



Department for Children and Families  
Economic Services Division  
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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,

A handwritten signature in cursive script that reads "Patricia Duda".

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

Enclosure.

Cc: Richard Giddings, ESD Deputy Commissioner

• creating  
corrective action plan  
notified clients  
training staff



## 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
<b>Contiguous towns:</b>	
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
<b>Total for contiguous towns</b>	<b>10.2</b>
Bethel town	7.5
Bridgewater town	8.5
Killington town	17.0
Pittsfield town	13.7
Stockbridge town	5.5
<b>Total for contiguous towns</b>	<b>10.1</b>
Dover town	11.2
Stratton town	6.0
<b>Total for contiguous towns</b>	<b>10.4</b>
<b>Individual towns:</b>	
Groton town	10.7
Whiting town	11.2
Isle La Motte town	12.4
Norton town	22.7

West Rutland town	10.5
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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.
13. Proposed quality control review procedures:  
There are no special quality control procedures needed in conjunction with this waiver.

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14. Signature and title of requesting official:

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

Date of request:

September 6, 2013