



United States Department of Agriculture

Food and
Nutrition
Service

Park Office
Center

3101 Park
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Alexandria
VA 22302

SEP 18 2015

Mr. Benjamin Anderson
Chief
Bureau of Cash/Food Policy and Technical Support
Office of Family Assistance
Department of Job and Family Services
30 East Broad Street
Columbus, Ohio 43215

RE: SNAP – Ohio Request to Waive Able-bodied Adults without Dependents
Time Limit – Initial – Approval

Dear Mr. Anderson:

This is in response to the Ohio Department of Job and Family Services' request to exempt able-bodied adults without dependents (ABAWD) in 18 counties from the Supplemental Nutrition Assistance Program (SNAP) time limit at 7 CFR 273.24.

The Ohio State agency has requested to waive the ABAWD time limit based upon each of the 18 counties having an average unemployment rate 20 percent above the national average for the 24-month period of January 2013 through December 2014. The 18 requested counties are:

Adams, Ashtabula, Brown, Clinton, Coshocton, Gallia, Highland, Huron, Jackson, Jefferson, Meigs, Monroe, Morgan, Noble, Ottawa, Perry, Pike, and Scioto Counties.

The Bureau of Labor Statistics data provided by the State agency demonstrates that each of the 18 counties had an average unemployment rate that reached 20 percent above the national average for the selected 24-month period. Therefore, the Food and Nutrition Service is approving the State agency's request to waive the ABAWD time limit in all eighteen counties for 12 months, effective October 1, 2015, through September 30, 2016. The detailed waiver response is attached. If you have any questions, please contact Dana Bax at Dana.Bax@fns.usda.gov.

Sincerely,

Sasha Gersten-Paal
Chief
Certification Policy Branch
Program Development Division

Attachment
An Equal Opportunity Provider and Employer

WAIVER RESPONSE

1. **Waiver serial number:** 2160001
2. **Type of request:** Initial
3. **Primary regulation citation:** 7 CFR 273.24
4. **State:** Ohio
5. **Region:** Midwest
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 Ohio State agency has requested to waive the ABAWD time limit at 7 CFR 273.24 in Adams, Ashtabula, Brown, Clinton, Coshocton, Gallia, Highland, Huron, Jackson, Jefferson, Meigs, Monroe, Morgan, Noble, Ottawa, Perry, Pike, and Scioto Counties from October 1, 2015, through September 30, 2016. Ohio has supported its request based upon each having an average unemployment rate 20 percent above the national average for the 24-month period of January 2013 through December 2014. During this 24-month period the national unemployment rate was 6.77 percent; 20 percent above this is 8.1 percent.

Bureau of Labor Statistics Local Area Unemployment Data January 2013 through December 2014*	
County	Unemployment Rate
Adams	10.9%
Ashtabula	8.3%
Brown	8.6%
Clinton	9.0%
Coshocton	8.5%
Gallia	8.6%
Highland	9.0%
Huron	9.1%
Jackson	9.5%
Jefferson	9.4%
Meigs	10.4%
Monroe	10.5%
Morgan	9.0%
Noble	8.6%
Ottawa	8.6%
Perry	8.4%
Pike	10.6%
Scioto	10.3%
20% Above National Average Threshold	8.1%

*Data extracted from <http://www.bls.gov> on August 31, 2015

8. **Action and reason for approval or denial:** The Food and Nutrition Service (FNS) is approving the State agency's request to waive the ABAWD time limit in the 18 counties because the State meets the requirements for approval provided at 7 CFR 273.24(f) and relevant FNS guidance. Adams, Ashtabula, Brown, Clinton, Coshocton, Gallia, Highland, Huron, Jackson, Jefferson, Meigs, Monroe, Morgan, Noble, Ottawa, Perry, Pike, and Scioto Counties qualify for the waiver because each county had an average unemployment rate 20 percent above the national average for the 24-month period of January 2013 through December 2014.
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 October 1, 2015, through September 30, 2016.
13. **Limitation, if any, on regional office approval of like requests:** The waiver is limited to the Ohio State agency.
14. **Date of national office action:** SEP 18 2015
15. **Date of State agency's request:** August 14, 2015
16. **Date of regional office transmittal of request:** August 18, 2015
17. **Implementation date:** October 1, 2015
18. **State agency contact:**
Betsy Suver
(614) 387-8302
Betsy.Suver@jfs.ohio.gov
19. **FNS regional contacts:**
Dana Bax
(312) 886-5768
Dana.Bax@fns.usda.gov