

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2150033
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:** Arizona
6. **Region:** WRO

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 Arizona is requesting to exempt able-bodied adults without dependents (ABAWDs) in 12 counties, one city, and 15 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 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 Arizona seeks a waiver for a group of 12 contiguous counties based on the region's aggregate average unemployment rate for the 24-month period of March 2016 through February 2018. The average national unemployment rate for this period was 4.5 percent; 20 percent above this was 5.4 percent. The region's aggregate average unemployment rate for this period was 8.1 percent.

Bureau of Labor Statistics Local Area Unemployment Data March 2016 through February 2018		
County	Unemployed Total	Labor Force Total
Apache	52,871	488,249
Cochise	69,500	1,184,369
Coconino	103,312	1,797,356
Gila	33,121	508,535
Graham	20,582	345,506
Greenlee	5,707	94,752
La Paz	11,699	205,914
Mohave	120,259	1,960,001
Navajo	77,757	992,302
Pinal	209,601	4,004,961
Santa Cruz	44,532	456,713
Yuma	403,134	2,269,632
Combined Area Total	1,152,075	14,308,290
Combined Area Unemployment Rate	8.1%	
20% Above National Average Threshold	5.4%	

The State requests to waive one independent city based on having an unemployment rate that is 20 percent above the national average for the period of March 2016 through February 2018. The city's unemployment rate was 13.0 percent, above the national average threshold for the same time period.

Bureau of Labor Statistics Local Area Unemployment Data March 2016 through February 2018			
City	Unemployed	Labor Force	Unemployment Rate
Apache Junction city, Maricopa County part	206	1,588	13.0%
20% Above National Average Threshold			5.4%

The State requests to waive the following reservations based on having average unemployment rates exceeding the national average for a recent 24-month period. The reservation unemployment rates were calculated by applying 2016 American Community Survey¹ share ratios to county-level Bureau of Labor Statistics data from March 2016 through February 2018. The following table summarizes the calculations:

¹ These calculations are based on data from the 2012-2016 American Community Survey 5-Year Estimates.

Bureau of Labor Statistics Local Area Unemployment/Census Bureau Data March 2016 through February 2018			
	Unemployed	Labor Force	Unemployment Rate
Yuma County (part); Arizona (part); Cocopah Reservation, AZ	2,605	8,550	30.5%
Total Cocopah Reservation	2,605	8,550	30.5%

La Paz County (part); Arizona (part); Colorado River Indian Reservation, AZ--CA	6,752	108,192	6.2%
Total Colorado River Reservation	6,752	108,192	6.2%

Apache County (part); Arizona (part); Fort Apache Reservation, AZ	1,604	5,300	30.3%
Gila County (part); Arizona (part); Fort Apache Reservation, AZ	3,023	15,082	20.0%
Navajo County (part); Arizona (part); Fort Apache Reservation, AZ	21,946	102,594	21.4%
Total Fort Apache Reservation	26,573	122,977	21.6%

Maricopa County (part); Arizona (part); Fort McDowell Yavapai Nation Reservation, AZ	659	8,036	8.2%
Total Fort McDowell Yavapai Nation Reservation	659	8,036	8.2%

Mohave County (part); Arizona (part); Fort Mojave Reservation and Off-Reservation Trust Land, AZ--CA--NV	920	8,287	11.1%
Total Fort Mojave Reservation	920	8,287	11.1%

Maricopa County (part); Arizona (part); Gila River Indian Reservation, AZ	6,349	36,002	17.6%
Pinal County (part); Arizona (part); Gila River Indian Reservation, AZ	10,801	67,098	16.1%
Total Gila River Reservation	17,150	103,100	16.6%

Coconino County (part); Arizona (part); Havasupai Reservation, AZ	247	740	33.4%
Total Havasupai Reservation	247	740	33.4%

Coconino County (part); Arizona (part); Hualapai Indian Reservation and Off- Reservation Trust Land, AZ	0	0	-
Mohave County (part); Arizona (part); Hualapai Indian Reservation and Off- Reservation Trust Land, AZ	1,381	12,279	11.2%
Yavapai County (part); Arizona (part); Hualapai Indian Reservation and Off- Reservation Trust Land, AZ	0	0	-
Total Hualapai Reservation	1,381	12,279	11.2%

Pinal County (part); Arizona (part); Maricopa (Ak Chin) Indian Reservation and Off-Reservation Trust Land, AZ	1,643	12,221	13.4%
Total Maricopa Reservation	1,643	12,221	13.4%

Apache County (part); Arizona (part); Navajo Nation Reservation and Off- Reservation Trust Land, AZ--NM--UT	42,892	341,037	12.6%
Coconino County (part); Arizona (part); Navajo Nation Reservation and Off- Reservation Trust Land, AZ--NM--UT	27,243	222,942	12.2%
Navajo County (part); Arizona (part); Navajo Nation Reservation and Off- Reservation Trust Land, AZ--NM--UT	22,548	171,751	13.1%

Total Navajo Nation Reservation	92,683	735,730	12.6%
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Pima County (part); Arizona (part); Pascua Pueblo Yaqui Reservation and Off-Reservation Trust Land, AZ	3,955	31,999	12.4%
Total Pascua Pueblo Yaqui Reservation	3,955	31,999	12.4%

Maricopa County (part); Arizona (part); Salt River Reservation, AZ	5,897	55,837	10.6%
Total Salt River Reservation	5,897	55,837	10.6%

Gila County (part); Arizona (part); San Carlos Reservation, AZ	9,256	47,598	19.4%
Graham County (part); Arizona (part); San Carlos Reservation, AZ	7,501	35,844	20.9%
Pinal County (part); Arizona (part); San Carlos Reservation, AZ	0	0	-
Total San Carlos Reservation	16,757	83,442	20.1%

Maricopa County (part); Arizona (part); Tohono O'odham Nation Reservation and Off-Reservation Trust Land, AZ	1094.845276	4,977	22.0%
Pima County (part); Arizona (part); Tohono O'odham Nation Reservation and Off-Reservation Trust Land, AZ	12,269	74,957	16.4%
Pinal County (part); Arizona (part); Tohono O'odham Nation Reservation and Off-Reservation Trust Land, AZ	743	6,610	11.2%
Total Tohono O'odham Nation Reservation	14,106	86,545	16.3%

Yavapai County (part); Arizona (part); Yavapai-Apache Nation Reservation, AZ	1,155	8,667	13.3%
Total Yavapai-Apache Reservation	1,155	8,667	13.3%

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 affected portion (if applicable):

The caseload for these areas represent **27.63 percent** of the caseload for the state. During the 2017 Federal Fiscal Year, Arizona cited 252 case and procedural errors; of these cases, ten (10) were ABAWDs. Three (3) were active quality control errors.

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

The State is requesting a one-year waiver, from January 1, 2019 through December 31, 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:

Gretchen Caraway, Policy Administrator
Arizona Department of Economic Security
Employment and Rehabilitation Services

15. Signature and title of requesting official:



Chevera Trillo, Workforce Development Administrator
Arizona Department of Economic Security
Employment and Rehabilitation Services
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16. Date of request: 08/28/18

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

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