

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2150033
2. **Type of request:** Initial
3. **Statutory citation:** Section 6(o) of the Food and Nutrition Act of 2008
4. **Regulatory citation:** 7 CFR 273.24
5. **State:** Arizona
6. **Region:** Southwest Regional Office

7. **Regulatory requirements:**

Under 7 CFR 273.24(b) individuals are not 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 three months during any three-year period in which the individual was subject to, but did not comply with, the SNAP work requirements. Regulations at 273.24(a) provide that fulfilling the work requirement means: working 20 hours or more per week, averaged monthly; participating in and complying with the requirements of a work program or a workfare program for at least 20 hours per week; or any combination of working and participating in a work program for a total of 20 hours per week.

Under 7 CFR 273.24(f), upon the request of a state agency, the Food and Nutrition Service (FNS) may waive the applicability of the 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.

8. **Description of alternative procedures:**

The State of Arizona is requesting to exempt Able-Bodied Adults Without Dependents (ABAWDs) in 14 counties, two cities, and 16 reservations from SNAP time limits at 7 CFR 273.24.

9. **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 is designated as a Labor Surplus Area by the Department of Labor's Employment and Training Administration, or 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 State of Arizona seeks a waiver for a group of 14 contiguous counties, based on the region's aggregate average unemployment rate for the 24-month period of May 2022 through April 2024. The average national unemployment rate for this period was 3.6 percent; 20 percent above this is 4.4 percent. The region's aggregate average unemployment rate for this period was 4.7 percent.

Bureau of Labor Statistics Local Area Unemployment Data May 2022 through April 2024		
County	Unemployed Total	Labor Force Total
Apache County	33,782	438,127
Cochise County	52,130	1,184,647
Coconino County	74,072	1,797,848
Gila County	20,532	492,557
Graham County	14,122	398,195
Greenlee County	3,184	113,358
La Paz County	10,169	216,842
Mohave County	95,921	2,159,052
Navajo County	51,955	958,188
Pima County	441,575	11,819,887
Pinal County	193,602	4,874,714
Santa Cruz County	33,812	457,552
Yavapai County	91,300	2,613,833
Yuma County	299,751	2,348,668
Combined Area Total	1,415,907	29,873,468
Combined Area Unemployment Rate	4.7%	
20% Above National Average Threshold	4.4%	

The State also requests to waive two cities, based on having individual unemployment rates that are at least 20 percent above the national average for the period of May 2022 through April 2024. The average unemployment rates for these cities were above 4.4 percent.

Bureau of Labor Statistics Local Area Unemployment Data May 2022 through April 2024			
City	Unemployed	Labor Force	Unemployment Rate
Apache Junction city, Maricopa County part	183	1,810	10.1%
Buckeye city	39,191	878,348	4.5%
20% Above National Average Threshold	4.4%		

The State requests to waive the following reservations, based on having average unemployment rates exceeding 20 percent above the national average for a recent 24-month period. The national average unemployment rate for this 24-month period was 3.6 percent; 20 percent above this is 4.4 percent. Reservation unemployment rates were calculated by applying 2018-2022 American Community Survey¹ share ratios to county-level Bureau of Labor Statistics data from May 2022 – April 2024. The following table summarizes the calculations:

Bureau of Labor Statistics Local Area Unemployment/Census Bureau Data May 2022 through April 2024			
	Unemployed	Labor Force	Unemployment Rate
Yuma County (part); Arizona (part); Cocopah Reservation, Arizona	2,036	9,342	21.8%
Total Cocopah Reservation	2,036	9,342	21.8%
Apache County (part); Arizona (part); Fort Apache Reservation, Arizona	585	5,084	11.5%
Gila County (part); Arizona (part); Fort Apache Reservation, Arizona	854	12,672	6.7%
Navajo County (part); Arizona (part); Fort Apache Reservation, Arizona	5,442	88,918	6.1%
Total Fort Apache Reservation	6,880	106,674	6.4%
Maricopa County (part); Arizona (part); Fort McDowell Yavapai Nation Reservation, Arizona	728	9,406	7.7%
Total Fort McDowell Yavapai Nation Reservation	728	9,406	7.7%
Mohave County (part); Arizona (part); Fort Mojave Reservation and Off-Reservation Trust Land, Arizona--California--Nevada	408	8,346	4.9%
Total Fort Mojave Reservation	408	8,346	4.9%
Maricopa County (part); Arizona (part); Gila River Indian Reservation, Arizona	1,367	22,837	6.0%
Pinal County (part); Arizona (part); Gila River Indian Reservation, Arizona	4,876	81,408	6.0%
Total Gila River Reservation	6,243	104,244	6.0%

¹ Calculations based on data from the 2017-2021 American Community Survey 5-Year Estimates.

Coconino County (part); Arizona (part); Hopi Reservation and Off-Reservation Trust Land, Arizona	582	10,499	5.5%
Navajo County (part); Arizona (part); Hopi Reservation and Off-Reservation Trust Land, Arizona	4,359	60,783	7.2%
Total Hopi Reservation	4,941	71,282	6.9%
Coconino County (part); Arizona (part); Hualapai Indian Reservation and Off-Reservation Trust Land, Arizona	0	152	-
Mohave County (part); Arizona (part); Hualapai Indian Reservation and Off-Reservation Trust Land, Arizona	1,583	14,608	10.8%
Yavapai County (part); Arizona (part); Hualapai Indian Reservation and Off-Reservation Trust Land, Arizona	0	0	-
Total Hualapai Reservation	1,583	14,760	10.7%
Coconino County (part); Arizona (part); Kaibab Indian Reservation, Arizona	0	0	-
Mohave County (part); Arizona (part); Kaibab Indian Reservation, Arizona	219	3,481	6.3%
Total Kaibab Reservation	219	3,481	6.3%
Pinal County (part); Arizona (part); Maricopa (Ak Chin) Indian Reservation and Off-Reservation Trust Land, Arizona	1,351	14,369	9.4%
Total Maricopa Reservation	1,351	14,369	9.4%
Apache County (part); Arizona (part); Navajo Nation Reservation and Off-Reservation Trust Land, Arizona--New Mexico--Utah	31,531	326,599	9.7%
Coconino County (part); Arizona (part); Navajo Nation Reservation and Off-Reservation Trust Land, Arizona--New Mexico--Utah	19,532	202,170	9.7%
Navajo County (part); Arizona (part); Navajo Nation Reservation and Off-Reservation Trust Land, Arizona--New Mexico--Utah	15,557	181,015	8.6%
Total Navajo Nation Reservation	66,620	709,784	9.4%
Pima County (part); Arizona (part); Pascua Pueblo Yaqui Reservation and Off-Reservation Trust Land, Arizona	2,388	36,614	6.5%
Total Pascua Pueblo Yaqui Reservation	2,388	36,614	6.5%

Maricopa County (part); Arizona (part); Salt River Reservation, Arizona	8,689	50,896	17.1%
Total Salt River Reservation	8,689	50,896	17.1%
Gila County (part); Arizona (part); San Carlos Reservation, Arizona	4,710	45,493	10.4%
Graham County (part); Arizona (part); San Carlos Reservation, Arizona	4,554	29,596	15.4%
Pinal County (part); Arizona (part); San Carlos Reservation, Arizona	0	0	-
Total San Carlos Reservation	9,264	75,089	12.3%
Maricopa County (part); Arizona (part); Tohono O'odham Nation Reservation and Off-Reservation Trust Land, Arizona	444	2,473	18.0%
Pima County (part); Arizona (part); Tohono O'odham Nation Reservation and Off-Reservation Trust Land, Arizona	5,434	71,985	7.5%
Pinal County (part); Arizona (part); Tohono O'odham Nation Reservation and Off-Reservation Trust Land, Arizona	741	4,383	16.9%
Total Tohono O'odham Nation Reservation	6,619	78,841	8.4%
Gila County (part); Arizona (part); Tonto Apache Reservation and Off-Reservation Trust Land, Arizona	74	982	7.5%
Total Tonto Apache Reservation	74	982	7.5%
Yavapai County (part); Arizona (part); Yavapai-Apache Nation Reservation, Arizona	615	10,922	5.6%
Total Yavapai-Apache Reservation	615	10,922	5.6%

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 affected portion (if applicable):

The caseload for these areas, as of July 10, 2024, represents 49 percent 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, effective from October 1, 2024 through September 30, 2025.

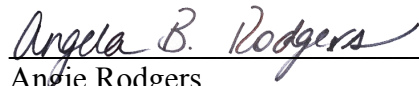
13. Proposed quality control review procedures:

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

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

Arizona Department of Economic Security
Nancy Meeden
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Division of Employment and Rehabilitation Services
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15. Signature and title of requesting official:



Angie Rodgers
Executive Deputy Director
Cabinet Executive Officer
angierodgers@azdes.gov

16. Date of request: August 5, 2024

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

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