

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2160002
2. **Type of request:** Initial
3. **Statutory citation:** Section 6(o) of the Food and Nutrition Act of 2008
4. **Regulatory citation:** 7 CFR 273.24
5. **State:** Minnesota
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 Minnesota is requesting to exempt able-bodied adults without dependents (ABAWDs) in 17 counties and 9 reservations 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 Minnesota seeks a waiver for a region of 17 contiguous counties based on its average unemployment rate that is 20 percent above the national average for the 24-month period of November 2022 to October 2024. The national average unemployment rate for this 24-month period was 3.8 percent; 20 percent above this was 4.5 percent. The region's unemployment rate was 4.5 percent for the same period.

Bureau of Labor Statistics Local Area Unemployment Data November 2022 to October 2024		
County	Total Unemployed	Total Labor Force
Aitkin County	8,886	180,979
Carlton County	15,969	422,933
Cass County	16,364	361,535
Clearwater County	6,564	110,574
Hubbard County	10,946	248,468
Isanti County	21,002	528,282
Itasca County	24,498	524,958
Kanabec County	11,625	225,031
Koochiching County	5,956	138,736
Lake of the Woods County	2,005	57,410
Mahnomen County	2,631	56,115
Mille Lacs County	16,132	308,962
Morrison County	19,638	427,868
Norman County	2,779	77,708
Pine County	17,768	352,656
Todd County	12,329	334,958
Wadena County	7,020	147,091
Combined Area Total	202,112	4,504,264
Combined Unemployment Rate	4.5%	
20% Above National Average Threshold	4.5%	

The State requests to waive the following 9 reservations based on having average unemployment rates exceeding the national average for a recent 24-month period. The reservation unemployment rates were calculated by applying 2023 American Community Survey¹ share ratios to county-level Bureau of Labor Statistics data from November 2022 to October 2024. The following table summarizes the calculations:

American Community Survey and Bureau of Labor Statistics Data November 2022 to October 2024			
Reservation	Unemployed	Labor Force	Unemployment Rate
Itasca County (part); Minnesota (part); Bois Forte Reservation, MN	62	2,110	2.9%
Koochiching County (part); Minnesota (part); Bois Forte Reservation, MN	24	467	5.2%
St. Louis County (part); Minnesota (part); Bois Forte Reservation, MN	402	5,458	7.4%

¹ These calculations are based on data from the 2019-2023 American Community Survey 5-Year Estimates.

Total Bois Forte Reservation	488	8,036	6.1%
Carlton County (part); Minnesota (part); Fond du Lac Reservation and Off- Reservation Trust Land, MN--WI	3,099	34,406	9.0%
St. Louis County (part); Minnesota (part); Fond du Lac Reservation and Off-Reservation Trust Land, MN--WI	926	8,156	11.4%
Total Fond du Lac Reservation	4,026	42,562	9.5%
Cook County (part); Minnesota (part); Grand Portage Reservation and Off- Reservation Trust Land, MN	1,071	8,789	12.2%
Total Grand Portage Reservation	1,071	8,789	12.2%
Beltrami County (part); Minnesota (part); Leech Lake Reservation and Off- Reservation Trust Land, MN	569	18,813	3.0%
Cass County (part); Minnesota (part); Leech Lake Reservation and Off- Reservation Trust Land, MN	6,085	68,636	8.9%
Hubbard County (part); Minnesota (part); Leech Lake Reservation and Off- Reservation Trust Land, MN	142	3,366	4.2%
Itasca County (part); Minnesota (part); Leech Lake Reservation and Off- Reservation Trust Land, MN	2,214	27,991	7.9%
Total Leech Lake Reservation	9,009	118,806	7.6%
Redwood County (part); Minnesota (part); Lower Sioux Indian Community and Off-Reservation Trust Land, MN	0	0	-
Renville County (part); Minnesota (part); Lower Sioux Indian Community and Off-Reservation Trust Land, MN	378	4,611	8.2%
Total Lower Sioux Community Reservation	378	4,611	8.2%
Aitkin County (part); Minnesota (part); Mille Lacs Reservation and Off- Reservation Trust Land, MN	185	959	19.3%
Crow Wing County (part); Minnesota (part); Mille Lacs Reservation and Off- Reservation Trust Land, MN	0	0	-
Mille Lacs County (part); Minnesota (part); Mille Lacs Reservation and Off- Reservation Trust Land, MN	4,385	38,922	11.3%

Pine County (part); Minnesota (part); Mille Lacs Reservation and Off- Reservation Trust Land, MN	43	734	5.8%
Total Mille Lacs Reservation	4,613	40,616	11.4%
Beltrami County (part); Minnesota (part); Red Lake Reservation, MN	5,173	48,836	10.6%
Clearwater County (part); Minnesota (part); Red Lake Reservation, MN	0	866	0.0%
Koochiching County (part); Minnesota (part); Red Lake Reservation, MN	0	0	-
Lake of the Woods County (part); Minnesota (part); Red Lake Reservation, MN	0	164	0.0%
Marshall County (part); Minnesota (part); Red Lake Reservation, MN	0	0	-
Pennington County (part); Minnesota (part); Red Lake Reservation, MN	0	0	-
Polk County (part); Minnesota (part); Red Lake Reservation, MN	0	0	-
Red Lake County (part); Minnesota (part); Red Lake Reservation, MN	0	0	-
Roseau County (part); Minnesota (part); Red Lake Reservation, MN	0	0	-
Total Red Lake Reservation	5,173	49,866	10.4%
Scott County (part); Minnesota (part); Shakopee Mdewakanton Sioux Community and Off-Reservation Trust Land, MN	164	2,919	5.6%
Total Shakopee Mdewakanton Sioux Community Reservation	164	2,919	5.6%
Becker County (part); Minnesota (part); White Earth Reservation and Off- Reservation Trust Land, MN	2,352	41,465	5.7%
Clearwater County (part); Minnesota (part); White Earth Reservation and Off-Reservation Trust Land, MN	895	7,621	11.7%
Mahnomen County; Minnesota (part); White Earth Reservation and Off- Reservation Trust Land, MN	2,631	56,115	4.7%
Total White Earth Reservation	5,878	105,201	5.6%

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 **December, 01, 2024** represent **8%** 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 July 1, 2025 through June 30, 2026.

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:

Minnesota Department of Children, Youth, and Families

Kathy Bruen, SNAP Manager

kathy.bruen@state.mn.us

15. Signature and title of requesting official:



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Kathy Bruen, SNAP Manager, Economic Assistance & Employment Supports Division
Minnesota Department of Children, Youth, and Families

16. Date of request:

04/29/2025

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

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