



**CABINET FOR HEALTH AND FAMILY SERVICES
DEPARTMENT FOR COMMUNITY BASED SERVICES
Commissioner's Office
COA ACCREDITED AGENCY**

Matthew G. Bevin
Governor

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Adam Meier
Secretary

July 20, 2018

Peggy Fouts
Regional Director
USDA Food and Nutrition Services
Southeast Regional Office
61 Forsyth Street, S. W. Room 8T36
Atlanta, GA 30303

Dear Ms. Fouts:

Enclosed for your review is the Supplemental Nutrition Assistance Program (SNAP) Able-bodied Adults Without Dependents (ABAWDS) time limit waiver extension request. Kentucky is requesting to exempt ABAWDS from the SNAP time limits at 7 CFR 273.24 from January 1, 2019 to December 31, 2019.

If you have any questions regarding this request, please contact Ann Supplee at (502) 564-3440. Your assistance is greatly appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric T. Clark".

Eric T. Clark
Commissioner

Enclosures

STATE WAIVER REQUEST

1. Waiver Serial Number (if applicable):

2150037

2. Type of request:

Extension and modification

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:

Kentucky

6. Region:

SERO

7. Regulatory requirements:

Under 7 CFR 273.24(b) 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 months during any 3 year period in which the individual was subject to, but did not comply with, the SNAP 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.

8. Description of alternative procedures:

The State of Kentucky is requesting to exempt able-bodied adults without dependents (ABAWDs) in 8 counties (Bell, Clay, Harlan, Knox, Leslie, Letcher, Perry and Whitley) 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 qualify for an ABAWD time limit waiver if they have insufficient jobs. To support this claim, states may submit evidence that an area has an average unemployment rate for a 24-month time period that is at least 20 percent above the national average for the same 24-month period. 7 CFR 273.24(f)(6) provides that States may define areas to be waived.

STATE WAIVER REQUEST

The State of Kentucky seeks a waiver for a region of contiguous counties based on its average unemployment rate that is 20 percent above the national average for the 24-month period of **May 2016 to April 2018**. The national average unemployment rate for this 24-month period was 4.4 percent; 20 percent above this was **5.3** percent. The unemployment rate for the region was 8.1 percent for the same time period.

May 2016 to April 2018 (Averaged)		
County	Total Unemployed	Total Labor Force
Bell County, KY	16,608	209,980
Clay County, KY	11,561	135,498
Harlan County, KY	16,694	168,134
Knox County, KY	17,982	243,430
Leslie County, KY	7,126	66,986
Letcher County, KY	15,089	157,066
Perry County, KY	17,943	207,479
Whitley County, KY	19,154	328,020
Total Region	122,157	1,516,953
Combined Region Unemployment Rate	8.1	
20% Above National Average Threshold	5.3	

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 affection portion (if applicable):

The caseload for these areas, as of May 2018, represent 15% 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 twelve (12) month waiver, from January 1, 2019 through December 31, 2019.

13. Proposed quality control review procedures:

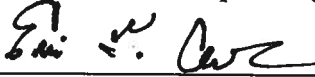
There are no special quality control procedures needed in conjunction with this waiver.

14. State agency submitting waiver request and State contact person:

KY Cabinet for Health and Family Services
Department for Community Based Services
275 East Main St
Frankfort, KY 40621
Ann Supplee, Internal Policy Analyst III

STATE WAIVER REQUEST

15. Signature and title of requesting official:



Title: Commissioner

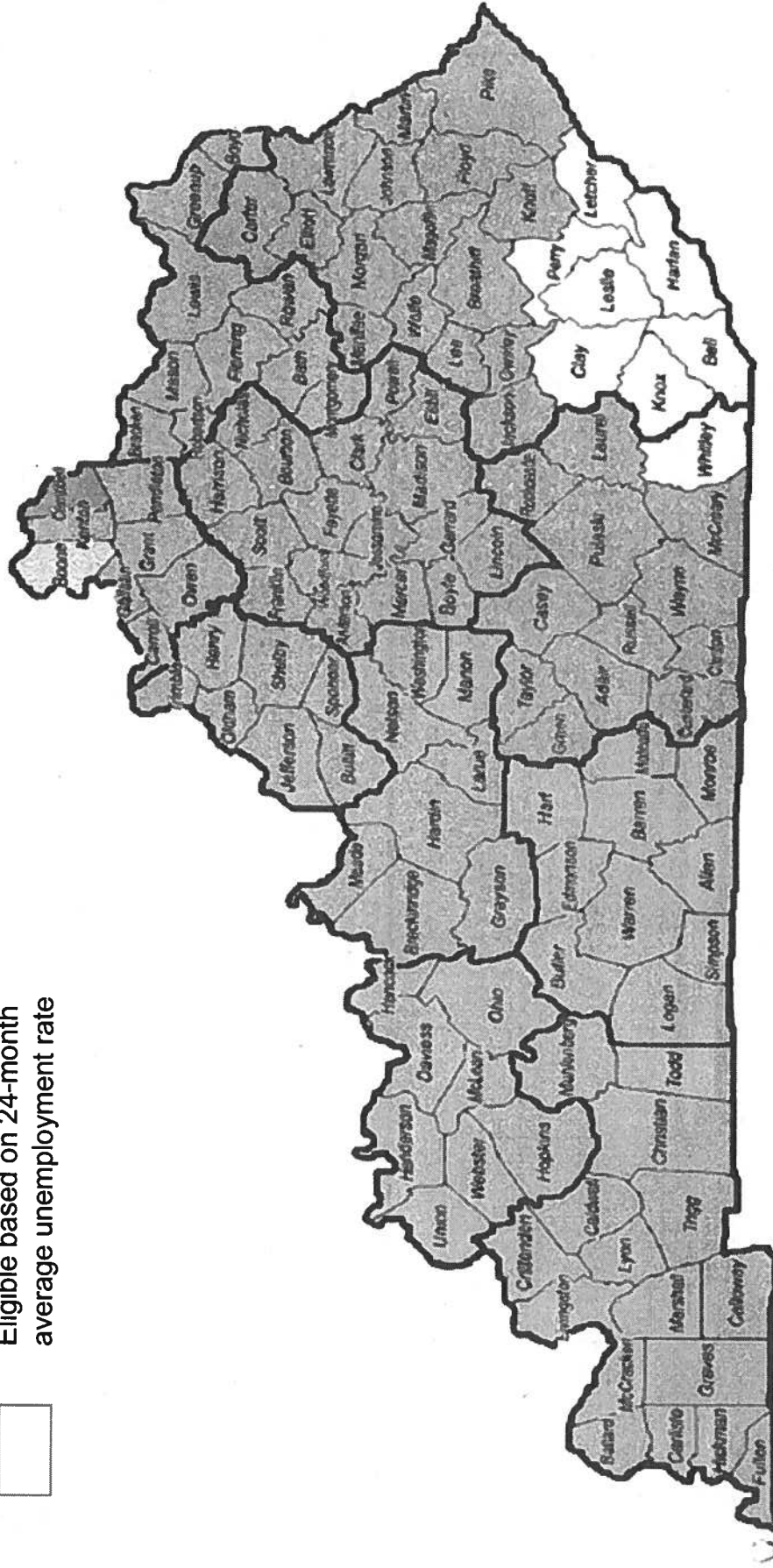
Email for transmission of response: EricT.Clark@ky.gov

16. Date of request: 07/09/2018

**17. State agency staff contact (name/email/telephone): Ann Supplee –
annc.supplee@ky.gov (502) 564-3440 ext. 3675**

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

Eligible based on 24-month
average unemployment rate



8 Counties in Kentucky are Eligible for Waiver in 2019

AREAS IN KENTUCKY THAT ARE ELIGIBLE FOR WAIVERS ON THE BASIS OF
May 2016-April 2018
UNEMPLOYMENT RATES

6/29/18

Step 1
Step 2
Step 3
Step 4

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

	from Step 2 5/16-4/18	from Step 4 5/16-4/18	Step 5		Step 6		Step 7
			5/16-4/18 Average	5/16-4/18 Average	5/16-4/18 Average	5/16-4/18 Average	5/16-4/18 Average
	Total labor force	Total number unemployed	Unemployment Rate (unrounded)	Unemployment Rate (4 decimal places)	Unemployment Rate (multiply by 100)	Unemployment Rate	Unemployment (one decimal)
Regional Grouping of Counties							
Bell County, KY	209,980	16,608	0.07909	0.0790	7.90	7.9	7.9
Clay County, KY	135,498	11,561	0.08532	0.0853	8.53	8.5	8.5
Harlan County, KY	168,134	16,694	0.09929	0.0992	9.92	9.9	9.9
Knox County, KY	243,430	17,982	0.07387	0.0738	7.38	7.4	7.4
Leslie County, KY	66,986	7,126	0.10638	0.1063	10.63	10.6	10.6
Letcher County, KY	157,066	15,089	0.09607	0.0960	9.60	9.6	9.6
Perry County, KY	207,479	17,943	0.08648	0.0864	8.64	8.6	8.6
Whitley County, KY	328,020	19,154	0.05839	0.0583	5.83	5.8	5.8
Total for Region	1,516,593	122,157	0.08055	0.0805	8.05	8.1	8.1
National Unemployment							
Threshold - 20% Above the National Average	3,866,318	171,625	0.04439	0.0443	4.43	4.4	4.4
				0.0531	5.31	5.3	5.3

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