



United States
Department of
Agriculture

Food and
Nutrition
Service

Mountain
Plains
Region

1244 Speer Boulevard, Suite 903
Denver, Colorado 80204-3585

MAY 15 2012

Alyson Campbell, Director
Family Support Division
Missouri Department of Social Services
615 Howerton Court
P.O. Box 2320
Jefferson City, MO 65102-2320

Dear Ms. Campbell:

This is in response to the State of Missouri's modification and extension of its waiver of the work requirements for able-bodied adult without dependents (ABAWD) 18 to 50 years old.

The State agency's request would waive the provision Section 6(0) 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. This section limits the receipt of food stamp benefits to three months within a three year period for able-bodied adults who are neither working 20 hours or more each week nor participating in a work program. Additionally, Missouri requested a modification and extension of its existing waiver to exempt all ABAWDS statewide from the work requirements of 7 CFR 273.24 based on the U.S. Department of Labor data showing that the State qualifies for extended unemployment benefits due to insufficient jobs statewide.

This waiver allows the State agency to waive work requirements for all ABAWDs for 12 months based on the Department of Labor's Unemployment Insurance Service determining the State meets the criteria for extended benefits statewide.

The Food and Nutrition Service is approving the waiver effective October 1, 2012, through September 30, 2013. The attachment explains Missouri's request and our approval in greater detail.

We would like to reiterate our commitment to assist and support you and your staff in the continued excellence of Missouri's SNAP Program. Should you have any questions or concerns, please contact Lisa Amaro-Rife by email at Lisa.Amaro-Rife@fns.usda.gov or by telephone at 303-844-0340.

Sincerely,

CHERYL KENNEDY
Regional Director
Supplemental Nutrition Assistance Program

cc: Jeannie Olson, Assistant Deputy Director, Family Support Division
Nancy Young, Unit Manager, Food Stamp Program & Policy

MPSNAP: 10-1-1 MO ABAWD Waiver

AN EQUAL OPPORTUNITY EMPLOYER

 Missouri Department of
SOCIAL SERVICES
Your Potential. Our Support.

JEREMIAH W. (JAY) NIXON, GOVERNOR • BRIAN KINKADE, INTERIM DIRECTOR

ALYSON CAMPBELL, DIVISION DIRECTOR

FAMILY SUPPORT DIVISION

POBOX 2320-615 HOWERTON CT. JEFFERSON CITY, MO 65109-2320

WWW.DSS.MO.GOV • (573) 751-3178 • FAX (573) 522-6220

April 11, 2012

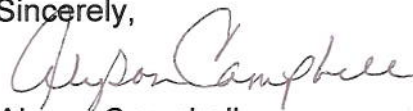
Cheryl Kennedy
Regional Director
Supplemental Nutrition Assistance Program
USDA, Food and Nutrition Service
Mountain Plains Region
1244 Speer Boulevard
Denver, Colorado 80204-3585

Dear Ms. Cheryl Kennedy:

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 Jeannie Olson at (573) 751-3178 or by email at Jeannie.Olson@dss.mo.gov.

Sincerely,



Alyson Campbell
Director

AC/jm

Attachment

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 State Extended Benefit (EB) Indicators Under P.L. 111-312 effective January 8, 2012¹ shows the State's 3-month average total unemployment rate (TUR) was: (1) 8.5 percent and (2) 88 percent of the 3-month average for the corresponding period in the second year, making the State eligible for extended unemployment benefits.

Missouri is one of 46 states that continue to be eligible for Tier Four Status extended unemployment benefits. The Tier Four Status began January 2, 2011.

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 January 31, 2012, there are 444,230 Food Stamp households in Missouri. There are an estimated 35,590 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, 2012 through September 30, 2013.

13. Proposed quality control review procedures:
There is no special quality control procedures needed in conjunction with this waiver.

14. Signature and title of requesting official:

Alyson Campbell, Director

¹ State Extended Benefit (EB) Indicators Under P.L. 111-312 effective January 8, 2012 can be http://workforcesecurity.doleta.gov/unemploy/euc_trigger/2012/euc_010812.html.

15. Date of request: