

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2160002
2. **Type of request:** 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:** Minnesota
6. **Region:** MWRO

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 Minnesota is requesting to exempt able-bodied adults without dependents (ABAWDs) in 30 counties and 11 reservations from 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 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.

The State of Minnesota seeks a waiver for a region of two contiguous counties based on its average unemployment rate that is 20 percent above the national average for the 24-month period of March 2016 to February 2018. The national average unemployment rate for this 24-month period was 4.5 percent; 20 percent above this was 5.4 percent. The average unemployment rate for the county was 5.4 percent.

Bureau of Labor Statistics Local Area Unemployment Data March 2016 through February 2018		
County	Total Unemployed	Total Labor Force
Cottonwood County	8,256	133,884
Murray County	5,305	118,173
Total for Region	13,561	252,057
Combined Region Unemployment Rate	5.4%	
20% Above National Average Threshold	5.4%	

The State of Minnesota seeks a waiver for a region of 28 contiguous counties based on its average unemployment rate that is 20 percent above the national average for the 24-month period of March 2016 through February 2018. The region's unemployment rate was 5.4 percent for the same period.

Bureau of Labor Statistics Local Area Unemployment Data March 2016 through February 2018		
County	Total Unemployed	Total Labor Force
Aitkin County	11,348	171,828
Becker County	19,307	447,431
Beltrami County	28,630	570,768
Carlton County	21,430	428,857
Cass County	21,739	348,264
Clearwater County	10,310	112,319
Cook County	3,109	76,540
Crow Wing County	36,615	778,019
Hubbard County	14,219	238,577
Isanti County	22,520	503,031
Itasca County	40,206	526,613
Kanabec County	13,610	216,765
Kittson County	2,289	57,278
Koochiching County	11,102	146,233
Lake County	6,184	133,180
Lake of the Woods County	2,715	57,212
Mahnomen County	3,045	57,143
Marshall County	9,583	133,303
Mille Lacs County	17,683	309,193
Morrison County	23,431	427,821
Norman County	3,911	82,030

Pennington County	12,375	214,580
Pine County	20,609	360,108
Red Lake County	3,690	54,482
Roseau County	9,485	196,149
St. Louis County	124,475	2,471,675
Todd County	13,702	318,430
Wadena County	8,324	144,083
Total for Region	515,646	9,581,912
Combined Region Unemployment Rate	5.4%	
20% Above National Average Threshold	5.4%	

The State requests to waive the following 11 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 May 2016 – April 2018. The following table summarizes the calculations:

American Community Survey and Bureau of Labor Statistics Data May 2016 – April 2018			
Reservation	Unemployed	Labor Force	Unemployment Rate
Itasca County (part); Minnesota (part); Bois Forte Reservation, MN	-	1,865	-
Koochiching County (part); Minnesota (part); Bois Forte Reservation, MN	252	991	25.4%
St. Louis County (part); Minnesota (part); Bois Forte Reservation, MN	1,282	8,815	14.5%
Total Bois Forte Reservation	1,534	11,672	13.1%
Carlton County (part); Minnesota (part); Fond du Lac Reservation and Off-Reservation Trust Land, MN--WI	2,740	35,358	7.7%
St. Louis County (part); Minnesota (part); Fond du Lac Reservation and Off-Reservation Trust Land, MN--WI	1,382	12,271	11.3%
Total Fond du Lac Reservation	4,122	47,630	8.7%
Cook County (part); Minnesota (part); Grand Portage Reservation and Off-Reservation Trust Land, MN	1,099	9,473	11.6%
Total Grand Portage Reservation	1,099	9,473	11.6%

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

Beltrami County (part); Minnesota (part); Leech Lake Reservation and Off-Reservation Trust Land, MN	1,549	20,468	7.6%
Cass County (part); Minnesota (part); Leech Lake Reservation and Off-Reservation Trust Land, MN	8,422	65,651	12.8%
Hubbard County (part); Minnesota (part); Leech Lake Reservation and Off-Reservation Trust Land, MN	362	3,071	11.8%
Itasca County (part); Minnesota (part); Leech Lake Reservation and Off-Reservation Trust Land, MN	3,447	32,332	10.7%
Total Leech Lake Reservation	13,780	121,523	11.3%
Redwood County (part); Minnesota (part); Lower Sioux Indian Community, MN	435	3,449	12.6%
Total Lower Sioux Community Reservation	435	3,449	12.6%
Aitkin County (part); Minnesota (part); Mille Lacs Reservation and Off-Reservation Trust Land, MN	214	1,267	16.9%
Crow Wing County (part); Minnesota (part); Mille Lacs Reservation and Off-Reservation Trust Land, MN	-	-	-
Mille Lacs County (part); Minnesota (part); Mille Lacs Reservation and Off-Reservation Trust Land, MN	5,149	41,960	12.3%
Pine County (part); Minnesota (part); Mille Lacs Reservation and Off-Reservation Trust Land, MN	278	1,169	23.8%
Total Mille Lacs Reservation	5,641	44,396	12.7%
Dakota County (part); Minnesota (part); Prairie Island Indian Community and Off-Reservation Trust Land, MN	-	-	-
Goodhue County (part); Minnesota (part); Prairie Island Indian Community and Off-Reservation Trust Land, MN	130	1,650	7.9%
Total Prairie Island Community Reservation	130	1,650	7.9%
Beltrami County (part); Minnesota (part); Red Lake Reservation, MN	8,643	57,971	14.9%
Clearwater County (part); Minnesota (part); Red Lake Reservation, MN	-	1,718	-

Koochiching County (part); Minnesota (part); Red Lake Reservation, MN	-	-	-
Lake of the Woods County (part); Minnesota (part); Red Lake Reservation, MN	-	-	-
Marshall County (part); Minnesota (part); Red Lake Reservation, MN	-	-	-
Pennington County (part); Minnesota (part); Red Lake Reservation, MN	-	-	-
Polk County (part); Minnesota (part); Red Lake Reservation, MN	-	-	-
Red Lake County (part); Minnesota (part); Red Lake Reservation, MN	-	-	-
Roseau County (part); Minnesota (part); Red Lake Reservation, MN	-	-	-
Total Red Lake Reservation	8,643	59,688	14.5%
Scott County (part); Minnesota (part); Shakopee Mdewakanton Sioux Community and Off-Reservation Trust Land, MN	296	2,703	11.0%
Total Shakopee Mdewakanton Sioux Community Reservation	296	2,703	11.0%
Chippewa County (part); Minnesota (part); Upper Sioux Community and Off-Reservation Trust Land, MN	-	-	-
Yellow Medicine County (part); Minnesota (part); Upper Sioux Community and Off-Reservation Trust Land, MN	282	1,555	18.1%
Total Upper Sioux Community Reservation	282	1,555	18.1%
Becker County (part); Minnesota (part); White Earth Reservation and Off-Reservation Trust Land, MN	3,646	37,160	9.8%
Clearwater County (part); Minnesota (part); White Earth Reservation and Off-Reservation Trust Land, MN	1,421	9,390	15.1%
Mahnomen County; Minnesota (part); White Earth Reservation and Off-Reservation Trust Land, MN	3,003	57,125	5.3%
Total White Earth Reservation	8,070	103,675	7.8%

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 June 18, represent 18% 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 October 1, 2018 through September 30, 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: Minnesota and Karen Nelsen-Huss, SNAP Policy contact.

15. Signature and title of requesting official:

e-signed: Kathy Bruen

Title: SNAP manager

Email for transmission of response: kathy.bruen@state.mn.us

16. Date of request: July 18, 2018

17. State agency staff contact (name/email/telephone): Karen Nelsen-Huss at Karen.nelsen-huss@state.mn.us / 651-431-4027, or Pamela Majkozak at Pamela.majkozak@state.mn.us / 651-43-2765, SNAP Policy Analysts.

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