

## McConnell, Casey - FNS

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**From:** Malveaux, Eugene - FNS  
**Sent:** Friday, November 16, 2018 9:29 AM  
**To:** Gersten-Paal, Sasha - FNS; McConnell, Casey - FNS  
**Cc:** Fouts, Peggy - FNS; Daniel, Yolaunda - FNS; Daniels, Gwen - FNS  
**Subject:** FW: ABAWD Waiver

Good Morning,

Please see the request below from GA to make the pending ABAWD waiver request effective November 1<sup>st</sup>.

Let us know if you have any questions.

Thanks.

Gene

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**From:** Anderson, Jon <[Jon.Anderson@dhs.ga.gov](mailto:Jon.Anderson@dhs.ga.gov)>  
**Sent:** Friday, November 16, 2018 7:45 AM  
**To:** Fouts, Peggy - FNS <[Peggy.Fouts@fns.usda.gov](mailto:Peggy.Fouts@fns.usda.gov)>  
**Cc:** Donald, Kimberlin M <[Kimberlin.Donald@dhs.ga.gov](mailto:Kimberlin.Donald@dhs.ga.gov)>; Young, Tatrina J <[Tatrina.Young@dhs.ga.gov](mailto:Tatrina.Young@dhs.ga.gov)>; McCall, Brian - FNS <[Brian.McCall@fns.usda.gov](mailto:Brian.McCall@fns.usda.gov)>  
**Subject:** ABAWD Waiver

Georgia would like to make our waiver effective November 1<sup>st</sup>. We have a few modifications in our system and some additional infrastructure items to complete before we go Statewide.

Once we have those items complete, we fully intend to quickly eliminate our waiver.

Thank you for your consideration.

Jon



**JON M ANDERSON** | CHIEF DEPUTY DIVISION DIRECTOR  
**GEORGIA DIVISION OF FAMILY & CHILDREN SERVICES**

2 Peachtree St, 21.440 | Atlanta, GA 30303  
O. 404-657-3700 C. 404-596-9562 F. 678-717-5946

EMAIL: [JON.ANDERSON@DHS.GA.GOV](mailto:JON.ANDERSON@DHS.GA.GOV)  
[DFCS.GEORGIA.GOV](http://DFCS.GEORGIA.GOV)



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SAFE CHILDREN. STRENGTHENED FAMILIES. STRONGER GEORGIA.**



October 16, 2018

Peggy Fouts, Regional Director  
USDA Supplemental Nutrition Assistance Program  
Southeast Regional Office  
6 Forsyth Street, NW, Suite 8 -T36  
Atlanta, Georgia 30303

Dear Ms. Fouts,

The Georgia Food Stamp Employment and Training (E&T) Program is submitting a request to extend the ABAWD Waiver through December 31, 2019 in 135 of Georgia's 159 counties. Georgia will operate a voluntary E&T program in its 24-time limited counties. The State of Georgia seeks a waiver for a regional group of 135 contiguous counties based on the region's aggregate average unemployment rate for the 24-month period of March 2016 through February 2018. The national average 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 5.4 percent. The waiver is attached for your review.

Upon approval, the following 24 counties will be subject to the ABAWD time limit rule: Banks, Barrow, Catoosa, Cherokee, Clarke, Cobb, Columbia, Coweta, Dawson, Fayette, Forsyth, Gwinnett, Hall, Harris, Jackson, Jasper, Jones, Lumpkin, Madison, Paulding, Pickens, Terrell, Union and White effective January 1, 2019.

If you have any questions regarding this waiver, please contact Tatrina Young, SNAP E&T Coordinator at (404) 463- 0877. Thank you in advance for your consideration of this request.

Sincerely,

Tom C. Rawlings  
Interim Division Director

Enclosures: GA 2019 ABAWD Waiver

cc: Jon Anderson, Chief Deputy Division Director  
Carla Fairley, Assistant Division Deputy Director  
Ann C. Carter, OFI State Operations Director  
Melissa Belk, Quality Operations Director  
Kimberlin Donald, SNAP Director  
Tatrina Young, SNAP E&T Coordinator

## **STATE WAIVER REQUEST**

- 1. Waiver Serial Number (if applicable):** 2150036
- 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:** Georgia
- 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 Georgia is requesting to exempt able-bodied adults without dependents (ABAWDs) in 135 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 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 Georgia seeks a waiver for a regional group of 135 contiguous counties based on the region's aggregate average unemployment rate for the 24-month period of March 2016 through February 2018. The national average 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 5.4 percent.

**Bureau of Labor Statistics Local Area Unemployment Data  
March 2016 through February 2018**

| <b>Contiguous Counties</b> | <b>Unemployed Total</b> | <b>Labor Force Total</b> |
|----------------------------|-------------------------|--------------------------|
| Appling County             | 12,961                  | 222,083                  |
| Atkinson County            | 4,696                   | 98,360                   |
| Bacon County               | 5,825                   | 121,424                  |
| Baker County               | 1,983                   | 28,973                   |
| Baldwin County             | 27,000                  | 426,529                  |
| Bartow County              | 56,525                  | 1,182,183                |
| Ben Hill County            | 10,502                  | 132,766                  |
| Berrien County             | 9,607                   | 176,311                  |
| Bibb County                | 92,795                  | 1,664,795                |
| Bleckley County            | 7,998                   | 109,423                  |
| Brantley County            | 10,578                  | 172,709                  |
| Brooks County              | 8,169                   | 170,805                  |
| Bryan County               | 18,384                  | 412,866                  |
| Bulloch County             | 46,589                  | 883,075                  |
| Burke County               | 16,498                  | 226,005                  |
| Butts County               | 12,930                  | 254,029                  |
| Calhoun County             | 2,849                   | 52,918                   |
| Camden County              | 26,717                  | 496,707                  |
| Candler County             | 5,450                   | 124,911                  |
| Carroll County             | 70,411                  | 1,309,785                |
| Charlton County            | 6,112                   | 115,468                  |
| Chatham County             | 158,115                 | 3,315,340                |
| Chattahoochee County       | 3,814                   | 49,875                   |
| Chattooga County           | 13,303                  | 253,464                  |
| Clay County                | 1,992                   | 21,065                   |
| Clayton County             | 195,511                 | 3,201,423                |
| Clinch County              | 3,858                   | 67,078                   |
| Coffee County              | 24,050                  | 440,730                  |
| Colquitt County            | 25,059                  | 523,590                  |
| Cook County                | 8,998                   | 183,930                  |
| Crawford County            | 7,388                   | 137,682                  |
| Crisp County               | 12,398                  | 224,909                  |
| Dade County                | 9,101                   | 196,749                  |
| Decatur County             | 16,681                  | 278,538                  |
| DeKalb County              | 470,082                 | 9,381,687                |
| Dodge County               | 11,291                  | 170,206                  |

|                   |         |            |
|-------------------|---------|------------|
| Dooly County      | 6,500   | 121,315    |
| Dougherty County  | 59,163  | 930,947    |
| Douglas County    | 88,114  | 1,720,514  |
| Early County      | 6,459   | 107,929    |
| Echols County     | 1,834   | 46,018     |
| Effingham County  | 30,303  | 692,398    |
| Elbert County     | 11,119  | 188,224    |
| Emanuel County    | 14,520  | 206,224    |
| Evans County      | 5,314   | 117,042    |
| Fannin County     | 13,114  | 263,315    |
| Floyd County      | 58,019  | 1,057,891  |
| Franklin County   | 11,802  | 239,155    |
| Fulton County     | 654,042 | 13,023,783 |
| Gilmer County     | 15,148  | 286,327    |
| Glascocock County | 1,677   | 30,999     |
| Glynn County      | 46,699  | 951,652    |
| Gordon County     | 31,464  | 628,735    |
| Grady County      | 12,877  | 252,956    |
| Greene County     | 8,812   | 161,853    |
| Habersham County  | 22,459  | 464,652    |
| Hancock County    | 4,662   | 61,365     |
| Haralson County   | 15,274  | 297,301    |
| Hart County       | 12,869  | 268,693    |
| Heard County      | 6,525   | 122,321    |
| Henry County      | 135,924 | 2,668,229  |
| Houston County    | 82,205  | 1,650,622  |
| Irwin County      | 5,718   | 78,181     |
| Jeff Davis County | 9,104   | 148,435    |
| Jefferson County  | 10,789  | 161,090    |
| Jenkins County    | 5,405   | 76,601     |
| Johnson County    | 5,252   | 95,475     |
| Lamar County      | 11,513  | 193,267    |
| Lanier County     | 4,952   | 92,763     |
| Laurens County    | 28,633  | 463,690    |
| Lee County        | 15,624  | 355,939    |
| Liberty County    | 33,430  | 614,106    |
| Lincoln County    | 4,747   | 85,266     |
| Long County       | 9,332   | 182,655    |
| Lowndes County    | 60,982  | 1,242,224  |
| Macon County      | 8,467   | 113,622    |

|                   |         |           |
|-------------------|---------|-----------|
| Marion County     | 5,301   | 81,753    |
| McDuffie County   | 14,230  | 214,340   |
| McIntosh County   | 7,818   | 146,075   |
| Meriwether County | 13,298  | 214,302   |
| Miller County     | 3,252   | 67,399    |
| Mitchell County   | 13,092  | 205,081   |
| Monroe County     | 14,958  | 315,999   |
| Montgomery County | 6,300   | 90,608    |
| Morgan County     | 10,085  | 213,866   |
| Murray County     | 24,845  | 378,466   |
| Muscogee County   | 120,563 | 1,901,368 |
| Newton County     | 68,119  | 1,225,293 |
| Oglethorpe County | 7,677   | 170,735   |
| Peach County      | 17,557  | 278,617   |
| Pierce County     | 10,117  | 209,865   |
| Pike County       | 9,725   | 205,987   |
| Polk County       | 24,462  | 440,240   |
| Pulaski County    | 5,390   | 98,743    |
| Putnam County     | 12,163  | 194,042   |
| Quitman County    | 1,291   | 19,765    |
| Rabun County      | 8,735   | 164,267   |
| Randolph County   | 4,381   | 59,999    |
| Richmond County   | 129,197 | 2,068,931 |
| Rockdale County   | 57,748  | 1,060,631 |
| Schley County     | 2,975   | 51,069    |
| Screven County    | 8,620   | 126,505   |
| Seminole County   | 5,245   | 74,669    |
| Spalding County   | 41,850  | 679,044   |
| Stephens County   | 14,617  | 265,116   |
| Stewart County    | 3,204   | 53,226    |
| Sumter County     | 22,150  | 310,134   |
| Talbot County     | 4,209   | 66,742    |
| Taliaferro County | 914     | 13,517    |
| Tattnall County   | 11,720  | 228,435   |
| Taylor County     | 5,987   | 73,630    |
| Telfair County    | 9,188   | 115,199   |
| Terrell County    | 5,480   | 89,405    |
| Thomas County     | 25,033  | 417,515   |
| Tift County       | 22,716  | 455,789   |
| Toombs County     | 20,058  | 285,932   |

|                                             |                  |                   |
|---------------------------------------------|------------------|-------------------|
| Towns County                                | 6,293            | 94,613            |
| Treutlen County                             | 4,634            | 65,968            |
| Troup County                                | 41,876           | 897,621           |
| Turner County                               | 4,765            | 78,809            |
| Twiggs County                               | 5,719            | 71,243            |
| Upson County                                | 15,891           | 269,774           |
| Walker County                               | 35,628           | 731,380           |
| Walton County                               | 48,217           | 1,063,618         |
| Ware County                                 | 18,438           | 379,355           |
| Warren County                               | 4,117            | 65,333            |
| Washington County                           | 10,792           | 175,581           |
| Wayne County                                | 16,807           | 272,140           |
| Webster County                              | 1,871            | 23,550            |
| Wheeler County                              | 3,736            | 41,972            |
| Whitfield County                            | 62,022           | 1,083,320         |
| Wilcox County                               | 4,252            | 65,647            |
| Wilkes County                               | 5,521            | 91,058            |
| Wilkinson County                            | 5,369            | 90,565            |
| Worth County                                | 11,765           | 222,831           |
| <b>Combined Area Total</b>                  | <b>4,089,049</b> | <b>76,408,842</b> |
| <b>Combined Area Unemployment Rate</b>      | <b>5.4%</b>      |                   |
| <b>20% Above National Average Threshold</b> | <b>5.4%</b>      |                   |

**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):**

Georgia is working on acquiring this information for FFY18. There have been challenges with generating reports using the State's new eligibility certification system. However, in FFY17 the caseload for these areas represented 46.77% 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, 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: Same as below**

**15. Signature and title of requesting official:**



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Jon Anderson

Chief Deputy Division Director

Email for transmission of response: Jon.Anderson@dhs.ga.gov

**16. Date of request:** October 4, 2018

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

Kimberlin Donald

SNAP Director

Kimberlin.Donald@dhs.ga.gov

(404) 657-3608

Tatrina Young

SNAP E&T Coordinator

Tatrina.Young@dhs.ga.gov

(404) 463-0877

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