



Food and  
Nutrition  
Service

1320 Braddock Place  
Alexandria, VA  
22314

October 19, 2023

Nicole Denson-Sogbaka  
Policy Director  
Economic Stability Administration  
Department of Health and Human Services  
235 S. Grand Ave Suite 1402  
Lansing, Michigan 48909


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

Dear Director Denson-Sogbaka:

This is in response to the Michigan Department of Health and Human Services' September 19, 2023, request to waive the Supplemental Nutrition Assistance Program (SNAP) time limit for able-bodied adults without dependents (ABAWDs). The attached waiver response includes the approved areas, the supporting evidence used, and the conditions of approval.

The Food and Nutrition Service (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 the waiver when it expires and reintroduce the time limit. Please contact your Regional Office representative with any questions.

Sincerely,

DocuSigned by:  
  
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Catrina L. Kamau  
Chief  
Certification Policy Branch  
Program Development Division

Enclosure

**ABLE-BODIED ADULTS WITHOUT DEPENDENTS (ABAWD)  
WAIVER RESPONSE**

1. **Request Type:** Initial
2. **Statutory Citation:** Section 6(o) of the Food and Nutrition Act of 2008
3. **Regulatory Citation:** 7 CFR 273.24
4. **State:** Michigan
5. **Food and Nutrition Service (FNS) Region:** Midwest
6. **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.
7. **Requested Area(s) and Support:** The State agency requested to waive the ABAWD time limit in 82 counties and one city from March 1, 2024, to February 28, 2025.

The State agency supported its request based upon the combined area of 82 contiguous counties having an aggregate average unemployment rate 20 percent above the national average for the 24-month period of August 2021 through July 2023. During this period, the national average unemployment rate was 3.8 percent; 20 percent above that rate is 4.5 percent. The average unemployment rate for the combined area was 4.5 percent during the 24-month period (Table 1).

**Table 1: Combined Area (Bureau of Labor Statistics Local Area Unemployment Data, August 2021 – July 2023)**

<b>Combined Area</b>
1. Alcona County, MI
2. Alger County, MI
3. Allegan County, MI
4. Alpena County, MI
5. Antrim County, MI
6. Arenac County, MI
7. Baraga County, MI
8. Barry County, MI

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

54. Mecosta County, MI
55. Menominee County, MI
56. Midland County, MI
57. Missaukee County, MI
58. Monroe County, MI
59. Montcalm County, MI
60. Montmorency County, MI
61. Muskegon County, MI
62. Newaygo County, MI
63. Oceana County, MI
64. Ogemaw County, MI
65. Ontonagon County, MI
66. Osceola County, MI
67. Oscoda County, MI
68. Otsego County, MI
69. Ottawa County, MI
70. Presque Isle County, MI
71. Roscommon County, MI
72. Saginaw County, MI
73. St. Clair County, MI
74. St. Joseph County, MI
75. Sanilac County, MI
76. Schoolcraft County, MI
77. Shiawassee County, MI
78. Tuscola County, MI
79. Van Buren County, MI
80. Washtenaw County, MI
81. Wayne County, MI
82. Wexford County, MI
<b>Combined Area Unemployment Rate: 4.5%</b>

Data extracted from <http://www.bls.gov> on October 11, 2023.

The State agency supported its request based upon the city having an average unemployment rate 20 percent above the national average for the 24-month period of August 2021 through July 2023. During this period, the national average unemployment rate was 3.8 percent; 20 percent above that rate is 4.5 percent. The average unemployment rate for the city was 5.2 percent during the 24-month period (Table 2).

**Table 2: City (Bureau of Labor Statistics Local Area Unemployment Data, August 2021 – July 2023)**

City	Unemployment Rate
Oak Park city, MI	5.2%

Data extracted from <http://www.bls.gov> on October 11, 2023.

**8. FNS Action and Justification:** FNS is approving the State agency's request to waive the ABAWD time limit. The State agency's request meets the requirements for approval provided at 7 CFR 273.24(f) and relevant FNS guidance.

**9. Authority:** The waiver is approved pursuant to section 6(o) of the Food and Nutrition Act of 2008 and 7 CFR 273.24(f).

**10. Implementation Date:** March 1, 2024

**11. Expiration Date:** February 28, 2025

**12. Information Required to Submit a Modification, Extension, or New Waiver:** To receive a modification, extension, or submit a new waiver to replace the current waiver, 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.

**13. State Agency Contact Information:**

Name: Shelley Walker

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**14. FNS Regional Office Contact Information:**

Name: Anna Adams

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