



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF HEALTH AND HUMAN SERVICES
LANSING

NICK LYON
DIRECTOR

September 8, 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 January 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 December 31, 2018. 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,


Amy Hundley
Deputy Director
Field Operations Administration

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

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2150032
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:**

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 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 SNAP work requirements. Regulations at 273.24(a) provide that fulfilling the work requirement means: working 20 hours or more per week, averaged monthly; participating in and complying with the requirements of a work program or a workfare program for at least 20 hours per week; or any combination of working and participating in a work program for a total of 20 hours per week.

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 time limit described above for any group of individuals in the State if FNS makes a determination that the area in which the individuals reside 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 69 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 qualify for an ABAWD time limit waiver if they have insufficient jobs. To support this claim, states may submit evidence that an area has an average unemployment rate for a 24-month time period that is at least 20 percent above the national average for the same 24-month period. 7 CFR 273.24(f)(6) provides that States may define areas to be waived.

The State of Michigan seeks a waiver for a region of 69 contiguous counties based on an average unemployment rate that is 20 percent above the national average for the 24-month period of April 2015 through March 2017. The national average

unemployment rate for this 24-month period was 5.0 percent; 20 percent above this was 5.9 percent. The average unemployment rate for this region was 5.9 percent for the same period.

Bureau of Labor Statistics Local Area Unemployment Data April 2015 through March 2017		
Counties	Unemployed Total	Labor Force Total
Alcona County, MI	6,913	91,977
Alger County, MI	6,375	77,635
Alpena County, MI	19,162	328,522
Antrim County, MI	16,731	240,700
Arenac County, MI	12,326	147,670
Baraga County, MI	6,524	78,342
Bay County, MI	67,320	1,250,746
Benzie County, MI	13,866	210,708
Branch County, MI	21,762	460,000
Calhoun County, MI	73,489	1,546,317
Cass County, MI	27,450	584,126
Charlevoix County, MI	17,308	314,483
Cheboygan County, MI	23,889	259,889
Chippewa County, MI	30,021	397,508
Clare County, MI	20,917	285,241
Crawford County, MI	9,455	127,717
Delta County, MI	26,643	412,749
Dickinson County, MI	15,969	301,826
Emmet County, MI	27,852	423,944
Genesee County, MI	246,088	4,380,774
Gladwin County, MI	16,333	237,427
Gogebic County, MI	10,625	154,734
Gratiot County, MI	22,845	438,495
Hillsdale County, MI	25,064	510,040
Houghton County, MI	23,816	395,232
Huron County, MI	19,802	388,754
Iosco County, MI	17,441	241,763
Iron County, MI	8,394	125,803
Isabella County, MI	38,766	848,954
Jackson County, MI	86,083	1,773,574
Kalkaska County, MI	13,244	185,089
Keweenaw County, MI	1,926	22,310

Lake County, MI	6,925	90,313
Lapeer County, MI	65,349	967,466
Leelanau County, MI	12,443	256,538
Lenawee County, MI	53,048	1,141,562
Luce County, MI	3,921	58,475
Mackinac County, MI	11,966	124,676
Macomb County, MI	561,220	10,298,369
Manistee County, MI	16,187	253,239
Marquette County, MI	45,882	799,821
Mason County, MI	19,731	343,929
Mecosta County, MI	25,941	460,088
Menominee County, MI	15,021	274,663
Midland County, MI	45,773	990,371
Missaukee County, MI	10,053	167,940
Monroe County, MI	81,349	1,841,686
Montcalm County, MI	35,040	674,470
Montmorency County, MI	7,291	74,233
Muskegon County, MI	99,832	1,855,379
Newaygo County, MI	27,604	559,665
Oceana County, MI	21,731	295,924
Ogemaw County, MI	15,264	199,769
Ontonagon County, MI	4,708	54,150
Osceola County, MI	14,659	249,484
Oscoda County, MI	5,231	69,822
Otsego County, MI	16,184	279,072
Presque Isle County, MI	12,229	128,476
Roscommon County, MI	16,011	189,657
Saginaw County, MI	112,530	2,128,789
Sanilac County, MI	28,399	466,705
Schoolcraft County, MI	8,026	80,712
Shiawassee County, MI	41,696	802,981
St. Clair County, MI	112,768	1,775,000
St. Joseph County, MI	28,846	703,673
Tuscola County, MI	36,463	583,192
Van Buren County, MI	48,740	852,337
Wayne County, MI	1,214,466	18,477,547
Wexford County, MI	20,876	352,692
Combined Area Total	3,877,802	66,165,914

Combined Area Unemployment Rate	5.9%
20% Above National Average Threshold	5.9%

The State also seeks a waiver modification that would facilitate a gradual phase-in of the ABAWD time limit. Under the waiver modification, the State would begin applying the time limit at recertification for ABAWDs. Therefore, the waiver modification is based on the recipient's certification period rather than the geographic area alone. The State requests to apply the modification as follows:

In 68 of the 69 counties that the State is requesting (all except for Wayne County), the State would continue to waive the time limit for ABAWDs until July 1, 2018, after which the time limit would be applied to them based on their subsequent recertification date. At that time, the State would evaluate their household circumstances and apply the time limit to ABAWDs who are not exempt or meeting ABAWD work requirements. Similarly, in Wayne County the State would continue to waive the time limit for ABAWDs until October 1, 2018, after which the time limit would be applied to them based on their subsequent recertification date.

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 DATE, represent XX% 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:

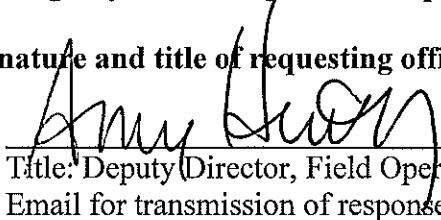
The State is requesting a one-year waiver, from January 1, 2018 through December 31, 2018.

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:

15. Signature and title of requesting official:


 Title: Deputy Director, Field Operations Administration
 Email for transmission of response: Hundleya@michigan.gov

16. Date of request: September 5, 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*):