

## STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** NA
2. **Type of request:** Initial
3. **Regulatory citation:** 7 CFR 273.5(a) and (b)
4. **State:** Michigan
5. **Region:** MWRO
6. **Regulatory requirements:** The Supplemental Nutrition Assistance Program regulations at 7 CFR 273.5(a) state that an individual who is enrolled at least half-time in an institution of higher learning shall be ineligible to participate in SNAP unless the individual qualifies for one of the exemptions contained in paragraph (b) of this section.
7. **Description of alternative procedures:** The Michigan Department of Health & Human Services (MDHHS) is requesting a waiver of the regulations at 7 CFR 273.5(a) to allow students who are enrolled at least half-time in an institution of higher learning to be eligible to participate in SNAP without being required to meet one of the exemptions in 7 CFR 273.5 (b). MDHHS is requesting to allow students of higher education who are impacted by COVID-19 to qualify for SNAP regardless of employment status. MDHHS will re-evaluate for student eligibility at the next periodic report or recertification, after the pandemic has ceased.
8. **Justification for request:** On January 31, 2020, the International Health Regulations Emergency Committee of the World Health Organization declared the outbreak of COVID-19 a public health emergency of international concern as well as Health and Human Services Secretary, Alex M. Azar II, declared a public health emergency for the United States. The Governor of Michigan, Governor Gretchen Whitmer, declared a state of emergency of the entire state of Michigan on March 10, 2020, (Executive Order 2020-04) to protect the well-being of the citizens of Michigan from the dangerous effects of COVID-19. In addition to the state-declared state of emergency, on March 13, 2020, President Trump declared a national state of emergency over the COVID-19 pandemic.

This makes it virtually impossible to verify if a student is enrolled in an institution of higher education, if the student is approved to participate in a work study program, or if the student is placed in an institution of higher education through or in compliance with one of the programs identified in paragraphs (b)(11)(i) through (b)(11)(iv) of 273.5. In addition, with the most business closed, it is nearly impossible for a student to be employed a minimum of 20 hours per week.

- 9. Anticipated impact on households and State agency operations:** This waiver will apply to all SNAP applicant and recipient households covered under this regulation. MDHHS does not anticipate an increase in the number of eligible households, but rather maintaining eligibility for current recipients.
- .
- 10. Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable):** The number of SNAP recipients as of February 9,2020 was 1,175,901
- 11. Anticipated implementation date and time period for which waiver is needed:** Immediately upon approval until the month following the month the state of emergency ends.
- 12. Proposed quality control review procedures:** Cases will be reviewed in accordance with this waiver approval.
- 13. Signature and title of requesting official:**

---

Title: SNAP State Administrator

Email for transmission of response: [Sweeneyd1@michigan.gov](mailto:Sweeneyd1@michigan.gov)

- 14. Date of request:** 3/22/20
- 15. State agency staff contact (name/email/telephone):** Dawn M. Sweeney, 517-243-5560  
[Sweeneyd1@michigan.gov](mailto:Sweeneyd1@michigan.gov)
- 16. Regional office contact person (to be completed by FNS regional office):**