



JUN 26 2015

**United States
Department of
Agriculture**

**Food and
Nutrition
Service**

3101 Park
Center Drive

Alexandria, VA
22302-1500

Ms. Sheryl D. Thompson
Deputy Director
State of Michigan Department of Health
and Human Resources
235 South Grand Avenue, Suite 1406
P.O. Box 30037
Lansing, Michigan 48909

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

Dear Ms. Thompson:

This is in response to the Michigan Department of Health and Human Resources' request to extend waiver number 2150032, which would allow Michigan to exempt able-bodied adults without dependents (ABAWD) throughout the State from the Supplemental Nutrition Assistance Program time limit at 7 CFR 273.24 for calendar year 2016. Michigan's current ABAWD time limit waiver is effective Statewide through December 31, 2015. Michigan has supported its extension request based upon the State having an average unemployment rate 20 percent above the national average for the 24-month period of February 2013 through January 2015. The Bureau of Labor Statistics data provided by the State agency demonstrates that Michigan's average unemployment rate reached 20 percent above the national average for the selected 24-month period.

Therefore, the Food and Nutrition Service is approving the State agency's request to extend its Statewide ABAWD time limit waiver for 12-months, effective January 1, 2016 through December 31, 2016. The detailed waiver response is attached. If you have any questions, please contact Sheena Panoor at Sheena.Panoor@fns.usda.gov or (312) 886-5632.

Sincerely,

Sasha Gersten-Paal
Chief
Certification Policy Branch
Program Development Division

Attachment

WAIVER RESPONSE

1. **Waiver serial number:** 2150032
2. **Type of request:** Extension
3. **Primary regulation citation:** 7 CFR 273.24
4. **State:** Michigan
5. **Region:** Midwest
6. **Regulatory requirement:** Federal 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. Regulations at 7 CFR 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 at least 20 hours per week; any combination of working and participating in a work program for a total of 20 hours per week; or participating and complying with a workfare program.

Regulations at 7 CFR 273.24(f) also provide that, upon the request of a State agency, the Secretary may waive the applicability of the above provision 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.

7. **Description of proposed alternative procedures:** The Michigan State agency has requested to waive the ABAWD time limit at 7 CFR 273.24 throughout the State from January 1, 2016 through December 31, 2016. Michigan has supported its request based upon the State having an average unemployment rate 20 percent above the national average for the 24-month period of February 2013 through January 2015. During this 24-month period the national average unemployment rate was 6.7 percent; 20 percent above this is 8.0 percent. As detailed in the following table, Michigan's average unemployment rate for the selected 24-month period reached 8.0 percent.

Bureau of Labor Statistics Local Area Unemployment Data February 2013 through January 2015*		
	Labor Force Total	Unemployment Total
Michigan	113,792,635	9,080,813
State Average Unemployment Rate	8.0%	
20% Above National Average Unemployment Rate Threshold	8.0%	

*Data extracted from <http://www.bls.gov> on June 10, 2015

8. **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 Statewide because the State meets the requirements for approval provided at 7 CFR 273.24(f) and relevant FNS guidance. Michigan qualifies for the waiver based upon having an average unemployment rate 20 percent above the national average for the 24-month period of February 2013 through January 2015.
9. **Regulatory or legislative basis for action:** The waiver is approved pursuant to 7 CFR 273.24(f).
10. **Conditions and reasons:** None.
11. **Information required for extension:** To receive an extension the State agency must provide FNS with a formal waiver request supported by data or other information as described in 7 CFR 273.24(f). If the State requests an extension based upon unemployment rates, it must provide FNS with all supporting documentation, including data spreadsheets.
12. **Expiration date:** The waiver extension is effective January 1, 2016 through December 31, 2016.
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:** **JUN 26 2015**
15. **Date of State agency's request:** April 2, 2015
16. **Date of regional office transmittal of request:** April 10, 2015
17. **Implementation date:** January 1, 2016

18. State agency contact:

Dawn Sweeney

Email: Sweeneydl@michigan.gov

Ph: (517) 243-5560

19. FNS regional contact:

Sheena Panoor

Email: Sheena.Panoor@fns.usda.gov

Ph: (312) 886-5632