



# Food and Nutrition Service

U.S. DEPARTMENT OF AGRICULTURE

June 3, 2025

Kathy Bruen  
Program Manager  
Economic Assistance and Employment Supports Division  
Department of Human Services  
444 Lafayette Road North  
St. Paul, Minnesota 55105

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

Dear Program Manager Bruen:

This is in response to the Minnesota Department of Human Service' (DHS) April 29, 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) 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.

FNS also reminds DHS 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 DHS' SNAP Employment and Training 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:  
*Sasha Gersten-Paal*  
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Sasha Gersten-Paal  
Director  
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:** Minnesota
- 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 17 contiguous counties and 9 reservations from July 1, 2025, to June 30, 2026.

The State agency supported its request based upon the combined area of 17 counties having an aggregate average unemployment rate 20 percent above the national average for the 24-month period of November 2022 through October 2024. 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 1 (Bureau of Labor Statistics Local Area Unemployment Data, November 2022 – October 2024)**

<b>Combined Area 1</b>
Aitkin County
Carlton County
Cass County
Clearwater County

Hubbard County
Isanti County
Itasca County
Kanabec County
Koochiching County
Lake of the Woods County
Mahnomen County
Mille Lacs County
Morrison County
Norman County
Pine County
Todd County
Wadena County
<b>Combined Area Unemployment Rate: 4.5%</b>

Data extracted from <http://www.bls.gov> on May 2, 2025.

The State agency supported its request for the 9 reservation areas based up the areas each having an average unemployment rate 20 percent above the national average for the 24-month period of November 2022 through October 2024. 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 requested reservation areas was 5.4 percent or greater during the 24-month period (Table 2).

**Table 2: Reservation Areas (2023 American Community Survey and Bureau of Labor Statistics Data, November 2022 – October 2024)**

Reservation Areas	Unemployment Rate
Bois Forte Reservation	6.2%
Fond du Lac Reservation	9.5%
Grand Portage Reservation	12.1%
Leech Lake Reservation	8.0%
Lower Sioux Community Reservation	8.0%
Mille Lacs Reservation	10.3%
Red Lake Reservation	11.3%
Shakopee Mdewakanton Sioux Community Reservation	5.4%
White Earth Reservation	6.0%

Data extracted from <http://www.bls.gov> and <https://data.census.gov> on May 2, 2025.

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:** July 1, 2025

**11. Expiration Date:** June 30, 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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