

STATE WAIVER REQUEST

- 1. Waiver Serial Number (if applicable):**
- 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:**
Tennessee
- 6. Region:**
SERO
- 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 Tennessee is requesting to exempt able-bodied adults without dependents (ABAWDs) in 7 counties 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 counties designated as a Labor Surplus Area by the U.S. Department of Labor. 7 CFR 273.24(f)(6) provides that States may define areas to be waived.

The State of Tennessee seeks a waiver for a region of 7 counties based on these counties designation by the U.S. Department of Labor as a Labor Surplus Area and identified as being a Distressed County.

Labor surplus (LSA) counties are those identified as having a low and declining employment-to-population ratio, lack of jobs in declining occupations or industries, or a 24-month average unemployment rate of 20 percent above the national average for the same 24-month period.

Distressed counties in Tennessee are identified by the Appalachian Regional Commission based on its rates of poverty and unemployment. The Tennessee Department of Economic and Community Development listed these 15 counties in Tennessee as being economically distressed based on these criteria. The Distressed County Criteria ranks in the worst 10% of the nation's counties and meets three economic indicators. Those indicators are:

1. Three Year Average Unemployment Rates
2. Per Capita Market Income- Per capita income or average income measures the average income earned per person in a given area (city, region, country, etc.) in a specified year. It is calculated by dividing the area's total income by its total population and;
3. Poverty Rate-The poverty rate is computed by dividing the number of persons living below the poverty threshold by the number of persons for whom poverty status has been determined.

10. Anticipated impact on households and State agency operations:

This waiver will provide consistency for households and State agency operations in areas that are economically distressed by being identified as having a low and declining employment-to-population ratio, lack of jobs in declining occupations or industries, or a 24-month average unemployment rate of 20 percent above the national average for the same 24-month period.

The following counties will no longer be waived: Haywood, Hardeman, Wayne, Perry, Grundy, Van Buren, Fentress, Campbell, Claiborne, and Cocke. Staff will emphasize Employment and Training opportunities in these counties

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

The caseload for these areas, as of **October 2018**, represents 2.78% of the caseload for the state. There are no quality control procedures involved.

Labor Surplus & Economically Distressed Counties	
Counties	SNAP Participating Individuals
Bledsoe	2,785
Hancock	2,310
Jackson	1,981

Lake	1,893
Lauderdale	6,138
McNairy	4,874
Scott	6,164
Total Counties SNAP Participating Individuals	26,145
Total State SNAP Participating Individuals	939,046

12. Anticipated implementation date and time period for which waiver is needed:

The State is requesting a one-year waiver, from February 1, 2019 through January 31, 2020.

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: Tennessee,
Lisa Cowell, Program Director 4, SNAP/EBT**

15. Signature and title of requesting official:



Title: Director of Operations, Family Assistance

Email for transmission of response: Keisha.Thaxton@tn.gov

16. Date of request: 11 29, 2018

**17. State agency staff contact (name/email/telephone): Lisa Cowell,
Lisa.Cowell@tn.gov, 615-741-5934**

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