

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2130033
2. **Type of request:** Initial
3. **Statutory citation:** Section 6(o) of the Food and Nutrition Act of 2008
4. **Regulatory citation:** 7 CFR 273.24
5. **State:** Vermont
6. **Region:** NERO
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 Vermont is requesting to exempt able-bodied adults without dependents (ABAWDs) in 24 towns 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 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 Vermont seeks a waiver for six towns in the Brattleboro VT-NH Labor Market Area, based on their average unemployment rates for the 24-month period of April 2020 to March 2022. During this time, the national average for unemployment was 6.7 percent; 20 percent above this was 8.0 percent. The combined average unemployment rate for these towns in this Labor Market Area was 8.0 percent. The Labor Market Areas used in this waiver request are defined by the Vermont Department of Labor.¹

¹ A map of Vermont Labor Market Areas is available from the Vermont Department of Labor: <http://www.vtlmi.info/lmadef2015.pdf>. These Labor Market Areas are treated as economic regions,

Bureau of Labor Statistics Local Area Unemployment Data April 2020 to March 2022		
Brattleboro VT-NH Labor Market Area	Unemployed Total	Labor Force Total
Dover town	1,632	1,632
Grafton town	367	367
Halifax town	684	684
Searsburg town	38	38
Wilmington town	1,631	1,631
Windham town	323	323
Combined Area Total	4,675	58,504
Combined Area Unemployment Rate	8.0%	
20% Above National Average Threshold	8.0%	

The State of Vermont also seeks a waiver for four towns in the Woodstock VT Labor Market Area, based on their average unemployment rates for the 24-month period of April 2020 to March 2022. During this time, the national average for unemployment was 6.7 percent; 20 percent above this was 8.0 percent. The combined average unemployment rate for these towns in this Labor Market Area was 8.0 percent.

Bureau of Labor Statistics Local Area Unemployment Data April 2020 to March 2022		
Woodstock Labor Market Area	Unemployed Total	Labor Force Total
Bridgewater town	777	13,227
Killington town	1,851	11,684
Pomfret town	402	9,112
Reading town	315	7,599
Combined Area Total	3,345	41,622
Combined Area Unemployment Rate	8.0%	
20% Above National Average Threshold	8.0%	

The State of Vermont also seeks a waiver for two towns in the Manchester VT Labor Market Area, based on their average unemployment rates for the 24-month period of April 2020 to March 2022. During this time, the national average for unemployment

enabling the towns to be grouped non-contiguously into eligible areas, in accordance with Section VI of FNS guide on calculating waiver requests (<https://fns-prod.azureedge.us/sites/default/files/resource-files/snap-2021-guide-supporting-abawd-time-limit-waiver-requests.pdf>).

was 6.7 percent; 20 percent above this was 8.0 percent. The combined average unemployment rate for these towns in this Labor Market Area was 8.0 percent.

Bureau of Labor Statistics Local Area Unemployment Data April 2020 to March 2022		
Manchester Labor Market Area	Unemployed Total	Labor Force Total
Sandgate town	155	3,326
Stratton town	346	2,651
Combined Area Total	501	5,977
Combined Area Unemployment Rate	8.4%	
20% Above National Average Threshold	8.0%	

The State of Vermont also seeks a waiver for Buels gore, based on its average unemployment rate for the 24-month period of December 2020 to November 2022. During this time, the national average for unemployment was 4.6 percent; 20 percent above this was 5.5 percent.

Bureau of Labor Statistics Local Area Unemployment Data December 2020 to November 2022			
Individual towns	Unemployed Total	Labor Force Total	Unemployment Rate
Buels gore	21	363	5.8%
20% Above National Average Threshold	5.5%		

The State of Vermont also seeks a waiver for three towns in the St. Johnsbury VT Labor Market Area, based on their average unemployment rates for the 24-month period of December 2020 to November 2022. During this time, the national average for unemployment was 4.6 percent; 20 percent above this was 5.5 percent. The combined average unemployment rate for these towns in this Labor Market Area was 5.7 percent.

Bureau of Labor Statistics Local Area Unemployment Data December 2020 to November 2022		
St. Johnsbury VT Labor Market Area	Unemployed Total	Labor Force Total
Granby town	55	817
Sutton town	601	10,244
Victory town	11	593
Combined Area Total	667	11,654

Combined Area Unemployment Rate	5.7%
20% Above National Average Threshold	5.5%

The State of Vermont also seeks a waiver for eight towns in the Derby VT Labor Market Area, based on their average unemployment rates for the 24-month period of December 2020 to November 2022. During this time, the national average for unemployment was 4.6 percent; 20 percent above this was 5.5 percent. The combined average unemployment rate for these towns in this Labor Market Area was 5.5 percent.

Bureau of Labor Statistics Local Area Unemployment Data December 2020 to November 2022		
Derby VT Labor Market Area	Unemployed Total	Labor Force Total
Barton town	1,543	26,341
Brighton town	649	12,027
Brownington town	670	12,406
Ferdinand town	-	335
Irasburg town	611	14,150
Newport city	2,235	38,457
Troy town	1,001	18,858
Warren's gore	-	96
Combined Area Total	6,709	122,670
Combined Area Unemployment Rate	5.5%	
20% Above National Average Threshold	5.5%	

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 January 2023, represent 3% of the entire 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 July 1, 2023 through June 30, 2024.

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. Contact person is Leslie Wisdom, Director, Food and Nutrition Program.

- 15. Signature and title of requesting official:**

DocuSigned by:

Miranda A. Gray

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Name/Title: **Miranda A. Gray, Deputy Commissioner, Economic Services Division**

Email for transmission of response: **Miranda.Gray@vermont.gov**

- 16. Date of request:** March 13, 2023

- 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):**