



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF HUMAN SERVICES
LANSING



ISMAEL AHMED
DIRECTOR

November 19, 2007

Mr. Tim English, Regional Director
Food Stamp Program
USDA
FNS Midwest Region
77 W. Jackson Blvd. 20th floor
Chicago, IL 60604-3511

Dear Mr. English:

As you know, Michigan has seen a decrease in jobs and an increase in unemployment during the past seven years. As a result, all counties in Michigan continue to meet one or more of the criteria established by FNS to demonstrate a lack of sufficient jobs and to waive the time limits on receipt of Food Stamps that are otherwise in place for able-bodied adults without dependents. Therefore, we are submitting the attached two-year request to extend Michigan's waiver of the three-month time limit from March 1, 2008 through February 29, 2010, along with the unemployment data to support the request.

Thank you for your consideration. If you have any questions, please feel free to contact Donald Mussen at (517) 335-4323.

Sincerely,

Ismael Ahmed

Attachments

WAIVER REQUEST

1. **Waiver serial number:** 2040026
2. **Type of request:** Extension
3. **Primary regulation citation:** 7 CFR 273.24
4. **Secondary regulation citation:**
5. **State:** Michigan
6. **Region:** MWRO
7. **Regulatory Requirements:** Under 7 CFR 273.24(b) individuals are not eligible to participate in the Food Stamp Program as a member of any household if, during the preceding 36-month period, the individual received food stamp benefits for not less than 3 months (consecutive or otherwise), during which the individual did not work 20 hours or more per week, averaged monthly; participate in and comply with the requirements of a work program for 20 hours or more per week; or participate in and comply with requirements of a program under Section 20 or a comparable program established by the State.

Under 7 CFR 273.24(f), upon the request of a State agency, the Food and Nutrition Service (FNS) may waive the applicability of the above provision for any group of individuals in the State if the FNS makes a determination that the area in which the individuals reside has an unemployment rate of over 10 percent, or does not have a sufficient number of jobs to provide employment for the individuals.

In addition, the FNS will approve two-year State agency waivers under limited circumstances, targeting areas that qualified for waivers for two consecutive past years. In order to be eligible for a two-year waiver, the area must meet at least one of the following criteria indicating that the area has experienced and will probably continue chronic high unemployment: an unemployment rate greater than 10 percent for the two-year period immediately prior to the request; designation as a Labor Surplus Area (LSA) by the Department of Labor's Employment and Training Administration (DOLETA) for a minimum of two consecutive fiscal years (the year of the request and the fiscal year prior to the request); or an unemployment rate greater than 20 percent above the national average for a 36-month period, ending no earlier than three months prior to the request.

8. Description of the proposed alternative procedures:

Michigan is seeking a 2-year statewide waiver from Section 6(o) of the Food Stamp Act, based on having a 36-month unemployment rate that is at least 20 percent above the national average. Michigan's unemployment rate for October 2004 through September 2007 is 6.9; this is at least 20 percent greater than the national unemployment rate for the same time period. The corresponding waiver threshold for October 2004 through September 2007 is 5.8.

9. Justification for request: As stated in number 8 above, the State had an average unemployment rate of at least 20 percent above the national average during a recent 36-month time period. All of the raw data supporting our numbers that we have used are from the Bureau of Labor Statistics (BLS) website.

10. Anticipated impact on households and State agency operations: This waiver will provide consistency for households and State agency operations in areas where unemployment remains higher than the national average.

11. Caseload information, including percent, characteristic, and quality control error rate for affected portion: The caseload for these areas, as of November 12, 2007, represents 14% of the caseload for the state. There are no special quality control procedures in conjunction with this waiver.

12. Anticipated implementation date and time period for which waiver is needed: The State is requesting a two-year waiver from March 1, 2008 through February 28, 2010.

13. Proposed quality control review procedures: There are no special quality control procedures needed in conjunction with this waiver.

14. Signature and title of requesting official:



Ismael Ahmed

15. Date of request:

November 19, 2007