



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF HUMAN SERVICES  
LANSING

NICK LYON  
INTERIM DIRECTOR

April 2, 2015

Susan Holzer, Director  
Supplemental Nutrition Assistance Program  
Midwest Regional Office  
USDA Food & Nutrition Service  
77 West Jackson Blvd., 20th Floor  
Chicago, IL 60604-3591

Dear Ms. Holzer,

Pursuant to the Jan 8, 2009 memorandum *SNAP- ABAWD Statewide Waivers- New Criteria for Unemployment Insurance Extended Benefits Trigger*, please consider this Michigan's official request to extend the state's waiver to the Able Bodied Adults Without Dependents restrictions, as set forth in 7 CFR 273.24 through September 30, 2016. We believe Michigan meets the eligibility for this waiver extension on the basis of the aforementioned memo, as well as its eligibility for at least second tier of Emergency Unemployment Compensation (EUC) benefits, as outlined in the June 23, 2014 trigger notice from the Department of Labor (DOL).

If you require additional information, please contact Dawn M. Sweeney, Food Assistance Program Manager, Michigan Department of Human Services (MDHS), Field Operations Administration, at (517) 243-5560 or [sweeneyd1@michigan.gov](mailto:sweeneyd1@michigan.gov).

Sincerely,

Sheryl Thompson  
Deputy Director, Field Operations Administration

Cc: Sandra MacMartin, FNS  
Sheena Panoor, FNS  
Christina Kopec, FNS  
Dawn M. Sweeney, DHS

## STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2040026
2. **Type of request:** Extension
3. **Regulatory citation:** 7 CFR 273.24
4. **State:** Michigan
5. **Region:** MWRO
6. **Regulatory requirements:** Under 7 CFR 273.24(b) individuals are not eligible to participate in the Supplemental Nutrition Assistance Program (SNAP) as a member of any household if, during the preceding 36-month period, the individual received SNAP 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.
7. **Description of alternative procedures:** The State of Michigan is requesting a statewide waiver from the time limit for calendar year 2016.
8. **Justification for request:** This request to exempt residents residing in the entire State from the time limit in 7 CFR 273.24 due to having insufficient jobs is based on the State having an unemployment rate at least 20 percent above the national average for the 24-month period of February 2013-January 2015. 7 CFR 273.24 (f)(2)(ii) states that, "To support a claim of lack of sufficient jobs, a State may submit evidence that an area (...) has a 24-month average unemployment rate 20 percent above the national average for the same 24-month period. This 24-month period may not be any earlier than the same 24-month period the ETA uses to designate LSAs for the current fiscal year." The time period that the Department of Labor uses to determine Labor Surplus Areas for Fiscal Year 2016 is January 2013-December 2014, the earliest time period that can be used to support a waiver request for 2016. Michigan's average unemployment rate for the subsequent period of February 2013-January 2015 was 8.0 percent. The national average for the same time period was 6.7 percent; 20 percent above that was 8.0 percent. The data is below, and attached.

|                                          | Labor Force Totals, February 2013-January 2015 | Unemployment Totals, February 2013-January 2015 | Average Unemployment Rate, February 2013-January 2015 |
|------------------------------------------|------------------------------------------------|-------------------------------------------------|-------------------------------------------------------|
| Michigan                                 | 113,791,856                                    | 9,080,434                                       | 8.0                                                   |
| 20% Above the National Average Threshold | 8.0                                            |                                                 |                                                       |

9. **Anticipated impact on households and State agency operations:** This waiver will provide consistency for state operations.

10. Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable): This waiver affects the entire state.
11. Anticipated implementation date and time period for which waiver is needed: The State is requesting a one-year waiver, from January 1, 2016 through December 31, 2016.
12. Proposed quality control review procedures: There are no quality control procedures involved.
12. State agency submitting waiver request and State contact person: Michigan Department of Human Services,  
Dawn M. Sweeney
13. Signature and title of requesting official:  
  
Title: Deputy Director, Field Operations Administration  
Email for transmission of response: [thompsons2@michigan.gov](mailto:thompsons2@michigan.gov)
14. Date of request: April 2, 2015
15. State agency staff contact (name/email/telephone): Dawn M. Sweeney [sweeneyd1@michigan.gov](mailto:sweeneyd1@michigan.gov) 517-243-5560
16. Regional office contact person (to be completed by FNS regional office):