



Department for Children and Families
Economic Services Division
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Agency of Human Services

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July 9, 2019

Bonnie Brathwaite, Regional Division Director
Supplemental Nutrition Assistance Program
USDA\FNS Northeast Region
Thomas P. O'Neill Federal Building
10 Causeway Street, Room 501
Boston, MA 02222

Re: Vermont FFY 20 ABAWD Waiver Extension Request

Dear Ms. Brathwaite,

Please find enclosed Vermont's resubmission to extend the waiver of the 3-month ABAWD time limit for individuals residing in labor surplus regions and towns. Also enclosed to support the waiver extension request is a map of Vermont depicting the 17 towns we seek to waive and the supporting data spreadsheet.

If you have any questions or seek further clarification, please do not hesitate to contact pat.duda@vermont.gov.

Sincerely,

A handwritten signature in blue ink that reads "Sean P. Brown". The signature is fluid and cursive, with the first name "Sean" being more prominent.

Sean P. Brown
Deputy Commissioner

Enc.



STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2130033
2. **Type of request:** Amendment and extension
3. **Statutory citation:** Section 6(o) of the Food and Nutrition Act of 2008, as amended
4. **Regulatory citation:** 7 CFR 273.24
5. **State:** Vermont
6. **Region:** NERO
7. **Regulatory requirements:** Section 6(o) of the Food and Nutrition Act of 2008, as amended, provides 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. Section 6(o) also provides that, upon the request of the State agency, the Secretary may waive the applicability of the 3-month ABAWD time limit for any group of individuals in the State if the Secretary makes a determination that the area in which the individuals reside has an unemployment rate of over 10 percent, or does not have a sufficient number of jobs to provide employment for the individuals.
8. **Description of alternative procedures:** The State of Vermont is requesting to exempt able-bodied adults without dependents (ABAWDs) in 17 towns from SNAP time limits at 7 CFR 273.24 and based on unemployment data from the U.S. Bureau of Labor Statistics for the 24-month period of February 2017 through January 2019.
9. **Justification for request:** Under SNAP regulations at 7 CFR 273.24(f)(2), areas may support a claim of insufficient jobs by submitting evidence that an area has an average unemployment rate for a 24-month period that exceeds the national average for the same 24-month period by 20 percent. 7 CFR 273.24(f)(6) provides that States may define areas to be waived.

The State of Vermont seeks a waiver for 17 towns based on their average unemployment rates for the 24-month period of February 2017 through January 2019. During this time, the national average for unemployment was 4.1 percent; 20 percent above this was 4.9 percent. As detailed in the following tables, 17 towns qualify based upon having an unemployment rate or belonging to a region with an aggregate average unemployment rate 20 percent above the national average for the selected 24-month period.

The State of Vermont seeks a waiver for these individually eligible towns with populations greater than 1,000 with individual unemployment rates 20 percent above the national average for the period of February 2017 through January 2019.

Bureau of Labor Statistics Local Area Unemployment Data February 2017 through January 2019			
Town	Unemployed Total	Labor Force Total	Unemployment Rate by Percentage
Concord town	681	13,626	5.0%
Dover town	756	14,473	5.2%
Sutton town	628	10,592	5.9%
Wells town	577	10,962	5.3%
20% Above National Average Threshold	4.9%		

The State of Vermont also seeks a waiver for a regional group of towns eligible through grouping with populations greater than 1,000 with a regional aggregate average unemployment rate of 4.9 percent during the 24-month period of February 2017 through January 2019.

Bureau of Labor Statistics Local Area Unemployment Data February 2017 through January 2019		
Towns	Unemployed Total	Labor Force Total
Barton town	1,928	29,245
Brighton town	595	12,988
Charleston town	614	14,770
Coventry town	537	13,262
Derby town	2,424	53,763
Glover town	510	13,262
Irasburg town	628	15,040
Newport city	2,370	41,595
Newport town	1,181	31,564
Troy town	1,136	20,300
Combined Area Total	11,923	245,789
Combined Area Unemployment Rate	4.9%	
20% Above National Average Threshold	4.9%	

The State of Vermont also seeks a waiver for a regional group of towns eligible through grouping with populations greater than 1,000 with a regional aggregate average unemployment rate of 4.9 percent during the 24-month period of February 2017 through January 2019.

Bureau of Labor Statistics Local Area Unemployment Data February 2017 through January 2019		
Towns	Unemployed Total	Labor Force Total
Eden town	1,163	18,240
Johnson town	1,942	41,827
Montgomery town	583	14,481
Combined Area Total	3,688	74,548
Combined Area Unemployment Rate	4.9%	
20% Above National Average Threshold	4.9%	

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, characteristics, and quality control error rate for affection portion (if applicable):

The caseload for these areas, as of **May 2019**, represent **8%** of the entire 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, 2019 through September 30, 2020.

13. Proposed quality control review procedures:

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

14. State agency submitting waiver request and State contact person:

Vermont Department for Children and Families (DCF), Economic Services Division (ESD), Patricia Duda, 802.241.0603.

15. Signature and title of requesting official:



Name/Title: Sean Brown, DCF/ESD Deputy Commissioner

Email for transmission of response: pat.duda@vermont.gov

16. Date of request: 7/9/2019

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

Patricia Duda/ pat.duda@vermont.gov/ 802.241.0603

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