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GOVERNMENT OF GUAM
DEPARTMENT OF PUBLIC HEALTH AND SOCIAL SERVICES
DIPATTAMENTON SALUT PUPBLEKO YAN SETBISION SUSIAT



LINDA UNPINGCO DENORCEY, MPH
ACTING DIRECTOR

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JAN 09 2019

Ms. Rebecca Hobbs
Acting Director
Supplemental Nutrition Assistance Program
Western Region
90 Seventh St. #10-100
San Francisco, CA 94108

Dear Hobbs:

Enclosed for your review and approval is Guam Department of Public Health & Social Services' request to extend waiver number 2140024 upon its expiration on September 30, 2019. This waiver allows Guam to exempt able-bodied adults without dependents (ABAWDs) throughout the Territory from the Supplemental Nutrition Assistance Program (SNAP) time limit pursuant to 7 CFR 273.24. The request for extension is submitted because Guam's average of unemployment rate in the last 24 periodic unemployment rate surveys is 20 percent above the national average.

Should you have any questions regarding this matter, please contact Ms. Ma. Theresa L. Arcangel, Chief, Division of Public Welfare at (671) 735-7300 or email her at theresa.arcangel@dphss.guam.gov.

Sincerely,


LINDA UNPINGCO DENORCEY, MPH
Acting Director

Enclosure

WAIVER EXTENSION REQUEST

1. Waiver number: 2140024
2. Type of Request: Waiver Extension
3. Primary Regulation Citation: 7 CFR 273.24
4. Secondary Regulation Citation, if any: None
5. State: Territory of Guam
6. Region: Western
7. Regulatory Requirement: 7 CFR 273.24 provide that no individual, who is able bodied without a dependent (ABAWD), shall be eligible to participate in the Supplemental Nutrition Assistance Program (SNAP) as a member of any household if, during the preceding 36-month period, the individual received SNAP benefits for not less than 3-months (consecutive or otherwise), during which the individual did not work 20 hours or more per week, averaged monthly; did not participate in and comply with the work requirements of a work program of 20 hours or more per week; did not participate in and comply with the requirements of a program under Section 20 of the Act or comparable program established by the state; or received benefits because they were exempt from these requirements.

Current regulations at 7 CFR 273.24(f)(2) and (3) provide for waiver approvals for requested areas with an average unemployment rate at least 20 percent above the national average for a recent 24-month period, beginning no earlier than the same 24-month period that Department of Labor (DOL) uses to determine Labor Surplus Areas (LSAs) for the current fiscal year (otherwise known as the "20 percent standard"). Under the current regulations, the Department adopted the 20 percent standard, in addition to LSA designation, to provide States with the flexibility to support waivers for areas in the country that are not considered by DOL for LSA designation and to allow States to use a more flexible 24-month reference period.

8. Proposed Alternative Procedures: The Territory of Guam Department of Public Health & Social Services is requesting an island-wide waiver to exempt its ABAWD population from the work requirements of 7 CFR 273.24 because Guam's average unemployment rate in the last 24 periodic unemployment rate surveys is 20 percent above the national average. The U.S. Department of Labor's Bureau of Labor Statistics does not collect unemployment data for Guam. Labor data is derived from sample surveys of households conducted by the Guam Department of Labor's Bureau

of Labor Statistics. These are periodic surveys, usually conducted on a quarterly basis, where field interviews are conducted inquiring about activity of status during the calendar week. The State agency has supported its request based upon the Territory having an average unemployment rate 20 percent above the national average for the 24-month period. Please see attached table, reflecting that Guam unemployment rate had exceeded the national average by more than 20 percent.

9. Action and Reason for Request: Guam is seeking relief from the requirement that ABAWDs meet the 20 hours per week work participation requirement because the average of Guam's unemployment rate in the last 24 periodic unemployment rate surveys is 20 percent above the national average.
10. Regulatory or Legislative Basis for Action: This waiver request is pursuant to 7 CFR 273.24(f)(1)(ii), which allows FNS to waive the applicability of the work requirement provision of 7 CFR 273.24 for any group of individuals in the State if FNS determines that the requesting state's (or Territory's) average of unemployment rate in the last 24 periodic unemployment rate surveys is 20 percent above the national average.
11. Conditions and Reasons:
12. Information Required for Request: Guam is submitting the Department of Labor data indicating that, in the last 24 periodic unemployment rate surveys the average unemployment rate is 20 percent above the national average. Please see attachment.
13. Expiration Date:
14. Limitation on Regional Office Approval of Like Requests:
15. Quality Control Procedures:
16. Date of National Office Action:
17. Date of State Agency's Request:
18. Date of Regional Office Transmittal to the National Office:
19. Date of Regional Transmittal to the State Agency:
20. Date of Implementation by State Agency:

UNEMPLOYMENT RATES BETWEEN GUAM AND UNITED STATES

Guam Statistics

	Year	Month	Unemployed	
1	2018	MAR	4.4	
2	2017	SEP	5.8	
3	2017	JUN	4.5	
4	2017	MAR	4.3	
5	2016	SEP	5.4	
6	2016	JUN	3.9	
7	2016	MAR	4	
8	2015	DEC	4.8	
9	2015	SEP	4.5	
10	2015	JUN	8.7	
11	2015	MAR	6.9	
12	2014	DEC	7.7	
13	2014	SEP	7.6	
14	2014	JUN	9	
15	2014	MAR	7.4	
16	2013	DEC	8.4	
17	2013	SEP	10	
18	2013	JUN	14.6	
19	2013	MAR	13.3	
20	2012	DEC	10.7	
21	2012	SEP	10.9	
22	2012	JUN	14	
23	2012	MAR	11.8	
24	2011	MAR	13.3	
			195.9	SUM
			8.16	AVG

United States Statistics

	Year	Month	Unemployed
1	2018	November	3.7
2	2018	October	3.7
3	2018	September	3.7
4	2018	August	3.9
5	2018	July	3.9
6	2018	June	4
7	2018	May	3.8
8	2018	April	3.9
9	2018	March	4.1
10	2018	February	4.1
11	2018	January	4.1
12	2017	December	4.1
13	2017	November	4.1
14	2017	October	4.1
15	2017	September	4.2
16	2017	August	4.4
17	2017	July	4.3
18	2017	June	4.3
19	2017	May	4.3
20	2017	April	4.4
21	2017	March	4.5
22	2017	February	4.7
23	2017	January	4.8
24	2016	December	4.7

99.8 SUM
4.16 AVG

DIFFERENCE: 50.98%