



Food and
Nutrition
Service

Park Office
Center

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Center Drive
Alexandria
VA 22302

AUG 11 2017

Ms. Chevera Trillo
Workforce Administrator
Arizona Department of Economic Services
1789 W. Jefferson Street
Phoenix, Arizona 85007

RE: SNAP – Arizona Request to Waive Able-Bodied Adults without
Dependents Time Limit – Approval

Dear Ms. Trillo:

This is in response to the Arizona State agency's request to waive the Supplemental Nutrition Assistance Program (SNAP) time limit for able-bodied adults without dependents in 12 counties, one city, and 18 Native American Reservation areas from January 1, 2018, through December 31, 2018. After careful review of the supporting data provided, the Food and Nutrition Service (FNS) is partially approving the State agency's request.

The requirements for approval are provided at 7 CFR 273.24(f) and through relevant FNS guidance. FNS is approving Arizona to waive the time limit in 12 counties, one city, and 17 Native American Reservation areas for the requested 12-month period. FNS is not approving the request for the Hopi Reservation area, on its own, because the data provided does not adequately support the lack of sufficient jobs needed for waiver approval. The State provided Bureau of Labor Statistics (BLS) data to FNS to support its request. The BLS data has been updated since the State accessed this data source. Under the updated data, the Hopi Reservation area no longer meets the requirements for approval. However, the geographic boundaries of the Hopi Reservation area lie within approved counties, namely Coconino and Navajo Counties. Therefore, this waiver would still apply to the Hopi Reservation area.

The approval amends and extends waiver number 2150033. The attached waiver response includes the approved areas, the supporting evidence used, and the conditions of approval.

If you have any questions please contact Barbara Utuchian at Barbara.Utuchian@fns.usda.gov.

Sincerely,

Sasha Gersten-Paal
Chief
Certification Policy Branch
Program Development Division
An Equal Opportunity Provider and Employer

WAIVER RESPONSE

1. **Waiver serial number:** 2150033
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:** Arizona
6. **Region:** Western
7. **Requirement:** 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 in an unemployment rate of over 10 percent, or does not have a sufficient number of jobs to provide employment for the individuals.
8. **Proposed alternative procedures:** FNS is approving Arizona to waive the ABAWD time limit in 12 contiguous counties, one city, and 17 reservation areas from January 1, 2018, through December 31, 2018. The State agency has grouped the 12 contiguous counties for consideration as a combined area, while considering the city and reservation areas individually. The State has supported its request based upon the areas having aggregate average unemployment rate 20 percent above the national average for the recent 24-month period of February 2015 through January 2017. During this time period the national average unemployment rate was 5.0 percent; 20 percent above that rate is 6.0 percent. As detailed in the following tables, the aggregate unemployment rates for the approved areas reached or exceeded 6.0 percent during the selected time period.

Bureau of Labor Statistics Local Area Unemployment Data February 2015 – January 2017*		
County Group	Unemployment	Labor Force
Apache County	59,191	486,923
Cochise County	79,372	1,209,247
Coconino County	108,947	1,772,678
Gila County	37,612	505,654
Graham County	23,986	345,521
Greenlee County	7,291	95,052
La Paz County	13,202	200,822
Mohave County	137,079	1,922,027
Navajo County	86,210	984,257
Pinal County	222,536	3,836,241
Santa Cruz County	49,515	468,375
Yuma County	448,345	2,254,606
Combined Area Total	1,273,286	14,081,403
Combined Area Unemployment Rate	9.0%	

*Data extracted from <http://www.bls.gov> on July 11, 2017.

Bureau of Labor Statistics Local Area Unemployment Data April 2014 – March 2016*			
City	Unemployment	Labor Force	Unemployment Rate
Apache Junction City, Maricopa County Part	180	1,517	11.9%

*Data extracted from <http://www.bls.gov> on July 11, 2017.

American Community Survey and Bureau of Labor Statistics Data April 2014 – March 2016*			
Reservation Area	Unemployment	Labor Force	Unemployment Rate
Cocopah	3,082	8,781	35.1%
Colorado River	8,072	105,555	7.6%
Fort Apache	29,439	130,912	22.5%
Fort McDowell Yavapai Nation	490	7,763	6.3%
Mojave	1,038	8,190	12.7%
Gila River	22,228	107,761	20.6%
Havasupai	262	902	29.0%
Hualapai	1,685	12,680	13.3%
Maricopa (Ak Chin)	1,787	11,345	15.8%
Navajo	102,526	735,772	13.9%
Pascua Pueblo Yaqui	4,156	31,947	13.0%
Salt River	4,762	55,067	8.6%

San Carlos	17,781	79,396	22.4%
Tohono O'odham Nation	11,986	77,493	15.5%
Tonto Apache	71	722	9.8%
Yavapai-Apache	1,321	9,890	13.4%

*Data extracted from <http://www.bls.gov> and <http://factfinder.census.gov> on July 11, 2017.

9. Action and reason for approval or denial: The Food and Nutrition Service (FNS) is approving the Arizona State agency's request to waive the ABAWD time limit in the 12 counties, one city, and 17 reservation areas because the jurisdictions meet the requirements for approval provided at 7 CFR 273.24(f) and relevant FNS guidance.

10. Regulatory or legislative basis for action: The waiver is approved pursuant to section 6(o) of the Food and Nutrition Act of 2008, as amended and 7 CFR 273.24(f).

11. Information required for an extension: To receive an amendment or extension the State agency must provide FNS with a formal request supported by data or other information as described in 7 CFR 273.24(f). Any request based upon unemployment rates must include data spreadsheets and supporting documentation.

12. Implementation date and expiration date: The waiver is effective January 1, 2018, through December 31, 2018.

13. Limitation if any on regional office approval of like requests: The waiver is limited to the Arizona State agency.

14. Date of national office action: AUG 11 2017

15. Date of State agency's request: June 16, 2017

16. Date of regional office transmittal of request: June 16, 2017

17. State agency contact:

Gretchen Caraway
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GCaraway@azdes.gov

18. FNS regional contact:

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