



Food and Nutrition Service

U.S. DEPARTMENT OF AGRICULTURE

December 16, 2024

Bethany Cabanaw
SNAP State Administrator
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 Administrator Cabanaw:

This is in response to the Michigan Department of Health and Human Services' November 27, 2024, 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 agency must continue tracking so that the State agency 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,

Signed by:

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Catrina L. Kamau
Chief
Certification Policy Branch
Program Development Division
Supplemental Nutrition Assistance Program

Enclosure

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 80 counties, three cities, and 10 reservations from March 1, 2025, to February 28, 2026.

The State agency supported its request based upon the combined area of 80 counties having an aggregate average unemployment rate 20 percent above the national average for the 24-month period of February 2022 through January 2024. During this period, the national average unemployment rate was 3.6 percent; 20 percent above that rate is 4.3 percent. The average unemployment rate for the combined area was 4.3 percent during the 24-month period (Table 1).

Table 1: Combined Area 1 (Bureau of Labor Statistics Local Area Unemployment Data, February 2022 – January 2024)

Combined Area 1
Alcona County, MI

Alger County, MI
Allegan County, MI
Alpena County, MI
Antrim County, MI
Arenac County, MI
Baraga County, MI
Barry County, MI
Bay County, MI
Benzie County, MI
Berrien County, MI
Branch County, MI
Calhoun County, MI
Cass County, MI
Charlevoix County, MI
Cheboygan County, MI
Chippewa County, MI
Clare County, MI
Clinton County, MI
Crawford County, MI
Delta County, MI
Dickinson County, MI
Eaton County, MI
Emmet County, MI
Genesee County, MI
Gladwin County, MI
Gogebic County, MI
Grand Traverse County, MI
Gratiot County, MI
Hillsdale County, MI
Houghton County, MI
Huron County, MI
Ingham County, MI
Ionia County, MI
Iosco County, MI
Iron County, MI
Isabella County, MI
Jackson County, MI
Kalamazoo County, MI
Kalkaska County, MI
Keweenaw County, MI
Lake County, MI

Lapeer County, MI
Leelanau County, MI
Lenawee County, MI
Luce County, MI
Mackinac County, MI
Macomb County, MI
Manistee County, MI
Marquette County, MI
Mason County, MI
Mecosta County, MI
Menominee County, MI
Midland County, MI
Missaukee County, MI
Monroe County, MI
Montcalm County, MI
Montmorency County, MI
Muskegon County, MI
Newaygo County, MI
Oceana County, MI
Ogemaw County, MI
Ontonagon County, MI
Osceola County, MI
Oscoda County, MI
Otsego County, MI
Ottawa County, MI
Presque Isle County, MI
Roscommon County, MI
Saginaw County, MI
Sanilac County, MI
Schoolcraft County, MI
Shiawassee County, MI
St. Clair County, MI
St. Joseph County, MI
Tuscola County, MI
Van Buren County, MI
Washtenaw County, MI
Wayne County, MI
Wexford County, MI
Combined Area Unemployment Rate: 4.3%

Data extracted from <http://www.bls.gov> on December 4, 2024.

The State agency supported its request based upon the three cities having an average unemployment rate 20 percent above the national average for the 24-month period of February 2022 through January 2024. During this period, the national average unemployment rate was 3.6 percent; 20 percent above that rate is 4.3 percent. The average unemployment rate for the requested areas was 4.3 percent or greater during the 24-month period (Table 2).

Table 2: Cities (Bureau of Labor Statistics Local Area Unemployment Data, February 2022 – January 2024)

Cities	Unemployment Rate
Grand Rapids city, MI	4.3%
Oak Park city, MI	4.9%
Pontiac city, MI	7.0%

Data extracted from <http://www.bls.gov> on December 4, 2024.

The State agency supported its request for the 10 reservation areas based up the areas each having an average unemployment rate 20 percent above the national average for the 24-month period of February 2022 through January 2024. During this period, the national average unemployment rate was 3.6 percent; 20 percent above that rate is 4.3 percent. The average unemployment rate for the requested reservation areas was 4.7 percent or greater during the 24-month period (Table 3).

Table 3: Reservation Areas (2022 American Community Survey and Bureau of Labor Statistics Data, February 2022 – January 2024)

Reservation Areas	Unemployment Rate
Bay Mills Reservation	6.1%
Grand Traverse Reservation	29.2%
Hannahville Reservation	11.3%
Huron Potawatomi Reservation	8.9%
Isabella Reservation	4.7%
L’Anse Reservation	6.1%
Little River Reservation	38.5%
Little Traverse Bay Reservation	10.1%
Pokagon Reservation	12.1%
Sault Ste. Marie Reservation	34.1%

Data extracted from <http://www.bls.gov> and <https://data.census.gov> on December 4, 2024.

- 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, 2025

11. Expiration Date: February 28, 2026

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:

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14. FNS Regional Office Contact Information:

Name: Abram Krause

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