



Food and
Nutrition
Service

Park Office
Center

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SEP 21 2017

Kathe Quittenton
Bureau Chief
SNAP Program Manager
Human and Community Services Division
Montana Department of Public Health and Human Services
PO Box 202925
Helena, Montana 29620-2925

RE: SNAP – Montana Request to Waive Able-Bodied Adults without
Dependents Time Limit – Approval

Dear Ms. Quittenton:

This is in response to the Montana State agency's request to waive the Supplemental Nutrition Assistance Program (SNAP) time limit for able-bodied adults without dependents in 25 counties and 6 reservation areas from January 1, 2018, through December 31, 2018.

The State agency's request meets the requirements for approval provided at 7 CFR 273.24(f) and relevant Food and Nutrition Service (FNS) guidance. Therefore, FNS is approving Montana to waive the time limit for the 25 counties and 6 reservation areas for the requested 12-month period. The approval amends and extends waiver number 2140013. The attached waiver response includes the approved areas, the supporting evidence used, and the conditions of approval.

If you have any questions please contact Kathie Herrman at Kathie.Herrman@fns.usda.gov or Philip Fraley at Philip.Fraley@fns.usda.gov.

Sincerely,

Sasha Gersten-Paal
Chief
Certification Policy Branch
Program Development Division

Attachment

WAIVER RESPONSE

1. **Waiver serial number:** 2140013
2. **Type of request:** Extension and amendment
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:** Montana
6. **Region:** Mountain Plains
7. **Requirement:** 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. Section 6(o) and 7 CFR 273.24 also provide 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 in an unemployment rate of over 10 percent, or does not have a sufficient number of jobs to provide employment for the individuals.

Proposed alternative procedures: The Montana State agency has requested to waive the ABAWD time limit in 25 counties and 6 reservations from January 1, 2018, through December 31, 2018. The State agency has supported its request for one 14 county area based upon the area having an aggregate average unemployment rate 20 percent above the national average for the 24-month period of June 2015 through May 2017. During this time period the national average unemployment rate was 4.8 percent; 20 percent above that rate is 5.8 percent. As detailed in the following table, the requested area's aggregate unemployment rate for the selected time period reached 5.8 percent.

Bureau of Labor Statistics Local Area Unemployment Data June 2015 through May 2017*		
Counties	Unemployed Total	Labor Force Total
1. Blaine County	2,567	56,971
2. Chouteau County	2,175	61,033
3. Flathead County	60,924	1,100,933
4. Glacier County	11,805	139,350
5. Granite County	2,312	38,745
6. Lake County	14,794	314,166
7. Liberty County	697	23,810
8. Lincoln County	17,281	190,425
9. Mineral County	3,173	40,827
10. Pondera County	2,871	69,537
11. Powell County	3,317	69,971
12. Sanders County	8,819	113,288
13. Teton County	2,602	68,775
14. Toole County	1,822	54,389
Combined Area Total	135,159	2,342,220
Combined Area Unemployment Rate	5.8%	

*Data extracted from <http://www.bls.gov> on September 12, 2017.

The State has also requested to waive an additional 11 counties as a combined area based on the area having an aggregate unemployment rate 20 percent above the national average unemployment rate for the 24-month period of July 2015 through June 2017. During this time period the national average unemployment rate was 4.8 percent; 20 percent above that rate is 5.8 percent. As detailed in the following table, the requested areas' unemployment rates for the selected time period reached or exceeded 5.8 percent.

Bureau of Labor Statistics Local Area Unemployment Data July 2015 through June 2017*		
Contiguous towns and cities	Unemployed Total	Labor Force Total
1. Big Horn County	11,251	135,706
2. Garfield County	523	18,533
3. Golden Valley County	415	9,194
4. Musselshell County	2,661	55,911
5. Petroleum County	318	6,579
6. Powder River County	614	25,905
7. Prairie County	452	12,716
8. Rosebud County	5,323	99,237
9. Treasure County	374	8,521
10. Wheatland County	939	19,203
11. Wibaux County	460	12,670
Combined Area Total	23,330	404,175
Combined Area Unemployment Rate	5.8%	

*Data extracted from <http://www.bls.gov> on September 12, 2017.

The State is also requesting to waive six reservation areas based each reservation area having an average unemployment rate exceeding the national average for the 24-month period of July 2015 to June 2017. During this time period the national average unemployment rate was 4.8 percent; 20 percent above that rate is 5.8 percent. As detailed in the following table, the requested areas' unemployment rates for the selected time period reached or exceeded 5.8 percent.

American Community Survey and Bureau of Labor Statistics Data July 2015 through June 2017*			
Reservations	Unemployed	Labor Force	Unemployment Rate
1. Blackfeet Reservation	11,978	105,498	11.4%
2. Crow Reservation	7,939	75,774	10.5%
3. Fort Belknap Reservation	2,368	20,977	11.3%
4. Fort Peck Indian Reservation	6,661	101,129	6.6%
5. Northern Cheyenne Indian Reservation	5,746	38,630	14.9%
6. Rocky Boy's Reservation	4,313	27,577	15.6%

*Data extracted from <http://www.bls.gov> and <http://factfinder.census.gov> on September 12, 2017.

8. **Action and reason for approval or denial:** The Food and Nutrition Service (FNS) is approving the Montana State agency's request to waive the ABAWD time limit in the 25 counties and 6 reservation areas because the jurisdictions meet the requirements for approval provided at 7 CFR 273.24(f) and relevant FNS guidance.
9. **Regulatory or legislative basis for action:** The waiver is approved pursuant to section 6(o) of the Food and Nutrition Act of 2008, as amended and 7 CFR 273.24(f).
10. **Information required for an extension:** To receive an amendment or extension the State agency must provide FNS with a formal request supported by data or other information as described in 7 CFR 273.24(f). Any request based upon unemployment rates must include data spreadsheets and supporting documentation.
11. **Implementation date and expiration date:** The waiver is effective January 1, 2018, through December 31, 2018.
12. **Limitation if any on regional office approval of like requests:** The waiver is limited to the Montana State agency.
13. **Date of national office action:** SEP 21 2017
14. **Date of State agency's request:** September 6, 2017
15. **Date of regional office transmittal of request:** September 7, 2017

16. State agency contact:

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17. FNS regional contact:

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