



Department for Children and Families
Services
Economic Services Division
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Agency of Human

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August 1, 2018

Bonnie Brathwaite, Regional Division Director
Supplemental Nutrition Assistance Program
USDA\FNS Northeast Region
Thomas P. O'Neill Federal Building
10 Causeway Street, Room 501
Boston, MA 02222

Re: Vermont FFY 19 ABAWD Waiver Extension Request

Dear Ms. ^{Bonnie}Brathwaite,

Please find enclosed Vermont's resubmission, adjusting town groupings per email correspondence from your office on July 31, to extend the waiver of the 3-month ABAWD time limit for individuals residing in labor surplus regions and towns.

If you have any questions or seek further clarification, please do not hesitate to contact pat.duda@vermont.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "S. P. Brown", written over a horizontal line.

Sean P. Brown
Deputy Commissioner

Enclosure



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 38 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 38 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, 38 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 these individually eligible towns with populations greater than 1,000 with individual unemployment rates 20 percent above the national average for the period of January 2016 through December 2017.

Bureau of Labor Statistics Local Area Unemployment Data January 2016 through December 2017			
Town	Unemployed Total	Labor Force Total	Unemployment Rate by Percentage
Concord Town	819	13,564	6.03
Dover Town	821	14,878	5.51
Eden Town	1,192	18,146	6.56
Wells Town	604	10,843	5.57
20% Above National Average Threshold	5.5%		

The State of Vermont also seeks a waiver for a regional group of towns eligible through grouping with populations greater than 1,000 with a regional aggregate average unemployment rate of 5.5 percent during the 24-month period of January 2016 through December 2017.

Bureau of Labor Statistics Local Area Unemployment Data January 2016 through December 2017		
Towns	Unemployed Total	Labor Force Total
Barton Town	1,928	29,479
Burke Town	741	19,385
Coventry Town	601	13,221
Derby Town	2,889	54,376
Irasburg Town	725	15,023
Newport City	2,611	42,041
Sutton Town	580	10,528
Combined Area Total	10,075	184,053
Combined Area Unemployment Rate	5.5%	
20% Above National Average Threshold	5.5%	

The State of Vermont also seeks a waiver for these individual towns with populations below 1,000 with unemployment rates 20 percent above the national average for the period of January 2016 through December 2017.

Bureau of Labor Statistics Local Area Unemployment Data January 2016 through December 2017			
Town	Unemployed Total	Labor Force Total	Unemployment Rate by percentage
Belvidere Town	242	4,401	5.49
Buelsgore	28	376	7.44
Isle La Motte Town	340	5,803	5.85
20% Above National Average Threshold	5.5%		

The State of Vermont also seeks a waiver for a regional group of towns eligible through grouping with populations below 1,000 with a regional aggregate average unemployment rate of 6.0 percent during the 24-month period of January 2016 through December 2017.

Bureau of Labor Statistics Local Area Unemployment Data January 2016 through December 2017		
Towns	Unemployed Total	Labor Force Total
Bloomfield Town	162	1,979
Brunswick Town	129	1,391
Canaan Town	353	8,977
East Haven Town	191	3,109
Ferdinand Town	-	319
Granby Town	105	925
Guildhall Town	203	3,222
Lemington Town	102	725
Maidstone Town	125	2,220
Newark	276	6,523
Norton Town	165	5,803
Victory Town	51	616
Warren's Gore	-	96
Combined Area Total	1,862	38,905
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 towns eligible through grouping with populations below 1,000 with a regional aggregate average unemployment rate of 6.2 percent during the 24-month period of January 2016 through December 2017.

Bureau of Labor Statistics Local Area Unemployment Data January 2016 through December 2017		
Towns	Unemployed Total	Labor Force Total
Jay Town	605	7,515
Lowell Town	672	10,591
Westfield Town	293	7,185
Combined Area Total	1,570	25,291
Combined Area Unemployment Rate	6.2%	
20% Above National Average Threshold	5.5%	

The State of Vermont also seeks a waiver for a town eligible with a population below 1,000 with an average unemployment rate of 6.95 percent during the 24-month period of January 2016 through December 2017.

Bureau of Labor Statistics Local Area Unemployment Data January 2016 through December 2017		
Towns	Unemployed Total	Labor Force Total
Brownington Town	920	13,236
Area Unemployment Rate	6.95%	
20% Above National Average Threshold	5.5%	

The State of Vermont also seeks a waiver for this regional group of towns eligible through grouping with populations below 1,000 with a regional aggregate average unemployment rate of 5.8 percent during the 24-month period of January 2016 through December 2017.

Bureau of Labor Statistics Local Area Unemployment Data January 2016 through December 2017		
Towns	Unemployed Total	Labor Force Total
Goshen	110	2,462
Hancock	219	3,209
Combined Area Total	329	5,671
Combined Area Unemployment Rate	5.8%	
20% Above National Average Threshold	5.5%	

The State of Vermont also seeks a waiver for this regional group of towns eligible through grouping with populations below 1,000 with a regional aggregate average unemployment rate of 6.0 percent during the 24-month period of January 2016 through December 2017.

Bureau of Labor Statistics Local Area Unemployment Data January 2016 through December 2017		
Towns	Unemployed Total	Labor Force Total
Bridgewater	548	13,653
Killington	1,030	12,450
Combined Area Total	1,578	26,103
Combined Area Unemployment Rate	6.0%	
20% Above National Average Threshold	5.5%	

The State of Vermont also seeks a waiver for this regional group of towns eligible through grouping with populations below 1,000 with a regional aggregate average unemployment rate of 6.5 percent during the 24-month period of January 2016 through December 2017.

Bureau of Labor Statistics Local Area Unemployment Data January 2016 through December 2017		
Towns	Unemployed Total	Labor Force Total
Glastenbury Town	0	144
Searsburg Town	102	1,484
Stratton Town	187	2,785
Combined Area Total	289	4,413
Combined Area Unemployment Rate	6.5%	
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.

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

The caseload for these areas, as of 5/31/18, represent 6.7% of the entire 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:

 Deputy Commissioner

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

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

16. Date of request: 7/31/2018

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*):