

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 60 counties and 2 cities and towns 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 an 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. 7 CFR 273.24(f)(6) provides that states may define areas to be waived.

The Commonwealth of Pennsylvania seeks a waiver for one area of contiguous counties based on their average unemployment rates for the 24-month period of January 2017 through December 2018. The national average unemployment rate for this 24-month period was 4.1 percent; 20 percent above this was 4.9 percent. The unemployment rate for this area was also 4.9 percent for this period.

| Bureau of Labor Statistics Local Area Unemployment Data January 2017 through December 2018 | | |
|---|------------|-------------|
| County Group | Unemployed | Labor Force |
| 1. Allegheny County | 678,724 | 15,493,558 |
| 2. Armstrong County | 43,242 | 773,772 |
| 3. Beaver County | 101,898 | 2,021,967 |
| 4. Bedford County | 27,490 | 568,482 |
| 5. Berks County | 223,087 | 5,099,439 |
| 6. Blair County | 64,765 | 1,436,219 |
| 7. Bradford County | 33,113 | 697,916 |
| 8. Bucks County | 326,365 | 8,176,412 |
| 9. Butler County | 100,020 | 2,366,402 |

| | | |
|---------------------------|---------|------------|
| 10. Cambria County | 79,424 | 1,415,815 |
| 11. Cameron County | 3,088 | 52,040 |
| 12. Carbon County | 40,119 | 756,051 |
| 13. Clarion County | 21,800 | 421,293 |
| 14. Clearfield County | 46,798 | 859,176 |
| 15. Clinton County | 25,149 | 440,094 |
| 16. Columbia County | 40,033 | 806,413 |
| 17. Crawford County | 47,810 | 940,608 |
| 18. Dauphin County | 144,583 | 3,416,850 |
| 19. Delaware County | 301,883 | 7,090,594 |
| 20. Elk County | 16,586 | 382,093 |
| 21. Erie County | 163,060 | 3,119,429 |
| 22. Fayette County | 87,526 | 1,373,732 |
| 23. Forest County | 2,809 | 43,793 |
| 24. Franklin County | 74,998 | 1,843,861 |
| 25. Fulton County | 8,129 | 181,566 |
| 26. Greene County | 21,580 | 400,612 |
| 27. Huntingdon County | 26,738 | 475,235 |
| 28. Indiana County | 50,232 | 936,159 |
| 29. Jefferson County | 25,137 | 492,801 |
| 30. Juniata County | 12,809 | 298,039 |
| 31. Lackawanna County | 122,989 | 2,534,780 |
| 32. Lawrence County | 54,418 | 977,368 |
| 33. Lebanon County | 67,045 | 1,703,418 |
| 34. Lehigh County | 218,899 | 4,556,852 |
| 35. Luzerne County | 213,919 | 3,795,469 |
| 36. Lycoming County | 71,543 | 1,379,605 |
| 37. McKean County | 23,585 | 432,371 |
| 38. Mercer County | 61,450 | 1,209,187 |
| 39. Mifflin County | 24,816 | 497,497 |
| 40. Monroe County | 110,326 | 1,970,268 |
| 41. Northampton County | 177,601 | 3,809,538 |
| 42. Northumberland County | 56,681 | 1,040,551 |
| 43. Perry County | 23,332 | 583,004 |
| 44. Philadelphia County | 998,079 | 16,973,113 |
| 45. Pike County | 33,493 | 592,763 |
| 46. Potter County | 10,254 | 173,463 |
| 47. Schuylkill County | 87,313 | 1,588,127 |
| 48. Snyder County | 20,550 | 492,450 |
| 49. Somerset County | 44,916 | 806,210 |
| 50. Sullivan County | 3,523 | 64,577 |
| 51. Susquehanna County | 21,553 | 492,812 |
| 52. Tioga County | 25,303 | 455,076 |
| 53. Union County | 19,022 | 471,718 |
| 54. Venango County | 29,992 | 544,467 |
| 55. Warren County | 22,353 | 460,254 |
| 56. Washington County | 121,643 | 2,548,117 |
| 57. Wayne County | 26,380 | 537,288 |
| 58. Westmoreland County | 207,704 | 4,335,365 |

| | | |
|--|------------------|--------------------|
| 59. Wyoming County | 16,154 | 331,063 |
| 60. York County | 230,832 | 5,628,192 |
| Combined Area Totals | 5,984,663 | 123,365,384 |
| Combined Area Unemployment Rate | 4.9% | |

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

Pennsylvania also identified 2 minor civil divisions that are eligible for waivers based on their own unemployment rate that was 20% above the national average for the 24-month period from January 2017 through December 2018.

| Center for Workforce Information and Analysis, PA Dept. L&I Data January 2017 through December 2018 | | | |
|--|------------|-------------|-------------------|
| Minor Civil Division | Unemployed | Labor Force | Unemployment Rate |
| Lancaster City | 34,754 | 645,682 | 5.4% |
| Pottstown Boro | 14,841 | 283,688 | 5.2% |

Source: Pennsylvania Department of Labor; Center for Workforce Information and Analysis

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 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 approximately 95 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 one-year waiver, from January 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 waiver 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: 11/8/19

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

Cathy Buhrig
Director
Bureau of Policy
cbuhrig@pa.gov
717-772-7906

Tanoa Fagan
Director
Bureau of Employment Programs
tanfagan@pa.gov
717-787-8307

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