



Oregon

Kate Brown, Governor

Department of Human Services

Office of Self Sufficiency Programs

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Salem, OR 97301

503-947-5389

belit.burke@state.or.us

September 17, 2018

Dennis Stewart, SNAP Director
Western Region
FNS, USDA
90 Seventh Street, Suite 10-100
San Francisco, CA 94103



Dear Mr. Stewart:

The Oregon Department of Human Services (DHS) SNAP is operating under waiver 2000039 which suspends time limits on able-bodied adults without dependents (ABAWD). The current waiver expires on December 31, 2018.

We are requesting to renew this waiver of the three-month time limit for ABAWDs for twenty-three counties based on the region's aggregate average unemployment rate. These areas experienced an averaged unemployment rate of at least 20 percent of the national average over a 24-month period from February 2015 through January 2017. We are also seeking to include 7 reservation lands in the waiver. The high unemployment rate qualifies these counties and reservation lands to be exempt from the three-month time limit for ABAWDs.

Enclosed with this letter is the request to renew Oregon's Labor Surplus waiver for January 1, 2019 through December 31, 2019.

Thank you for your attention to this matter.

Sincerely,

Belit Burke, SSP Program Design Administrator
Self-Sufficiency Programs
Oregon Department of Human Services

Enclosure

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info\Waiver Request

September 5, 2018

"Safety, health and independence for all Oregonians"
An Equal Opportunity Employer

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2150022
2. **Type of request:** Amendment & Renewal
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:** Oregon
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 Oregon is requesting to exempt able-bodied adults without dependents (ABAWDs) in 23 counties and 7 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 Oregon seeks a waiver for a region of 23 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 5.5 percent. All counties in this region share borders except for Columbia and Lincoln Counties. The State is including Lincoln

County because it is economically tied to the other eligible counties and contributes to the overall economic health.. Also, although Lincoln county shares borders with non-waived counties, it is geographically separated by mountains, and its road conditions (narrow, crooked and not direct) make travel a prominent barrier.

	Bureau of Labor Statistics Local Area Unemployment Data March 2016 through February 2018		
	Counties	Unemployed Total	Labor Force Total
1	Baker County	9,748	168,995
2	Coos County	37,302	637,999
3	Crook County	14,701	227,657
4	Curry County	13,735	217,289
5	Douglas County	63,343	1,111,984
6	Gilliam County	980	20,509
7	Grant County	5,400	75,446
8	Harney County	5,117	82,470
9	Hood River County	12,859	339,948
10	Jefferson County	14,343	239,874
11	Josephine County	48,710	840,582
12	Klamath County	44,435	713,067
13	Lake County	4,968	84,265
14	Lincoln County	25,635	506,442
15	Malheur County	15,065	302,077
16	Morrow County	6,425	140,035
17	Sherman County	982	21,481
18	Umatilla County	44,398	878,366
19	Union County	15,996	289,120
20	Wallowa County	4,806	80,303
21	Wasco County	14,588	332,813
22	Wheeler County	684	17,293
	Combined Area Total	404,220	7,328,015
Combined Area Unemployment Rate		5.5%	
20% Above National Average Threshold		5.4%	

The State of Oregon also seeks a waiver for Columbia County based on its average unemployment rate for the 24-month period of March 2016 through February 2018. The county's average unemployment rate for this period was 5.5 percent.

Bureau of Labor Statistics Local Area Unemployment Data March 2016 through February 2018			
County	Unemployed Total	Labor Force Total	Unemployment Rate
23. Columbia County	31,761	576,746	5.5%
20% Above National Average Threshold	5.4%		

The State requests to waive the following 7 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 March 2016 - February 2018. The following table summarizes the calculations:

American Community Survey and Bureau of Labor Statistics Data March 2016 through February 2018			
Reservation	Unemployed	Labor Force	Unemployment Rate
Harney County (part); Oregon (part); Burns Paiute Indian Colony and Off- Reservation Trust Land, OR	189	1,403	13.5%
1.Total Burns Paiute Indian Reservation	189	1,403	13.5%
Coos County (part); Oregon (part); Coquille Reservation, OR	185	2,685	6.9%
2.Total Coquille Reservation	185	2,685	6.9%
Douglas County (part); Oregon (part); Cow Creek Reservation and Off- Reservation Trust Land, OR	104	1,917	5.4%
3.Total Cow Creek Reservation	104	1,917	5.4%
Polk County (part); Oregon (part); Grand Ronde Community and Off- Reservation Trust Land, OR	365	4,280	8.5%
Yamhill County (part); Oregon (part); Grand Ronde Community and Off- Reservation Trust Land, OR	26	332	7.9%
4.Total Grand Ronde Reservation	391	4,612	8.5%

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

Klamath County (part); Oregon (part); Klamath Reservation, OR	136	214	63.5%
5.Total Klamath Reservation	136	214	63.5%
Lincoln County (part); Oregon (part); Siletz Reservation and Off-Reservation Trust Land, OR	1,007	6,428	15.7%
Marion County (part); Oregon (part); Siletz Reservation and Off-Reservation Trust Land, OR	0	-	-
6.Total Siletz Reservation	1,007	6,428	15.7%
Clackamas County (part); Oregon (part); Warm Springs Reservation and Off-Reservation Trust Land, OR	0	-	-
Gilliam County (part); Oregon (part); Warm Springs Reservation and Off- Reservation Trust Land, OR	0	-	-
Hood River County (part); Oregon (part); Warm Springs Reservation and Off-Reservation Trust Land, OR	0	-	-
Jefferson County (part); Oregon (part); Warm Springs Reservation and Off- Reservation Trust Land, OR	4,234	36,088	11.7%
Marion County (part); Oregon (part); Warm Springs Reservation and Off- Reservation Trust Land, OR	0	-	-
Sherman County (part); Oregon (part); Warm Springs Reservation and Off- Reservation Trust Land, OR	0	-	-
Wasco County (part); Oregon (part); Warm Springs Reservation and Off- Reservation Trust Land, OR	1,433	8,275	17.3%
7.Total Warm Springs Reservation	5,668	44,363	12.8%

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. ABAWDs residing in the 23 waived counties will be required to comply with the requirements to register for work, and accept a job if offered. They will be invited to participate in

the SNAP E&T program. They will continue to be offered the work components offered to all SNAP E&T clients in Oregon. However, ABAWD's residing in the waived areas will not be subject to the three-month time limit.

11. Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable):

The caseload for these waived areas, as of **June 30th**, represent **26%** of the caseload for the state, compared to 74% of the non-waived caseload. In addition, SNAP QC error rates based on last 12 available months in the waived areas is 5.25% compared to 6.84% on the non-waived areas.

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: Department of Human Services, Self-Sufficiency Programs, SNAP Policy

15. Signature and title of requesting official:

Belit Burke
Office of SSP Program Design Administrator
Belit.BURKE@dhsosha.state.or.us

16. Date of request: 09/05/2018

**17. State agency staff contact (name/email/telephone): Antonio Heras-De La Luz/
antonio.heras-delaluz@dhsosha.state.or.us/503-945-6220**

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