

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2130033
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:** Vermont
6. **Region:** NERO
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 Vermont is requesting to exempt able-bodied adults without dependents (ABAWDs) in one county and 35 towns from SNAP time limits at 7 CFR 273.24 and based on unemployment data from the U.S. Bureau of Labor Statistics for the 24-month period of January 2016 through December 2017.
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 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 Vermont seeks a waiver for one county and 35 towns based on their average unemployment rates for the 24-month period of January 2016 through December 2017. During this time, the national average for unemployment was 4.6 percent; 20 percent above this was 5.5 percent. As detailed in the following tables, Essex County and 35 towns qualify based upon having an unemployment rate or

belonging to a region with an aggregate average unemployment rate 20 percent above the national average for the selected 24-month period.

The State of Vermont seeks a waiver for Essex County based on the county's average unemployment rate for the 24-month period of January 2016 to December 2017. The county's average unemployment rate for this period was 5.7 percent.

Bureau of Labor Statistics Local Area Unemployment Data January 2016 through December 2017			
County	Unemployed Total	Labor Force Total	Unemployment Rate
Essex County	3,644	64,479	5.7%
20% Above National Average Threshold	5.5%		

The State of Vermont would also seek a waiver for one town based on having individual unemployment rates that are 20 percent above the national average for the period of January 2016 – December 2017.

Bureau of Labor Statistics Local Area Unemployment Data January 2016 through December 2017			
Town	Unemployed Total	Labor Force Total	Unemployment Rate
Buels gore	28	376	7.4%
20% Above National Average Threshold	5.5%		

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The State of Vermont also seeks a waiver for a regional group of two contiguous towns based on the region's aggregate average unemployment rate for the 24-month period of January 2016 to December 2017. The region's aggregate average unemployment rate for this period was 6.0 percent.

Bureau of Labor Statistics Local Area Unemployment Data January 2016 through December 2017		
Contiguous Towns	Unemployed Total	Labor Force Total
Alburgh town	1,456	24,242
Isle La Motte town	340	5,803
Combined Area Total	1,796	30,045
Combined Area Unemployment Rate	6.0%	
20% Above National Average Threshold	5.5%	

The State of Vermont also seeks a waiver for a regional group of 20 contiguous towns and cities based on the region's aggregate average unemployment rate for the 24-month period of January 2016 to December 2017. The region's aggregate average unemployment rate for this period was 5.5 percent.

Bureau of Labor Statistics Local Area Unemployment Data January 2016 through December 2017		
Contiguous Towns	Unemployed Total	Labor Force Total
Barton town	2,021	30,043
Belvidere town	242	4,401
Brownington town	920	13,236
Burke town	828	19,308
Coventry town	594	13,160
Derby town	2,876	54,856
Eden town	1,333	17,860
Glover town	573	13,014
Holland town	316	8,504
Irasburg town	732	15,007
Jay town	605	7,515
Johnson town	1,982	39,963
Lowell town	672	10,591
Newark town	276	6,523
Newport city	2,736	42,189
Richford town	1,220	26,728
Sheffield town	393	7,419
Sutton town	529	10,731

Waterville town	466	9,222
Westfield town	293	7,185
Combined Area Total	19,607	357,455
Combined Area Unemployment Rate	5.5%	
20% Above National Average Threshold	5.5%	

The State of Vermont also seeks a waiver for a regional group of three contiguous towns based on the region's aggregate average unemployment rate for the 24-month period of January 2016 to December 2017. The region's aggregate average unemployment rate for this period was 5.5 percent.

Bureau of Labor Statistics Local Area Unemployment Data January 2016 through December 2017		
Contiguous Towns	Unemployed Total	Labor Force Total
Bridgewater town	548	13,653
Killington town	1,030	12,450
Pittsfield town	235	7,067
Combined Area Total	1,813	33,170
Combined Area Unemployment Rate	5.5%	
20% Above National Average Threshold	5.5%	

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Bureau of Labor Statistics Local Area Unemployment Data January 2016 through December 2017		
Contiguous Towns	Unemployed Total	Labor Force Total
Hancock town	219	3,209
Goshen town	110	2,462
Combined Area Total	329	5,671
Combined Area Unemployment Rate	5.5%	
20% Above National Average Threshold	5.5%	

The State of Vermont also seeks a waiver for an additional regional group of five contiguous towns based on the region's aggregate average unemployment rate for the 24-month period of January 2016 to December 2017. The region's aggregate average unemployment rate for this period was 5.5 percent.

Bureau of Labor Statistics Local Area Unemployment Data January 2016 through December 2017		
Contiguous Towns	Unemployed Total	Labor Force Total
Dover town	909	15,173
Glastenbury town	0	144
Searsburg town	102	1,484
Stratton town	187	2,785
Readsboro town	390	9,157
Combined Area Total	1,588	28,743
Combined Area Unemployment Rate	5.5	
20% Above National Average Threshold	5.5%	

The State of Vermont also seeks a waiver for two towns in the Manchester Labor Market Area based on the region's aggregate average unemployment rate for the 24-month period of January 2016 to December 2017. The Labor Market Area used in this waiver request is defined by the U.S. Bureau of Labor Statistics.¹ The unemployment rate for the towns in the Manchester LMA for which Vermont is requesting the waiver was 5.5 percent.

Bureau of Labor Statistics Local Area Unemployment Data January 2016 through December 2017		
Manchester Labor Market Area	Unemployed Total	Labor Force Total
Sandgate town	195	3,802
Wells town	598	10,682
Combined Area Total	793	14,484
Combined Area Unemployment Rate	5.5	
20% Above National Average Threshold	5.5%	

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.

¹ Map available from the Vermont Department of Labor at <http://www.vtlmi.info/lmadef2015.pdf>. Full listing of Labor Market Areas available from the Bureau of Labor Statistics: <http://www.bls.gov/lau/lmadir2015.xlsx>.

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

The caseload for these areas, as of 2/29/2018, represent 11.1% 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.

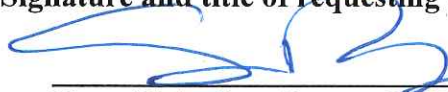
13. Proposed quality control review procedures:

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

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

Vermont Department for Children and Families, Economic Service Division,
Patricia Duda, 802-241-0603

15. Signature and title of requesting official:



Name/Title: Sean Brown, DCF/ESD Deputy Commissioner

Email for transmission of response: pat.duda@vermont.gov

16. Date of request: 5/10/2018

17. State agency staff contact (name/email/telephone):

Patricia Duda: pat.duda@vermont.gov

802 241 0603

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