



STATE OF WASHINGTON
DEPARTMENT OF SOCIAL AND HEALTH SERVICES

March 8, 1999

Dennis Stewart, Program Director
Food Stamp Program
Western Region, Food and Nutrition Service
United States Department of Agriculture
550 Kearny Street, Room 400
San Francisco, California 94108-2518

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FOOD STAMP PROGRAM

Dear Mr. Stewart:

The state of Washington is submitting its requests for the waivers to the Food Stamp Act, Section 6(0). Our prior waivers (#970032, 970063, and 970164) are set to expire on March 31, 1999, and we are submitting new data to support the continuation of these waivers until March 31, 2000.

Section 6 (0)(4) permits waivers for areas with: (1) an unemployment rate of more than 10 percent; or (2) insufficient jobs to provide employment. Administrative Notice 97 - 27 allowed self-certification for areas of state where the unemployment rate is more than ten percent and the data is supported by the Bureau of Labor Statistics.

This waiver request includes:

- Areas that we can self-certify. This would extend the waiver until March 31, 2000.
- Areas that have insufficient jobs as evidenced by their listing as Federal Labor Surplus areas or as supported by other employment data.

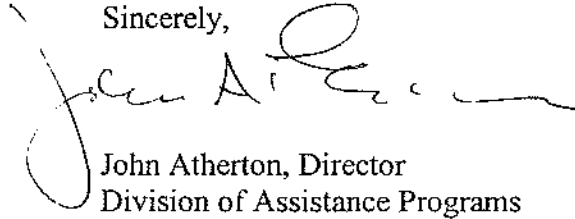
We will be submitting a separate waiver request (waiver #970153) for American Indian Reservations based on employment-to-population ratios below the state average. We are still awaiting the Bureau of Indian Affairs Report on Indian Service Populations and Labor Force Status which was due to have been released in May of 1998. For this reason, we did request an extension until the data was available for the waiver.

We will not be submitting a waiver request for the parts of King County previously covered under waiver # 970032. From our compilation of the current data, it no longer appears that significant numbers of census tracts have unemployment rates over 10 percent.

Dennis Stewart, Regional Director
March 8, 1999
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Thank you for your consideration of these waivers. If you have any questions, please call James Kainber at (360) 413-3207.

Sincerely,

A handwritten signature in dark ink, appearing to read "John Atherton", with a long horizontal flourish extending to the right.

John Atherton, Director
Division of Assistance Programs

cc: Liz Begert Dunbar
James Kelly
James Wilson
James Kainber
Patricia Richards
Mary Monahan
Maura Donoghue

**Waiver Request, Washington Counties and Areas
with High Unemployment , or Insufficient Jobs**

1. **Waiver serial number:** 970032, 970063, and 970164
2. **Type of request:** Waive the work requirement for those Able-Bodied Adults with No Dependents (ABAWDs) where unemployment rates are above 10 percent, or where there are insufficient jobs.
3. **Primary regulation citation:** Food Stamp Act of 1977 Work Requirements Section 6 (o) (2) as amended through Public Law 104-193.
4. **Secondary regulation citation:** Food Stamp Act of 1977 Work Requirements Section 6 (o) (4) as amended through Public Law 104-193.
5. **State:** Washington
6. **Region:** Western
7. **Regulatory requirements:** No individual (between 18 and 50) will be eligible to participate in the Food Stamp Program as a member of any household if the individual received Food Stamp benefits for three full months unless the individual works 20 hours a week, participates in a work program for 20 hours or more a week, participates in a workfare program each month, or is exempt.
8. **Description of proposed alternate procedures:** Exempt all ABAWD Food Stamp recipients in areas of the state with unemployment over 10 percent, or where there are insufficient jobs.
9. **Rationale for Request:** Request a waiver from Food Stamp work requirements for areas with high unemployment or insufficient jobs. In these areas many individuals receiving Food Stamps will be unable to find employment despite significant effort. The supply of employment will be particularly short in these areas for individuals with little training or education, as is the case for most ABAWDs who are receiving Food Stamps. The following areas qualify either on the basis of high unemployment, or on the basis of insufficient jobs as evidenced by their listing on federal Labor Surplus areas list, their low employment-to-population ratios, or because a declining job base indicates significant economic dislocation.

A. Counties with Unemployment over 10 Percent:

Request a waiver for the following counties on the basis of unemployment rates

exceeding 10 percent. The data submitted is the average for the 12 months of calendar year 1998. These data are provided by the Washington State Employment Security Department, a BLS-cooperating agency, and conform to BLS methodologies for calculating rates. (See Appendix A for data for these counties).

Adams *not requesting extension for Franklin, Grays Harbor*
Columbia
Klickitat - *new*
Okanogan
Pend Oreille - *new*
Skamania
Yakima

B. Counties and Cities Listed on the Federal Labor Surplus Areas list, October, 1998:

We request a waiver for the following counties and cities on the basis of insufficient jobs, as evidenced by their listing as Federal Labor Surplus areas. Federal Labor Surplus areas are defined as areas where unemployment exceeds the national unemployment rate by 20 percent or more over the previous two calendar years. (Please see attached list in Appendix B.)

Benton County [Kennewick City plus balance of Benton EXCEPT Richland City]
Chelan County
Clallam County
Cowlitz County [Longview City plus balance of Cowlitz County]
Douglas County
Ferry County - *new*
Franklin County - *new*
Grant County
Grays Harbor County - *new*
Jefferson County
Kittitas County
Lewis County
Mason County
Pacific County
San Juan County
Skagit County
Stevens County - *new*
Wahkiakum County
Whatcom County [Bellingham City plus balance of Whatcom County]

Cities Listed on the Federal Labor Surplus Areas list, October, 1998:

Bremerton City [in Kitsap County]
Everett City [in Snohomish County]
Lakewood City [in Pierce County] - 1998
Walla Walla City [in Walla Walla County]

C. Benton, Kitsap and Walla Walla Counties on the Basis of Insufficient Jobs:

We request that the balance of able bodied adults without dependents be exempt from Food Stamp work requirements in the following three counties on the basis of insufficient jobs. Portions of these counties are listed on the Labor Surplus Areas list, but we believe that available data indicate that the entire county should be exempt.

Benton and Walla Walla Counties are over the threshold established to qualify for Federal Labor Surplus status. According to statistics available from the Washington state Department of Employment Security, and the U.S. Bureau of Labor Statistics, unemployment rates in both counties have averaged more than 20 percent over the national unemployment rate for the last two calendar years. In Walla Walla County, unemployment during the same period was 6.46 percent, or 36.9 percent over the national rate of 4.7 percent for the previous two years. In Benton County, the unemployment rate was 6.55 percent or 38.7 percent over the national rate for the previous two years. These counties have not shared in the decrease in the unemployment rate shared at the state or national level.

Benton and Walla Walla Counties

Benton and Walla Walla Counties should be made exempt since the latest unemployment data available to the state (annual averages for 1997 and 1998) indicate that unemployment significantly exceeds the 20 percent criterion for listing as labor surplus areas. The following table summarizes data for the US and the two counties for the years 1997 and 1998.

<i>1997-98 Annual Averages</i>	US	Benton	Walla Walla
Labor Force	136,973,000	70,954	26,643
Employment	130,508,000	66,308	24,922
Unemployment	6,465,000	4,646	1,721
Unemployment Rate	4.72%	6.55%	6.46%
<i>Percentage Increase Over US Rate</i>		38.7%	36.9%

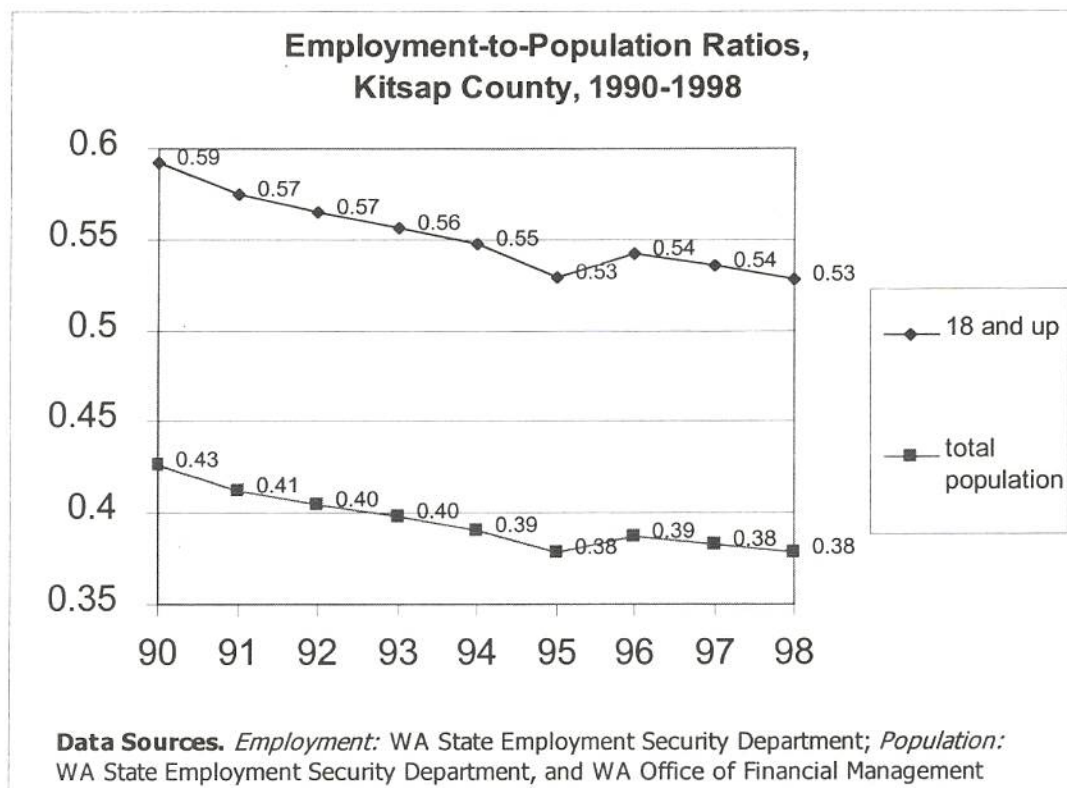
US data are from the Bureau of Labor Statistics. Washington State data are from the Washington State Employment Security Department.

Kitsap County

We are also requesting that Kitsap county be exempt since declining employment-to-population ratios combined with slow job growth indicate an insufficient number of jobs.

In Kitsap county for 1998, the employment-to-population ratio (based on total population) was .378 in 1998, compared to .511 at the state level in the same year. Employment-to-population ratios have also dropped when measured for the population 18 and over. According to the Washington State Employment Security Department, job growth in the county has been low for a number of years, and over the last year (November 1997 to November 1998) non-agricultural employment grew by less than one percent (0.6%).

Kitsap County has not shared in the decreased unemployment rate experienced at the state or federal level and has not shown improvement in employment-to-population ratios since last year's waiver was approved.



10. Anticipated impact on households and state agency operations:

Households: Exempting clients from work requirements in areas of high unemployment or insufficient jobs will reduce the likelihood of clients being cut from assistance without an ability to support themselves. Focusing our Food Stamp Employment and Training activities on areas of the state where there is a robust economy will allow the state to devote sufficient resources to ensure that the training and job search activities required lead to desired outcomes of client self-sufficiency.

State Agency: Exemption will allow the Department of Social and Health Services to spend its staff and monetary resources in the most efficient manner. The Department's commitment to meeting the needs of recipients may require expensive and ineffective investments in workfare slots in areas with insufficient jobs, absent waivers for these areas.

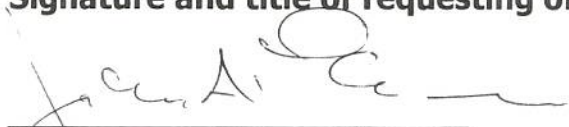
11. Caseload information, including percent, characteristics, and quality control error rate for affected population:

For caseload and quality control information, see attachments. The data is for federal fiscal year 1998.

12. Anticipated implementation date and time for which waiver is needed:
April 1, 1999 through March 31, 2000.

13. Proposed quality control review procedures: No anticipated change in the quality control review procedure.

14. Signature and title of requesting official



John Atherton, Director
Division of Assistance Programs



Date