

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2150040
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:** Idaho
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 Idaho is requesting to exempt able-bodied adults without dependents (ABAWDs) in 10 counties and 3 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 Idaho seeks a waiver for a region of 10 contiguous counties based on the region's aggregate average unemployment rate for the 24-month period of January 2016 through December 2017. The national average unemployment rate for this period was 4.6 percent; 20 percent above this was 5.5 percent. The region's aggregate average unemployment rate for this period was 5.5 percent.

Bureau of Labor Statistics Local Area Unemployment Data January 2016 through December 2017		
Contiguous Counties	Unemployed Total	Labor Force Total
Adams County	2,633	41,861
Benewah County	5,486	95,968
Bonner County	22,508	455,785
Boundary County	6,127	122,777
Clearwater County	5,172	72,998
Idaho County	7,996	150,893
Lemhi County	4,670	82,489
Lewis County	2,351	38,711
Shoshone County	8,124	121,768
Washington County	5,605	110,422
Combined Area Total	70,672	1,293,672
Combined Area Unemployment Rate	5.5%	
20% Above National Average Threshold	5.5%	

The state also seeks a waiver for 3 reservations: Duck Valley, Fort Hall, and Nez Perce Reservations. During the period of January 2016 through December 2017, each of these reservations had an average unemployment rate 20 percent higher than the national average unemployment rate during the same period. The reservation unemployment rates were calculated by applying 2012-2016 5-year American Community Survey (ACS) share ratios to county-level Bureau of Labor Statistics data for January 2016 – December 2017.

Bureau of Labor Statistics Local Area Unemployment/Census Bureau Data January 2016 through December 2017			
	Unemployed	Labor Force	Unemployment Rate
Owyhee County (part); Idaho (part); Duck Valley Reservation, NV--ID	471	2,612	18.0%
Duck Valley Reservation	471	2,612	18.0%

Bannock County (part); Idaho (part); Fort Hall Reservation and Off- Reservation Trust Land, ID	2,884	24,897	11.6%
Bingham County (part); Idaho (part); Fort Hall Reservation and Off- Reservation Trust Land, ID	3,556	28,176	12.6%

Caribou County (part); Idaho (part); Fort Hall Reservation and Off- Reservation Trust Land, ID	-	-	
Power County (part); Idaho (part); Fort Hall Reservation and Off- Reservation Trust Land, ID	418	10,811	3.9%
Fort Hall Reservation	6,858	63,884	10.7%

Clearwater County (part); Idaho (part); Nez Perce Reservation, ID	3,577	45,210	7.9%
Idaho County (part); Idaho (part); Nez Perce Reservation, ID	2,565	37,598	6.8%
Lewis County (part); Idaho (part); Nez Perce Reservation, ID	2,351	38,711	6.1%
Nez Perce County (part); Idaho (part); Nez Perce Reservation, ID	3,236	50,193	6.4%
Nez Perce Reservation	11,728	171,712	6.8%

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 August 2018, represent 8.2% 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:

15. Signature and title of requesting official:



Julie Hammon, Administrator

Email for transmission of response: Kristin.Matthews@dhw.idaho.gov

16. Date of request: September 10, 2018

17. State agency staff contact (name/email/telephone): Kristin Matthews,
208-860-8170, Kristin.Matthews@dhw.idaho.gov

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