

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2130033
2. **Type of request:** Initial
3. **Statutory citation:** 7 U.S.C. § 2015(o)
4. **Regulatory citation:** 7 C.F.R § 273.24, January 17, 2001 rule (66 FR 4438)
5. **State:** Vermont
6. **Region:** Northeast
7. **Regulatory requirements:** 7 C.F.R. § 273.24(b) 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.
8. **Description of alternative procedures:** The State of Vermont is requesting a waiver to exempt ABAWDs residing in the entire state from the SNAP time limit at 7 C.F.R § 273.24 under the criteria published in the January 17, 2001, final rule, Food Stamp Program: Personal Responsibility Provisions of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (66 FR 4438)
9. **Justification for request:**

Under SNAP regulations at 7 CFR § 273.24(f)(1)(ii), FNS may waive the time limit for a group of individuals in the State if it determines that the area in which the individuals reside does not have a sufficient number of jobs to provide employment for the individuals. The State may support a claim of insufficient jobs by submitting evidence that the State qualifies for extended unemployment benefits within the past 12 months (7 C.F.R. § 273.24(f)(2)(ii)).

The U.S. Department of Labor's Trigger Notice No. 2020 – 24¹ shows the State's 13-week insured unemployment rate (IUR) is: (1) 15.42 percent; and (2) 1,087 percent of the 13-week rate for the corresponding period in the two preceding years. The State's three-month average total unemployment rate (TUR) is 10.8 percent, making the State eligible for extended unemployment benefits based on both the IUR and TUR.

¹ Extended Benefits Trigger Notices can be found at <https://oui.doleta.gov/unemploy/archive.asp>. Trigger notice 2020-24 https://oui.doleta.gov/unemploy/trigger/2020/trig_062820.html was issued the week of June 28, 2020.

10. Anticipated impact on households and State agency operations:

This waiver will provide consistency for households and State agency operations.

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

This waiver affects the entire state. As of the end of May 2020, Vermont had a total of 72,855 individual SNAP recipients. Of this total, approximately 3,006 individuals are ABAWDs.

12. Anticipated implementation date and time period for which waiver is needed:

The State is requesting a one-year waiver from October 1, 2020 through September 30, 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:

Vermont Department for Children and Families, Economic Services Division
Leslie Wisdom, 802-585-4852

15. Signature and title of requesting official:



Title: Sean Brown, DCF Commissioner

Email for transmission of response: leslie.wisdom@vermont.gov

16. Date of request: July 2, 2020

17. State agency staff contact (name/email/telephone): Leslie Wisdom,
leslie.wisdom@vermont.gov, 802-585-4852

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