



United States Department of Agriculture

Food and
Nutrition
Service

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Date: November 9, 2018

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

**Supplemental Nutrition Assistance Program (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 October 2, 2019, request to waive the SNAP time limit for able-bodied adults without dependents in 69 counties from January 1, 2019, through December 31, 2019.

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 the State to waive the time limit for a 12-month period in these areas, as requested.

The State has also requested to continue to gradually phase-in the ABAWD time limit based on individual household certification and recertification dates, as it has done since October 1, 2018 under its current waiver. FNS is approving the State to continue this phase-in process as requested. The attached waiver response includes the approved areas, the supporting evidence used, and the conditions of approval. Please contact your FNS Regional Office with any questions.

FNS is reviewing its policies regarding waivers of the SNAP time limit for able-bodied adults without dependents. Moving forward, FNS will be taking actions to support the Administration's priority to provide able-bodied Americans a path to self-sufficiency. This goal requires that we establish a clear and mutual commitment to moving SNAP participants to meaningful employment.

Sincerely,

Sasha Gersten-Paal
Chief
Certification Policy Branch
Program Development Division

Able-Bodied Adults Without Dependents (ABAWD) Waiver Response

1. **Serial Number:** 2150032
2. **Request Type:** Extension
3. **Statutory Citation:** Section 6(o) of the Food and Nutrition Act of 2008
4. **Regulatory Citation:** 7 CFR 273.24
5. **State:** Michigan
6. **Food and Nutrition Service (FNS) Region:** Midwest
7. **Requirement:** Section 6(o) of the Food and Nutrition Act of 2008 and regulations at 7 CFR 273.24 provide that no individual 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. **Requested Area(s) and Support:** The Michigan State agency has requested to waive the ABAWD time limit in 69 contiguous counties from January 1, 2019, through December 31, 2019. The State agency has grouped the counties for consideration a combined area, and has supported its request based upon the combined area having an aggregate average unemployment rate 20 percent above the national average for a recent 24-month period. The State agency selected February 2016 through January 2018 for the area. During this time period the national average unemployment rate was 4.6 percent; 20 percent above that rate is 5.5 percent. As shown in the following tables, the aggregate unemployment rates for the requested area was 5.5 percent during the selected time period.

The State has also requested to continue to gradually phase-in the ABAWD time limit based on individual household certification and recertification dates, as it has done since October 1, 2018 under its currently approved waiver. Under this process, the State would continue to begin applying the time limit when individual ABAWDs are certified or recertified. ABAWDs already subject to the time limit would continue to be subject to the time limit in all counties in the State.

Table 1: Combined Area 1 (Bureau of Labor Statistics Local Area Unemployment Data February 2016 through January 2018)

Counties
1. Alcona County, MI
2. Alger County, MI
3. Alpena County, MI
4. Antrim County, MI
5. Arenac County, MI
6. Baraga County, MI
7. Bay County, MI
8. Benzie County, MI
9. Branch County, MI
10. Calhoun County, MI
11. Cass County, MI
12. Charlevoix County, MI
13. Cheboygan County, MI
14. Chippewa County, MI
15. Clare County, MI
16. Crawford County, MI
17. Delta County, MI
18. Dickinson County, MI
19. Emmet County, MI
20. Genesee County, MI
21. Gladwin County, MI
22. Gogebic County, MI
23. Gratiot County, MI
24. Hillsdale County, MI
25. Houghton County, MI
26. Huron County, MI
27. Iosco County, MI
28. Iron County, MI
29. Isabella County, MI
30. Jackson County, MI
31. Kalkaska County, MI
32. Keweenaw County, MI
33. Lake County, MI
34. Lapeer County, MI
35. Leelanau County, MI
36. Lenawee County, MI
37. Luce County, MI
38. Mackinac County, MI
39. Macomb County, MI
40. Manistee County, MI

Counties
41. Marquette County, MI
42. Mason County, MI
43. Mecosta County, MI
44. Menominee County, MI
45. Midland County, MI
46. Missaukee County, MI
47. Monroe County, MI
48. Montcalm County, MI
49. Montmorency County, MI
50. Muskegon County, MI
51. Newaygo County, MI
52. Oceana County, MI
53. Ogemaw County, MI
54. Ontonagon County, MI
55. Osceola County, MI
56. Oscoda County, MI
57. Otsego County, MI
58. Presque Isle County, MI
59. Roscommon County, MI
60. Saginaw County, MI
61. Sanilac County, MI
62. Schoolcraft County, MI
63. Shiawassee County, MI
64. St. Clair County, MI
65. St. Joseph County, MI
66. Tuscola County, MI
67. Van Buren County, MI
68. Wayne County, MI
69. Wexford County, MI
Combined Area Unemployment Rate: 5.5%
Data extracted from http://www.bls.gov on October 15, 2018

- 9. FNS Action and Justification:** FNS is approving the State agency to waive the ABAWD time limit as requested. The State agency's request meets the requirements for approval provided at 7 CFR 273.24(f) and relevant FNS guidance.
- 10. Authority:** The waiver is approved pursuant to section 6(o) of the Food and Nutrition Act of 2008 and 7 CFR 273.24(f).
- 11. Implementation Date:** January 1, 2019
- 12. Expiration Date:** December 31, 2019
- 13. Information Required for Amendment or 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.
- 14. State Agency Contact Information:**
 - Name: Dawn M. Sweeney
 - Phone Number: (517) 243-5560
 - Email: sweeneyd1@michigan.gov
- 15. FNS Regional Office Contact Information:**
 - Name: Scott Keller
 - Phone Number: (312) 353-6587
 - Email: scott.keller@usda.gov