

 Missouri Department of
SOCIAL SERVICES
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Jeremiah W. (Jay) Nixon, GOVERNOR • RONALD J. LEVY, DIRECTOR

August 20, 2010

FAMILY SUPPORT DIVISION
ALYSON CAMPBELL, DIRECTOR
PO BOX 2320 JEFFERSON CITY, MO 65102-2320
573-751-3178 • 573-522-4333 FAX

Jody Cornwell
Regional Director
Supplemental Nutrition Assistance Program
USDA, Food and Nutrition Service
Mountain Plains Region
1244 Speer Boulevard
Denver, Colorado 80204-3585

Dear Ms. Cornwell:

Please find attached a request to modify and extend waiver 2070002 of regulations at 7CFR 273.24. This waiver, if approved, would permit Missouri to waive all counties from the able bodied adult without dependents (ABAWD) 18 to 50 year old work requirement policy.

We request your immediate consideration of the waiver request. If you have any questions regarding this waiver, please contact Rachel Traver at (573) 751-3178 or by email at Rachel.E.Traver@dss.mo.gov.

Sincerely,


Alyson Campbell
Director

AC/jm

Attachments

RELAY MISSOURI
FOR HEARING AND SPEECH IMPAIRED
1-800-735-2466 VOICE • 1-800-735-2966 TEXT PHONE

An Equal Opportunity Employer, services provided on a nondiscriminatory basis.

WAIVER REQUEST

1. **Waiver serial number:**
2070002
2. **Type of request:**
Modification and Extension
3. **Primary regulation citation:**
Section 6 (o) of the Food Stamp Act, as amended by Section 824 of the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996, P.L. 104-193
4. **Secondary regulation citation, if any:**
7 CFR 273.24 (f)(2)(ii)
5. **State:**
Missouri
6. **Region:**
Mountain Plains
7. **Regulatory requirements:**
Section 6(o) of the Food Stamp Act, as amended by Section 824 of the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA), P.L. 104-193, provides that no individual shall be eligible to participate in the Food Stamp Program as a member of any household if, during the preceding 36 month period, the individual received food stamp benefits for not less than 3 months (consecutive or otherwise), during which the individual did not work 20 hours or more per week, averaged monthly; did not participate in and comply with the requirement of a work program for 20 hours or more per week; or did not participate in and comply with requirements of a program under section 20 or a comparable program established by the State.

Section 6(o) of the Food Stamp Act, as amended by Section 824 of PRWORA, also provides 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 resides has 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:**
Missouri is requesting a modification and extension of its existing waiver to exempt residents residing in the entire State from the work requirements of 7 CFR 273.24 due to having insufficient jobs based on the U.S. Department of Labor data that the State qualifies for extended unemployment benefits.

26 USC 3304 (Public Law 102-318) allows States the option of providing an additional alternative trigger for the extended benefits program, based on the State's seasonally adjusted total unemployment rate (TUR) for the most recent three months reaching at least: (1) 6.5 percent; and (2) 110 percent of such TUR for the three-month periods ending in either or both of the two preceding calendar years.

The Department of Labor's Trigger Notice No. 2010-2¹ shows the State's 3-month average total unemployment rate (TUR) was: (1) 6.5 percent and (2) 138 percent of the 3-month average for the corresponding period in the second year, making the State eligible for extended unemployment benefits.

9. Justification for request:

This request to exempt residents residing in the entire State from the work requirements of 7 CFR 273.24 due to having insufficient jobs is based on the State qualifying for extended unemployment benefits within the past 12 months.

10. Anticipated impact on households and State agency operations:
None

11. Caseload information, including percent, characteristics, and quality control error rate for affected portion:

As of July 31, 2010, there are 408,804 households in Missouri. There are an estimated 33,117 individuals who would be impacted by this waiver.

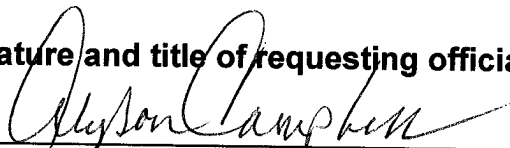
12. Anticipated implementation date and time period for which waiver is needed:

The State is requesting a one-year waiver from October 1, 2010 through September 30, 2011.

13. Proposed quality control review procedures:

There are no special quality control procedures needed in conjunction with this waiver.

14. Signature and title of requesting official:


Alyson Campbell, Director

15. Date of request:

8/20/10

¹ Extended Benefits Trigger Notices can be found at http://www.workforcesecurity.doleta.gov/unemploy/claims_arch.asp. Trigger notice 2010-2 was issued the week of January 24, 2010.

TRIGGER NOTICE NO. 2010 - 2
STATE EXTENDED BENEFIT (E.B.) INDICATORS UNDER P.L. 102-318
Effective January 24, 2010

			INDICATORS					STATUS		
			13 Weeks Insured Unemployment Rate	Percent of Prior 2 Years	3 months S.A. T.U.R.	Percent of prior			Periods	
						Year	Second Year	Available Weeks	Begin Date(B) End Date(E)	
@		Alabama	3.56	161	10.8	174	291	20	B 03-29-2009	
@		Alaska	6.02	153	8.6	126	136	20	B 01-25-2009	
@		Arizona	3.83	216	9.1	142	221	20	B 02-22-2009	
	&	Arkansas	4.92	145	7.6	138	152		E 09-26-2009	
@		California	5.00	151	12.4	149	213	20	B 02-22-2009	
@		Colorado	3.18	227	7.1	129	173	13	B 04-12-2009	
@		Connecticut	4.50	151	8.6	136	175	20	B 02-15-2009	
@	*	Delaware	3.46	136	8.7	155	235	20	B 06-28-2009	
@		District of Col	1.50	145	11.9	148	208	20	B 04-05-2009	
	*	&	Florida	3.61	157	11.6	158	246	E 01-02-2010	
@	*		Georgia	3.89	164	10.2	141	204	20	B 02-22-2009
		&	Hawaii	3.43	172	7.0	145	241	E 01-24-1981	
@		Idaho	5.06	146	9.1	156	267	20	B 02-08-2009	
@		Illinois	4.44	155	11.0	157	200	20	B 03-15-2009	
@		Indiana	3.52	123	9.8	138	213	20	B 03-15-2009	
	*	&	Iowa	3.35	154	6.6	153	173	E 06-04-1983	
@		Kansas	3.56	189	6.6	137	165	13	B 07-05-2009	
@	*		Kentucky	3.34	132	10.9	151	201	20	B 02-22-2009
		&	Louisiana	3.42	236	7.2	133	194	E 02-25-2006	
@		Maine	3.22	146	8.2	134	174	20	B 03-29-2009	
		&	Maryland	3.23	157	7.4	145	205	E 07-31-1982	
@	*		Massachusetts	4.10	133	9.0	147	200	20	B 03-22-2009
@		Michigan	5.27	125	14.8	154	202	20	B 01-25-2009	
@		Minnesota	3.55	157	7.5	122	159	13	B 03-29-2009	
		&	Mississippi	3.73	154	10.1	134	162	E 07-16-1983	
		&	Missouri	3.72	153	9.4	138	174	E 01-02-2010	
		&	Montana	4.72	185	6.5	132	175	E 07-18-2009	
		&	Nebraska	2.23	170	4.7	127	156	E 01-24-1981	
@		Nevada	5.48	164	12.7	158	249	20	B 02-22-2009	
@	*		New Hampshire	2.86	169	6.9	168	202	13	B 08-02-2009
@		New Jersey	4.53	132	9.8	153	222	20	B 03-15-2009	
@		New Mexico	3.39	187	8.0	173	222	13	B 09-06-2009	
@		New York	3.73	143	8.8	139	191	20	B 03-29-2009	
@		North Carolina	5.01	167	10.9	145	222	20	B 10-05-2008	
	*	&	North Dakota	1.72	136	4.2	127	135	E 06-11-1983	
@		Ohio	3.58	138	10.6	149	185	20	B 03-15-2009	
		&	Oklahoma	2.75	223	7.0	159	184	E 01-24-1981	
@		Oregon	6.10	149	11.0	141	207	20	B 12-07-2008	
@		Pennsylvania	5.35	144	8.8	144	195	20	B 02-15-2009	
#		&	Puerto Rico	5.93	150	15.5	121	138	13	B 01-25-2009
@		Rhode Island	4.06	122	12.8	140	220	20	B 07-06-2008	
@		South Carolina	4.79	145	12.3	148	215	20	B 03-08-2009	
	*	&	South Dakota	1.49	193	4.9	144	181	E 01-24-1981	
@		Tennessee	2.97	138	10.5	145	198	20	B 02-22-2009	
@		Texas	2.53	189	8.2	151	186	20	B 05-03-2009	
	*	&	Utah	2.95	197	6.5	171	224	E 06-25-1983	
@		Vermont	3.84	135	6.6	122	165	13	B 03-22-2009	
		&	Virgin Islands	2.68	137	7.8	114	165	E 08-06-1983	
@		Virginia	2.09	157	6.7	145	203	13	B 05-03-2009	

@	*	Washington	5.05	182	9.3	150	202	20	B 02-15-2009
@		West Virginia	3.83	165	8.7	202	197	20	B 06-07-2009
@		Wisconsin	5.61	159	8.4	155	186	20	B 02-22-2009
	*	& Wyoming	3.12	258	7.3	228	260		E 06-13-1987

Total Number "ON": 37

1

36

* - State does not have 6 % I.U.R option in law

& - State does not have T.U.R option in law

January 22, 2010

@ - State "ON" by 3-month average TUR

- State "ON" by 13-week IUR

I.U.R reflects 13-week period ending January 09, 2010

T.U.R reflects avg. seasonally adjusted T.U.R for 3-month period ending December, 2009