

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2150040
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:** Idaho
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 Idaho is requesting to exempt able-bodied adults without dependents (ABAWDs) in 12 counties and 3 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 Idaho seeks a waiver for a region of 12 contiguous counties based on the region's aggregate average unemployment rate for the 24-month period of July 2017 through June 2019. The national average 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 4.7 percent.

Bureau of Labor Statistics Local Area Unemployment Data July 2017 through June 2019		
Contiguous Counties	Unemployed Total	Labor Force Total
Adams County	2,448	41,623
Benewah County	4,834	97,019
Boise County	3,444	79,788
Bonner County	19,719	471,009
Boundary County	5,698	126,432
Clearwater County	4,731	70,301
Idaho County	7,245	154,086
Lemhi County	3,915	84,528
Lewis County	2,154	39,235
Shoshone County	7,137	121,117
Valley County	5,028	127,664
Washington County	4,692	111,073
Combined Area Total	71,045	1,523,875
Combined Area Unemployment Rate	4.7%	
20% Above National Average Threshold	4.7%	

The state also seeks a waiver for 3 reservations: Duck Valley, Fort Hall, and Nez Perce Reservations. During the period of July 2017 through June 2019, each of these reservations had an average unemployment rate 20 percent higher than the national average unemployment rate during the same period. The reservation unemployment rates were calculated by applying 2013-2017 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
Owyhee County (part); Idaho (part); Duck Valley Reservation, NV--ID	300	2,924	10.3%
Duck Valley Reservation	300	2,924	10.3%

Bannock County (part); Idaho (part); Fort Hall Reservation and Off- Reservation Trust Land, ID	2,418	23,110	10.5%
--	-------	--------	-------

Bingham County (part); Idaho (part); Fort Hall Reservation and Off- Reservation Trust Land, ID	3,428	29,569	11.6%
Caribou County (part); Idaho (part); Fort Hall Reservation and Off- Reservation Trust Land, ID	-	-	-
Power County (part); Idaho (part); Fort Hall Reservation and Off- Reservation Trust Land, ID	366	9,504	3.8%
Fort Hall Reservation	6,212	62,183	10.0%

Clearwater County (part); Idaho (part); Nez Perce Reservation, ID	3,240	45,968	7.0%
Idaho County (part); Idaho (part); Nez Perce Reservation, ID	2,906	40,005	7.3%
Lewis County (part); Idaho (part); Nez Perce Reservation, ID	2,154	39,235	5.5%
Nez Perce County (part); Idaho (part); Nez Perce Reservation, ID	2,776	50,510	5.5%
Nez Perce Reservation	11,075	175,718	6.3%

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 June 2019, represent 8.7% 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 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:

15. Signature and title of requesting official:


Julie A. Hammon, Division Administrator:
Email for transmission of response: Julie.Hammon@dhw.idaho.gov

16. Date of request: 9/4/2019

17. State agency staff contact (name/email/telephone): Kristin Matthews,
Kristin.Matthews@dhw.idaho.gov 208-334-5553

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