

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2140013
2. **Type of request:** Extension
3. **Statutory citation:** Section 6(o) of the Food and Nutrition Act of 2008
4. **Regulatory citation:** 7 CFR 273.24
5. **State:** Montana
6. **Region:** MPRO
7. **Regulatory requirements:**

Under 7 CFR 273.24(b) individuals are not 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 SNAP work requirements. Regulations at 273.24(a) provide that fulfilling the work requirement means: working 20 hours or more per week, averaged monthly; participating in and complying with the requirements of a work program or a workfare program for at least 20 hours per week; or any combination of working and participating in a work program for a total of 20 hours per week.

Under 7 CFR 273.24(f), upon the request of a State agency, the Food and Nutrition Service (FNS) may waive the applicability of the time limit described above for any group of individuals in the State if FNS makes a determination that the area in which the individuals reside does not have a sufficient number of jobs to provide employment for the individuals.
8. **Description of alternative procedures:**

The State of Montana is requesting to exempt able-bodied adults without dependents (ABAWDs) in 7 counties and 6 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 qualify for an ABAWD time limit waiver if they have insufficient jobs. To support this claim, states may submit evidence that an area has an average unemployment rate for a 24-month time period that is at least 20 percent above the national average for the same 24-month period. 7 CFR 273.24(f)(6) provides that States may define areas to be waived.

The State of Montana seeks a waiver for 7 counties based on their average unemployment rates that are 20 percent above the national average for the 24-month

period of January 2018 through December 2019. The national average unemployment rate for this 24-month period was 3.8 percent; 20 percent above this was 4.5 percent.

Bureau of Labor Statistics Local Area Unemployment Data January 2018 through December 2019			
Counties	Unemployed Total	Labor Force Total	Unemployment Rate
Big Horn County, MT	10,420	120,174	8.7%
Glacier County, MT	10,741	137,540	7.8%
Granite County, MT	2,273	40,851	5.6%
Lincoln County, MT	14,611	194,813	7.5%
Mineral County, MT	2,749	41,956	6.6%
Rosebud County, MT	4,871	92,543	5.3%
Sanders County, MT	7,305	116,409	6.3%
20% Above National Average Threshold	4.5%		

The State requests to waive the following reservations based on having an average unemployment rate exceeding the national average for a recent 24-month period. The reservation unemployment rate was calculated by applying 2019 American Community Survey¹ share ratios to county-level Bureau of Labor Statistics data from January 2017 through December 2019. The following table summarizes the calculations:

American Community Survey and Bureau of Labor Statistics Data January 2018 through December 2019			
Reservations	Unemployed	Labor Force	Unemployment Rate
Glacier County (part); Montana (part); Blackfeet Indian Reservation and Off-Reservation Trust Land, MT	9,127	98,731	9.2%
Pondera County (part); Montana (part); Blackfeet Indian Reservation and Off-Reservation Trust Land, MT	1,021	7,509	13.6%
Total Blackfeet Reservation	10,148	106,240	9.6%
Big Horn County (part); Montana (part); Crow Reservation and Off-Reservation Trust Land, MT	7,149	57,633	12.4%
Treasure County (part); Montana (part); Crow Reservation and Off-Reservation Trust Land, MT	-	-	-
Yellowstone County (part); Montana (part); Crow Reservation and Off-Reservation Trust Land, MT	430	5,000	8.6%

¹ These calculations are based on data from the 2015-2019 American Community Survey 5-Year Estimates.

Total Crow Reservation	7,579	62,634	12.1%
Blaine County (part); Montana (part); Fort Belknap Reservation and Off-Reservation Trust Land, MT	1,948	17,626	11.0%
Phillips County (part); Montana (part); Fort Belknap Reservation and Off-Reservation Trust Land, MT	183	1,205	15.2%
Total Fort Belknap Reservation	2,131	18,832	11.3%
Daniels County (part); Montana (part); Fort Peck Indian Reservation and Off-Reservation Trust Land, MT	-	358	-
Roosevelt County (part); Montana (part); Fort Peck Indian Reservation and Off-Reservation Trust Land, MT	4,712	83,777	5.6%
Sheridan County (part); Montana (part); Fort Peck Indian Reservation and Off-Reservation Trust Land, MT	-	1,289	-
Valley County (part); Montana (part); Fort Peck Indian Reservation and Off-Reservation Trust Land, MT	730	9,223	7.9%
Total Fort Peck Indian Reservation	5,442	94,647	5.7%
Big Horn County (part); Montana (part); Northern Cheyenne Indian Reservation and Off-Reservation Trust Land, MT--SD	1,053	12,453	8.5%
Rosebud County (part); Montana (part); Northern Cheyenne Indian Reservation and Off-Reservation Trust Land, MT--SD	3,271	27,704	11.8%
Total Northern Cheyenne Indian Reservation	4,324	40,156	10.8%
Chouteau County (part); Montana (part); Rocky Boy's Reservation and Off-Reservation Trust Land, MT	634	8,423	7.5%
Hill County (part); Montana (part); Rocky Boy's Reservation and Off-Reservation Trust Land, MT	1,169	16,081	7.3%
Total Rocky Boy's Reservation	1,803	24,503	7.4%

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 **05/31/2021**, represents **36.72%** 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 August 1, 2021 through July 31, 2022.

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:

Montana Department of Public Health & Human Services
Stephanie Jenewein (SNAP/QA Program Manager)

15. Signature and title of requesting official:



Title: SNAP/QA Program Manager

Email for transmission of response: sjenewein@mt.gov

16. Date of request: 06/21/2021

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

Stephanie Jenewein
SNAP/QA Program Manager
sjenewein@mt.gov
406-329-1247

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