

ARIZONA
— DEPARTMENT OF —
ECONOMIC SECURITY

Katie Hobbs
Governor

Michael Wisehart
Director

September 25, 2025

Mr. James Abraham
SNAP Program Director
Food and Nutrition Service Southwest Region
United States Department of Agriculture
1100 Commerce Street, Room 522
Dallas, Texas 75242

Dear Mr. Abraham:

Included for your approval is Arizona's Supplemental Nutrition Assistance Program, Able Bodied Adult Without Dependents time-limit State Waiver Request.

The State of Arizona seeks a waiver for four reservations: Cocopah, Hualapai, Maricopa Ak-Chin, and Salt River, and one county, based on having average unemployment rates over 10% for a recent 12-month period.

Additionally, the San Carlos Apache tribe requested to be included in the State's waiver request and presented alternative data for consideration.

This request has the support of Arizona's Governor, the State's Chief Executive Officer.

If you have any questions, please contact Nancy Meeden, Senior Workforce Policy Manager, Division of Employment and Rehabilitation Services, at 480-271-5794 or nmeeden@azdes.gov.

Sincerely,



Michael Wisehart
Director

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2150033

2. **Type of request:** Initial

3. **Statutory citation:** 7 U.S.C. § 2015(o)

4. **Regulatory citation:** 7 CFR 273.24

5. **State:** Arizona

6. **Region:** Southwest Regional Office

7. **Regulatory requirements:**

Under 7 U.S.C. § 2015(o), individuals between the ages of 18 and 65 who do not have dependents under the age of 14 and are not otherwise exempt are not eligible to participate in the Supplemental Nutrition Assistance Program (SNAP) if the individual received program benefits for more than three months during any three-year period in which the individual was subject to, but did not comply with, the SNAP work requirements at 7 CFR 273.24(a). This is known as the able-bodied adults without dependents (ABAWD) time limit.

Under 7 U.S.C. § 2015(o)(4) and 7 CFR 273.24(f), upon request of a state agency and with the support of the chief elected officer of the State, the Food and Nutrition Service (FNS) may waive the ABAWD time limit for any group of individuals in the state if FNS makes a determination that the area in which the individuals reside has an unemployment rate in excess of 10%.

8. **Description of alternative procedures:**

The State of Arizona is requesting to waive the ABAWD time limit for five geographic areas for federal fiscal year (FFY) 2026.

9. **Justification for request:**

The State requests to waive the ABAWD time limit for Cocopah, Hualapai, Maricopa (Ak-Chin), and Salt River reservation areas and Yuma County. These areas had average unemployment rates over 10% for the 12-month period of June 2024 through May 2025. Reservation area unemployment rates were calculated by applying 2019-2023 American Community Survey share ratios to county-level Bureau of Labor Statistics data¹ from June 2024 – May 2025. The following table summarizes the calculations:

¹ Source: Local Area Unemployment Statistics, Bureau of Labor Statistics, U.S. Dept. of Labor

Bureau of Labor Statistics Local Area Unemployment/Census Bureau Data June 2024 through May 2025			
	Unemployed	Labor Force	Unemployment Rate
Yuma County (part); Arizona (part); Cocopah Reservation, AZ	863	4,145	20.8%
Total Cocopah Reservation	863	4,145	20.8%
Coconino County (part); Arizona (part); Hualapai Indian Reservation and Off-Reservation Trust Land, AZ	0	0	-
Mohave County (part); Arizona (part); Hualapai Indian Reservation and Off-Reservation Trust Land, AZ	682	4,870	14.0%
Yavapai County (part); Arizona (part); Hualapai Indian Reservation and Off-Reservation Trust Land, AZ	0	0	-
Total Hualapai Reservation	682	4,870	14.0%
Pinal County (part); Arizona (part); Maricopa (Ak Chin) Indian Reservation and Off-Reservation Trust Land, AZ	729	6,834	10.7%
Total Maricopa (Ak-Chin) Reservation	729	6,834	10.7%
Maricopa County (part); Arizona (part); Salt River Reservation, AZ	3,610	24,555	14.7%
Total Salt River Reservation	3,610	24,555	14.7%
Yuma County	155,584	1,198,903	13.0%

In addition, the San Carlos Apache Tribe requested that the State pursue a waiver on their behalf. The letter with their request and data to support their request is provided in an attachment.

10. Anticipated impact on households and State agency operations:

This waiver will provide consistency for households and State agency operations in areas where comparatively high unemployment rates make it difficult for SNAP participants to find employment.

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

The caseload for these areas is 30,116 as of September 25, 2025, and represents 6.7% 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, effective from October 1, 2025, through September 30, 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:

Arizona Department of Economic Security
Nancy Meeden
Senior Workforce Policy Manager
Division of Employment and Rehabilitation Services
nmeeden@azdes.gov

15. Signature and title of requesting official:



Michael Wisheart
Director
mwisehart@azdes.gov

16. Date of request: September 25, 2025

17. State agency staff contact (name/email/telephone):

Name: Nancy Meeden
Phone Number: (480) 271-5794
Email: nmeeden@azdes.gov

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



Terry Rambler
Chairman

SAN CARLOS APACHE TRIBE

P.O. Box 0, San Carlos, Arizona 85550
Phone (928) 475-1600 ❖ Fax (928) 475-2567

Tao Etpison
Vice-Chairman

July 31, 2025

Via E-mail and U.S. Postal Service

Michael Wischart
Director
Arizona Department of Economic Security
1789 Jefferson – Mail Drop 1111
Phoenix, Arizona 85007
E-M: dvinarskai@azdes.gov

Dear Director Wischart:

Dagot'ee (Greetings). On behalf of the over 17,400 members of the San Carlos Apache Tribe ("Tribe"), thank you for your letter regarding the recent changes to the Supplemental Nutrition Assistance Program ("SNAP") under H.R. 1 (July 4, 2025, P.L. 119-21), and their impact on our community here on the San Carlos Apache Reservation. In your letter, you state that our Tribe no longer qualifies for an Able Bodied Adults Without Dependents work requirements waiver. Respectfully, I disagree.

Curiously, your letter does not provide DES's estimate of unemployment on our Reservation. Yet, here on our Reservation we do have elevated unemployment and insufficient jobs – factors that would qualify our members on SNAP for the waiver.

Some sources report varied unemployment rates on our Reservation between 20% and 65%. For example, the 2020 Census recorded an unemployment rate of 39.4%, while the Arizona Office of Economic Opportunity ("OEO") report of January 8, 2024, estimates labor force participation at 44.2% and unemployment at 19.4%, based on 2022 data. The unemployment rate on our Reservation considerably higher than both the state (5.4%) and national averages (5.5%).

Michael Wischart

Re: ABAWD

July 31, 2025

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In 2020, our Reservation population was estimated at 10,251 individuals, while the average monthly SNAP case load in 2025 is 4,509, inclusive of children. Nationally, nearly 89 percent of SNAP benefits go to households with incomes at or near the poverty line.

See <https://www.cbpp.org/research/food-assistance/the-supplemental-nutrition-assistance-program-snap#:~:text=Lessening%20the%20extent%20and%20severity,pov%20effects%20of%20any%20program>. This means that those living at or near poverty on our Reservation stands at or about 44%.

Our Reservation's rate of unemployment and poverty are simply due to job scarcity and our remote, rural location. Our Tribe and its enterprises simply cannot create enough jobs, even though collectively we amount to the largest employer in the region with nearly 3,000 employees. Despite our Tribe's employment efforts and job training programs, there are substantial barriers to employment. Other than those jobs within the Tribe or its enterprises, there are very few other employment opportunities on our Reservation. Then, there exist great distances from the Reservation, which is slightly larger than Rhode Island, to those other few, highly competitive jobs available in Globe, Safford and other areas, and those jobs require skills and education that most of our members on SNAP do not have.

Outside of work requirements, as you noted, H.R. 1 includes an exemption for individuals defined as Indians under the Indian Health Care Improvement Act and Medicaid. We can confirm that all enrolled members of our Tribe are eligible for services through the Indian Health Service and therefore meet the definition required for this exemption. We appreciate DES's swift action to implement this provision and encourage full inclusion of our Tribe's members in the newly created exemption category.

In conclusion, our Tribe continues to face longstanding, systemic economic challenges that directly impact access to food security, employment opportunities, and health outcomes. The Tribe simply does not have the resources to overcome infrastructure, job development, and transportation barriers. In this context, maintaining access to critical nutrition support through SNAP is essential to the well-being and resilience of the members of our Tribe who depend upon the program.

In view of these facts, the Tribe's members should remain eligible for the SNAP time-limit waiver under the new federal thresholds. I respectfully request that DES proceed with pursuing a waiver on our behalf.

We appreciate DES's recognition of the sovereign status of the San Carlos Apache Tribe and your stated commitment to open consultation and partnership.

Please do not hesitate to contact my office, if further documentation or communication is needed in support of these efforts.

Michael Wisehart

Re: ABAWD

July 31, 2025

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Ahi'yi'e (thank you) in advance for your review and consideration of this request.

Sincerely,

SAN CARLOS APACHE TRIBE

A handwritten signature in black ink, appearing to read "Terry Rambler", with a long horizontal flourish extending to the right.

Terry Rambler
Chairman

Cc: Darlene Vinarskai, Tribal Relations Manager, AZDES, dvinarskai@azdes.gov

San Carlos Apache Tribe

Tao Etpison, Vice Chairman

San Carlos Council Members

Dennis Irby, Treasurer

Christabelle Mull, GM

Terry Ross, Exec. Dir., DHHS

A.B. Ritchie, AG, DOJ

Chrono