



**COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF HUMAN SERVICES  
OFFICE OF INCOME MAINTENANCE**

**P.O. Box 2675  
Harrisburg, Pennsylvania 17105-8018**

**Lisa M. Watson, J.D.  
Deputy Secretary for  
Office of Income Maintenance**

**Telephone: 717-783-3063  
Fax: 717-787-6765**

**Eric Ratchford, Regional Director  
Supplemental Nutrition Assistance Program  
USDA, Food and Nutrition Service  
Mid-Atlantic Region  
300 Corporate Boulevard  
Robbinsville, New Jersey 08691-1598**

**Dear Director Ratchford:**

The Commonwealth of Pennsylvania is requesting a modification of our ABAWD Waiver #2150045. This request is being submitted with the support of Governor Wolf, Chief Executive Officer of the Commonwealth of Pennsylvania. Enclosed please find the justification for the waiving of one labor market area and one intra-state portion of an interstate labor market area based upon the following:

- The average, or aggregate average, unemployment rate which exceeded the average U.S. unemployment rate by at least 20 percent, but in no case is less than 6 percent.

We have sent the analysis and source documents to support this request via electronic copy. This information was compiled from the U.S. Department of Labor, Bureau of Labor Statistics.

Thank you for your consideration of this waiver request. If you have any questions or concerns, please feel free to contact Tanoa Fagan, Director, Bureau of Employment Programs at (717) 787-8307.

**Sincerely,**

A handwritten signature in blue ink, appearing to read "Lisa M. Watson".

**Lisa M. Watson, J.D.  
Deputy Secretary**

**Enclosures**

**c: Cathy Buhrig, Director, Bureau of Policy  
Tanoa Fagan, Director, Bureau of Employment Programs**

## STATE WAIVER REQUEST

1. **Waiver Serial Number:** 2150045
2. **Type of request:** Amendment and extension
3. **Regulatory citation:** 7 CFR 273.24
4. **State:** Pennsylvania
5. **Region:** Mid-Atlantic
6. **Regulatory requirements:** Section 6(o) of the Food and Nutrition Act of 2008, as amended, and 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.

Under 7 CFR 273.24(f), upon the request of the State agency, the Food and Nutrition Service (FNS) may waive the applicability of time limit described above for any group of individuals in the state if FNS makes a determination that the area in which the individuals reside does not have a sufficient number of jobs to provide employment for the individuals.

7. **Description of alternative procedures:**

The Commonwealth of Pennsylvania is requesting to exempt able-bodied adults without dependents (ABAWDs) in one labor market area and one intra-state portion of an interstate labor market area from SNAP time limits at 7 CFR 273.24.

8. **Justification for request:**

Under SNAP regulations at 7 CFR 273.24(f)(2), areas may qualify for an ABAWD time limit waiver if they have insufficient jobs. To support this claim, states may submit evidence that a labor market area has an average unemployment rate for a 24-month time period that is at least 20 percent above the national average for the same 24-month period, but in no case less than 6 percent. 7 CFR 273.24(f)(4) provides that states must only consider entire labor market areas or the intra-state portions of interstate labor market areas for such waivers.

The Commonwealth of Pennsylvania seeks a waiver for two labor market areas based on their average unemployment rates for the 24-month period of May 2017 through April 2019. This data period was selected pursuant to regulations since the number of months from the end of April 2019 through the end of December 2020 equals 20 months, and thus does not exceed 21 months. The national average unemployment rate for this 24-month period was 4.0 percent; 20 percent above this was 4.8 percent. Application of the unemployment rate floor requires areas to meet a minimum rate of 6.0 percent. The unemployment rate for Forest County labor market area was 6.2 percent for this period. The unemployment rate for the entire interstate Youngstown-Warren-Boardman, OH-PA Metropolitan Statistical Area (MSA) was 6.0 percent for this period. This labor market area includes one county in Pennsylvania, Mercer County.

Bureau of Labor Statistics Labor Market Area Unemployment Data May 2017 through April 2019			
Labor Market Area	Unemployed	Labor Force	Unemployment Rate
Forest	2,726	43,700	6.2
Youngstown-Warren-Boardman, OH-PA MSA	346,646	5,809,464	6.0

Source: U.S. Department of Labor, Bureau of Labor Statistics

**9. Anticipated impact on households and state agency operations:**

This waiver will provide consistency for households and state agency operations in areas where unemployment remains extraordinarily higher than the national average.

**10. Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable):**

The caseload for these areas represents less than one percent of the caseload for the state. There are no quality control procedures involved.

**11. Anticipated implementation date and time period for which waiver is needed:**

Pennsylvania is requesting a waiver from April 1, 2020 through December 31, 2020.

**12. Proposed quality control review procedures:**

There are no special quality control procedures needed in conjunction with this waiver.

**13. State agency submitting walver request and state contact person:**

Pennsylvania Department of Human Services  
Office of Income Maintenance  
Lisa Watson  
Deputy Secretary

**14. Signature and title of requesting official:**

  
Deputy Secretary

**15. Date of request:**

3/11/20

**16. State agency staff contact (name/email/telephone):**

Cathy Buhrig  
Director  
Bureau of Policy  
[cbuhrig@pa.gov](mailto:cbuhrig@pa.gov)  
717-772-7906

Tanoa Fagan  
Director  
Bureau of Employment Programs  
[tanfagan@pa.gov](mailto:tanfagan@pa.gov)  
717-787-8307

**17. Regional office contact person (*to be completed by FNS regional office*):**

**AREAS IN PENNSYLVANIA THAT ARE ELIGIBLE FOR WAIVERS ON THE BASIS OF  
MAY 17 - APR 19  
UNEMPLOYMENT RATES**

*Source: Local Area Unemployment Statistics, Bureau of Labor Statistics, Department of Labor  
(Data Included in File)*

Step 1
Step 2
Step 3
Step 4

Please see worksheet entitled "Step 1" for monthly labor force numbers  
Please see worksheet entitled "Step 2" for 24-month labor force totals  
Please see worksheet entitled "Step 3" for monthly unemployed numbers  
Please see worksheet entitled "Step 4" for 24-month unemployed totals

	From Step 2		From Step 4		Step 5		Step 6		Step 7	
	MAY 17 - APR 19		MAY 17 - APR 19		MAY 17 - APR 19		MAY 17 - APR 19		MAY 17 - APR 19	
U.S. National Average (in thousands)										
207% Above National										
6% Minimum										

Monthly Labor Force Resources <https://www.bls.gov/news.release/lfr.t01.htm>

United States NATCON May-17 Jun-17 Jul-17 Aug-17 Sep-17 Oct-17 Nov-17 Dec-17 Jan-18 Feb-18 Mar-18 Apr-18 May-18 Jun-18 Jul-18 Aug-18 Sep-18 Oct-18 Nov-18 Dec-18 Jan-19 Feb-19 Mar-19 Apr-19

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Female COUNTIES May-17 Jun-17 Jul-17 Aug-17 Sep-17 Oct-17 Nov-17 Dec-17 Jan-18 Feb-18 Mar-18 Apr-18 May-18 Jun-18 Jul-18 Aug-18 Sep-18 Oct-18 Nov-18 Dec-18 Jan-19 Feb-19 Mar-19 Apr-19

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Area Code	Area Name	Area Type	24 month Total
000000	United States	00	3880667000
000053	Forest County	04	43700
049660	Mercer County (Youngstown-Warren-Boardman, OH-PA MSA)	23	5809464





Area Code	Area Name	Area Type	24 month Total
000000	United States	00	155213000
000053	Forest County	04	2726
049660	Mercer County (Youngstown-Warren-Boardman, OH-PA MSA)	23	346646