original Data Value

Not Seasonally Adjusted

Type of data: Number in
 Age: 16 years
 Years: 2015 to 2017

24-Month Unemployment Averages									
Year	Month	Civilian labor force	Unemployment ment	Start date	End date	Civilian labor force	Unemployment	Unemployment Rate (Rounded)	20% Above the National Average (Rounded)
2015	Jan	156050	9498	Jan-15	Dec-16	3,795,805	192,568	5.1	6.1
2015	Feb	156213	9095	Feb-15	Jan-17	3,798,431	191,219	5.0	6.0
2015	Mar	156318	8682	Mar-15	Feb-17	3,801,700	190,011	5.0	6.0
2015	Apr	156554	7966	Apr-15	Mar-17	3,805,294	188,613	5.0	5.9
2015	May	157719	8370	May-15	Apr-17	3,808,557	187,202	4.9	5.9
2015	Jun	158283	8638	Jun-15	May-17	3,810,817	185,404	4.9	5.8
2015	Jul	158527	8805						
2015	Aug	157390	8162						
2015	Sep	156607	7628						
2015	Oct	157313	7597						
2015	Nov	157340	7573						
2015	Dec	157245	7542						
2016	Jan	157347	8309						
2016	Feb	158279	8219						
2016	Mar	158854	8116						
2016	Apr	158488	7413						
2016	May	158800	7207						
2016	Jun	160135	8144						
2016	Jul	160705	8267						
2016	Aug	159800	7996						
2016	Sep	159636	7658						
2016	Oct	159783	7447						
2016	Nov	159451	7066						
2016	Dec	158968	7170						
2017	Jan	158676	8149						
2017	Feb	159482	7887						
2017	Mar	159912	7284						
2017	Apr	159817	6555						
2017	May	159979	6572						

Local Area Unemployment Statistics

Original Data Value

Series Id: LAUST5400000000000003,LAUST5400000000000004,LAUST540000000000

Not Seasonally Adjusted

Area: West Virginia

Area Type: Statewide

State/Region West Virginia

Years: 2015 to 2017

Year	Period	labor force	employment	unemployment	unemployment rate
2015	Jan	772756	715554	57202	7.4
2015	Feb	778066	716597	61469	7.9
2015	Mar	776224	716517	59707	7.7
2015	Apr	785695	730178	55517	7.1
2015	May	788860	734459	54401	6.9
2015	Jun	799077	741469	57608	7.2
2015	Jul	794186	738650	55536	7.0
2015	Aug	787186	734168	53018	6.7
2015	Sep	782634	736637	45997	5.9
2015	Oct	783633	739476	44157	5.6
2015	Nov	777074	732601	44473	5.7
2015	Dec	773280	727336	45944	5.9
2016	Jan	774279	718376	55903	7.2
2016	Feb	780879	722025	58854	7.5
2016	Mar	776928	723685	53243	6.9
2016	Apr	782789	735209	47580	6.1
2016	May	785503	740155	45348	5.8
2016	Jun	795837	747066	48771	6.1
2016	Jul	791694	746267	45427	5.7
2016	Aug	787513	740659	46854	5.9
2016	Sep	787174	744425	42749	5.4
2016	Oct	788123	746351	41772	5.3
2016	Nov	779129	740379	38750	5.0
2016	Dec	771785	732524	39261	5.1
2017	Jan	770527	722938	47589	6.2
2017	Feb	776080	729642	46438	6.0
2017	Mar	770989	728165	42824	5.6
2017	Apr	781038	742301	38737	5.0
2017	May	780676	748446	32230	4.1

Alaska 36-Month Unemployment Averages

Start date	End date	labor force	Unemployment	Unemployment Rate (Rounded)
Jan-15	Dec-16	18,800,304	1,199,541	6.4
Feb-15	Jan-17	18,798,075	1,189,928	6.3
Mar-15	Feb-17	18,796,089	1,174,897	6.3
Apr-15	Mar-17	18,790,854	1,158,014	6.2
May-15	Apr-17	18,786,197	1,141,234	6.1
Jun-15	May-17	18,778,013	1,119,063	6