



NC DEPARTMENT OF
**HEALTH AND
HUMAN SERVICES**

ROY COOPER • Governor

MANDY COHEN, MD, MPH • Secretary

SUSAN OSBORNE • Assistant Secretary for County Operations for
Human Services

November 15, 2021

Eugene Malveaux
Regional Director, Supplemental Nutrition Assistance Program
61 Forsyth St. S.W. Room 8T36
Atlanta, GA 30303-3415

Dear Mr. Malveaux:

North Carolina received and reviewed the Fiscal Year 2021 Management Evaluation (ME) review of the North Carolina Department of Health and Human Services administration of the Supplemental Nutrition Assistance Program (SNAP) response letter dated September 17th, 2021. We appreciate the technical assistance your office has provided through Gwen Daniels, Nick Espinosa and Larry Young. We have addressed all the issues identified in your letter and have a plan of action in place that we believe will satisfy the findings. Attached you will find North Carolina's updated corrective action plan for the findings noted in the letter. If you have questions, please reach out to me at (919) 855-4405 or by email at Carla.West@dhhs.nc.gov.

Sincerely,

A handwritten signature in blue ink that reads "Carla West".

Carla West, Senior Director for Economic Security
NC Department of Health and Human Services, Division of Social Services

cc: Susan Osborne, Assistant Secretary for County Operations

NC DEPARTMENT OF HEALTH AND HUMAN SERVICES • DIVISION OF SOCIAL SERVICES • ECONOMIC AND FAMILY SERVICES

LOCATION: 820 S. Boylan Avenue, McBryde Building, Raleigh, NC 27603
MAILING ADDRESS: 2420 Mail Service Center, Raleigh, NC 27699-2420
www.ncdhhs.gov • TEL: 919-527-6300 • FAX: 919-334-1265

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E&T Finding 2.1:

The SA failed to document that SNAP work requirements were explained to individuals during the eligibility determination process, including the rights and responsibilities of work-registered household members. The SA also failed to provide a written statement of the above to each individual in the household who is registered for work. 7 CFR 273.7(c)(1)(ii)

Background:

During the case review process, FNS determined the SA was not consistently documenting that the required oral and written explanation of the SNAP work requirements occurred during the eligibility determination process.

Required Corrective Action:

The SA must establish a consistent process to document eligibility staff are providing the required oral and written notification of the SNAP work requirements to clients during the eligibility determination process. The SA must review a sample of cases, including work registrants, for a period of 60 days to ensure compliance with this requirement. A report of the results must be submitted to FNS for review and validation.

NCDHHS Response:

The State Agency is in the process of developing a consolidated work notice which will be provided in writing as well as verbally explained to FNS recipients. The notice will explain the rights and responsibilities of work-registered household members. A change request was submitted to NC FAST to automatically generate the form. This request is currently pending completion.

This notice will be issued at eligibility and recertification. This requirement will be re-enforced by the NCDHHS FNS monitor by sampling of cases, including work registrants, for a period of 60 days to ensure compliance with this requirement. A report of the results will be submitted to FNS for review and validation.

Finding 2.2:

The SA failed to document the date individuals were referred to E&T Providers to begin participation in the Program. 7 CFR 273.7(c)(2)

Background:

During the case review process, FNS reviewers were unable to determine when individuals were referred to the E&T Program, even though many of them were actively participating. There was no documentation present in NC FAST, the SA's eligibility system, or Geographic Solutions, the E&T case management system. Federal regulations require that the SA refer participants to an appropriate and available E&T activity. Identifying the date of referrals to 12 of 18 the E&T program is a critical data element needed to evaluate the effectiveness and efficiency of the SA's E&T operations.

Required Correction Action:

The SA must implement procedures to ensure eligibility staff document when referrals to the E&T Program are completed. The SA must review a sample of cases, including E&T participants, for a period of 60 days to ensure referrals to the E&T Program are consistently documented. A report of the results must be submitted to FNS for review and validation.

NCDHHS Response:

The State Agency has developed a standardized SNAP E&T screening and referral form which will address a potential participant's service needs (e.g., Vocational Training, Basic Education, Job Search Training, etc.) as well as challenges to employment (e.g., transportation, childcare, etc.). This form (attached) is pending review/feedback from USDA.

Upon referral, the form will be uploaded to NCWORKS Geosol, NCDHHS's SNAP E&T case management system. The State Agency is also in the process of assembling an "Offering list" which will document all available SNAP E&T components by partner and location. This will be a tool that can be utilized to refer potential participants to appropriate SNAP E&T providers in their area. The SA will review a random sample of cases, including E&T participants, for a period of 60 days to ensure referrals to the E&T Program are consistently documented. A report of the results will be submitted to FNS for review and validation.



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