



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF HEALTH AND HUMAN SERVICES
LANSING

NICK LYON
DIRECTOR

July 18, 2016

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 June 30, 2017. 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 Health and Human Services (MDHHS), Field Operations Administration, at (517) 243-5560 or sweeneyd1@michigan.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy Hundley".

Amy Hundley
Acting Deputy Director
Field Operations Administration

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

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2040026
2. **Type of request:**
Amendment and extension
3. **Statutory citation:**
Section 6(o) of the Food and Nutrition Act of 2008, as amended
4. **Regulatory citation:**
7 CFR 273.24
5. **State:**
Michigan
6. **Region:**
MWRO
7. **Regulatory requirements:**
Section 6(o) of the Food and Nutrition Act of 2008, as amended, provides that no able-bodied adult without dependents (ABAWD) shall be eligible to participate in the Supplemental Nutrition Assistance Program (SNAP) as a member of any household if the individual received program benefits for more than 3 months during any 3-year period in which the individual was subject to but did not comply with the ABAWD work requirement. Section 6(o) also provides that, upon the request of the State agency, the Secretary may waive the applicability of the 3-month ABAWD time limit for any group of individuals in the State if the Secretary makes a determination that the area in which the individuals reside has an unemployment rate of over 10 percent, or does not have a sufficient number of jobs to provide employment for the individuals.
8. **Description of alternative procedures:**
The State of Michigan is requesting to exempt able-bodied adults without dependents (ABAWDs) in 79 counties from SNAP time limits at 7 CFR 273.24.
9. **Justification for request:**
Under SNAP regulations at 7 CFR 273.24(f)(2), areas may support a claim of insufficient jobs by submitting evidence that an area has an average unemployment rate for a 24-month time period that exceeds the national average for the same 24-month period by 20 percent. 7 CFR 273.24(f)(6) provides that States may define areas to be waived.

The State of Michigan seeks a waiver for a regional group of 79 contiguous counties based on the region's aggregate average unemployment rate for the 24-month period of January 2014 through December 2015. The national average unemployment rate for this period was 5.7 percent; 20 percent above this was 6.9 percent. The region's aggregate average unemployment rate for this period was 6.9 percent.

Bureau of Labor Statistics Local Area Unemployment Data January 2014 through December 2015		
Contiguous Counties	Unemployed Total	Labor Force Total
Alcona County	8,445	92,243
Alger County	7,354	78,878
Allegan County	68,142	1,451,464
Alpena County	22,856	328,269
Antrim County	20,162	241,992
Arenac County	14,981	152,186
Baraga County	8,180	81,453
Barry County	34,519	728,790
Bay County	80,951	1,271,318
Benzie County	16,067	210,729
Berrien County	104,399	1,774,945
Branch County	26,740	463,600
Calhoun County	86,877	1,548,820
Cass County	33,326	578,814
Charlevoix County	21,889	316,340
Cheboygan County	25,008	256,988
Chippewa County	34,398	406,023
Clare County	24,682	286,435
Clinton County	41,996	958,588
Crawford County	10,847	127,395
Delta County	31,242	418,303
Dickinson County	18,795	308,579
Eaton County	67,037	1,347,939
Emmet County	35,281	429,387
Genesee County	302,197	4,413,003
Gladwin County	19,617	242,393
Gogebic County	12,691	160,215

Grand Traverse County	60,801	1,160,973
Gratiot County	27,751	443,915
Hillsdale County	30,010	498,189
Houghton County	27,736	405,177
Huron County	23,948	398,697
Ingham County	186,789	3,511,587
Ionia County	37,388	707,129
Iosco County	20,865	246,074
Iron County	9,696	125,910
Isabella County	44,770	855,640
Jackson County	103,194	1,756,851
Kalamazoo County	151,300	3,104,451
Kalkaska County	15,531	186,129
Keweenaw County	2,318	23,442
Lake County	8,499	87,934
Lapeer County	81,642	946,412
Leelanau County	14,904	255,037
Lenawee County	64,954	1,154,296
Livingston County	129,127	2,272,397
Luce County	4,528	60,054
Mackinac County	12,857	125,673
Macomb County	705,019	9,997,608
Manistee County	18,582	251,521
Marquette County	51,755	810,657
Mason County	23,403	352,236
Mecosta County	31,897	462,889
Menominee County	16,883	280,964
Midland County	53,773	1,002,156
Missaukee County	11,951	170,121
Monroe County	96,107	1,837,879
Montcalm County	43,509	669,890
Montmorency County	8,453	74,826
Muskegon County	123,249	1,863,902
Newaygo County	34,162	550,945
Oceana County	27,058	306,401

Ogemaw County	17,819	205,778
Ontonagon County	5,776	56,517
Osceola County	18,166	246,058
Oscoda County	7,176	71,247
Otsego County	19,002	270,538
Presque Isle County	14,711	130,550
Roscommon County	19,185	189,198
Saginaw County	138,548	2,142,817
Sanilac County	34,847	472,294
Schoolcraft County	8,995	84,042
Shiawassee County	51,805	801,666
St. Clair County	147,202	1,744,979
St. Joseph County	35,310	699,779
Tuscola County	44,999	600,170
Van Buren County	59,861	854,323
Wayne County	1,551,357	18,154,381
Wexford County	26,467	352,096
Combined Area Total	5,684,314	82,709,484
Combined Area Unemployment Rate	6.9%	
20% Above National Average Threshold	6.9%	

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, characteristics, and quality control error rate for affection portion (if applicable):

The caseload for these areas, as of 7/18/2016, represent 16% of the caseload for the state. There are no quality control procedures involved.

12. Anticipated implementation date and time period for which waiver is needed:

The State is requesting a six month waiver, from January 1, 2017 through June 30, 2017.

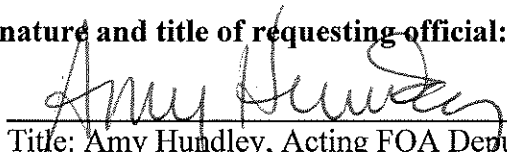
13. Proposed quality control review procedures:

There are no special quality control procedures needed in conjunction with this waiver.

14. State agency submitting waiver request and State contact person:

Michigan Department of Health and Human Services
Dawn M. Sweeney

15. Signature and title of requesting official:



Title: Amy Hundley, Acting FOA Deputy Director
Email for transmission of response: HundleyA@michigan.gov

16. Date of request: July 18, 2016

17. State agency staff contact (name/email/telephone):

Dawn M. Sweeney, Food Assistance Program Manager
SweeneyD1@michigan.gov
517-243-5560

18. Regional office contact person (to be completed by FNS regional office):

Keweenaw



Michigan 2017 Waiver Request

Eligible based on own 24-month unemployment rate (44)

Eligible based on regional grouping (35)