

FAMILY INVESTMENT ADMINISTRATION

August 16, 2018

Mr. Eric Ratchford
Regional Division Director
Supplemental Nutrition Assistance Program
Mid-Atlantic Region, USDA-FCS
Food and Nutrition Service
Mercer Corporate Park
300 Corporate Boulevard
Robbinsville, NJ 08691

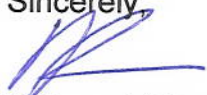
Dear Mr. Ratchford:

Attached is Maryland's waiver request to exempt able-bodied adults without dependants (ABAWDs) in specific jurisdictions within the State from the ABAWD time limit.

The waiver of time limits for ABAWD clients is based on evidence showing counties or regions of the State with average unemployment rates that are 20 percent above the national average and counties or regions with low and declining employment-to-population ratios. This data was compiled for us by the Center for Budget and Policy Priorities (CBPP) based on recent U.S. Department of Labor statistics.

Thank you for your consideration of Maryland's waiver request. If you have any questions, please feel free to contact me at netsanet.kibret@maryland.gov.

Sincerely,



Netsanet Kibret
Executive Director

cc: Alexis Lometz
Kim Lightfoot
Carrie Durham
snapcpbwaivers@fns.usda.gov



STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2150044
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:** Maryland
6. **Region:** MARO
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 Maryland is requesting to exempt able-bodied adults without dependents (ABAWDs) in 13 counties from the SNAP time limits. These areas are readily approvable under 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 Maryland seeks a waiver for three clusters of counties with average unemployment rates that are 20 percent above the national average for the 24-month period of April 2016 to March 2018. The national average unemployment rate for this 24-month period was 4.5 percent; 20 percent above this was 5.4 percent.

The State of Maryland would like to request a waiver for 9 contiguous counties on the Eastern Shore based on having an average unemployment rate of 5.5 percent for April 2016 - March 2018:

Bureau of Labor Statistics Local Area Unemployment Data April 2016 through March 2018		
Eastern Shore	Unemployed Total	Labor Force Total
Caroline County	19,222	429,402
Cecil County	63,143	1,273,805
Dorchester County	22,387	379,955
Kent County	11,634	248,805
Queen Anne's County	24,448	650,101
Somerset County	15,980	226,498
Talbot County	19,339	473,553
Wicomico County	72,964	1,230,644
Worcester County	53,743	614,618
Combined Area Total	302,860	5,527,381
Combined Area Unemployment Rate	5.5%	
20% Above National Average Threshold	5.4%	

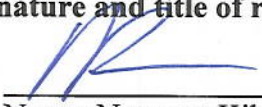
In addition, the State of Maryland would like to request a waiver for 2 jurisdictions in the Baltimore Metropolitan Region¹ based on having an average unemployment rate of 5.6 percent for the period of April 2016 to March 2018:

Bureau of Labor Statistics Local Area Unemployment Data April 2016 through March 2018		
Baltimore Region	Unemployed Total	Labor Force Total
Baltimore City	442,845	7,040,775
Harford County	133,504	3,319,456
Combined Area Total	576,349	10,360,231
Combined Area Unemployment Rate	5.6%	
20% Above National Average Threshold	5.4%	

The State of Maryland would also like to request a waiver for 2 contiguous counties in Western Maryland based on having an average unemployment rate of 6.2 percent for the period of April 2015 to March 2017:

¹ A map of the Baltimore Metropolitan region is available at <http://www.baltometro.org/about-bmc/about-the-region/map/>.

Bureau of Labor Statistics Local Area Unemployment Data April 2016 through March 2018		
Western Maryland	Unemployed Total	Labor Force Total
Allegany County	46,401	781,602
Garrett County	20,076	374,374
Combined Area Total	66,477	1,155,976
Combined Area Unemployment Rate	5.8%	
20% Above National Average Threshold	5.4%	

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 June 30, 2018, represents 40% 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:**

 Name: Netsanet Kibret
 Title: Executive Director, Family Investment Administration
 Email for transmission of response: netsanet.kibret@maryland.gov
16. **Date of request:** August 16, 2018
17. **State agency staff contact (name/email/telephone):**
 Name: Jennifer Moore
 Title: Deputy Executive Director, Family Investment Administration
 Email for transmission of response: jennifer.moore@maryland.gov
 Phone: 410-767-7947
18. **Regional office contact person (to be completed by FNS regional office):**