



Food and Nutrition Service

U.S. DEPARTMENT OF AGRICULTURE

November 20, 2025

Shelly Walker
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 SNAP State Administrator Walker:

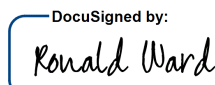
This is in response to the Michigan Department of Health and Human Services' (DHHS) October 21, 2025, request to waive the Supplemental Nutrition Assistance Program (SNAP) time limit for able-bodied adults without dependents (ABAWDs). The attached waiver response includes the approved areas, the supporting evidence used, and the conditions of approval.

The Food and Nutrition Service (FNS) 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.

FNS also reminds DHHS of the clear expectation that SNAP participants who can work, do work. ABAWDs may fulfill the ABAWD work requirement in several ways including by engaging for at least 80 hours a month in a work program. The SNAP Employment and Training (E&T) program is one of many ways that ABAWDs can meet this requirement and helps SNAP participants gain skills and find work that moves them toward self-sufficiency. Connecting participants to DHHS' Food Assistance Employment and Training (FAE&T) program supports our shared goal to lift millions of Americans out of dependency and into hopeful futures.

Please contact your Regional Office representative with any questions.

Sincerely,

DocuSigned by:

Ronald Ward

Acting Associate Administrator
Supplemental Nutrition Assistance Program
Food and Nutrition Service
U.S. Department of Agriculture

Enclosure

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**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 for non-contiguous States, has an unemployment rate 1.5 times the national average.
- 7. Requested Area(s) and Support:** The State agency requested to waive the ABAWD time limit in fifteen individual counties, six cities, and eight reservation areas from November 3, 2025, to November 2, 2026.

The State agency supported its request based upon three counties and four cities having a 12-month average unemployment rate over 10 percent for the 12-month period of September 2024 through August 2025. The average unemployment rate for the requested areas was 10.4 percent or greater during the 12-month period (Table 1).

Table 1: Counties and Cities in Data Period 1 (Bureau of Labor Statistics Local Area Unemployment Data, September 2024 – August 2025)

County	Unemployment Rate
Mackinac County, MI	10.3%
Oscoda County, MI	11.9%
Presque Isle County, MI	10.3%
Eastpointe city, MI	11.4%

Flint city, MI	14.3%
Jackson city, MI	10.5%
Saginaw city, MI	11.8%

Data extracted from <http://www.bls.gov> on October 28, 2025.

The State agency also supported its request based upon eight reservations areas having a 12-month average unemployment rate over 10 percent for the 12-month period of September 2024 through August 2025. The average unemployment rate for the requested areas was 10.3 percent or greater during the 12-month period (Table 2).

Table 2: Reservation Areas (2023 American Community Survey and Bureau of Labor Statistics Data, September 2024 – March 2025)

Reservation Area	Unemployment Rate
Bay Mills Reservation and Off-Reservation Trust Land	10.4%
Grand Traverse Reservation and Off-Reservation Trust Land	39.2%
Hannahville Indian Community and Off-Reservation Trust Land	13.0%
Huron Potawatomi Reservation and Off-Reservation Trust Land	12.8%
Little River Reservation and Off-Reservation Trust Land	43.9%
Little Traverse Bay Reservation and Off-Reservation Trust Land	14.2%
Pokagon Reservation and Off-Reservation Trust Land	19.5%
Sault Ste. Marie Reservation and Off-Reservation Trust Land	31.7%

Data extracted from <http://www.bls.gov> and <https://data.census.gov> on October 28, 2025.

The State agency supported its request based upon four counties having a recent three-month average unemployment rate over 10 percent for the three-month period of March 2025 through May 2025. The average unemployment rate for the requested areas was 10.2 percent or greater during the three-month period (Table 3).

Table 3: Counties in Data Period 2 (Bureau of Labor Statistics Local Area Unemployment Data, March 2025 – May 2025)

County	Unemployment Rate
Alcona County, MI	11.0%
Alger County, MI	10.6%
Cheboygan County, MI	11.5%
Ogemaw County, MI	10.2%

Data extracted from <http://www.bls.gov> on October 28, 2025.

The State agency supported its request based upon four counties and one city having a recent three-month average unemployment rate over 10 percent for the three-month period of February 2025 through April 2025. The average unemployment rate for the requested areas was 10.1 percent or greater during the three-month period (Table 4).

Table 4: Counties and Cities in Data Period 3 (Bureau of Labor Statistics Local Area Unemployment Data, February 2025 – April 2025)

County or City	Unemployment Rate
Iosco County, MI	10.4%
Luce County, MI	10.4%
Montmorency County, MI	10.9%
Schoolcraft County, MI	11.4%
Bay City, MI	10.1%

The State agency supported its request based upon four counties and one city having a recent three-month average unemployment rate over 10 percent for the three-month period of January 2025 through March 2025. The average unemployment rate for the requested areas was 10.2 percent or greater during the three-month period (Table 5).

Table 5: Counties and Cities in Data Period 4 (Bureau of Labor Statistics Local Area Unemployment Data, September 2024 – August 2025)

County	Unemployment Rate
Arenac County, MI	10.5%
Iron County, MI	10.2%
Oceana County, MI	10.6%
Roscommon County, MI	10.4%
Detroit city, MI	10.9%

- 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:** November 1, 2025
- 11. Expiration Date:** October 31, 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:

Name: Shelly Walker

Email: Walkers8@michigan.gov

14. FNS Regional Office Contact Information:

Name: Megan Stoltenberg

Phone: 312-353-0572

Email: Megan.Stoltenberg@usda.gov