



NOV 05 2015

Food and
Nutrition
Service

Park Office
Center

3101 Park
Center Drive
Alexandria
VA 22302

Ms. Lori Wolff
Division Administrator
Statewide Self Reliance Programs
Idaho Department of Health and Welfare
450 West State Street, 2nd Floor
Boise, Idaho 83720-0036

RE: SNAP – Idaho Request to Waive Able-bodied Adults without Dependents Time Limit – Extension and Modification – Approval

Dear Ms. Wolff:

This is in response to the Idaho Department of Health and Welfare's request to extend and modify waiver number 2150040, which would allow Idaho to exempt able-bodied adults without dependents (ABAWD) in 16 counties and four reservation areas from the Supplemental Nutrition Assistance Program (SNAP) time limit at 7 CFR 273.24 for calendar year 2016.

The Idaho State agency has supported its request to waive the time limit in 16 contiguous counties based upon the combined area having an aggregate average unemployment rate 20 percent above the national average for a recent 24-month period. The 16 counties are Adams, Benewah, Boise, Bonner, Boundary, Butte, Clark, Clearwater, Custer, Gem, Idaho, Lemhi, Lewis, Shoshone, Valley, and Washington Counties.

The State agency has also requested to waive the time limit in Coeur d'Alene, Duck Valley, Fort Hall, and Nez Perce Reservations based upon each individual reservation area having an aggregate average unemployment rate 20 percent above the national average for a recent 24-month period.

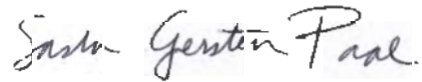
The Bureau of Labor Statistics and American Community Survey data provided by the Idaho State agency supports waiver approval for the requested areas. Therefore, the Food and Nutrition service is approving Idaho's request to waive the ABAWD time

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limit in the 16 counties and four reservation areas for 12 months, effective January 1, 2016, through December 31, 2016. The detailed waiver response is attached. If you have any questions, please contact Jackie Bourne at Jackie.Bourne@fns.usda.gov.

Sincerely,

A handwritten signature in black ink that reads "Sasha Gersten-Paal". The signature is written in a cursive style with a large, stylized "P" at the end.

Sasha Gersten-Paal
Chief
Certification Policy Branch
Program Development Division

Attachment

WAIVER RESPONSE

1. **Waiver serial number:** 2150040
2. **Type of request:** Extension and modification
3. **Regulatory citation:** 7 CFR 273.24
4. **State:** Idaho
5. **Region:** Western
6. **Regulatory requirement:** Federal regulations at 7 CFR 273.24 provide 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. Regulations at 7 CFR 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 at least 20 hours per week; any combination of working and participating in a work program for a total of 20 hours per week; or participating and complying with a workfare program.

Regulations at 7 CFR 273.24(f) also provide that, upon the request of a State agency, the Secretary may waive the applicability of the above provision 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.

7. **Description of proposed alternative procedures:** The Idaho State agency has requested to waive the ABAWD time limit at 7 CFR 273.24 in 16 counties and four reservation areas from January 1, 2016 to December 31, 2016.

Idaho has supported its request to waive the time limit in 16 contiguous counties based upon the combined area having an aggregate average unemployment rate 20 percent above the national average for a recent 24-month period. The 16 counties are Adams, Benewah, Boise, Bonner, Boundary, Butte, Clark, Clearwater, Custer, Gem, Idaho, Lemhi, Lewis, Shoshone, Valley, and Washington Counties.

In addition, the State agency has requested to waive the time limit in Coeur D'Alene, Duck Valley, Fort Hall and Nez Perce Reservations. based upon each individual reservation area having an aggregate average unemployment rate 20 percent above the national average for a recent 24-month period.

The State agency selected the same 24-month period – January 2013 through December 2014 – for the 16 county combined area and for all four reservation areas. During this 24-month period the national unemployment rate was 6.8 percent; 20 percent above this is 8.1 percent. As detailed in the tables below, the 16 county combined area and all four reservation areas qualify based upon having unemployment rates 20 percent above the national average from January 2013 through December 2014.

Bureau of Labor Statistics Local Area Unemployment Data January 2013 to December 2014*		
County	Labor Force Total	Unemployed Total
Adams	40,440	4,780
Benewah	95,190	8,674
Boise	70,187	4,888
Bonner	436,894	34,560
Boundary	117,508	8,276
Butte	31,222	1,851
Clark	10,380	556
Clearwater	75,568	7,832
Custer	51,929	3,916
Gem	180,306	12,325
Idaho	156,231	13,456
Lemhi	81,526	6,965
Lewis	38,616	1,788
Shoshone	128,472	14,263
Valley	108,611	9,647
Washington	111,668	7,713
Combined Area Total	1,734,748	141,490
Combined Area Unemployment Rate	8.2%	
20% Above National Average Threshold	8.1%	

*Data extracted from <http://www.bls.gov> on October 8, 2015

Bureau of Labor Statistics Local Area Unemployment Data/Census Bureau Data*	
Reservation Area	Unemployment Rate: January 2013 – December 2014
Coeur d'Alene	9.3%
Duck Valley	18%
Fort Hall	12.3%
Nez Perce	8.2%
20% Above National Average Threshold	8.1%

*Data extracted from <http://www.bls.gov> and <http://factfinder.census.gov> on October 8, 2015 and October 13, 2015.

8. **Action and reason for approval or denial:** The Food and Nutrition Service (FNS) is approving the Idaho State agency's request to waive the ABAWD time limit in the 16 counties and four reservation areas because the areas meet the requirements for approval provided at 7 CFR 273.24(f) and relevant FNS guidance.
9. **Regulatory or legislative basis for action:** The waiver is approved pursuant to 7 CFR 273.24(f).
10. **Conditions and reasons:** None.
11. **Information required for extension:** To receive an extension the State agency must provide FNS with a formal waiver request supported by data or other information as described in 7 CFR 273.24(f). If the State requests an extension based upon unemployment rates, it must provide FNS with all supporting documentation, including data spreadsheets.
12. **Expiration date:** The waiver is effective January 1, 2016, through December 31, 2016.
13. **Limitation, if any, on regional office approval of like requests:** The waiver is limited to the Idaho State agency.
14. **Date of national office action:** **NOV 05 2015**
15. **Date of State agency's request:** August 12, 2015
16. **Date of regional office transmittal of request:** August 13, 2015

17. Implementation date: January 1, 2016

18. State agency contact:

Kristin Matthews

MatthewsK@dhs.idaho.gov

(208)334-5553

19. FNS regional contacts:

Jackie Bourne

Jackie.Bourne@fns.usda.gov

(415)293-3717