

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2150033
2. **Type of request:** Amendment
3. **Statutory citation:** Section 6(o) of the Food and Nutrition Act of 2008
4. **Regulatory citation:** 7 CFR 273.24 as amended by the Food and Nutrition Service's Final Rule "Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults Without Dependents," published on December 5, 2019 (84 FR 66782).
5. **State:** Arizona
6. **Region:** SWRO
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 Arizona is requesting to exempt able-bodied adults without dependents (ABAWDs) in 5 Labor Market Areas (LMAs) and 16 reservations from SNAP time limits at 7 CFR 273.24 as amended by the Food and Nutrition Service's Final Rule (84 FR 66782).
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, but in no case may the 24-month average unemployment rate of the requested area be less than 6 percent. 7 CFR 273.24(f)(4) provides that a Labor Market Area (LMA), the intrastate part of an interstate LMA, a reservation area, or a U.S. Territory are considered to be areas for the purposes of waivers.

The State of Arizona seeks a waiver for 5 Labor Market Areas based on each Labor Market Area having an average unemployment rate at least 6 percent and at least 20 percent above the national average for the 24-month period of July 2017 through June 2019. The national average unemployment rate for this 24-month period was 3.9 percent; 20 percent above this was 4.7 percent. These eligible Labor Market Areas include the Cocopah and Colorado River Reservations, which are located entirely in the labor market areas of Yuma, AZ Metropolitan Statistical Area and La Paz County.

Bureau of Labor Statistics Local Area Unemployment Data July 2017 through June 2019			
Labor Market Area	Unemployed Total	Labor Force Total	Unemployment Rate
Apache County, AZ	49,808	494,559	10.1
La Paz County, AZ	12,922	214,856	6.0
Nogales, AZ Micropolitan Statistical Area	43,102	462,164	9.3
Show Low, AZ Micropolitan Statistical Area	75,209	975,346	7.7
Yuma, AZ Metropolitan Statistical Area	394,869	2,341,456	16.9

The State also seeks a waiver for 16 reservations. During the period of July 2017 through June 2019, each reservation had an average unemployment rate at least 6 percent and at least 20 percent higher than the national average unemployment rate during the same period. The reservation unemployment rates were calculated by applying 2014-2018 5-year American Community Survey (ACS) share ratios to county-level Bureau of Labor Statistics data for July 2017 - June 2019.

Bureau of Labor Statistics Local Area Unemployment/Census Bureau Data July 2017 through June 2019			
	Unemployed	Labor Force	Unemployment Rate
Apache County (part); Arizona (part); Fort Apache Reservation, AZ	1,094	5,598	19.5%
Gila County (part); Arizona (part); Fort Apache Reservation, AZ	3,127	16,059	19.5%
Navajo County (part); Arizona (part); Fort Apache Reservation, AZ	20,182	96,014	21.0%
Total Fort Apache Reservation	24,402	117,671	20.7%

Maricopa County (part); Arizona (part); Fort McDowell Yavapai Nation Reservation, AZ	1,248	9,292	13.4%
Total Fort McDowell Yavapai Nation Reservation	1,248	9,292	13.4%
Mohave County (part); Arizona (part); Fort Mojave Reservation and Off-Reservation Trust Land, AZ--CA--NV	1,280	10,619	12.1%
Total Fort Mojave Reservation	1,280	10,619	12.1%
Maricopa County (part); Arizona (part); Gila River Indian Reservation, AZ	4,352	28,998	15.0%
Pinal County (part); Arizona (part); Gila River Indian Reservation, AZ	5,057	47,256	10.7%
Total Gila River Reservation	9,409	76,254	12.3%
Maricopa County (part); Arizona (part); Gila River Indian Reservation, AZ	4,352	28,998	15.0%
Coconino County (part); Arizona (part); Havasupai Reservation, AZ	113	166	68.4%
Total Havasupai Reservation	113	166	68.4%
Coconino County (part); Arizona (part); Hualapai Indian Reservation and Off- Reservation Trust Land, AZ	0	105	0.0%
Mohave County (part); Arizona (part); Hualapai Indian Reservation and Off- Reservation Trust Land, AZ	1,570	14,456	10.9%
Yavapai County (part); Arizona (part); Hualapai Indian Reservation and Off- Reservation Trust Land, AZ	0	0	-
Total Hualapai Reservation	1,570	14,561	10.8%
Coconino County (part); Arizona (part); Kaibab Indian Reservation, AZ	0	0	-

Mohave County (part); Arizona (part); Kaibab Indian Reservation, AZ	341	3,508	9.7%
Total Kaibab Reservation	341	3,508	9.7%
Pinal County (part); Arizona (part); Maricopa (Ak Chin) Indian Reservation and Off-Reservation Trust Land, AZ	1,976	13,212	15.0%
Total Maricopa Reservation	1,976	13,212	15.0%
Apache County (part); Arizona (part); Navajo Nation Reservation and Off-Reservation Trust Land, AZ--NM--UT	43,783	351,585	12.5%
Coconino County (part); Arizona (part); Navajo Nation Reservation and Off-Reservation Trust Land, AZ--NM--UT	24,762	221,276	11.2%
Navajo County (part); Arizona (part); Navajo Nation Reservation and Off-Reservation Trust Land, AZ--NM--UT	20,052	170,579	11.8%
Total Navajo Nation Reservation	88,598	743,441	11.9%
Pima County (part); Arizona (part); Pascua Pueblo Yaqui Reservation and Off-Reservation Trust Land, AZ	3,829	38,752	9.9%
Total Pascua Pueblo Yaqui Reservation	3,829	38,752	9.9%
Maricopa County (part); Arizona (part); Salt River Reservation, AZ	10,715	69,331	15.5%
Total Salt River Reservation	10,715	69,331	15.5%
Gila County (part); Arizona (part); San Carlos Reservation, AZ	8,573	45,095	19.0%

Graham County (part); Arizona (part); San Carlos Reservation, AZ	6,799	35,868	19.0%
Pinal County (part); Arizona (part); San Carlos Reservation, AZ	0	0	-
Total San Carlos Reservation	15,372	80,963	19.0%
Maricopa County (part); Arizona (part); Tohono O'odham Nation Reservation and Off-Reservation Trust Land, AZ	1,363	6,179	22.1%
Pima County (part); Arizona (part); Tohono O'odham Nation Reservation and Off-Reservation Trust Land, AZ	15,391	76,890	20.0%
Pinal County (part); Arizona (part); Tohono O'odham Nation Reservation and Off-Reservation Trust Land, AZ	0	4,970	0.0%
Total Tohono O'odham Nation Reservation	16,754	88,040	19.0%
Gila County (part); Arizona (part); Tonto Apache Reservation and Off-Reservation Trust Land, AZ	88	1,427	6.2%
Total Tonto Apache Reservation	88	1,427	6.2%
Yavapai County (part); Arizona (part); Yavapai-Apache Nation Reservation, AZ	632	8,309	7.6%
Total Yavapai-Apache Reservation	632	8,309	7.6%
Yavapai County (part); Arizona (part); Yavapai-Prescott Reservation, AZ	670	4,736	14.1%
Total Yavapai-Prescott Reservation	670	4,736	14.1%

10. Anticipated impact on households and State agency operations:

This waiver will provide consistency for households and State agency operations in areas where there are not a sufficient number of jobs to provide employment for able-bodied adults without dependents.

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

The caseload for these areas represents 14.53% of the current caseload for the state. For FFY2019, Arizona cited 241 case and procedural errors. Of these cases, eleven (11) were ABAWDs, and none were cited in the affected areas. 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 April 1, 2020 through March 31, 2021.

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:

Nancy Meeden, Workforce Policy Manager
Arizona Department of Economic Security
Division of Employment and Rehabilitation Services

15. Signature and title of requesting official:



Chevera Trillo, Workforce Administrator
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16. Date of request: January 29, 2020

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

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