



Food and
Nutrition
Service

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Date: December 31, 2019

Dawn M. Sweeney
SNAP State Administrator
Department of Health and Human Services
235 South Grand Avenue
P.O Box 30037
Lansing, Michigan 48909

**Supplemental Nutrition Assistance Program (SNAP) – Michigan Request to Waive
Able-Bodied Adults Without Dependents Time Limit – Partial Approval**

Dear Ms. Sweeney:

This is in response to the Michigan State agency's November 25, 2019, request to waive the SNAP time limit for able-bodied adults without dependents (ABAWDs) in 77 areas from January 1, 2020, through December 31, 2020. Through discussions with FNS, the State agency amended its request to delay implementation until February 1, 2020. Although the State initially requested a 12-month waiver, the Food and Nutrition Service (FNS) is approving the waiver for 2 months due to new regulatory requirements governing the approval of ABAWD waiver requests at 7 CFR 273.24(f). The attached waiver response includes the approved areas, the supporting evidence used, and the conditions of approval.

FNS has finalized [regulations](#) that strengthen the standards by which areas can qualify for these waivers so that the statutory ABAWD work requirement is applied more broadly. All waivers must be approvable under the new regulatory standards by April 1, 2020. Therefore, if the State agency wishes to waive the SNAP time limit for ABAWDs in any areas beyond March 31, 2020, it must submit a new waiver request. FNS will evaluate any such requests under the new regulatory requirements at 7 CFR 273.24(f). Please contact your FNS Regional Office with any questions.

FNS also reminds the State agency that it must measure the 3-year period and track ABAWDs on a continuous basis, even in areas under a waiver. The State must continue tracking so that the State will be ready to transition off-of the waiver when it expires and reintroduce the time limit.

Sincerely,

Miles Patrie

Miles Patrie
Acting 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 requested to waive the ABAWD time limit in a total of 77 areas from January 1, 2020, through December 31, 2020. Through discussions with FNS, the State agency amended its request to delay implementation until February 1, 2020. The State agency grouped 77 counties for consideration as a combined area. The State agency supported its request based upon these areas having an aggregate average unemployment rate 20 percent above the national average for the 24-month period of January 2017 through December 2018. During this time period the national average unemployment rate was 4.1 percent; 20 percent above that rate is 4.9 percent. The average aggregate unemployment rate for the combined area during this time period is 4.9 percent.

Table 1: Combined Area 1 (Bureau of Labor Statistics Local Area Unemployment Data January 2017 through December 2018)

Counties
1. Alcona County
2. Alger County
3. Alpena County
4. Antrim County
5. Arenac County
6. Baraga County
7. Barry County
8. Bay County

Counties
9. Benzie County
10. Berrien County
11. Branch County
12. Calhoun County
13. Cass County
14. Charlevoix County
15. Cheboygan County
16. Chippewa County
17. Clare County
18. Clinton County
19. Crawford County
20. Delta County
21. Dickinson County
22. Eaton County
23. Emmet County
24. Genesee County
25. Gladwin County
26. Gogebic County
27. Grand Traverse County
28. Gratiot County
29. Hillsdale County
30. Houghton County
31. Huron County
32. Ingham County
33. Ionia County
34. Iosco County
35. Iron County
36. Isabella County
37. Jackson County
38. Kalamazoo County
39. Kalkaska County
40. Keweenaw County
41. Lake County
42. Lapeer County
43. Leelanau County
44. Lenawee County
45. Luce County
46. Mackinac County
47. Macomb County
48. Manistee County

Counties
49. Marquette County
50. Mason County
51. Mecosta County
52. Menominee County
53. Midland County
54. Missaukee County
55. Monroe County
56. Montcalm County
57. Montmorency County
58. Muskegon County
59. Newaygo County
60. Oceana County
61. Ogemaw County
62. Ontonagon County
63. Osceola County
64. Oscoda County
65. Otsego County
66. Presque Isle County
67. Roscommon County
68. Saginaw County
69. Sanilac County
70. Schoolcraft County
71. Shiawassee County
72. St. Clair County
73. St. Joseph County
74. Tuscola County
75. Van Buren County
76. Wayne County
77. Wexford County
Combined Area Unemployment Rate: 4.9%
Data extracted from http://www.bls.gov on November 25, 2019

- 9. FNS Action and Justification:** FNS is approving the State agency to waive the ABAWD time limit in the approved areas for 2 months. 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:** February 1, 2020
- 12. Expiration Date:** March 31, 2020
- 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