



Food and
Nutrition
Service

Park Office
Center

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Alexandria
VA 22302

AUG 30 2016

Amy Hundley
Acting 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 – 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 in 79 counties from January 1, 2017, through June 30, 2017.

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 79 counties for the requested 6-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 Sheena Panoor at Sheena.Panoor@fns.usda.gov.

Sincerely,

Sasha Gersten-Paal
Chief
Certification Policy Branch
Program Development Division

Attachment

WAIVER RESPONSE

1. **Waiver serial number:** 2150032
2. **Type of request:** Amendment and extension
3. **Statutory citation:** Section 6(o) of the Food and Nutrition Act of 2008, as amended
4. **Primary regulation 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, 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 in 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 proposed alternative procedures:** The Michigan State agency has requested to waive the ABAWD time limit in 79 contiguous counties from January 1, 2017, through June 30, 2017. The State agency has supported its request based upon the 79 counties having an aggregate average unemployment rate 20 percent above the national average for the 24-month period of January 2014 through December 2015. During this time period the national average unemployment rate was 5.72 percent; 20 percent above that rate is 6.9 percent. As detailed in the following tables, the combined 79 county area had an aggregate unemployment rate of 6.9 percent during the selected time period.

Bureau of Labor Statistics Local Area Unemployment Data January 2014 through December 2015		
Contiguous Counties	Unemployed Total	Labor Force Total
1. Alcona County	8,445	92,243
2. Alger County	7,354	78,878
3. Allegan County	68,142	1,451,464
4. Alpena County	22,856	328,269
5. Antrim County	20,162	241,992
6. Arenac County	14,981	152,186
7. Baraga County	8,180	81,453
8. Barry County	34,519	728,790
9. Bay County	80,951	1,271,318
10. Benzie County	16,067	210,729
11. Berrien County	104,399	1,774,945
12. Branch County	26,740	463,600
13. Calhoun County	86,877	1,548,820
14. Cass County	33,326	578,814
15. Charlevoix County	21,889	316,340
16. Cheboygan County	25,008	256,988
17. Chippewa County	34,398	406,023
18. Clare County	24,682	286,435
19. Clinton County	41,996	958,588
20. Crawford County	10,847	127,395
21. Delta County	31,242	418,303
22. Dickinson County	18,795	308,579
23. Eaton County	67,037	1,347,939
24. Emmet County	35,281	429,387
25. Genesee County	302,197	4,413,003
26. Gladwin County	19,617	242,393
27. Gogebic County	12,691	160,215
28. Grand Traverse County	60,801	1,160,973
29. Gratiot County	27,751	443,915
30. Hillsdale County	30,010	498,189
31. Houghton County	27,736	405,177

32. Huron County	23,948	398,697
33. Ingham County	186,789	3,511,587
34. Ionia County	37,388	707,129
35. Iosco County	20,865	246,074
36. Iron County	9,696	125,910
37. Isabella County	44,770	855,640
38. Jackson County	103,194	1,756,851
39. Kalamazoo County	151,300	3,104,451
40. Kalkaska County	15,531	186,129
41. Keweenaw County	2,318	23,442
42. Lake County	8,499	87,934
43. Lapeer County	81,642	946,412
44. Leelanau County	14,904	255,037
45. Lenawee County	64,954	1,154,296
46. Livingston County	129,127	2,272,397
47. Luce County	4,528	60,054
48. Mackinac County	12,857	125,673
49. Macomb County	705,019	9,997,608
50. Manistee County	18,582	251,521
51. Marquette County	51,755	810,657
52. Mason County	23,403	352,236
53. Mecosta County	31,897	462,889
54. Menominee County	16,883	280,964
55. Midland County	53,773	1,002,156
56. Missaukee County	11,951	170,121
57. Monroe County	96,107	1,837,879
58. Montcalm County	43,509	669,890
59. Montmorency County	8,453	74,826
60. Muskegon County	123,249	1,863,902
61. Newaygo County	34,162	550,945
62. Oceana County	27,058	306,401
63. Ogemaw County	17,819	205,778
64. Ontonagon County	5,776	56,517
65. Osceola County	18,166	246,058

66. Oscoda County	7,176	71,247
67. Otsego County	19,002	270,538
68. Presque Isle County	14,711	130,550
69. Roscommon County	19,185	189,198
70. Saginaw County	138,548	2,142,817
71. Sanilac County	34,847	472,294
72. Schoolcraft County	8,995	84,042
73. Shiawassee County	51,805	801,666
74. St. Clair County	147,202	1,744,979
75. St. Joseph County	35,310	699,779
76. Tuscola County	44,999	600,170
77. Van Buren County	59,861	854,323
78. Wayne County	1,551,357	18,154,381
79. Wexford County	26,467	352,096
Combined Area Total	5,684,314	82,709,484
Combined Area Unemployment Rate	6.9%	
20% Above National Average Threshold	6.9%	

*Data extracted from <http://www.bls.gov> on July 28, 2016

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 79 counties because the jurisdictions 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 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 extension is effective January 1, 2017 through June 30, 2017.

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:** AUG 30 2016
15. **Date of State agency's request:** July 24, 2015
16. **Date of regional office transmittal of request:** July 25, 2015
17. **State agency contact:**
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(517) 243-5560
18. **FNS regional contact:**
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(312) 886-5632