NLWJC - Kagan

Counsel - Box 035 - Folder 006

Food Stamp: 18-50

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MEMORANDUM FOR FRANKLIN RAINES

THROUGH: Ken Apfel

FROM: Matthew McKearn

SUBJECT: USDA Guidance for States Seeking 18-50 Waivers -- DECISION

ISSUE

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (P.L. 104-438) limits able-bodied adults to three months of food stamp participation in a 3-year period. Individuals are exempt from the time limit if they are: under 18 or over 50 years of age; responsible for the care of a child or incapacitated household member; medically certified as physically or mentally unfit for employment; pregnant; or exempt from the food stamp work requirements. In addition, the law permits the Secretary of Agriculture to grant State requests for waivers for any group of individuals residing in: an area with an unemployment rate above 10 percent; or an area that "does not have a sufficient number of jobs to provide employment for the individuals." Note that the "insufficient jobs" waiver can apply to a geographic area or to a group of individuals within an area.

The Administration strongly opposed provisions to limit food stamp benefits to households that seek work, but are unable to find jobs, due to the lack of employment opportunities during welfare reform negotiations. The President noted his dissatisfaction with this provision in his signing statement for P.L. 104-438. He also highlighted this issue in reviewing your October 2 welfare reform implementation memo, asking how high unemployment areas will be defined in guidance.

Per OMB's request, USDA has prepared draft guidance to States on what types of information would be acceptable for these waiver requests. The Agency guidance is responsive to OMB's direction to examine a wide range of alternatives to define areas of insufficient jobs. However, we would like make you aware of an issue regarding scoring and we have concerns with the proposed guidance which will require your review. A decision is needed on how broadly this waiver provision should be extended. An outer bound estimate suggests that as many as 75% of all individuals subject to the provisions could be exempted under the guidance as currently proposed by USDA, if all States elect the full range of options.

BACKGROUND

Estimated Savings. At the time of enactment USDA estimated these provisions would deny benefits to 1.1 million persons monthly and OMB scored the proposal at $4.1 billion over seven years. Actual savings are unlikely to reach this level for two reasons. States will have

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considerable discretion to implement the medical exemptions described above. States likely to interpret the exemptions more broadly than OMB assumed in its estimate which will reduce the number of persons affected by approximately by 25% monthly and decrease savings by $1 billion. In addition, the scoring estimates did not include the impact of the 10% waiver. If all eligible counties request this waiver it would reduce the number of persons subject to the time limits by 10% and decrease savings by an additional $300 million over 7 years. Together, these two factors reduce estimated savings from $4.1 to $2.8 billion.

Proposed Guidance. The proposed guidance would establish parameters for what States should consider submitting as justification for a waiver. Federal policy requires that all USDA waivers determinations must be based on the use of Bureau of Labor Statistics (BLS) data or BLS standard methodologies. The procedures for determining which areas are eligible for a waiver because they meet the 10% unemployment threshold are straightforward. USDA proposed six alternatives to document waivers for areas without sufficient jobs: Lack of Jobs in Designated Labor Surplus Areas; Lack of Jobs in States with Extended UI Benefits; Lack of Jobs Based on Education or Skill Levels; Lack of Jobs Due to Lagging Job Growth; and Lack of Jobs in Declining Occupations or Industries. We have concerns with two of the criteria, which are outlined below.

Waivers Based on Education or Skill Level. The legislation permits waivers for groups of individuals who are unable to obtain work because of insufficient jobs, even though they live in areas with less than 10% unemployment. USDA has interpreted the language to allow waivers for most individuals without a high school education because these individuals face a marked lack of jobs appropriate to their skill levels. Data from BLS suggest that the unemployment rate among individuals without a high school diploma is 2.3 times higher than the average unemployment rate. Providing waivers for individuals without a high school diploma would exempt as many as 45% of all recipients subject to the time limits.

Labor Surplus Areas. USDA also proposes allowing waivers for approximately 1,300 jurisdictions designated as Labor Surplus Areas by BLS, because their unemployment rate exceeds the national average by 20% for a period of two years. This measure would expand the number of areas eligible for a waiver far beyond the straight 10% unemployment measure. Very preliminary estimates suggest that as many as half of all food stamp recipients subject to the provisions live in labor surplus areas. For example, the entire city of Los Angeles, with an unemployment rate of 9.2% would qualify for a waiver.

OPTIONS

Option 1: Approve guidance as proposed by USDA. If States take full advantage of the waiver criteria proposed by USDA it could excluded as many as 75% of the able bodied childless adults from the work provisions, and reduce the law's estimated savings by as much as $2 billion over seven years, if all States requested the full range of waivers. It could exempt virtually all individuals without high school diplomas, even those in geographic areas with low unemployment. It also could exempt all individuals in some geographic areas with unemployment rates well below 10%.

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Option 2: Modify the criteria to allow waivers based on lack of education or Labor Surplus Area, but with additional conditions. Individuals with limited education do face more difficultly in finding employment and probably merit special consideration. However, USDA's guidance could be interpreted as granting a waiver to these individuals even if they live in an area with as low as 4.4% unemployment. We propose to tighten the scope of the waiver by allowing it only in areas with unemployment rates in excess of the national average or in designated labor surplus areas. Similarly, USDA has proposed using Designated Labor Surplus Areas as a sole determinant of "insufficient jobs". Labor Surplus Areas currently must have an unemployment rate in excess of 7.5%, well below the legislated threshold of 10%. This designation would provide waivers to all groups of individuals in a large expanse of areas with unemployment rates well below the 10% threshold -- almost doubling the number of food stamp recipient eligible for the waiver. We recommend using this criteria only in combination with other provisions. A very rough estimate suggests that this option would reduce savings by between $0.7 - $1 billion over 7 years if all States requested this waiver for all eligible areas in a State.

Option 3: Exclude lack of education or Labor Surplus Area from the list of guidance. Relatively few areas are likely to meet the remaining four criteria for establishing areas without sufficient jobs. It seems unlikely that these criteria will provide any significant relief to large urban areas that may have high unemployment among groups of individuals, while the overall unemployment rate remains low.

RECOMMENDATION: ***Option 2*** This option provides relief for some individuals facing limited employment activities because they don't have a high school diploma, but limits the waiver to areas that have higher unemployment rates. It also suggests that in areas with unemployment less than 10%, waivers should not be granted to all individuals subject to the work provisions. If all States fully implemented this option it could reduce the projected 7 years savings to an estimated $1.8 billion, although it is unlikely the impact would be this large.

For Review
- ELENA KAGAN
- BRUCE REED
- J.

Dear Commissioner XXXX:

Under new provisions established by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (the Act), Food Stamp Program eligibility will be limited to three months in a three-year period for certain able-bodied adults who are not working or participating in a work program for at least 20 hours each week or who are not enrolled in a workfare program. Recognizing that area labor market forces and the availability of job training slots determine an individual's ability to met the new criteria, the Act authorizes the U.S. Department of Agriculture (USDA) to grant to States waivers of the three month restriction for individuals who reside in an area that: (1) has an unemployment rate which exceeds 10 percent; or (2) does not have a "sufficient number of jobs to provide employment for the individuals."

When a State agency can certify that data from the Bureau of Labor Statistics (BLS) show an unemployment rate above 10 percent in specified areas, the State may begin to operate the waiver in those areas at the time the waiver request is submitted. To assist you, we have enclosed a list of counties for which BLS data indicate that the unemployment rate, averaged from July, 1995 to June, 1996, exceeded 10 percent.

USDA must approve waivers based on a lack of sufficient jobs before they take effect, and we will certainly work with you to expedite these requests.

To aid you in this process, we are providing you with guidance on submitting a waiver request, data sources which can be used to substantiate the request, and descriptions of various approaches for evaluating whether an area lacks a "sufficient number of jobs" to justify a waiver. We hope this information will be helpful to you in evaluating and substantiating waivers of the three-month time limit. Please contact your regional office if you have any questions.

Sincerely,

Yvette S. Jackson
Deputy Administrator
Food Stamp Program

Enclosures

D R A F T: October 11, 1996

GUIDANCE FOR STATES SEEKING WAIVERS FOR FOOD STAMP LIMITS

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 limits receipt of food stamp benefits to three months in a 3-year period for able-bodied adults who are not working, participating in a work program for 20 hours or more each week, or in workfare. Individuals are exempt from this provision if they are:

- under 18 or over 50 years of age,
- responsible for the care of a child or incapacitated household member,
- medically certified as physically or mentally unfit for employment,
- pregnant, or
- already exempt from the work requirements of the Food Stamp Act.

States may request a waiver of this provision in areas with an unemployment rate above 10 percent, or for those residing in an area that does not have "...a sufficient number of jobs to provide employment for the individuals." The Department of Agriculture (USDA) will allow States broad discretion to decide if a waiver request is appropriate for a particular locale or situation.

USDA believes that the law provided authority to waive these provisions in recognition of the challenges that low-skilled workers may face in finding and keeping permanent employment. In some areas, including parts of rural America, the number of unemployed persons and the number of job seekers may be far larger than the number of vacant jobs. This may be especially so for persons with limited skills, minimal work history, and little education. The purpose of this guidance is to address some of the issues that States may consider in identifying areas for which to seek a waiver of the time limits on food stamp participation.

General Issues

Defining an Area: USDA will give States broad discretion in defining areas that best reflect the labor market prospects of program participants and State administrative needs. In general, USDA encourages States to consider requesting waivers for areas smaller than the entire State. There is enough variety in local employment conditions that statewide averages may mask slack job markets in some counties, cities, or towns. Accordingly, states should consider areas within, or combinations of, counties, cities, and towns for the same reason. USDA also urges States to consider the particular needs of rural areas and Indian reservations.

Duration of Waivers: In general, it is USDA's intent to grant waivers for a maximum of one year. Waivers may be renewed if conditions warrant. In some circumstances described below, or if States request, waivers may be granted for less than one year.

Waivers for Unemployment Rates Above 10 Percent

Established Federal policy requires Federal executive branch agencies to use the most recent National, State or local labor force and unemployment data from the Bureau of Labor Statistics (BLS) for all program purposes, including the determination of eligibility for and the allocation of Federal resources unless otherwise directed by statute.[1] This policy ensures the standardization of collection methods and the accuracy of data used to administer Federal programs. In accordance with this policy, States seeking waivers for areas with unemployment rates higher than 10 percent will be expected to rely on standard BLS data or methods.

Availability of Local Area Unemployment Rates: Unemployment figures for many local areas based on standard BLS data or methods are readily available. In the Local Area Unemployment Statistics (LAUS) program, BLS works in concert with State employment security agencies to estimate unemployment rates for:

- all States,
- all counties in the United States,
- all cities with a population of 25,000 or more,
- all cities and towns in New England, and
- all metropolitan and small labor market areas in the United States.

These estimates are produced monthly. In addition, State employment security agencies can use standard BLS methods to generate unemployment rates for smaller geographic areas and special geographic areas such as Indian reservations (as long as the boundaries of those areas coincide with the boundaries of a group of census tracts).[2]

There are two key issues related to the availability of data to document areas with unemployment rates above 10 percent. First, it is essential to identify areas with unemployment rates above 10 percent using standard BLS data or methods. Second, while these standard methods can be used to estimate unemployment rates for areas smaller than those routinely covered by current BLS publications, the reliability of these estimates will necessarily be less for smaller areas.

Duration of High Unemployment: Unemployment rates can and will fluctuate from month to month. The size of these fluctuations is likely to be larger for estimates based on smaller areas.

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[1] This policy is contained in Statistical Policy Directive No. 11, issued by the Office of Federal Statistical Policy Standards, Office of Management and Budget.

[2] A list of each cooperating State employment security agency is included as Appendix A. A list of State employment security administration contacts can be accessed through the BLS LAUS Home Page [found at http://stats.bls.gov:80/lauhome.htm]. Monthly State and local area unemployment rates are also readily available from a variety of published sources. These include the Bureau of Labor Statistics *State and Metropolitan Area Employment and Unemployment* news release, the monthly Employment and Earnings, and Unemployment in State and Local Areas (available on microfiche). States wishing to subscribe to these documents may contact the U.S. Government Printing Office at the number shown in Appendix A. A complete set of up-to-date data can be obtained via the LAUS home page, the LAUS program, BLS regional offices, or the State employment security agency.

One fairly standard approach to smooth such fluctuations is to average unemployment rates over a number of months.

If requested, USDA will automatically grant a waiver for any area in which the average unemployment rate in the preceding 12 months is greater than 10 percent. BLS routinely publishes monthly data so that 12-month moving average unemployment rates can be produced for all counties, all cities of 25,000 or more, and all cities and towns in New England.[3] A list of counties with unemployment rates above 10 percent for the period from July 1995 to June 1996 is included as Appendix D.

There are two shortcomings associated with using a 12-month average to waive the time limits on food stamp participation. First, a 12-month average will mask portions of the year when the unemployment rate rises above or falls below 10 percent. Second, a 12-month average will also require a sustained period of high unemployment before an area becomes eligible for a waiver.

To avoid these situations and ensure that waivers are granted as quickly as possible where needed, States have several options. First, a State might opt to use a shorter moving average. A moving average of at least three months is preferred. In periods of rising unemployment, a three-month average provides a reliable and relatively early signal of a labor market with high unemployment. A State might also consider using historical unemployment trends to show that such an increase is not part of a predictable seasonal pattern to support a waiver for an extended period (up to one year).

Second, in areas with predictable seasonal variations in unemployment, States may use historical trends to anticipate the need for waivers for certain periods. For example, if the pattern of seasonal unemployment is such that an area's unemployment rate typically increases by two percentage points in January, February, and March, and the area's unemployment rate is currently 9 percent, a State may request a waiver for this area based on its current rate and historical trends. The period covered by the waiver will then coincide with the period of high unemployment. (If a State did not anticipate the rise in unemployment, the increase in unemployment rates would not show up until after the fact.)

USDA will generally expect that the duration of the waiver requested will have some relationship to the period of high unemployment on which the request is based, although the time period for the waiver need not be identical to the period of unemployment data. There may be circumstances in which States may want to consider requesting waivers for as long as one year based on a shorter period of high unemployment. USDA will entertain such requests if a reasonable case is made that the high unemployment is not a seasonal or short term aberration. States may renew waivers as necessary, as long as area unemployment rates exceed 10 percent.

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[3] A 12-month moving average is computed each month based on data for the year prior to that month.

Waivers for Areas Without Sufficient Jobs

The statute recognizes that the unemployment rate alone is an imperfect measure of the employment prospects of individuals with little education, little work history, and diminished opportunities. It provides States with the option to seek waivers for areas in which there are not enough jobs for groups of individuals who may be affected by the new time limits in the Food Stamp Program.

To some extent, the decision to approve waivers based on an insufficient number of jobs must be made on an area-by-area basis. Examples of such situations include areas where an important employer has either relocated or gone out of business. In other areas there may be a shortage of jobs that can be filled by persons with limited skills, education, and work experience relative to the number of persons seeking such jobs.

The guidance that follows offers some examples of the types and sources of data available to States as they consider waiver requests for areas with insufficient jobs. Because there are no standard data or methods to make the determination of the sufficiency of jobs, the list that follows is not exhaustive. States may use these data sources as appropriate, or other data as available, to provide evidence that the necessary conditions exist in the area for which they intend the waiver to apply. The absence of a particular data source or approach (for example, data or statistics compiled by a university) is not meant to imply that it would not be considered by USDA if requested by a State.

Lack of Jobs in Designated Labor Surplus Areas: The U.S. Department of Labor (DOL) Employment and Training Administration compiles an annual list of labor surplus areas. As the name implies, these are areas in which it has been determined that the number of workers is relatively larger than the number of available jobs. Employers located in labor surplus areas can be given preference in bidding on Federal procurement contracts. The purpose in providing such preference is to help direct the government's procurement dollars into areas where people are in the most severe economic need.

Labor surplus areas are classified on the basis of civil jurisdictions rather than on a metropolitan area or labor market area basis. By classifying labor surplus areas in this way, specific localities with high unemployment rather than all civil jurisdictions within a metropolitan area, (not all of which may suffer from the same degree of unemployment) can be identified. This feature also makes the classification potentially useful to identify areas for which to seek waivers.

The labor surplus listing is issued for each Federal fiscal year. During the course of the fiscal year, the annual listing is updated on the basis of exceptional circumstance petitions submitted by State employment security agencies and approved by the Employment and Training Administration. Monthly updates of the list are available in Area Trends in Employment and Unemployment.

Lack of Jobs in States with Extended UI Benefits: The Department of Labor's Unemployment Insurance Service determines whether a State can qualify for extended unemployment benefits. Unemployed persons in these areas are eligible to receive extended unemployment insurance (UI) benefits. Extended UI benefits are an indication that jobs are relatively hard to find. The designation of a State as meeting the criterion for extended UI benefits, therefore, may be a useful indicator that insufficient jobs are available. DOL issues a list of States that meet the criteria for extended benefits each week. States may request a copy from the DOL Unemployment Insurance Service.

Lack of Jobs Based upon Education or Skill Levels: There is substantial evidence that people with limited education and few marketable skills will have more difficulty finding employment than those with better education and more extensive skills. In some areas, the supply of low-skilled workers may exceed job opportunities. Unpublished BLS data show that the unemployment rate among those without a high school education in 1995 was 2.3 times higher than the average unemployment rate of 5.6 percent. Thus, even in areas where the overall unemployment rate is less than 10 percent, segments of the area's population, especially those with little education and limited skills, may face substantially higher unemployment rates. While jobs for higher educated, more skilled workers may be relatively plentiful, jobs for low-skilled workers may be in short supply. States might use this information on the relative unemployment rate of those with less than a high school education to consider requesting a waiver of time limits for those persons. ??!!

Lack of Jobs Due to Lagging Job Growth: Job seekers may have a harder time finding work in an area where job growth lags behind population growth. A falling ratio of employment to population may be an indicator of an adverse job growth rate. When the number of jobs in an area grows more slowly than the working age population, the local economy is not generating enough jobs.

The employment-to-population ratio complements measures of unemployment by taking into account working age persons who may have dropped out of the labor force altogether. The ratio can be computed by dividing the number of employed persons in an area by the area's total population. A decline in this ratio over a period of months could indicate an adverse job growth rate for the area.

State social service agencies can obtain employment data from State employment security agencies or BLS. Population counts for the corresponding areas are also available through BLS, the Bureau of the Census, or State employment security agencies.[4] Census population data at the county level are updated annually as of July 1 of each year. There is a lag of at least one year in this population data (the most recent county data are for 1995, the most recent city data are for 1994).

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[4] The Bureau of Labor Statistics provides population estimates each year to cooperating State employment security agencies. The Census Bureau does not routinely publish small area population estimates, but they will provide it upon request.

Lack of Jobs in Declining Occupations or Industries: Employment markets dominated by declining industries could lead to the presence of large numbers of people whose current job skills are no longer in demand. This can be especially true in smaller, rural areas where the loss of a single employer can immediately have a major effect on local job prospects and unemployment rates. In more occupationally diverse areas however, displaced workers might have more work options available to them, including jobs other than those for which they may have been previously trained

States might consider several options to capture the effect of a declining industry or occupation. BLS provides monthly data on State and local employment figures by major industry (including mining, construction, manufacturing, transportation and public utilities, wholesale and retail trade; finance, insurance and real estate; services, and government). This information, published in Employment and Earnings, compares the current month to the month before and to the same month from the previous year. A declining trend within a particular industry or sector may be taken as evidence of declining employment prospects for persons with experience in or skills appropriate to that sector.

State welfare agencies can also work with State employment security agencies to identify declining industries and occupations in their areas. Databases on occupation and employment changes are used by the UI divisions of State employment security departments to determine how quickly displaced workers can find new jobs (a process known as "profiling"). These databases may also be helpful in identifying groups of individuals that may have an unusually difficult time finding work.

Finally, evidence of increased filing of unemployment insurance claims, available from State employment security agencies, may also offer signs of diminished employment prospects in some areas.

Applying for Waivers

To ensure that waivers are granted quickly where they are needed, USDA will keep the application and approval process as simple as possible. USDA will offer States the option to self-certify areas where the unemployment rate exceeds 10 percent. States will have to seek prior approval from USDA for waiver requests for areas that lack available jobs.

Areas with Unemployment Rate Above 10 Percent: States may self-certify areas that have an unemployment rate higher than 10 percent based upon standard BLS data or methods. State welfare agencies should work with State employment security agencies to make this determination. States must inform their USDA Food and Consumer Service Regional Office and Headquarters (at the address shown in Appendix A) of each area that meets this criterion and certify that the determination was based on standard BLS data or methods. States may update these certifications as frequently as necessary. The waiver period will begin as soon as a State

certifies that an area's unemployment rate is above 10 percent. USDA will contact States if additional clarification on the waiver is needed.

Areas with Insufficient Jobs: Waivers granted under this category may not be implemented until they are approved by USDA. As indicated above, waiver request for areas with insufficient jobs may be based on a number of criteria, some of which are straightforward (such as areas designated as labor surplus areas or meeting the criteria for extended UI benefit) while others are more subjective. States are encouraged to request waivers for any area based on the circumstances in those areas. States should indicate the current unemployment rate for the area (based on standard BLS data or methods) and describe the type of waiver that they are requesting. States should also provide enough documentary evidence for USDA to determine whether to grant a waiver.

Waiver requests of either type may be renewed on request if the condition which formed the basis of the initial approval persists.

APPENDIX A:
CONTACT NUMBERS

State and local agencies should be able to get most of their employment/unemployment information from their respective state employment security department (list provided). Additional information or data necessary to support a waiver request may be obtained by contacting the organizations listed below.

U.S. Department of Agriculture

Food and Consumer Service
3101 Park Center Drive
Alexandria, VA 22302
(703) 305-2133

Bureau of the Census

Statistical Information Staff - Population Division
(301) 457-2422

U.S. Department of Labor

Employment and Training Administration
(202) 219-9092 x129.

Federal Unemployment Insurance Service
(202) 219-5309.

Bureau of Labor Statistics

Current Employment Statistics Survey (State & Area Branch)
(202) 606-6559.

Division of Labor Force Statistics (Educational Attainment)
(202) 606-6378.

Division of Local Area Unemployment Statistics
(202) 606-6392.

U.S. Government Printing Office

Subscription information
(202) 512-2168.

U.S. DEPARTMENT OF LABOR
Bureau of Labor Statistics

Regional Office

REGION I—BOSTON
1 Congress Street
10th Floor
Boston, MA 02114
Phone (617) 565 2327

REGION II—NEW YORK
Room 808
201 Varick Street
New York, NY 10014
Phone: (212) 337-2400

REGION III—PHILADELPHIA
3535 Market Street, 8th Floor
Gateway Building, Suite 8000
Philadelphia, PA 19104-3309
Phone: (215) 596-1154

REGION IV—ATLANTA
Suite 540
1371 Peachtree Street, NE.
Atlanta, GA 30367
Phone. (404) 347-4416

REGION V—CHICAGO
9th Floor
230 South Dearborn Street
Chicago, IL 60604
Phone. (312) 353-1880

REGION VI—DALLAS
Room 221
Federal Building
525 Griffin Street
Dallas, TX 75202
Phone: (214) 767-6970

REGIONS VII and VIII—
KANSAS CITY
City Center Square
1100 Main, Suite 600
Kansas City, MO 64105-2112
Phone: (816) 426-2481

REGIONS IX and X—
SAN FRANCISCO
71 Stevenson Street
P.O. Box 193766
San Francisco, CA 94119
Phone: (415) 975-4384

Cooperating State Agencies
Current Employment Statistics (CES) and State and Local Area Unemployment Statistics (LAUS) Programs

BLS Region		
IV	ALABAMA	Department of Industrial Relations, Room 427, Industrial Relations Bldg., Montgomery 36130
X	ALASKA	Department of Labor, Research and Analysis Section, 1111 West 8th St., Juneau 99802-5501
IX	ARIZONA	Department of Economic Security, 1300 West Washington St., Phoenix 85005
VI	ARKANSAS	Employment Security Department, P.O. Box 2981, Little Rock 72203-2981
IX	CALIFORNIA	Employment Development Department, Employment Data and Research Division, 7000 Franklin Blvd., Bldg. 1100, Sacramento 95823
VIII	COLORADO	Department of Labor and Employment, Suite 801, 1120 Lincoln Street, Denver 80203
I	CONNECTICUT	Labor Department, Employment Security Division, 200 Folly Brook Blvd, Wethersfield 06109
III	DELAWARE	Department of Labor, Office of Occupational and Labor Market Information, P.O. Box 9029, Newark 19714-9029
III	DIST. OF COL.	Department of Employment Services, Division of Labor Market Information and Analysis, Room 201, 500 C St., NW., Washington, DC 20001
IV	FLORIDA	Florida Department of Labor and Employment Security, Bureau of Labor Market Information, Suite 203, 2574 Seagate Dr., Tallahassee 32399-0674
IV	GEORGIA	Department of Labor, Labor Information Systems, 148 International Blvd., NE., Atlanta 30303
IX	HAWAII	Department of Labor and Industrial Relations, Research and Statistics Office, Room 304, 830 Punchbowl St., Honolulu 96813
X	IDAHO	Department of Employment, 317 Main St., Boise 83735
V	ILLINOIS	Department of Employment Security, (2 South), 401 South State St., Chicago 60605
V	INDIANA	Department of Employment and Training Services, Statistical Services Division, 10 North Senate Avenue, Indianapolis 46204
VII	IOWA	Department of Employment Services, 1000 East Grand Avenue, Des Moines 50319
VII	KANSAS	Department of Human Resources, 401 Topeka Avenue, Topeka 66603
IV	KENTUCKY	Department for Employment Services, Labor Market Research and Analysis Branch, 275 East Main St., Frankfort 40621
VI	LOUISIANA	Department of Labor, Research and Statistics Section, 1001 North 23rd St., Baton Rouge 70804-9094
I	MAINE	Department of Labor, Division of Economic Analysis and Research, 20 Union St., Augusta 04330
III	MARYLAND	Department of Employment and Training, Research and Analysis Division, 1100 North Eutaw St., Baltimore 21201
I	MASSACHUSETTS	Department of Employment and Training, Government Center, Charles F. Hurley Bldg., Boston 02114
V	MICHIGAN	Employment Security Commission, Research and Statistics Division, Room 516, 7310 Woodward Avenue, Detroit 48202
V	MINNESOTA	Department of Jobs and Training, Research and Statistics Division, 5th Fl., 390 North Robert St., St. Paul 55101
IV	MISSISSIPPI	Employment Security Commission, Labor Market Information Division, P.O. Box 1699, Jackson 39215-1699
VII	MISSOURI	Division of Employment Security, P.O. Box 59, Jefferson City 65104
VIII	MONTANA	Department of Labor and Industry, P.O. Box 1728, Helena 59624
VII	NEBRASKA	Department of Labor, P.O. Box 94600, Lincoln 68509-4600
IX	NEVADA	Employment Security Department, 500 East 3rd St., Carson City 89713
I	NEW HAMPSHIRE	Department of Employment Security, 32 South Main St., Concord 03301
II	NEW JERSEY	Department of Labor, Division of Planning and Research, P.O. Box 2765, Trenton 08625
VI	NEW MEXICO	Employment Security Commission, 401 Broadway, TIWA Bldg., Albuquerque 87103
II	NEW YORK	Department of Labor, Division of Research and Statistics, State Campus, Room 400, Bldg. 12, Albany 12240-0020
IV	NORTH CAROLINA	Employment Security Commission, Labor Market Information Division, P.O. Box 25903, Raleigh 27611
VIII	NORTH DAKOTA	Job Service, P.O. Box 1537, Bismarck 58502
V	OHIO	Bureau of Employment Services, Labor Market Information Division, 1160 Dublin Rd., Columbus 43215
VI	OKLAHOMA	Employment Security Commission, Research and Planning Division, 2401 North Lincoln, Oklahoma City 73105
X	OREGON	Employment Division, 875 Union St., NE., Salem 97311
III	PENNSYLVANIA	Bureau of Research and Statistics 300 Capitol Associates Building Harrisburg, PA 17120-0034
II	PUERTO RICO	Department of Labor and Human Resources, Bureau of Labor Statistics, 17th Fl., 505 Munoz Rivera Avenue, Hato Rey 00918 (CES), Bureau of Employment Security, Research and Analysis Section, 15th Fl., 505 Munoz Rivera Avenue, Hato Rey 00918 (LAUS)
I	RHODE ISLAND	Department of Employment Security, 24 Mason St., Providence 02903
IV	SOUTH CAROLINA	Employment Security Commission, Labor Market Information Division, P.O. Box 995, Columbia 29202
VIII	SOUTH DAKOTA	Department of Labor, Labor Market Information Center, P.O. Box 4730, Aberdeen 57401
IV	TENNESSEE	Department of Employment Security, Research and Statistics Division, 519 Cordell Hull Office Bldg., Nashville 37219
VI	TEXAS	Employment Commission, Room 208-T, 1117 Trinity St., Austin 78778
VIII	UTAH	Department of Employment Security, Labor Market Information Services, P.O. Box 11249, Salt Lake City 84147
I	VERMONT	Department of Employment and Training, Office of Policy and Public Information, P.O. Box 488, Montpelier 05602
III	VIRGINIA	Employment Commission, Economic Information Services, P.O. Box 1358, Richmond 23211
II	VIRGIN ISLANDS	Department of Labor, Bureau of Labor Statistics, 53-A, 54-A&B Kronprindsens Gade Charlotte Amalie, St. Thomas 00801-3359 (CES)
X	WASHINGTON	Employment Security Department, Labor Market and Economic Analysis Branch, 605 Woodview Dr., Olympia 98503
III	WEST VIRGINIA	Department of Employment Security, Division of Labor and Economic Security, 112 California Avenue, Charleston 25305
V	WISCONSIN	Department of Industry, Labor, and Human Relations, Labor Market Information Bureau, 201 East Washington Avenue, Madison 53707
VIII	WYOMING	Employment Security Commission, Research and Analysis Section, P.O. Box 2760, Casper 82602

APPENDIX B:
THE STATISTICAL INFORMATION SHEETS

The following tables are designed to provide "at a glance" information about the statistical data that USDA has identified as being useful for determining state and area waiver eligibility. Information contained in the tables is broken down by category as follows:

Name - Refers as closely as possible to the specific title of a publication or a data set.

Size - Describes the items used to compose the data set.

Area Coverage - The geographic regions covered by the data set.

Periodicity - The frequency with which the data is compiled and/or released.

Description of Data Set - Brief description of the data set with an emphasis on its content, seasonal adjustment status (whether the data [redacted] absorbs seasonal unemployment fluctuations into an average percentage), and comparative benchmarks.

Contact Source - The most direct known contact number to request information.

Applicability for Identifying Waiver Areas - Suggested use for the information, including caveats where appropriate.

While organizational contact numbers have been provided, much of the data mentioned herein should also be readily obtainable through state labor departments, local libraries or other depositories of government documents. Additionally, a good portion of the information described can be found in the U.S. Statistical Abstract and the State and Metropolitan Area Data Book (however, formats in these books may differ slightly and the data may not be as current). USDA will also consider other data that is gathered directly by state and local agencies.

STATISTICAL INFORMATION SHEET

Name	Employment status of the noninstitutional population by educational attainment, age, sex, race, and Hispanic origin.
Size	National
Area Coverage	National population by age (16 and over), educational level, sex, and race/Hispanic origin.
Periodicity	Annual.
Description of Data Set	Annual national unemployment broken down by age and educational level. Separate tables show data by sex, and race/Hispanic origin.
Contact Source	This is an unpublished table. Contact the Bureau of Labor Statistics Division of Labor Force Statistics (Educational Attainment), (202) 606-6378 (ask for Table 10).
Applicability for Identifying Waiver Areas	May be useful in developing ratios for defining a "lack of available work" criterion based upon education level.

STATISTICAL INFORMATION SHEET

Name	State and metropolitan area employment and unemployment.
Size	50 states, DC, Puerto Rico; approximately 278 cities and Metropolitan Statistical Areas (MSAs).
Area Coverage	States and selected Cities/Metropolitan Statistical Areas.
Periodicity	Released Monthly in Bureau of Labor Statistics News (see also BLS periodical Employment and Earnings).
Description of Data Set	Non-seasonally adjusted unemployment rates for states and selected metropolitan areas. Compares the current month's data with the same month's data from the previous year. Unemployment rates do not account for workers who have dropped out of the labor force (discouraged workers).
Contact Source	Bureau of Labor Statistics, (202) 606-6559 (employment), (202) 606-6392 (unemployment).
Applicability for Identifying Waiver Areas	Useful for identifying the unemployment rate in the defined area.

STATISTICAL INFORMATION SHEET

Name	State extended benefit indicators.
Size	50 states, District of Columbia, Puerto Rico, Virgin Islands.
Area Coverage	State level.
Periodicity	Updated weekly.
Description of Data Set	Identifies states that are "on trigger" for extended Unemployment Insurance (UI) benefits. Provides state insured and total unemployment rates. Compares current rates as a percentage of the last two previous years.
Contact Source	U.S. Department of Labor Unemployment Insurance Service (202) 219-5309.
Applicability for Identifying Waiver Areas	Useful for identifying statewide trends over a two period and for determining whether a state's employment situation warrants extended benefits. Cannot identify unemployment rates for counties or cities.

STATISTICAL INFORMATION SHEET

Name	Employees on nonfarm payrolls in States and selected areas by major industry.
Size	50 states, DC, Puerto Rico; approximately 278 cities and Metropolitan Statistical Areas (MSAs). Covers employment data for a variety of industries (construction, wholesale/retail, service, etc.).
Area Coverage	States and selected Cities/Metropolitan Statistical Areas.
Periodicity	Released Monthly in Bureau of Labor Statistics periodical Employment and Earnings.
Description of Data Set	Non-seasonally adjusted employment figures for states and selected metropolitan areas. Compares the current month's data with the prior month's data from the current year and the same month's data from the previous year.
Contact Source	Bureau of Labor Statistics, (202) 606-6559 (employment), (202) 606-6392 (unemployment).
Applicability for Identifying Waiver Areas	Useful for identifying a "lack of available jobs" criterion (for example, industries where employment rates in the defined area are declining). **Note:** the data does not display percentage changes.

STATISTICAL INFORMATION SHEET

Name	Area Trends in Employment and Unemployment.
Size	1,311 civil jurisdictions.
Area Coverage	All 50 states, the District of Columbia, and Puerto Rico.
Periodicity	Initial list is compiled annually and updated as necessary on the basis of exceptional circumstance. Updates are released on a monthly basis.
Description of Data Set	List of eligible designated "labor surplus areas" by state and affected civil jurisdictions.
Contact Source	Department of Labor Employment and Training Administration (202) 219-5185.
Applicability for Identifying Waiver Areas	Useful for identifying a "lack of available jobs" criterion based on "labor surplus area" status.

APPENDIX C:
SAMPLE FORMAT FOR WAIVER REQUESTS

The following is a suggested format state agencies may use to submit time limit waiver requests to USDA. Such requests should contain *at a minimum* the following information:

State Agency submitting the waiver request: (include a contact name, address and phone number).

Area(s) covered by the request:

Category under which waiver is being requested: (self-certification based on an unemployment rate higher than 10 percent, or request due to lack of sufficient jobs).

Duration of the waiver: (one year, other than one year).

Basis for the request: provide the rationale for the waiver request in this section. If self-certifying for a waiver based on an unemployment rate higher than 10 percent, include evidence of the area's current unemployment rate as released by either BLS or the state employment security agency and the length of the average for which this figure was generated.

If requesting a waiver based on the lack of sufficient jobs in an area, include the area's unemployment rate as released by either BLS or the state employment security agency and indicate the criterion under which the waiver is being sought (labor surplus area, extended UI benefit area, etc.). Provide additional documentary evidence of the condition for which the waiver is being requested.

Appendix D:
COUNTIES WITH UNEMPLOYMENT RATES ABOVE 10 PERCENT

According to the Bureau of Labor Statistics, the counties listed below have an unemployment rate higher than 10 percent for the period from July, 1995 to June, 1996.

County	State	Civilian Labor Force	Employment	Unemployment	Unemployment Rate
BULLOCK COUNTY	AL	4,325	3,607	718	16.6
WILCOX COUNTY	AL	3,826	3,195	631	16.5
GREENE COUNTY	AL	3,622	3,067	555	15.3
LOWNDES COUNTY	AL	4,239	3,610	629	14.8
MONROE COUNTY	AL	10,425	8,918	1,507	14.5
PERRY COUNTY	AL	4,626	3,954	672	14.5
SUMTER COUNTY	AL	6,134	5,300	834	13.6
WASHINGTON COUNTY	AL	6,154	5,329	825	13.4
DALLAS COUNTY	AL	21,349	18,682	2,667	12.5
CONECUH COUNTY	AL	6,787	5,944	843	12.4
CHOCTAW COUNTY	AL	6,551	5,753	798	12.2
CLARKE COUNTY	AL	13,492	11,969	1,523	11.3
YUKON-KOYUKUK CENSUS AREA	AK	2,080	1,716	364	17.5
NORTHWEST ARCTIC BOROUGH	AK	2,265	1,882	383	16.9
SOUTHEAST FAIRBANKS CENSUS AREA	AK	2,475	2,128	347	14.0
NOME CENSUS AREA	AK	3,453	2,991	462	13.4
KENAI PENINSULA BOROUGH	AK	22,197	19,386	2,811	12.7
WADE HAMPTON CENSUS AREA	AK	1,798	1,578	220	12.2
PRINCE OF WALES-OUTER KETCHIKAN CENSUS AREA	AK	3,342	2,952	390	11.7
HAINES BOROUGH	AK	1,210	1,082	128	10.6
WRANGELL-PETERSBURG CENSUS AREA	AK	3,889	3,482	407	10.5

DENALI BOROUGH	AK	1,104	990	114	10.3
MATANUSKA-SUSITNA CENSUS AREA	AK	26,409	23,719	2,690	10.2
BETHEL CENSUS AREA	AK	5,399	4,856	543	10.1
YUMA COUNTY	AZ	65,288	47,557	17,731	27.2
SANTA CRUZ COUNTY	AZ	15,188	12,157	3,031	20.0
APACHE COUNTY	AZ	19,943	16,661	3,282	16.5
NAVAJO COUNTY	AZ	31,442	26,828	4,614	14.7
LA PAZ COUNTY	AZ	6,427	5,775	652	10.1
RANDOLPH COUNTY	AR	7,983	7,098	885	11.1
IMPERIAL COUNTY	CA	60,335	42,512	17,823	29.5
COLUSA COUNTY	CA	8,652	6,934	1,718	19.9
MERCED COUNTY	CA	83,119	68,917	14,202	17.1
SUTTER COUNTY	CA	34,065	28,332	5,733	16.8
TULARE COUNTY	CA	160,463	133,616	26,847	16.7
GLENN COUNTY	CA	11,711	9,926	1,785	15.2
MADERA COUNTY	CA	50,192	42,714	7,478	14.9
STANISLAUS COUNTY	CA	195,832	166,646	29,186	14.9
KINGS COUNTY	CA	41,578	35,468	6,110	14.7
SISKIYOU COUNTY	CA	18,402	15,719	2,683	14.6
TRINITY COUNTY	CA	5,243	4,490	753	14.4
YUBA COUNTY	CA	21,519	18,472	3,047	14.2
FRESNO COUNTY	CA	369,546	318,022	51,524	13.9
KERN COUNTY	CA	277,671	240,446	37,225	13.4
SAN BENITO COUNTY	CA	23,330	20,295	3,035	13.0
PLUMAS COUNTY	CA	9,945	8,671	1,274	12.8
MODOC COUNTY	CA	4,304	3,772	532	12.4
MONTEREY COUNTY	CA	176,340	155,272	21,068	11.9

SAN JOAQUIN COUNTY	CA	242,528	213,580	28,948	11.9
DEL NORTE COUNTY	CA	10,076	8,911	1,165	11.6
LAKE COUNTY	CA	24,252	21,443	2,809	11.6
MONO COUNTY	CA	6,167	5,456	711	11.5
LASSEN COUNTY	CA	11,639	10,348	1,291	11.1
TEHAMA COUNTY	CA	23,613	21,024	2,589	11.0
SIERRA COUNTY	CA	1,762	1,573	189	10.7
TUOLUMNE COUNTY	CA	20,243	18,084	2,159	10.7
SHASTA COUNTY	CA	72,005	64,332	7,673	10.7
CALAVERAS COUNTY	CA	13,935	12,495	1,440	10.3
SAN JUAN COUNTY	CO	299	253	46	15.4
SAGUACHE COUNTY	CO	2,639	2,353	286	10.8
HENDRY COUNTY	FL	16,089	13,659	2,430	15.1
HARDEE COUNTY	FL	11,303	9,794	1,509	13.4
ST LUCIE COUNTY	FL	73,347	64,033	9,314	12.7
OKEECHOBEE COUNTY	FL	15,320	13,662	1,658	10.8
BURKE COUNTY	GA	9,175	7,856	1,319	14.4
TERRELL COUNTY	GA	4,224	3,620	604	14.3
TREUTLEN COUNTY	GA	2,996	2,619	377	12.6
JEFFERSON COUNTY	GA	8,521	7,513	1,008	11.8
WHEELER COUNTY	GA	2,148	1,894	254	11.8
JOHNSON COUNTY	GA	4,362	3,861	501	11.5
MACON COUNTY	GA	5,493	4,889	604	11.0
TELFAIR COUNTY	GA	5,220	4,646	574	11.0
HANCOCK COUNTY	GA	4,197	3,760	437	10.4
RANDOLPH COUNTY	GA	3,299	2,960	339	10.3

KAUAI COUNTY	HI	28,796	25,553	3,243	11.3
ADAMS COUNTY	ID	1,766	1,521	245	13.9
CLEARWATER COUNTY	ID	3,972	3,480	492	12.4
IDAHO COUNTY	ID	6,555	5,833	722	11.0
BENEWAH COUNTY	ID	4,272	3,836	436	10.2
PERRY COUNTY	IL	7,952	6,962	990	12.4
FRANKLIN COUNTY	IL	16,818	14,928	1,890	11.2
HARDIN COUNTY	IL	1,953	1,746	207	10.6
PULASKI COUNTY	IL	2,917	2,608	309	10.6
SALINE COUNTY	IL	10,647	9,537	1,110	10.4
LAWRENCE COUNTY	IL	7,169	6,443	726	10.1
ELLIOTT COUNTY	KY	2,564	2,143	421	16.4
HARLAN COUNTY	KY	10,009	8,482	1,527	15.3
MAGOFFIN COUNTY	KY	4,946	4,241	705	14.3
MARTIN COUNTY	KY	3,415	2,957	458	13.4
LAWRENCE COUNTY	KY	5,065	4,390	675	13.3
CARTER COUNTY	KY	10,974	9,604	1,370	12.5
CUMBERLAND COUNTY	KY	3,080	2,709	371	12.0
BREATHITT COUNTY	KY	4,664	4,116	548	11.7
LETCHER COUNTY	KY	8,124	7,195	929	11.4
LEWIS COUNTY	KY	5,491	4,877	614	11.2
MORGAN COUNTY	KY	4,410	3,921	489	11.1
FLOYD COUNTY	KY	14,372	12,836	1,536	10.7
RUSSELL COUNTY	KY	6,869	6,134	735	10.7
MENIFEE COUNTY	KY	2,322	2,075	247	10.6
KNOTT COUNTY	KY	5,978	5,351	627	10.5
MC CREARY COUNTY	KY	6,135	5,499	636	10.4

PERRY COUNTY	KY	11,782	10,577	1,205	10.2
EAST CARROLL PARISH	LA	3,425	2,870	555	16.2
WEST CARROLL PARISH	LA	5,093	4,296	797	15.6
MADISON PARISH	LA	5,677	4,947	730	12.9
CONCORDIA PARISH	LA	8,213	7,249	964	11.7
RED RIVER PARISH	LA	3,875	3,423	452	11.7
RICHLAND PARISH	LA	8,187	7,313	874	10.7
CATAHOULA PARISH	LA	5,330	4,770	560	10.5
ST JAMES PARISH	LA	8,893	7,979	914	10.3
DORCHESTER COUNTY	MD	15,688	14,007	1,681	10.7
GARRETT COUNTY	MD	13,318	11,896	1,422	10.7
SOMERSET COUNTY	MD	11,130	9,952	1,178	10.6
ONTONAGON COUNTY	MI	3,706	3,138	568	15.3
PRESQUE ISLE COUNTY	MI	6,234	5,335	899	14.4
MONTMORENCY COUNTY	MI	3,429	2,978	451	13.2
KEWEENAW COUNTY	MI	724	632	92	12.7
SCHOOLCRAFT COUNTY	MI	4,001	3,510	491	12.3
CHEBOYGAN COUNTY	MI	11,749	10,381	1,368	11.6
LAKE COUNTY	MI	3,143	2,777	366	11.6
GOGEBIC COUNTY	MI	8,342	7,414	928	11.1
MANISTEE COUNTY	MI	10,179	9,065	1,114	10.9
OCEANA COUNTY	MI	12,702	11,319	1,383	10.9
MACKINAC COUNTY	MI	7,327	6,548	779	10.6
CLEARWATER COUNTY	MN	3,843	3,298	545	14.2
RED LAKE COUNTY	MN	1,860	1,651	209	11.2

SHARKEY COUNTY	MS	2,960	2,414	546	18.4
ISSAQUENA COUNTY	MS	773	640	133	17.2
JEFFERSON COUNTY	MS	2,472	2,066	406	16.4
QUITMAN COUNTY	MS	3,733	3,184	549	14.7
JEFFERSON DAVIS COUNTY	MS	5,140	4,395	745	14.5
PANOLA COUNTY	MS	13,710	11,898	1,812	13.2
WILKINSON COUNTY	MS	3,513	3,050	463	13.2
TALLAHATCHIE COUNTY	MS	5,583	4,923	660	11.8
HOLMES COUNTY	MS	7,534	6,654	880	11.7
MONROE COUNTY	MS	16,629	14,677	1,952	11.7
HUMPHREYS COUNTY	MS	4,570	4,052	518	11.3
CHICKASAW COUNTY	MS	8,906	7,937	969	10.9
SUNFLOWER COUNTY	MS	11,741	10,457	1,284	10.9
CHOCTAW COUNTY	MS	3,457	3,089	368	10.6
CLAIBORNE COUNTY	MS	3,823	3,424	399	10.4
CLAY COUNTY	MS	8,811	7,894	917	10.4
WASHINGTON COUNTY	MS	28,441	25,477	2,964	10.4
COAHOMA COUNTY	MS	12,573	11,289	1,284	10.2
GEORGE COUNTY	MS	8,126	7,309	817	10.1
TUNICA COUNTY	MS	5,095	4,582	513	10.1
WAYNE COUNTY	MO	3,716	3,212	504	13.6
WRIGHT COUNTY	MO	7,474	6,620	854	11.4
SANDERS COUNTY	MT	4,021	3,433	588	14.6
GLACIER COUNTY	MT	5,748	4,938	810	14.1
LINCOLN COUNTY	MT	7,518	6,554	964	12.8
BIG HORN COUNTY	MT	4,697	4,136	561	11.9
MINERAL COUNTY	MT	1,519	1,343	176	11.6
ROSEBUD COUNTY	MT	4,960	4,405	555	11.2

BLAINE COUNTY	MT	2,871	2,577	294	10.2
ROOSEVELT COUNTY	MT	4,367	3,928	439	10.1
LINCOLN COUNTY	NV	1,186	1,047	139	11.7
CAPE MAY COUNTY	NJ	45,890	40,418	5,472	11.9
LUNA COUNTY	NM	10,650	8,062	2,588	24.3
MORA COUNTY	NM	1,754	1,392	362	20.6
TAOS COUNTY	NM	13,120	11,127	1,993	15.2
RIO ARRIBA COUNTY	NM	17,995	15,646	2,349	13.1
CATRON COUNTY	NM	1,411	1,237	174	12.3
CIBOLA COUNTY	NM	10,434	9,217	1,217	11.7
GUADALUPE COUNTY	NM	1,883	1,669	214	11.4
SAN JUAN COUNTY	NM	48,238	43,183	5,055	10.5
HAMILTON COUNTY	NY	2,407	2,127	280	11.6
SWAIN COUNTY	NC	5,900	4,873	1,027	17.4
GRAHAM COUNTY	NC	4,220	3,668	552	13.1
RICHMOND COUNTY	NC	21,006	18,874	2,132	10.1
ROLETTE COUNTY	ND	5,999	5,390	609	10.2
MORGAN COUNTY	OH	5,229	4,468	761	14.6
ADAMS COUNTY	OH	11,631	10,144	1,487	12.8
VINTON COUNTY	OH	3,989	3,540	449	11.3
MEIGS COUNTY	OH	8,927	7,938	989	11.1
MONROE COUNTY	OH	6,336	5,667	669	10.6
SCIOTO COUNTY	OH	33,359	29,961	3,398	10.2

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HASKELL COUNTY	OK	4,142	3,647	495	12.0
CHOCTAW COUNTY	OK	5,550	4,913	637	11.5
LATIMER COUNTY	OK	4,185	3,763	422	10.1
HARNEY COUNTY	OR	3,560	3,145	415	11.7
WALLOWA COUNTY	OR	3,371	3,001	370	11.0
GRANT COUNTY	OR	4,108	3,664	444	10.8
FOREST COUNTY	PA	1,867	1,669	198	10.6
HUNTINGDON COUNTY	PA	19,298	17,302	1,996	10.3
WILLIAMSBURG COUNTY	SC	16,414	13,839	2,575	15.7
MARLBORO COUNTY	SC	12,113	10,470	1,643	13.6
MARION COUNTY	SC	16,193	14,166	2,027	12.5
DILLON COUNTY	SC	13,964	12,311	1,653	11.8
BARNWELL COUNTY	SC	11,007	9,796	1,211	11.0
SHANNON COUNTY	SD	3,144	2,714	430	13.7
DEWEY COUNTY	SD	2,198	1,929	269	12.2
JOHNSON COUNTY	TN	8,176	6,867	1,309	16.0
STEWART COUNTY	TN	3,963	3,388	575	14.5
HOUSTON COUNTY	TN	3,330	2,880	450	13.5
LEWIS COUNTY	TN	5,087	4,421	666	13.1
LAWRENCE COUNTY	TN	21,986	19,314	2,672	12.2
HAYWOOD COUNTY	TN	9,100	8,022	1,078	11.8
MEIGS COUNTY	TN	4,290	3,787	503	11.7
WAYNE COUNTY	TN	7,605	6,730	875	11.5
RHEA COUNTY	TN	11,792	10,464	1,328	11.3
SCOTT COUNTY	TN	8,323	7,388	935	11.2

PICKETT COUNTY	TN	2,393	2,127	266	11.1
MONROE COUNTY	TN	17,399	15,490	1,909	11.0
COCKE COUNTY	TN	17,219	15,382	1,837	10.7
HENDERSON COUNTY	TN	13,387	11,977	1,410	10.5
MC MINN COUNTY	TN	21,764	19,533	2,231	10.3
PRESIDIO COUNTY	TX	3,502	2,227	1,275	36.4
MAVERICK COUNTY	TX	19,033	13,170	5,863	30.8
STARR COUNTY	TX	22,511	15,789	6,722	29.9
ZAVALA COUNTY	TX	4,594	3,484	1,110	24.2
WILLACY COUNTY	TX	7,964	6,260	1,704	21.4
HIDALGO COUNTY	TX	190,543	152,178	38,365	20.1
DIMMIT COUNTY	TX	3,817	3,226	591	15.5
WEBB COUNTY	TX	69,404	58,773	10,631	15.3
MATAGORDA COUNTY	TX	17,719	15,245	2,474	14.0
DUVAL COUNTY	TX	4,741	4,083	658	13.9
CAMERON COUNTY	TX	124,749	108,517	16,232	13.0
BROOKS COUNTY	TX	3,310	2,889	421	12.7
JASPER COUNTY	TX	16,005	14,047	1,958	12.2
ORANGE COUNTY	TX	41,950	36,999	4,951	11.8
NEWTON COUNTY	TX	6,205	5,488	717	11.6
EL PASO COUNTY	TX	287,974	254,580	33,394	11.6
UVALDE COUNTY	TX	10,921	9,662	1,259	11.5
MARION COUNTY	TX	4,113	3,643	470	11.4
LOVING COUNTY	TX	89	79	10	11.2
REEVES COUNTY	TX	6,940	6,167	773	11.1
VAL VERDE COUNTY	TX	18,842	16,746	2,096	11.1
PANOLA COUNTY	TX	8,435	7,514	921	10.9
FRIO COUNTY	TX	6,558	5,847	711	10.8
DICKENS COUNTY	TX	1,064	951	113	10.6

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SOMERVELL COUNTY	TX	2,292	2,048	244	10.6
ZAPATA COUNTY	TX	4,309	3,874	435	10.1
DICKENSON COUNTY	VA	6,270	5,102	1,168	18.6
WISE COUNTY	VA	16,767	13,704	3,063	18.3
LANCASTER COUNTY	VA	5,220	4,534	686	13.1
BUCHANAN COUNTY	VA	9,632	8,382	1,250	13.0
NORTON CITY	VA	1,580	1,376	204	12.9
LEE COUNTY	VA	11,090	9,697	1,393	12.6
NORTHUMBERLAND COUNTY	VA	5,308	4,654	654	12.3
RUSSELL COUNTY	VA	14,522	12,963	1,559	10.7
LUNENBURG COUNTY	VA	4,841	4,335	506	10.5
COLUMBIA COUNTY	WA	1,394	1,197	197	14.1
PEND OREILLE COUNTY	WA	3,984	3,425	559	14.0
FERRY COUNTY	WA	2,864	2,501	363	12.7
YAKIMA COUNTY	WA	115,357	100,825	14,532	12.6
ADAMS COUNTY	WA	8,459	7,505	954	11.3
KLICKITAT COUNTY	WA	8,889	7,886	1,003	11.3
FRANKLIN COUNTY	WA	21,914	19,456	2,458	11.2
GRAYS HARBOR COUNTY	WA	27,650	24,676	2,974	10.8
OKANOGAN COUNTY	WA	23,227	20,803	2,424	10.4
SKAMANIA COUNTY	WA	3,998	3,587	411	10.3
CHELAN COUNTY	WA	34,667	31,176	3,491	10.1
CALHOUN COUNTY	WV	2,770	2,181	589	21.3
POCAHONTAS COUNTY	WV	4,271	3,540	731	17.1
WIRT COUNTY	WV	2,117	1,782	335	15.8
BARBOUR COUNTY	WV	6,536	5,603	933	14.3
MINGO COUNTY	WV	10,038	8,610	1,428	14.2

CLAY COUNTY	WV	3,635	3,121	514	14.1
LINCOLN COUNTY	WV	7,095	6,146	949	13.4
RITCHIE COUNTY	WV	4,316	3,738	578	13.4
TUCKER COUNTY	WV	3,846	3,337	509	13.2
ROANE COUNTY	WV	6,277	5,487	790	12.6
MCDOWELL COUNTY	WV	8,097	7,080	1,017	12.6
BRAXTON COUNTY	WV	5,435	4,754	681	12.5
WEBSTER COUNTY	WV	3,076	2,695	381	12.4
UPSHUR COUNTY	WV	10,178	8,922	1,256	12.3
LOGAN COUNTY	WV	14,310	12,608	1,702	11.9
RANDOLPH COUNTY	WV	13,477	11,905	1,572	11.7
MASON COUNTY	WV	9,764	8,670	1,094	11.2
WETZEL COUNTY	WV	7,549	6,705	844	11.2
NICHOLAS COUNTY	WV	10,351	9,202	1,149	11.1
GRANT COUNTY	WV	4,896	4,359	537	11.0
LEWIS COUNTY	WV	7,146	6,359	787	11.0
SUMMERS COUNTY	WV	4,534	4,040	494	10.9
TAYLOR COUNTY	WV	6,798	6,066	732	10.8
GILMER COUNTY	WV	2,746	2,454	292	10.6
BOONE COUNTY	WV	8,467	7,615	852	10.1
MENOMINEE COUNTY	WI	2,353	2,014	339	14.4