

## STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2150032
2. **Type of request:** Initial
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. **Region:** MWRO
7. **Regulatory requirements:**

Under 7 CFR 273.24(b) individuals are not 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 SNAP work requirements. Regulations at 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 or a workfare program for at least 20 hours per week; or any combination of working and participating in a work program for a total of 20 hours per week.

Under 7 CFR 273.24(f), upon the request of a State agency, the Food and Nutrition Service (FNS) may waive the applicability of the time limit described above for any group of individuals in the State if FNS makes a determination that the area in which the individuals reside does not have a sufficient number of jobs to provide employment for the individuals.
8. **Description of alternative procedures:**

The State of Michigan is requesting a waiver to exempt able-bodied adults without dependents (ABAWDs) in 80 counties, 3 cities and 10 reservations from SNAP time limits at 7 CFR 273.24.
9. **Justification for request:**

Under SNAP regulations at 7 CFR 273.24(f)(2), areas may qualify for an ABAWD time limit waiver if they have insufficient jobs. To support this claim, states may submit evidence that an area has an average unemployment rate for a 24-month time period that is at least 20 percent above the national average for the same 24-month period. 7 CFR 273.24(f)(6) provides that States may define areas to be waived.

The State of Michigan seeks a waiver for a region of 80 counties based on the region's average unemployment rate for the 24-month period of February 2022 to

January 2024. The national average unemployment rate for this 24-month period was 3.6 percent; 20 percent above this was 4.3 percent. The region’s aggregate average unemployment rate was 4.3 percent for the same period.

<b>Bureau of Labor Statistics Local Area Unemployment Data February 2022 to January 2024</b>		
<b>County</b>	<b>Total Unemployed</b>	<b>Total Labor Force</b>
Alcona County, MI	89,997	6,276
Alger County, MI	78,889	5,900
Allegan County, MI	1,525,716	53,000
Alpena County, MI	330,446	15,325
Antrim County, MI	246,667	13,508
Arenac County, MI	141,997	9,959
Baraga County, MI	75,672	4,983
Barry County, MI	784,093	28,271
Bay County, MI	1,187,692	58,903
Benzie County, MI	215,358	10,779
Berrien County, MI	1,759,794	75,407
Branch County, MI	479,758	18,819
Calhoun County, MI	1,468,329	65,507
Cass County, MI	576,238	25,140
Charlevoix County, MI	312,626	14,221
Cheboygan County, MI	249,441	20,170
Chippewa County, MI	388,836	23,427
Clare County, MI	279,953	18,076
Clinton County, MI	992,773	34,986
Crawford County, MI	134,223	8,156
Delta County, MI	403,734	21,259
Dickinson County, MI	299,098	11,879
Eaton County, MI	1,378,180	53,686
Emmet County, MI	402,539	22,270
Genesee County, MI	4,360,876	223,932
Gladwin County, MI	245,093	14,289
Gogebic County, MI	140,287	6,806
Grand Traverse County, MI	1,216,161	42,350
Gratiot County, MI	424,959	18,772
Hillsdale County, MI	490,217	21,228
Houghton County, MI	401,384	18,645
Huron County, MI	367,588	16,237
Ingham County, MI	3,606,223	145,420
Ionia County, MI	746,134	27,394
Iosco County, MI	249,454	15,080

Iron County, MI	116,308	6,591
Isabella County, MI	778,002	35,544
Jackson County, MI	1,792,559	74,310
Kalamazoo County, MI	3,214,705	119,858
Kalkaska County, MI	193,470	10,831
Keweenaw County, MI	22,397	1,323
Lake County, MI	93,688	6,496
Lapeer County, MI	987,258	41,224
Leelanau County, MI	253,951	9,916
Lenawee County, MI	1,098,594	47,488
Luce County, MI	52,900	3,133
Mackinac County, MI	127,056	11,247
Macomb County, MI	10,800,980	386,356
Manistee County, MI	235,716	13,558
Marquette County, MI	775,551	36,540
Mason County, MI	320,217	15,982
Mecosta County, MI	447,501	23,870
Menominee County, MI	259,250	10,473
Midland County, MI	972,912	39,548
Missaukee County, MI	167,471	8,042
Monroe County, MI	1,835,028	80,832
Montcalm County, MI	686,020	29,491
Montmorency County, MI	74,030	5,695
Muskegon County, MI	1,880,274	87,122
Newaygo County, MI	566,707	24,971
Oceana County, MI	280,146	16,800
Ogemaw County, MI	200,718	13,376
Ontonagon County, MI	49,477	3,487
Osceola County, MI	284,766	13,302
Oscoda County, MI	67,565	5,189
Otsego County, MI	280,926	13,960
Ottawa County, MI	3,990,500	123,694
Presque Isle County, MI	119,603	8,996
Roscommon County, MI	200,650	15,458
Saginaw County, MI	2,009,224	105,588
Sanilac County, MI	465,194	23,012
Schoolcraft County, MI	77,930	5,726
Shiawassee County, MI	792,437	35,193
St. Clair County, MI	1,824,484	69,413
St. Joseph County, MI	689,015	29,322
Tuscola County, MI	567,311	28,904

Van Buren County, MI	839,850	40,316
Washtenaw County, MI	4,765,038	161,689
Wayne County, MI	19,327,903	861,691
Wexford County, MI	360,917	17,051
<b>Combined Area Total</b>	<b>90,996,624</b>	<b>3,892,668</b>
<b>Combined Unemployment Rate</b>	<b>4.3%</b>	
<b>20% Above National Average Threshold</b>	<b>4.3%</b>	

The State of Michigan seeks a waiver for 3 cities based on their average unemployment rates for the 24-month period of February 2022 to January 2024. The cities' individual average unemployment rates were at least 4.3 percent for this period.

<b>Bureau of Labor Statistics Local Area Unemployment Data February 2022 to January 2024</b>			
<b>County</b>	<b>Unemployed</b>	<b>Labor Force</b>	<b>Unemployment Rate</b>
Grand Rapids city, MI	111,072	2,567,347	<b>4.3%</b>
Oak Park city, MI	17,081	346,933	<b>4.9%</b>
Pontiac city, MI	41,959	603,289	<b>7.0%</b>
<b>20% Above National Average Threshold</b>	<b>4.3%</b>		

The State requests to waive the following reservations based on having an average unemployment rate exceeding the national average for a recent 24-month period. The national average unemployment rate for this 24-month period was 3.6 percent; 20 percent above this was 4.3 percent. The reservation unemployment rates were calculated by applying 2018-2022 American Community Survey<sup>1</sup> share ratios to county-level Bureau of Labor Statistics data from February 2022 – January 2024. The following table summarizes the calculations:

<b>American Community Survey and Bureau of Labor Statistics Data February 2022 through January 2024</b>			
<b>Reservations</b>	<b>Unemployed</b>	<b>Labor Force</b>	<b>Unemployment Rate</b>
Chippewa County (part); Michigan (part); Bay Mills Reservation and Off-Reservation Trust Land, MI	876	14,319	6.1%
<b>Total Bay Mills Reservation</b>	<b>876</b>	<b>14,319</b>	<b>6.1%</b>

<sup>1</sup> These calculations are based on data from the 2018-2022 American Community Survey 5-Year Estimates.

Antrim County (part); Michigan (part); Grand Traverse Reservation and Off-Reservation Trust Land, MI	26	113	23.3%
Benzie County (part); Michigan (part); Grand Traverse Reservation and Off-Reservation Trust Land, MI	0	204	-
Charlevoix County (part); Michigan (part); Grand Traverse Reservation and Off-Reservation Trust Land, MI	0	0	-
Grand Traverse County (part); Michigan (part); Grand Traverse Reservation and Off-Reservation Trust Land, MI	0	0	-
Leelanau County (part); Michigan (part); Grand Traverse Reservation and Off-Reservation Trust Land, MI	1,386	4,524	30.6%
<b>Total Grand Traverse Reservation</b>	<b>1,412</b>	<b>4,841</b>	<b>29.2%</b>
Delta County (part); Michigan (part); Hannahville Indian Community and Off-Reservation Trust Land, MI	0	177	-
Menominee County (part); Michigan (part); Hannahville Indian Community and Off-Reservation Trust Land, MI	536	4,570	11.7%
<b>Total Hannahville Reservation</b>	<b>536</b>	<b>4,748</b>	<b>11.3%</b>
Calhoun County (part); Michigan (part); Huron Potawatomi Reservation and Off-Reservation Trust Land, MI	75	853	8.9%
<b>Total Huron Potawatomi Reservation</b>	<b>75</b>	<b>853</b>	<b>8.9%</b>
Arenac County (part); Michigan (part); Isabella Reservation and Off-Reservation Trust Land, MI	0	107	-
Iosco County (part); Michigan (part); Isabella Reservation and Off-Reservation Trust Land, MI	0	0	-
Isabella County (part); Michigan (part); Isabella Reservation and Off-Reservation Trust Land, MI	13,877	294,129	4.7%
<b>Total Isabella Reservation</b>	<b>13,877</b>	<b>294,236</b>	<b>4.7%</b>
Baraga County (part); Michigan (part); L'Anse Reservation and Off-Reservation Trust Land, MI	2,154	35,787	6.0%
Marquette County (part); Michigan (part); L'Anse Reservation and Off-Reservation Trust Land, MI	79	768	10.3%
<b>Total L'Anse Reservation</b>	<b>2,233</b>	<b>36,555</b>	<b>6.1%</b>

Manistee County (part); Michigan (part); Little River Reservation and Off-Reservation Trust Land, MI	258	671	38.5%
Mason County (part); Michigan (part); Little River Reservation and Off-Reservation Trust Land, MI	0	0	-
<b>Total Little River Reservation</b>	<b>258</b>	<b>671</b>	<b>38.5%</b>
Charlevoix County (part); Michigan (part); Little Traverse Bay Reservation and Off-Reservation Trust Land, MI	0	47	-
Delta County (part); Michigan (part); Little Traverse Bay Reservation and Off-Reservation Trust Land, MI	0	0	-
Emmet County (part); Michigan (part); Little Traverse Bay Reservation and Off-Reservation Trust Land, MI	132	1,268	10.4%
<b>Total Little Traverse Bay Reservation</b>	<b>132</b>	<b>1,315</b>	<b>10.1%</b>
Berrien County (part); Michigan (part); Pokagon Reservation and Off-Reservation Trust Land, MI--IN	0	47	-
Cass County (part); Michigan (part); Pokagon Reservation and Off-Reservation Trust Land, MI--IN	200	1,213	16.4%
Van Buren County (part); Michigan (part); Pokagon Reservation and Off-Reservation Trust Land, MI--IN	0	395	-
<b>Total Pokagon Reservation</b>	<b>200</b>	<b>1,655</b>	<b>12.1%</b>
Alger County (part); Michigan (part); Sault Ste. Marie Reservation and Off-Reservation Trust Land, MI	0	1,127	-
Chippewa County (part); Michigan (part); Sault Ste. Marie Reservation and Off-Reservation Trust Land, MI	6,045	16,417	36.8%
Delta County (part); Michigan (part); Sault Ste. Marie Reservation and Off-Reservation Trust Land, MI	156	307	50.6%
Luce County (part); Michigan (part); Sault Ste. Marie Reservation and Off-Reservation Trust Land, MI	0	205	-
Mackinac County (part); Michigan (part); Sault Ste. Marie Reservation and Off-Reservation Trust Land, MI	895	2,227	40.2%
Marquette County (part); Michigan (part); Sault Ste. Marie Reservation and Off-Reservation Trust Land, MI	0	214	-

Schoolcraft County (part); Michigan (part); Sault Ste. Marie Reservation and Off-Reservation Trust Land, MI	209	934	22.4%
<b>Total Sault Ste. Marie Reservation</b>	<b>7,304</b>	<b>21,430</b>	<b>34.1%</b>

**10. Anticipated impact on households and State agency operations:**

This waiver will provide consistency for households and State agency operations in areas where unemployment remains higher than the national average.

**11. Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable):**

The caseload for these areas, as of **DATE**, represent **XX%** of the caseload for the state. There are no quality control procedures involved.

**12. Anticipated implementation date and time period for which waiver is needed:**

The State is requesting a one-year waiver, from March 1, 2025 through February 28, 2026.

**13. Proposed quality control review procedures:**

There are no special quality control procedures needed in conjunction with this waiver.

**14. State agency submitting waiver request and State contact person: Shelley Walker, FAP Policy Manager**

**15. Signature and title of requesting official:**

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Title: SNAP State Administrator

Email for transmission of response: [cabanawb2@michigan.gov](mailto:cabanawb2@michigan.gov)

**16. Date of request: 11/26/2024**

**17. State agency staff contact (name/email/telephone): Shelley Walker, FAP Policy Manager, [Walkers8@michigan.gov](mailto:Walkers8@michigan.gov), 517 243 3317**

**18. Regional office contact person (to be completed by FNS regional office):**