



Department for Children and Families
Economic Services Division
103 South Main Street
Waterbury, VT 05671-1201

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Alison Mickiewicz
Supplemental Nutrition Assistance Program
USDA/FNS Northeast Region
Thomas P. O'Neill Federal Building
10 Causeway Street, Room 501
Boston, MA 02222

September 6, 2013

Re: WAIVER 970228. (ABAWD FFY 2013)

Dear Alison,

Vermont submits the enclosed waiver request for your review. Thank you for the guidance you provided over the last several months.

If you have any questions or suggested revisions, please send to me and I will promptly take action.

Sincerely,

Patricia Duda
Director, Food and Nutrition Programs
Agency of Human Services
DCF/ESD
103 South Main Street
Waterbury, Vermont 05674-1201

• creating
corrective action plan
notified clients
training staff

Enclosure.

Cc: Richard Giddings, ESD Deputy Commissioner



WAIVER REQUEST

1. Waiver serial number:
970228
2. Type of request:
Extension
3. Primary regulation citation, if any:
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)(i)
5. State:
Vermont
6. Region:
NERO
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 Supplemental Nutrition Assistance Program (SNAP) as a member of any household if, during the preceding 36 month period, the individual received SNAP 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. 7 CFR 273.24 (f)(2)(i) explains that "To support a claim of unemployment over 10 percent, a State agency may submit evidence that an area has a recent 12 month average unemployment rate over 10 percent; a recent three month average unemployment rate over 10 percent; or an historical seasonal unemployment rate over 10 percent".
8. Proposed procedures:

The State of Vermont is requesting to exempt from these requirements individuals residing in the following 27 towns. These areas are eligible based on having average unemployment rates of at least 10 percent during the 12-month period of October 2010 through September 2011. These areas had an average unemployment rate of at least 10 percent during October 2010 through September 2011, or were part of a group of contiguous towns with an aggregate average exceeding 10 percent for this time period.

| Area | Average Unemployment Rate, October 2010-September 2011 |
|-----------------------------------|--|
| Contiguous towns: | |
| Barton Town | 12.2 |
| Brighton town | 10.3 |
| Brunswick town | 11.8 |
| East Haven town | 11.2 |
| Eden town | 10.5 |
| Enosburg town | 10.2 |
| Ferdinand town | 0.0 |
| Irasburg Town | 7.8 |
| Lowell town | 10.0 |
| Montgomery town | 7.7 |
| Newport city | 13.7 |
| Newport town | 5.4 |
| Richford town | 10.4 |
| Troy town | 9.3 |
| Westfield town | 8.4 |
| Westmore town | 2.1 |
| Total for contiguous towns | 10.2 |
| Bethel town | 7.5 |
| Bridgewater town | 8.5 |
| Killington town | 17.0 |
| Pittsfield town | 13.7 |
| Stockbridge town | 5.5 |
| Total for contiguous towns | 10.1 |
| Dover town | 11.2 |
| Stratton town | 6.0 |
| Total for contiguous towns | 10.4 |
| Individual towns: | |
| Groton town | 10.7 |
| Whiting town | 11.2 |
| Isle La Motte town | 12.4 |
| Norton town | 22.7 |

| | |
|-------------------|------|
| West Rutland town | 10.5 |
|-------------------|------|

Barton, Brighton, Brunswick, East Haven, Eden, Enosburg, and Richford towns, and Newport city, are eligible based on having average unemployment rates exceeding 10 percent for the 12-month period of October 2010-September 2011; Ferdinand, Irasburg, Lowell, Montgomery, Newport, Troy, Westfield, and Westmore towns are all eligible for a waiver based on their belonging to a region of contiguous towns with an aggregate unemployment rate exceeding 10 percent for the 12-month period of October 2010-September 2011. Killington and Pittsfield towns are eligible based on having average unemployment rates exceeding 10 percent for the 12-month period of October 2010-September 2011; Bethel, Bridgewater, and Stockbridge towns are all eligible for a waiver based on their belonging to a region of contiguous towns with an aggregate unemployment rate exceeding 10 percent for the 12-month period of October 2010-September 2011. Dover town is eligible based on having an average unemployment rate exceeding 10 percent for the 12-month period of October 2010-September 2011; Stratton town is eligible for a waiver based on its belonging to a region of contiguous towns with an aggregate unemployment rate exceeding 10 percent for the 12-month period of October 2010-September 2011. Finally, the towns of Groton, Whiting, Isle La Motte, Norton, and West Rutland are all eligible based on their individual average unemployment rates for October 2010-September 2011, which exceeded 10 percent during this period.

9. Justification for request:
As stated in number 8 above, 27 towns requested have an average unemployment rate of at least 10 percent during a recent 12-month period, or are part of a region of contiguous towns with an aggregate average unemployment rate exceeding 10 percent for a recent 12-month period. All of the raw data supporting our numbers that we have used are from the Bureau of Labor Statistics (BLS) website.
10. Anticipated impact on households and State agency operations:
This waiver will provide consistency for households and State agency operations in areas where unemployment remains higher than the national average.
11. Caseload information, including percent, characteristic, and quality control error rate for affected portion:
The caseload for these areas, as of October 1, 2012, represent 7.827 % of the caseload for the state. There are no quality control procedures involved
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 1, 2013. Tupps
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:

Patricia Duda, Director, AHS/DCF Food and Nutrition Programs

Date of request:

September 6, 2013