

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2150033
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:** Arizona
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 Arizona is requesting to exempt able-bodied adults without dependents (ABAWDs) in 12 counties, one city, and 15 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 Arizona seeks a waiver for a group of 12 contiguous counties based on the region's aggregate average unemployment rate for the 24-month period of August 2017 through July 2019. The average national unemployment rate for this period was 3.9 percent; 20 percent above this was 4.7 percent. The region's aggregate average unemployment rate for this period was 7.7 percent.

Bureau of Labor Statistics Local Area Unemployment Data August 2017 through July 2019		
County	Unemployed Total	Labor Force Total
Apache County	50,038	495,210
Cochise County	68,331	1,194,290
Coconino County	102,664	1,850,527
Gila County	30,199	516,884
Graham County	18,438	358,418
Greenlee County	4,464	102,460
La Paz County	13,080	215,296
Mohave County	119,639	2,053,832
Navajo County	75,511	976,607
Pinal County	215,789	4,288,372
Santa Cruz County	42,986	463,172
Yuma County	396,175	2,345,145
Combined Area Total	1,137,314	14,860,213
Combined Area Unemployment Rate	7.7%	
20% Above National Average Threshold	4.7%	

The State requests to waive one independent city based on having an unemployment rate that is 20 percent above the national average for the period of August 2017 through July 2019. The city's unemployment rate was 11.9 percent, above the national average threshold for the same time period.

Bureau of Labor Statistics Local Area Unemployment Data August 2017 through July 2019			
City	Unemployed	Labor Force	Unemployment Rate
Apache Junction city, Maricopa County part	199	1,673	11.9%
20% Above National Average Threshold	4.7%		

The State requests to waive the following 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 2017 American Community Survey¹ share ratios to county-level Bureau of Labor Statistics data from August 2017 through July 2019. The following table summarizes the calculations:

¹ These calculations are based on data from the 2013-2017 American Community Survey 5-Year Estimates.

Bureau of Labor Statistics Local Area Unemployment/Census Bureau Data August 2017 through July 2019			
	Unemployed	Labor Force	Unemployment Rate
Yuma County (part); Arizona (part); Cocopah Reservation, AZ	2,471	8,924	27.7%
Total Cocopah Reservation	2,471	8,924	27.7%

La Paz County (part); Arizona (part); Colorado River Indian Reservation, AZ--CA	7,241	114,752	6.3%
Total Colorado River Reservation	7,241	114,752	6.3%

Apache County (part); Arizona (part); Fort Apache Reservation, AZ	1,627	5,639	28.9%
Gila County (part); Arizona (part); Fort Apache Reservation, AZ	2,913	16,272	17.9%
Navajo County (part); Arizona (part); Fort Apache Reservation, AZ	19,849	98,021	20.2%
Total Fort Apache Reservation	24,389	119,932	20.3%

Maricopa County (part); Arizona (part); Fort McDowell Yavapai Nation Reservation, AZ	1,023	9,813	10.4%
Total Fort McDowell Yavapai Nation Reservation	1,023	9,813	10.4%

Mohave County (part); Arizona (part); Fort Mojave Reservation and Off- Reservation Trust Land, AZ--CA--NV	1,143	9,514	12.0%
Total Fort Mojave Reservation	1,143	9,514	12.0%

Maricopa County (part); Arizona (part); Gila River Indian Reservation, AZ	6,061	34,539	17.5%
Pinal County (part); Arizona (part); Gila River Indian Reservation, AZ	9,305	62,750	14.8%
Total Gila River Reservation	15,366	97,288	15.8%

Coconino County (part); Arizona (part); Havasupai Reservation, AZ	86	139	62.2%
Total Havasupai Reservation	86	139	62.2%

Coconino County (part); Arizona (part); Hualapai Indian Reservation and Off-Reservation Trust Land, AZ	0	0	-
Mohave County (part); Arizona (part); Hualapai Indian Reservation and Off-Reservation Trust Land, AZ	1,813	14,509	12.5%
Yavapai County (part); Arizona (part); Hualapai Indian Reservation and Off-Reservation Trust Land, AZ	0	0	-
Total Hualapai Reservation	1,813	14,509	12.5%

Pinal County (part); Arizona (part); Maricopa (Ak Chin) Indian Reservation and Off-Reservation Trust Land, AZ	1,644	12,518	13.1%
Total Maricopa Reservation	1,644	12,518	13.1%

Apache County (part); Arizona (part); Navajo Nation Reservation and Off-Reservation Trust Land, AZ--NM--UT	41,550	346,298	12.0%
Coconino County (part); Arizona (part); Navajo Nation Reservation and Off-Reservation Trust Land, AZ--NM--UT	25,160	230,593	10.9%

Navajo County (part); Arizona (part); Navajo Nation Reservation and Off-Reservation Trust Land, AZ--NM--UT	20,292	166,673	12.2%
Total Navajo Nation Reservation	87,002	743,564	11.7%

Pima County (part); Arizona (part); Pascua Pueblo Yaqui Reservation and Off-Reservation Trust Land, AZ	4,319	34,974	12.3%
Total Pascua Pueblo Yaqui Reservation	4,319	34,974	12.3%

Maricopa County (part); Arizona (part); Salt River Reservation, AZ	9,639	69,165	13.9%
Total Salt River Reservation	9,639	69,165	13.9%

Gila County (part); Arizona (part); San Carlos Reservation, AZ	9,016	49,305	18.3%
Graham County (part); Arizona (part); San Carlos Reservation, AZ	7,152	37,502	19.1%
Pinal County (part); Arizona (part); San Carlos Reservation, AZ	0	0	-
Total San Carlos Reservation	16,168	86,807	18.6%

Maricopa County (part); Arizona (part); Tohono O'odham Nation Reservation and Off-Reservation Trust Land, AZ	755	4,816	15.7%
Pima County (part); Arizona (part); Tohono O'odham Nation Reservation and Off-Reservation Trust Land, AZ	13,221	81,769	16.2%
Pinal County (part); Arizona (part); Tohono O'odham Nation Reservation and Off-Reservation Trust Land, AZ	1,084	6,676	16.2%
Total Tohono O'odham Nation Reservation	15,060	93,261	16.1%

Yavapai County (part); Arizona (part); Yavapai-Apache Nation Reservation, AZ	1,103	9,895	11.1%
Total Yavapai-Apache Reservation	1,103	9,895	11.1%

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 affected portion (if applicable):

The caseload for these areas represents 29.67% of the current caseload for the state. Arizona cited 158 case and procedural errors, but of these cases, three (3) 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 January 1, 2020 through December 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:

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

15. Signature and title of requesting official:



Chevera Trillo, Workforce Administrator
Arizona Department of Economic Security
Employment and Rehabilitation Services
ctrillo@azdes.gov

16. Date of request: September 26, 2019

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

Nancy Meeden
nmeeden@azdes.gov
602-771-1309

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