



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF HEALTH AND HUMAN SERVICES  
LANSING

NICK LYON  
DIRECTOR

January 12, 2017

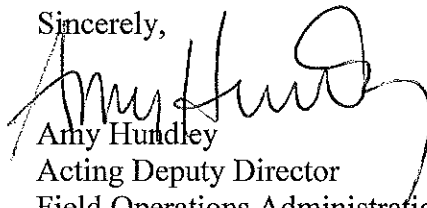
Susan Holzer, Director  
Supplemental Nutrition Assistance Program  
Midwest Regional Office  
USDA Food & Nutrition Service  
77 West Jackson Blvd., 20th Floor  
Chicago, IL 60604-3591

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 current waiver to the Able Bodied Adults Without Dependents restrictions, as set forth in 7 CFR 273.24 through December 31, 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 Human Services (MDHS), Field Operations Administration, at (517) 243-5560 or [sweeneyd1@michigan.gov](mailto:sweeneyd1@michigan.gov).

Sincerely,



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:**  
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. This request would modify the state's waiver approved for 2017 by extending it to 12 months, ending in December of 2017.
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.

| <b>Bureau of Labor Statistics Local Area Unemployment Data<br/>January 2014 through December 2015</b> |                         |                          |
|-------------------------------------------------------------------------------------------------------|-------------------------|--------------------------|
| <b>Contiguous Counties</b>                                                                            | <b>Unemployed Total</b> | <b>Labor Force Total</b> |
| 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           |
| <b>Combined Area Total</b>                      | <b>5,684,314</b> | <b>82,709,484</b> |
| <b>Combined Area<br/>Unemployment Rate</b>      | <b>6.9%</b>      |                   |
| <b>20% Above National<br/>Average Threshold</b> | <b>6.9%</b>      |                   |

**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 1/4/17, 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:**

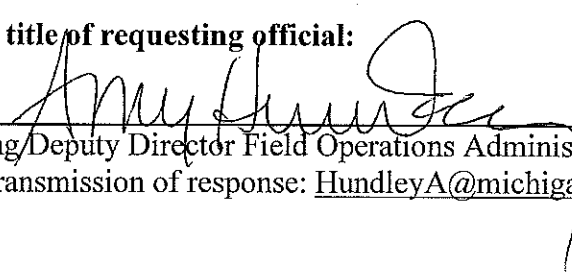
The State is requesting a one-year waiver, from January 1, 2017 through December 31, 2017.

**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: Acting Deputy Director Field Operations Administration  
Email for transmission of response: HundleyA@michigan.gov

**16. Date of request:** January 12, 2017

**17. State agency staff contact (name/email/telephone):** Dawn M. Sweeney,  
Sweeneyd1@michigan.gov 517-243-5560

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