



Food and
Nutrition
Service

Park Office
Center

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Center Drive
Alexandria
VA 22302

NOV 02 2017

Amy Hundley
Deputy Director
Field Operations Administration
State of Michigan Department of Health and Human Services
235 South Grand Avenue
Lansing, Michigan 48909

RE: SNAP – Michigan Request to Waive Able-Bodied Adults without
Dependents Time Limit – Approval

Dear Ms. Hundley:

This is in response to the Michigan State agency's request to waive the Supplemental Nutrition Assistance Program (SNAP) time limit for able-bodied adults without dependents (ABAWDs) in 69 counties from January 1, 2018, through December 31, 2018.

Michigan has requested 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 certified or recertified. In 68 of the 69 counties requested, all except Wayne County, the State would waive the time limit for all ABAWDs through June 30, 2018. Starting July 1, 2018, the State would evaluate household circumstances and apply the time limit to new ABAWDs in the county who are not exempt or meeting ABAWD work requirements. However, the State would continue to waive the time limit for ongoing ABAWDs in the county until their subsequent recertification. New ABAWDs are those certified on or after July 1, 2018; and ongoing ABAWDs are those certified and receiving SNAP prior to July 1, 2018. At recertification, the State would evaluate household circumstances and apply the time limit to ongoing ABAWDs who are not exempt or meeting ABAWD work requirements.

Similarly, in Wayne County, the State would continue to waive the time limit for all ABAWDs through September 30, 2018. The time limit in Wayne County would be phased in and applied to ABAWDs in the same manner as described above starting October 1, 2018. In Wayne County, new ABAWDs are those certified on or after October 1, 2018; and ongoing ABAWDs are those certified and receiving SNAP prior to October 1, 2018.

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The State agency's request meets the requirements for approval provided at 7 CFR 273.24(f) and relevant Food and Nutrition Service (FNS) guidance. Therefore, FNS is approving Michigan to waive the time limit in the 69 counties for the requested 12-month period. The approval amends and extends waiver number 2150032. The attached waiver response includes the approved areas, the supporting evidence used, and the conditions of approval. If you have any questions please contact Scott Keller at Scott.Keller@fns.usda.gov.

Sincerely,

A handwritten signature in black ink that reads "Sasha Gersten-Paal". The signature is written in a cursive, flowing style.

Sasha Gersten-Paal
Chief
Certification Policy Branch
Program Development Division

Attachment

WAIVER RESPONSE

1. **Waiver serial number:** 2150032
2. **Type of request:** Extension and amendment
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:** Midwest
7. **Requirement:** Section 6(o) of the Food and Nutrition Act of 2008, as amended, and regulations at 7 CFR 273.24 provide 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) and 7 CFR 273.24 also provide 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. **Proposed alternative procedures:** The Michigan State agency has requested to waive the ABAWD time limit in 69 counties from January 1, 2018, through December 31, 2018. The State agency has supported its request based upon the combined area having an aggregate average unemployment rate 20 percent above the national average for the 24-month period of April 2015 through March 2017. During this time period the national average unemployment rate was 4.95 percent; 20 percent above that rate is 5.9 percent. As detailed in the following tables, the aggregate unemployment rate for the combined 69 county area was 5.9 percent during the selected time period.

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However, the State would continue to waive the time limit for ongoing ABAWDs in the county until their subsequent recertification. New ABAWDs are those certified on or after July 1, 2018; and ongoing ABAWDs are those certified and receiving SNAP prior to July 1, 2018. At recertification, the State would evaluate household circumstances and apply the time limit ongoing ABAWDs who are not exempt or meeting ABAWD work requirements.

Similarly, in Wayne County, the State would continue to waive the time limit for all ABAWDs through September 30, 2018. The time limit in Wayne County would be phased in and applied to ABAWDs in the same manner as described above starting October 1, 2018. In Wayne County, new ABAWDs are those certified on or after October 1, 2018; and ongoing ABAWDs are those certified and receiving SNAP prior to October 1, 2018.

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

28. Iron County	8,394	125,803
29. Isabella County	38,766	848,954
30. Jackson County	86,083	1,773,574
31. Kalkaska County	13,244	185,089
32. Keweenaw County	1,926	22,310
33. Lake County	6,925	90,313
34. Lapeer County	65,349	967,466
35. Leelanau County	12,443	256,538
36. Lenawee County	53,048	1,141,562
37. Luce County	3,921	58,475
38. Mackinac County	11,966	124,676
39. Macomb County	561,220	10,298,369
40. Manistee County	16,187	253,239
41. Marquette County	45,882	799,821
42. Mason County	19,731	343,929
43. Mecosta County	25,941	460,088
44. Menominee County	15,021	274,663
45. Midland County	45,773	990,371
46. Missaukee County	10,053	167,940
47. Monroe County	81,349	1,841,686
48. Montcalm County	35,040	674,470
49. Montmorency County	7,291	74,233
50. Muskegon County	99,832	1,855,379
51. Newaygo County	27,604	559,665
52. Oceana County	21,731	295,924
53. Ogemaw County	15,264	199,769
54. Ontonagon County	4,708	54,150
55. Osceola County	14,659	249,484
56. Oscoda County	5,231	69,822
57. Otsego County	16,184	279,072
58. Presque Isle County	12,229	128,476
59. Roscommon County	16,011	189,657
60. Saginaw County	112,530	2,128,789
61. Sanilac County	28,399	466,705
62. Schoolcraft County	8,026	80,712
63. Shiawassee County	41,696	802,981
64. St. Clair County	112,768	1,775,000
65. St. Joseph County	28,846	703,673
66. Tuscola County	36,463	583,192
67. Van Buren County	48,740	852,337
68. Wayne County	1,214,466	18,477,547
69. Wexford County	20,876	352,692
Total for Region	3,877,802	66,165,914
Combined Region Unemployment Rate	5.9%	

*Data extracted from www.bls.gov on October 26, 2017.

- 9. Action and reason for approval or denial:** The Food and Nutrition Service (FNS) is approving the Michigan State agency's request to waive the ABAWD time limit in the 69 counties because the areas meet the requirements for approval provided at 7 CFR 273.24(f) and relevant FNS guidance.
- 10. Regulatory or legislative basis for action:** The waiver is approved pursuant to section 6(o) of the Food and Nutrition Act of 2008, as amended and 7 CFR 273.24(f).
- 11. Information required for an extension:** To receive an amendment or extension the State agency must provide FNS with a formal request supported by data or other information as described in 7 CFR 273.24(f). Any request based upon unemployment rates must include data spreadsheets and supporting documentation.
- 12. Implementation date and expiration date:** The waiver is effective January 1, 2018, through December 31, 2018.
- 13. Limitation, if any, on regional office approval of like requests:** The waiver is limited to the Michigan State agency.
- 14. Date of national office action:** NOV 02 2017
- 15. Date of State agency's request:** September 8, 2017
- 16. Date of regional office transmittal of request:** September 8, 2017
- 17. State agency contact:**
Dawn M. Sweeney
(517) 243-5560
Sweeneyd1@michigan.gov
- 18. FNS regional contacts:**
Scott Keller
(312) 353-6587
Scott.Keller@fns.usda.gov