

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 February 2016 through January 2018. The national average

unemployment rate for this 24-month period was 4.6 percent; 20 percent above this was 5.5 percent. The average unemployment rate for this region was 5.5 percent for the same period.

Bureau of Labor Statistics Local Area Unemployment Data February 2016 through January 2018		
Counties	Unemployed Total	Labor Force Total
Alcona County, MI	6,949	92,265
Alger County, MI	6,656	79,369
Alpena County, MI	19,358	326,558
Antrim County, MI	16,718	242,928
Arenac County, MI	12,183	146,605
Baraga County, MI	6,230	76,624
Bay County, MI	68,791	1,233,284
Benzie County, MI	14,028	213,179
Branch County, MI	21,928	458,321
Calhoun County, MI	75,680	1,536,540
Cass County, MI	27,567	585,598
Charlevoix County, MI	17,701	313,614
Cheboygan County, MI	25,932	260,296
Chippewa County, MI	30,677	393,985
Clare County, MI	20,795	288,850
Crawford County, MI	9,482	129,961
Delta County, MI	26,654	409,724
Dickinson County, MI	15,054	300,587
Emmet County, MI	28,021	423,427
Genesee County, MI	250,866	4,386,212
Gladwin County, MI	16,275	237,507
Gogebic County, MI	9,264	151,254
Gratiot County, MI	23,509	434,925
Hillsdale County, MI	25,408	507,080
Houghton County, MI	24,214	397,202
Huron County, MI	19,995	380,696
Iosco County, MI	18,151	243,405
Iron County, MI	8,163	125,142
Isabella County, MI	39,674	850,297
Jackson County, MI	85,759	1,784,660
Kalkaska County, MI	13,365	186,283
Keweenaw County, MI	1,948	22,564

Lake County, MI	7,102	90,327
Lapeer County, MI	57,641	982,094
Leelanau County, MI	12,481	254,935
Lenawee County, MI	53,652	1,136,691
Luce County, MI	3,975	58,042
Mackinac County, MI	12,776	125,885
Macomb County, MI	496,306	10,528,427
Manistee County, MI	16,702	251,708
Marquette County, MI	45,410	791,808
Mason County, MI	19,870	341,139
Mecosta County, MI	26,163	455,710
Menominee County, MI	13,681	266,810
Midland County, MI	46,499	976,814
Missaukee County, MI	10,101	168,875
Monroe County, MI	84,929	1,833,494
Montcalm County, MI	34,874	673,523
Montmorency County, MI	7,726	73,142
Muskegon County, MI	101,878	1,867,886
Newaygo County, MI	27,897	561,675
Oceana County, MI	21,499	297,038
Ogemaw County, MI	15,613	197,745
Ontonagon County, MI	4,633	52,346
Osceola County, MI	14,946	253,120
Oscoda County, MI	5,224	70,273
Otsego County, MI	17,067	280,332
Presque Isle County, MI	12,018	125,615
Roscommon County, MI	16,663	190,096
Saginaw County, MI	115,351	2,112,530
Sanilac County, MI	28,648	466,847
Schoolcraft County, MI	7,168	81,066
Shiawassee County, MI	42,540	804,326
St. Clair County, MI	98,880	1,801,244
St. Joseph County, MI	29,398	695,491
Tuscola County, MI	36,796	578,692
Van Buren County, MI	49,518	851,721
Wayne County, MI	1,094,801	18,827,174
Wexford County, MI	20,397	353,794
Combined Area Total	3,697,818	66,697,377

Combined Area Unemployment Rate	5.5%
20% Above National Average Threshold	5.5%

The State is requesting a process that would facilitate a gradual phase-in of the ABAWD time limit. The State would begin applying the time limit based upon when individual ABAWDs are recertified. In the 69 counties that the State is requesting, the State would continue to waive the time limit for individual ABAWDs until their subsequent recertification, 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. The State would gradually implement the time limit to ABAWDs throughout all 69 counties so that it is implemented throughout all counties until October 1, 2019.

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 9/16/18 represent 46% 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, 2019 through December 31, 2019.

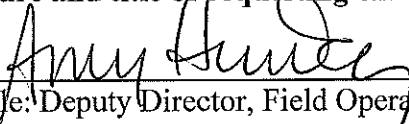
13. Proposed quality control review procedures:

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

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

Department of Health & Human Services (MDHHS)
Dawn M. Sweeney, SNAP State Administrator

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: 9/2018

17. State agency staff contact (name/email/telephone): Dawn M. Sweeney, 517-243-5560 SweeneyD1@michigan.gov

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