



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Health

DIVISION OF PUBLIC ASSISTANCE
Policy & Program Development
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September 15, 2025

Charles Tobin
Regional Director
USDA Food and Nutrition Service
Western Regional Office
90 Seventh Street, Suite 10-100
San Francisco, CA 94103

Dear Mr. Tobin:

The State of Alaska is submitting the enclosed request to modify and extend waiver 2150041 regarding the ABAWD work requirements and time limit. We are requesting this waiver be approved for a one-year period from November 1, 2025 through October 31, 2026, with the understanding that federal guidance on extensions is still forthcoming. Depending on that guidance, the State may either seek an extension through December 31, 2028 as permitted under federal authority, or request continuation of the currently approved waiver.

Alaska is supplying evidence that 20 census areas and boroughs in our state qualify for a time limit waiver based on the amended provisions in Section 6(o) of The Act. The provision allows non-contiguous states to submit evidence that an area has an average unemployment rate that is at least 1.5 times the national average.

The State is requesting this waiver to help manage our caseload and to better serve our clients.

If you have any questions, please contact Christina Davis at christina.davis@alaska.gov, Lydia Luchini at lydia.luchini@alaska.gov, or Seth Barnes at seth.barnes@alaska.gov.

Thank you,

Christina Davis

Christina Davis
Chief of Policy & Program Development
Division of Public Assistance

ABLE-BODIED ADULTS WITHOUT DEPENDENTS (ABAWD) WAIVER REQUEST

1. **Type of request:** Extension
2. **Statutory citation:** Section 6(o) of the Food and Nutrition Act of 2008, as amended
3. **Regulatory citation:** 7 CFR 273.24
4. **State:** Alaska
5. **Region:** WRO
6. **Regulatory requirements:** Section 6(o) of the Food and Nutrition Act of 2008 (The Act), 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 areas in Alaska and Hawaii have an unemployment rate that reaches or exceeds 150% of the national average. States other than Alaska and Hawaii may request waivers when the unemployment rate meets or exceeds 10 percent in an area.
7. **Description of alternative procedures:** The State of Alaska is requesting to exempt able-bodied adults without dependents (ABAWDs) in 20 boroughs and census areas from SNAP time limits at 7 CFR 273.24.
8. **Justification for request:** SNAP regulations at 7 CFR 273.24(f)(2), areas may qualify for an ABAWD time limit waiver if they have insufficient jobs. The amended provisions in Section 6(o) of The Act allow non-contiguous states to submit evidence that an area has an average unemployment rate that is at least 1.5 times the national average. 7 CFR 273.24(f)(6) provides that States may define areas to be waived.

The State of Alaska seeks a waiver for 20 boroughs and census areas, based on each borough and census areas' average unemployment rate for the 3-month period of December 2024 through February 2025. The national average unemployment rate for this 3-month period was 4.2 percent; 1.5 times the national average unemployment rate is 6.3 percent. The unemployment rates of each of the boroughs and census areas for this 3-month time period compared to 1.5 times the national average are detailed in the table below. The data used for this waiver determination comes from the Local Area Unemployment Statistics, Bureau of Labor Statistics, Department of Labor.

December 2024-February 2025				
Borough or Census Area	Unemployed	Labor Force	Unemployment Rate	Status
Aleutians East Borough, AK	196	5,182	3.8%	NOT EXEMPT
Aleutians West Census Area, AK	381	10,953	3.5%	NOT EXEMPT
Anchorage Borough, AK	18,524	454,255	4.1%	NOT EXEMPT
Bethel Census Area, AK	2,337	20,329	11.5%	EXEMPT
Bristol Bay Borough, AK	70	707	9.9%	EXEMPT
Chugach Census Area, AK	795	10,626	7.5%	EXEMPT
Copper River Census Area, AK	460	3,635	12.7%	EXEMPT
Denali Borough, AK	255	2,018	12.6%	EXEMPT
Dillingham Census Area, AK	401	4,790	8.4%	EXEMPT
Fairbanks North Star Borough, AK	6,109	139,397	4.4%	NOT EXEMPT
Haines Borough, AK	268	2,264	11.8%	EXEMPT
Hoonah-Angoon Census Area, AK	378	3,502	10.8%	EXEMPT
Juneau Borough/city, AK	2,034	49,779	4.1%	NOT EXEMPT
Kenai Peninsula Borough, AK	4,975	79,240	6.3%	EXEMPT
Ketchikan Gateway Borough, AK	1,048	20,094	5.2%	NOT EXEMPT
Kodiak Island Borough, AK	1,039	16,106	6.5%	EXEMPT
Kusilvak Census Area, AK	1,263	7,210	17.5%	EXEMPT
Lake and Peninsula Borough, AK	118	1,701	6.9%	EXEMPT
Matanuska-Susitna Borough, AK	8,947	159,430	5.6%	NOT EXEMPT
Nome Census Area, AK	1,141	12,900	8.8%	EXEMPT
North Slope Borough, AK	579	18,554	3.1%	NOT EXEMPT
Northwest Arctic Borough, AK	915	9,678	9.5%	EXEMPT
Petersburg Census Area, AK	317	3,935	8.1%	EXEMPT
Prince of Wales-Hyder Census Area, AK	634	6,933	9.1%	EXEMPT
Sitka Borough/city, AK	471	12,672	3.7%	NOT EXEMPT
Skagway Municipality, AK	321	1,673	19.2%	EXEMPT
Southeast Fairbanks Census Area, AK	710	10,241	6.9%	EXEMPT
Wrangell Borough/city, AK	142	2,430	5.8%	NOT EXEMPT
Yakutat Borough/city, AK	72	1,006	7.2%	EXEMPT
Yukon-Koyukuk Census Area, AK	847	7,364	11.5%	EXEMPT
1.5 Times National Average Unemployment	6.3%			

9. 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.

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

The ABAWD caseload for the proposed waived areas is 1,973 SNAP recipients as of July 2025, accounting for 2.9% percent of the total SNAP caseload for the state. The ABAWD caseload for the proposed non-waived areas of Alaska is 3,376 SNAP recipients as of July 2025, accounting for 5.0% of the total SNAP caseload for the state. There are no quality control procedures involved.

11. Anticipated implementation date and time period for which waiver is needed: The State of Alaska is requesting approval of an ABAWD time-limit waiver for a one-year period, beginning November 1, 2025 and ending October 31, 2026, with the understanding that federal guidance on extensions is still forthcoming. Depending on that guidance, the State may either seek an extension through December 31, 2028 as permitted under federal authority, or request continuation of the currently approved waiver.

12. Proposed quality control review procedures: There are no special quality control procedures needed in conjunction with this waiver.

13. Name, title, email, and signature of requesting official:

Name: Christina Davis

Title: Chief of Policy & Program Development

Email: christina.davis@alaska.gov

Signature: 

14. Date of request: 09/15/2025

15. State agency staff contact:

Name: Seth Barnes

Title: Public Assistance Analyst I

Email: seth.barnes@alaska.gov

Name: Lydia Luchini

Title: Public Assistance Programs Officer

Email: Lydia.luchini@alaska.gov

16. Regional Office contact person (to be completed by FNS regional office):