

October 1999

# FOOD STAMP PROGRAM

## How States Are Using Federal Waivers of the Work Requirement



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**Resources, Community, and  
Economic Development Division**

B-283514

October 20, 1999

The Honorable John R. Kasich  
Chairman, Committee on the Budget  
House of Representatives

Dear Mr. Chairman:

The Welfare Reform Act limits able-bodied adults between the ages of 18 and 50 who have no dependents to 3 months' participation in the Food Stamp Program in a 3-year period, unless they meet a work requirement or are exempted from that requirement. States may directly exempt up to 15 percent of their able-bodied adults without dependents from the work requirement. In addition, states may request waivers from the Department of Agriculture (USDA) for able-bodied adults without dependents who live in areas with insufficient jobs. In September 1998, we surveyed state food stamp officials to determine, among other things, the number of able-bodied adults without dependents who were receiving food stamp benefits, the number required to meet the work requirement, and the number who were exempted from the requirement. Together, in the 42 states that responded to our survey, 514,000 able-bodied adults without dependents were receiving food stamps. As we reported to you in December 1998, about 58 percent of those able-bodied adults were required to work, about 2 percent were covered by state exemptions, and about 40 percent were covered by USDA waivers.<sup>1</sup>

As you requested, this report provides information on (1) the measures used by USDA to assess states' requests for waivers to the work requirement for able-bodied adults without dependents, (2) how states have used the waiver provision, and (3) whether USDA and states considered the availability of employment in adjacent areas when deciding which areas to include in a waiver. In addition to analyzing USDA data covering all 50 states for this study, we also reviewed 13 states in more detail—10 that have implemented waivers and 3 that have not—to better understand states' decisions about seeking waivers.<sup>2</sup>

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<sup>1</sup>Food Stamp Program: Information on Employment and Training Activities (GAO/RCED-99-40, Dec. 14, 1998).

<sup>2</sup>The 13 states we reviewed, which together had about 65 percent of able-bodied adults without dependents who were on food stamps, included 10 states—California, Florida, Georgia, Illinois, Kentucky, Louisiana, New York, Pennsylvania, Texas, and West Virginia—that have implemented waivers and 3 states—Michigan, Ohio, and Wisconsin—that have not implemented waivers.

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## Results in Brief

USDA uses federal and state data to assess employment conditions when reviewing states' requests to waive the requirement that able-bodied adults without dependents work in order to remain eligible for food stamps. Consistent with welfare reform law, states must show that the areas where the individuals live (1) have unemployment rates above 10 percent or (2) do not have sufficient numbers of jobs to provide employment for these individuals. USDA has generally granted waivers if the states' requests were supported by data from the Department of Labor showing that areas either had unemployment rates above 10 percent or were designated as "labor surplus areas," meaning that the numbers of jobs there were not sufficient. USDA has provided states with guidance for other measures of employment conditions and has accepted data from states showing, among other things, worsening employment-to-population ratios or meager job growth to demonstrate that areas do not have sufficient numbers of jobs.

States vary in their use of USDA waivers. As of June 1999, 38 states and the District of Columbia had USDA waivers in place, whereas 12 states had chosen not to seek them. The 13 states we reviewed in detail differed in their waiver policies as well. For instance, of the 10 states we reviewed that have implemented waivers, 8 had sought waivers for all eligible areas, while 2 had sought waivers for only some eligible areas. California, for example, determined that in most areas that might qualify for waivers, enough options existed for food stamp recipients to meet the work requirement. Hence, the state sought a waiver only for two agricultural areas that had suffered economically disastrous freezes. The three remaining states we reviewed had decided not to seek waivers. Officials in those states said that all able-bodied adults without dependents should meet the work requirement and that if they fail to do so, their food stamp benefits should be terminated.

USDA does not consider the availability of employment in adjacent areas when assessing states' waiver requests because the law does not require it to do so. Moreover, of the 10 states we reviewed that have implemented waivers, 9 did not consider employment options in adjoining areas. The exception was California, where local officials decided not to seek waivers for Indian reservations with severe unemployment if jobs were available in nearby towns. But California officials, like those in USDA and the other states, said that employment in adjacent areas would generally not be a viable option, mainly because of transportation difficulties. These officials questioned how far individuals should have to travel to seek employment

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and how individuals who typically work for low wages could afford transportation to distant jobs.

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## Background

The Food Stamp Program is an entitlement program that helps low-income individuals and families obtain a more nutritious diet by supplementing their income with food stamp benefits. The Personal Responsibility and Work Opportunity Reconciliation Act of 1996, commonly referred to as the Welfare Reform Act, retained the Food Stamp Program as an entitlement program for participants who meet household income and asset qualifications. However, it tightened eligibility standards for food stamps by establishing the work requirement for able-bodied adults without dependents and by disqualifying most permanent resident aliens from participation. USDA's Food and Nutrition Service and the states jointly implement the Food Stamp Program; the states administer the program.

The Welfare Reform Act requires able-bodied adults between the ages of 18 and 50 who have no dependents to meet a work requirement, or have an exemption from that requirement, if they are to continue to be eligible for food stamps for more than 3 months in a 3-year period.<sup>3</sup> To meet the work requirement, these individuals must (1) work a minimum of 80 hours a month, (2) participate in a qualifying state employment and training program for 20 hours a week, or (3) do public service through a state Workfare program, which is a program that provides work in a public service capacity in exchange for public benefits, such as food stamps. Two kinds of exemptions may be granted for this requirement. Under welfare reform, at the request of a state agency, USDA may waive the work requirement after making a determination that the area in which the individuals reside has an unemployment rate above 10 percent or does not have a sufficient number of jobs to provide employment for the individuals. In addition, under the Balanced Budget Act of 1997, the states may exempt up to 15 percent of their able-bodied adults without dependents from the work requirement, using state-determined criteria.

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## USDA Uses Federal and State Data to Assess Waiver Requests

USDA's Food and Nutrition Service has developed fairly straightforward guidance to the states for requesting waivers of the work requirement. While the guidance does not specifically define the geographic areas that may be considered for waivers, it directs the states to "consider areas within, or combinations of, counties, cities, or towns" as well as "rural

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<sup>3</sup>The provisions of this legislation apply to the 50 states, the District of Columbia, Guam, and the Virgin Islands.

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areas and Indian reservations” that “best reflect the labor market prospects of program participants and State administrative needs.” Waivers may be granted for a maximum of 1 year and may be renewed annually for areas where the employment conditions continue to qualify.

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**Information Used to Evaluate Waivers Based on Unemployment Above 10 Percent**

Under the Food and Nutrition Service’s guidance, waivers will be granted for any requested area in which the average unemployment rate in the preceding 12 months was greater than 10 percent, using the Bureau of Labor Statistics’ standard data or methods. The Bureau releases unemployment estimates monthly for all counties, cities of 25,000 or more, all cities and towns in New England, and all metropolitan and small labor market areas. These data, which are produced by state employment security agencies using Bureau-developed concepts, definitions, and technical specifications, are also used to determine eligibility for benefits in other federal programs, including job training under the Job Training Partnership Act and assistance under the Emergency Food and Shelter Program. The Bureau screens and tests these data for consistency. The data released by the Bureau for June 1999 included 35 states that had areas with unemployment estimates above 10 percent.

For areas for which unemployment estimates are not routinely developed, the Food and Nutrition Service’s guidance allows states to generate estimated unemployment rates using the Bureau of Labor Statistics’ standard methods and formulas. State-generated data on employment trends and unemployment covering a short period may also be used to support waiver requests for areas where rising unemployment is expected to exceed 10 percent and where predictable seasonal unemployment has historically risen above 10 percent. Alaska, for example, has requested and received seasonal waivers using data that show seasonal unemployment rates above 10 percent.

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**Information Used to Evaluate Waivers Based on an Insufficient Number of Jobs**

According to the Food and Nutrition Service’s guidance, the law provides for waivers based on an insufficient number of jobs because the Congress recognized that “the unemployment rate alone is an imperfect measure of the employment prospects of individuals with little work history and diminished opportunities.” Noting that no standard data or methods exist to determine the sufficiency of jobs in an area, the guidance offers examples of the types and sources of data that the states may use—and that the Food and Nutrition Service will consider—to demonstrate that an area has an insufficient number of jobs.

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The following are some of the types and sources of data cited in the guidance as potentially useful for identifying areas for which states may seek waivers based on an insufficient number of jobs:

- Designation as a “labor surplus area”—The Department of Labor classifies an area as a labor surplus area if its average unemployment rate was at least 20 percent higher than the average unemployment rate for all states during the previous 2 years.<sup>4</sup> For instance, the national average unemployment rate for the 2-year period from January 1996 through December 1997 was 5.3 percent. Thus, to qualify as a labor surplus area for fiscal year 1999, an area needed an unemployment rate of at least 6.4 percent. All but two states, Delaware and New Hampshire, had areas that qualified as labor surplus areas for fiscal 1999. USDA has approved all waivers requested for designated labor surplus areas.
- Areas in states that qualify for extended unemployment insurance benefits—The Department of Labor determines whether a state can qualify for extended unemployment insurance benefits for its residents. The Food and Nutrition Service’s guidance recognizes this as a potentially useful indicator of insufficient jobs. However, only Alaska currently meets Labor’s criteria for extending unemployment insurance benefits, and Alaska has not used this measure to support a waiver request. According to Food and Nutrition Service officials, the fact that only one state qualifies for extended benefits is a reflection of the strong condition of the economy; however, more states would qualify for extended unemployment insurance benefits in an economic downturn.
- Areas with lagging job growth—The Food and Nutrition Service’s guidance recognizes that job seekers may have a harder time finding work in an area where job growth lags behind population growth. The ratio for lagging job growth is computed using employment and population estimates for an area. However, the guidance points out that the Census estimates for the populations of counties and cities are released only periodically and may not be current. According to the Food and Nutrition Service, a few states have used this indicator in conjunction with other data to show that an area has insufficient jobs.
- Areas with declining occupations or industries—The Food and Nutrition Service’s guidance recognizes that where employment markets are dominated by declining industries, large numbers of people may have skills that are no longer in demand. According to the guidance, the impact could be particularly significant in smaller rural areas where the loss of a single employer could have an immediate effect on job prospects and

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<sup>4</sup>The average unemployment rate for all states includes data for the District of Columbia and Puerto Rico, but not Guam and the Virgin Islands.

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unemployment rates. The guidance cites several options for measuring this decline, such as the Bureau of Labor Statistics' monthly data on state and local employment by major industry, state welfare and employment security agencies' data on occupation and employment changes, and increased filings for unemployment insurance. According to the Food and Nutrition Service, a few states have used this indicator with other data to show insufficient jobs; it has also been used alone for a few rural areas that lost major employers.

Noting that decisions to approve waivers because of insufficient jobs will be made on a case-by-case basis, the guidance alerts the states to provide sufficient data to support an assertion that an area lacks jobs. It further states that the "thoroughness of the data" that a state presents will have a bearing on whether a waiver request is approved.

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## Waiver Policy Differs Among States

States vary in the extent to which they have sought and used USDA waivers. As of June 1999, 38 states and the District of Columbia had USDA-granted waivers in place. All these jurisdictions had received waivers for one or more areas on the basis of insufficient jobs; 21 states also had sought and received waivers for one or more areas on the basis of unemployment rates above 10 percent. The Food and Nutrition Service estimates that just over 206,000 able-bodied adults without dependents live in these waived areas and receive food stamps. At the same time, however, 12 states, together with Guam and the Virgin Islands, have chosen not to seek USDA waivers of the work requirements for their able-bodied adults without dependents. According to the Food and Nutrition Service, the states that have chosen not to seek waivers would likely qualify to receive them. Indeed, 10 of the 12 states have areas with unemployment rates above 10 percent or have designated labor surplus areas—circumstances for which USDA has routinely approved waiver requests from other states—and the other 2 have areas for which other data may demonstrate that sufficient numbers of jobs do not exist.

Appendix I provides information on states' use of USDA waivers as of June 1999. For states that sought and received waivers, the appendix includes the basis on which USDA granted the waivers (whether unemployment above 10 percent or insufficient numbers of jobs) and the number and types of areas covered by the waivers.

To obtain a better understanding of states' decisions about seeking USDA waivers, we contacted 13 states. As shown in table 1, 10 of these states have implemented waivers and 3 states have not.

**Table 1: States We Reviewed Regarding Their Decisions to Seek USDA Waivers**

State (rank among all states in number of able-bodied adults) <sup>a</sup>	Use waivers
California (1)	Yes-some eligible areas
Florida (7)	Yes-all eligible areas
Georgia (11)	Yes-all eligible areas
Illinois (3)	Yes-all eligible areas
Kentucky (5)	Yes-all eligible areas
Louisiana (8)	Yes-all eligible areas
Michigan (9)	No
New York (2)	Yes-all eligible areas
Ohio (22)	No
Pennsylvania (4)	Yes-all eligible areas
Texas (6)	Yes-some eligible areas
West Virginia (10)	Yes-all eligible areas
Wisconsin (17)	No

<sup>a</sup>Rank is based on data for a 3-month period—April, May, and June 1998—reported to GAO by 42 states. See Food Stamp Program: Information on Employment and Training Activities (GAO/RCED-99-40, Dec. 14, 1998).

Source: GAO's analysis.

Officials from eight of these states (Florida, Georgia, Illinois, Kentucky, Louisiana, New York, Pennsylvania, and West Virginia) sought waivers for all areas that had unemployment rates above 10 percent and all areas that they could demonstrate did not have sufficient numbers of jobs. Most also told us that they would continue to seek waivers for all areas that might qualify because, among other things, it would not be equitable to waive the work requirement for able-bodied adults without dependents in one area but not for such individuals in another area that had the same employment characteristics. Some states told us they sought waivers from the work requirement because their states' agencies did not have the resources to offer job training or Workfare to individuals who were geographically scattered.

Eight states (Florida, Georgia, Illinois, Kentucky, Louisiana, New York, Pennsylvania, and Texas) also raised concerns about the administrative burdens on their agencies for such tasks as overseeing compliance with

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the work requirements, tracking individuals' job status, and operating work support programs, such as Workfare. Officials in Illinois, Louisiana, and New York, for example, pointed out that they are spending an inordinate amount of time on paperwork for the relatively small numbers of able-bodied adults without dependents who participate in their food stamp programs. In addition, officials in Louisiana and Pennsylvania voiced concern that many individuals regarded as able-bodied had medical problems that limited their ability to meet the work requirement. However, under the Welfare Reform Act, individuals certified as physically or mentally unfit for employment are not considered able-bodied. The Food and Nutrition Service is planning to propose regulations in December 1999 for determining what constitutes "physically or mentally unfit." Until then, the states will have no consistent basis for making that determination.

Two of the states we reviewed—California and Texas—told us they sought waivers only for a few of the areas in their jurisdictions that could qualify. California sought a 6-month waiver—which expired July 31, 1999—for two primarily agricultural counties that had suffered massive unemployment following economically disastrous freezes. Officials in California told us that sufficient employment training and Workfare programs existed in areas that might qualify for waivers for able-bodied adults without dependents there to fulfill the work requirement. California currently has no areas covered by waivers.

Texas officials told us that the state's policy is to seek waivers only for those counties with unemployment rates above 10 percent. Texas has 254 counties, of which 19 are covered by waivers. The unemployment rate in 1 of the 19 counties dropped below 10 percent after Texas applied for its most recent waiver. The Food and Nutrition Service granted a waiver for that county based on its designation as a labor surplus area; Texas decided to implement the waiver because the county's unemployment rate was still very high and it had been covered by a waiver during each of the previous 2 years. Texas officials told us they believe that Workfare and employment and training programs are disincentives to looking for jobs. According to the officials, these programs allow able-bodied adults without dependents to receive benefits instead of securing jobs.

Finally, officials in Michigan, Ohio, and Wisconsin—states that have chosen not to seek USDA waivers of the work requirement—told us that all able-bodied adults without dependents should be able to meet the work requirement and that if they fail to do so, their food stamp benefits should

be terminated. Michigan has a number of mechanisms in place to help able-bodied adults find work; for example, if the state cannot place an individual in a job within 3 months, it guarantees him or her a position with a public service or community service organization, which will fulfill the work requirement. Ohio had initially sought a waiver, and in early 1997 was granted a waiver for 20 counties and 12 cities; however, the state decided not to implement the waiver. According to an Ohio official, the state requires low-income individuals with dependents who participate in another assistance program to work in order to receive benefits from that program, so it would not be fair to waive the work requirement for able-bodied adults without dependents who participate in the Food Stamp Program. In Wisconsin, officials believe a waiver may be a good option in areas with high unemployment but that it is not needed at this point. Only 27 able-bodied adults without dependents reside in the state's labor surplus areas (seven counties and one city); none reside in the one county with an unemployment rate above 10 percent. According to Wisconsin officials, the state has an extensive, well-funded program operating in every county that provides numerous and widely available opportunities to fulfill the work participation requirement.

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## USDA and Most States Contacted Did Not Consider the Availability of Employment in Adjoining Areas

USDA officials said that they did not consider the availability of employment in adjoining counties or jurisdictions—or require states to do so—when reviewing waiver requests, primarily because the law does not require them to do so. Of the 10 states we reviewed that have USDA waivers, only California had considered the availability of employment in surrounding areas in deciding whether to seek a waiver. California officials told us that local officials had considered seeking a waiver for Indian reservations that had severe unemployment. However, when the local officials considered the availability of employment in nearby towns, they decided that a waiver would not be needed for the reservations. The California officials agreed with USDA and other state officials who expressed the view that employment in adjacent areas would not be a viable option in most instances. The concerns they raised focused on the transportation difficulties this would pose for the individuals required to work and on the administrative burden that it would place on state agencies.

With regard to transportation difficulties, USDA and state officials questioned how far individuals should have to travel to seek employment and how individuals who typically work for low wages would be able to afford transportation to distant jobs. In rural areas, able-bodied adults

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without dependents who rely on food stamps do not usually have access to public transportation or even have relatives who could provide transportation to jobs. In both Kentucky and West Virginia, for example, most of the counties covered by waivers are in rural areas where mass transit is unavailable. In some locations, the expense of getting to a job would not be covered by the paycheck the individual would receive. In many instances, state officials told us that areas with high unemployment are adjacent to other areas with high unemployment. In Louisiana, for example, so many parishes have high unemployment that finding jobs in adjoining areas is not likely; individuals would have to travel across several parishes to get to an area where jobs may be available. This is true as well in Kentucky, Texas, and West Virginia, where the counties covered by waivers are concentrated in a particular section of each state.

Even in urban areas, where public transportation is available, there may be limitations that could make it difficult to hold a job in a distant location. As we reported to you in May 1998, the majority of the entry-level jobs that the poor would be likely to fill are located in suburbs that have limited or no accessibility through existing public transportation systems.<sup>5</sup> In Pennsylvania, for example, many low-paying, low-skilled jobs are in retail or fast food businesses, which often require employees to work late at night. According to Pennsylvania officials, workers would have to provide their own transportation for these jobs because reliable public transportation often ends earlier in the evening. In addition, they said that job growth tends to be in the suburbs and that, in many places, there is no transportation to the suburbs from the inner city. A recent report by the Department of Housing and Urban Development observed that public transit is frequently not designed to carry city residents to suburban jobs.<sup>6</sup> The report cited a study on entry-level job openings that found that, in Boston, a 1-hour transit commute would reach only 14 percent of jobs in the region's fast-growth areas and, in the Atlanta area, less than half the entry-level jobs were within a quarter mile of a public transit route.

Some states are providing transportation so that able-bodied adults without dependents can travel to distant jobs. Three adjacent Florida counties, for example, have established a transportation system that uses county-owned vans to pick up individuals at designated stops and drop them off at places of employment anywhere within the tri-county area. Pennsylvania encourages individuals to seek employment wherever

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<sup>5</sup>Welfare Reform: Transportation's Role in Moving From Welfare to Work (GAO/RCED-98-161, May 29, 1998).

<sup>6</sup>The State of the Cities 1999, U.S. Department of Housing and Urban Development, June 1999.

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necessary and will pay relocation expenses to help with these efforts. In addition, the District of Columbia, which has a waiver for all its able-bodied adults without dependents, provides free farecards for public transportation to individuals who live in the District but are able to secure employment in Virginia or Maryland. The District also helps these individuals find jobs in the adjacent areas.

State officials also said that state agencies would face administrative problems if the states had to consider the availability of employment in adjacent areas when deciding whether to seek waivers. USDA's guidance acknowledges that, because the county is the usual administrative unit for states' food stamp programs, it may not be feasible for states to assess recipients' employment prospects in geographical areas that cross county or state lines. Officials said that determining whether an applicant has fulfilled a requirement to seek work in another jurisdiction could be "a nightmare"; state agencies may have no administrative structure with which to monitor efforts to seek or hold jobs across county or state lines. Finally, officials in several states told us they believe they are already spending a disproportionate amount of administrative effort on assisting and overseeing the relatively small portion of the food stamp population that is made up of able-bodied adults without dependents.

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## Agency Comments

We provided USDA and the Department of Labor with a draft of this report for their review and comment. USDA responded that the report gave an accurate and evenhanded picture of the process USDA uses to waive the work requirement for able-bodied adults without dependents. USDA also suggested several technical clarifications that we incorporated as appropriate. The Department of Labor had no comments. We also provided officials in the District of Columbia and the states we reviewed with excerpts that were attributed to them and incorporated their clarifications as appropriate.

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## Scope and Methodology

To obtain information on the measures USDA uses to determine whether to approve states' requests for waivers to the work requirement, we reviewed the appropriate statutes and USDA's guidance, spoke with officials from USDA's Food and Nutrition Service, and reviewed 43 waiver applications. We reviewed documents from the Bureau of Labor Statistics and the Employment and Training Administration to determine their methodology for gathering, compiling, and reporting the unemployment data used by USDA.

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To determine how states have used the waiver provision, we assessed USDA's data on participation in the waiver program and summary information on waiver requests; we discussed the data with USDA's Food and Nutrition Service officials. Information in this report on the basis for states' decisions about whether and to what extent to use waivers is based in part on our analysis of the waiver practices and experiences in 13 states. We selected the 10 states—California, Florida, Georgia, Illinois, Kentucky, Louisiana, New York, Pennsylvania, Texas, and West Virginia—with the largest populations of able-bodied adults without dependents that had USDA waivers, as identified in our December 14, 1998, report, Food Stamp Program: Information on Employment and Training Activities (GAO/RCED-99-40). We also selected three states—Michigan, Ohio, and Wisconsin—that had substantial populations of food stamp recipients who are able-bodied individuals but that had not implemented waivers. The December report analyzed data from our survey of states covering April, May, and June 1998. The 13 states together have about 65 percent of the able-bodied adults without dependents that the Food and Nutrition Service estimates currently participate in the Food Stamp Program.

To determine whether USDA and the states have considered the availability of employment in adjacent jurisdictions, we reviewed USDA's Food and Nutrition Service's guidance and discussed the guidance and waiver review procedures with Food and Nutrition Service officials. We also questioned officials in the 10 states we consulted that had requested and implemented waivers.

We performed our work in accordance with generally accepted government auditing standards from February 1999 through September 1999.

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Copies of this report will be sent to the Honorable Richard Lugar, Chairman, and the Honorable Tom Harkin, Ranking Minority Member, Senate Committee on Agriculture, Nutrition, and Forestry; the Honorable Larry Combest, Chairman, and the Honorable Charles Stenholm, Ranking Minority Member, House Committee on Agriculture; other appropriate congressional committees; the Honorable Dan Glickman, Secretary of Agriculture; the Honorable Alexis M. Herman, Secretary of Labor; the Honorable Jacob Lew, Director, Office of Management and Budget; and other interested parties. We will also make copies available to others upon request.

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If you or your staff have any questions about the information in this report, please contact me or Erin Lansburgh at (202) 512-5138. Key contributors to this report were Abiud Amaro, Natalie Herzog, and Stuart Ryba.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Lawrence J. Dyckman". The signature is fluid and cursive, with a large initial "L" and "D".

Lawrence J. Dyckman  
Director, Food and Agriculture Issues

# Information on States' Use of USDA Waivers of Work Requirement for Able-Bodied Adults Without Dependents, as of June 1999

States	Waiver status	Basis for waiver		Areas included in waiver
		Unemployment over 10 percent	Insufficient jobs	
Alabama	Yes	x	x	25 counties
Alaska	Yes	x	x	21 census tracts (14 seasonal)
Arizona	Yes	x	x	10 counties, 1 partial county, 3 Indian reservations
Arkansas	Yes		x	33 counties, 1 city
California	Yes	x		2 counties
Colorado	Yes		x	7 counties, 2 Indian reservations
Connecticut	Yes		x	21 cities and towns
Delaware	No			
District of Columbia	Yes	x	x	Entire District
Florida	Yes	x	x	21 counties, 1 city
Georgia	Yes		x	53 counties, 5 cities
Guam	No			
Hawaii	Yes	x	x	3 islands
Idaho	Yes	x	x	5 Indian reservations
Illinois	Yes		x	36 counties, 21 cities, 227 small municipalities
Indiana	Yes		x	3 counties, 2 cities
Iowa	No			
Kansas	No			
Kentucky	Yes		x	64 counties, 2 cities, 1 partial county
Louisiana	Yes		x	41 parishes, 5 cities
Maine	Yes		x	6 counties, 1 local metropolitan area, 1 Indian reservation, 9 cities
Maryland	Yes	x	x	8 counties, 2 cities
Massachusetts	No			
Michigan	No			
Minnesota	Yes	x	x	20 counties, 9 Indian reservations
Mississippi	No			
Missouri	Yes		x	28 counties, 1 city
Montana	Yes	x	x	13 counties, 7 Indian reservations
Nebraska	Yes		x	3 Indian reservations
Nevada	Yes	x	x	6 counties, 2 cities, 16 Indian reservations/colonies
New Hampshire	No			
New Jersey	Yes	x	x	1 county, 2 partial counties, 35 municipalities

(continued)

**Appendix I  
Information on States' Use of USDA Waivers  
of Work Requirement for Able-Bodied  
Adults Without Dependents, as of June 1999**

States	Waiver status	Basis for waiver		Areas included in waiver
		Unemployment over 10 percent	Insufficient jobs	
New Mexico	Yes	x	x	15 counties, 1 city, 22 Indian reservations
New York	Yes	x	x	23 counties, 1 partial county, 12 cities
North Carolina	No			
North Dakota	Yes		x	3 counties
Ohio	No			
Oklahoma	No			
Oregon	No			
Pennsylvania	Yes		x	33 counties, 6 cities
Rhode Island	Yes		x	4 cities and towns
South Carolina	Yes	x	x	22 counties, 2 cities
South Dakota	Yes	x	x	7 counties, 7 Indian reservations
Tennessee	Yes	x	x	54 counties
Texas	Yes	x	x	19 counties
Utah	Yes		x	5 counties
Vermont	Yes		x	2 counties
Virginia	Yes		x	19 counties, 3 cities
Virgin Islands	No			
Washington	Yes	x	x	27 counties, 3 cities, 26 Indian reservations
West Virginia	Yes	x	x	38 counties
Wisconsin	No			
Wyoming	Yes		x	1 Indian reservation

Source: GAO's analysis of the Food and Nutrition Service's data.

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