Dear Dr. Wos:

The Food and Nutrition Service (FNS) has received the State’s November 20, 2013 response regarding issues with the North Carolina Families Accessing Services through Technology (NC FAST) eligibility system. This letter serves as advance notification that the North Carolina Department of Health and Human Services (DHHS) may soon be subject to the suspension or disallowance of administrative funds in accordance with 7 CFR 276.4(d)(1) for failure to comply with the requirements specified in our November 6, 2013 letter.

The data provided by DHHS indicates that more than 20,000 households continue to experience significant delays with Supplemental Nutrition Assistance Program (SNAP) applications and recertifications. Of these households, over 6,000 have been waiting for more than three months to receive benefits. These delays are completely unacceptable and a serious failure on the part of North Carolina. Access to nutrition assistance program benefits for every eligible person who meets the qualifications, needs the help, and seeks assistance is a priority for FNS. We have grave concern for the low income people of North Carolina who are waiting for assistance. DHHS must work aggressively to correct the issues that are impacting the ability of North Carolina citizens to purchase food.

Specifically, DHHS failed to provide the following information as specified in our November 6, 2013 letter:

- **Application and Recertification Backlog:** FNS received the data as requested, but the State failed to include a detailed corrective action plan with specific strategies to address the delays. Data alone does not constitute a corrective action plan. The State also failed to provide a projected date of correction for all of the issues outlined in the letter.

- **NC FAST Defects:** FNS received the status update for the four defects that were remaining after our August 12 – 16, 2013 visit. FNS also received a list of the open Help Desk tickets, information about the age of these tickets, and which county submitted the tickets. However, the State failed to provide:
A description of the defect, the workaround in place, and the expected resolution date for any defects identified subsequent to our visit; and

An analysis of the open Help Desk tickets by topic with a detailed corrective action plan and projected date of correction.

We accept the State’s response for the following issues:

- **Local Access to NC FAST**: FNS will follow up on this issue during a site visit that will be scheduled for early 2014. However, the State must provide additional information regarding the interoperability issue between Curam and Internet Explorer (IE). This issue was escalated to IBM and a solution was to be in place by the end of November. Please provide the status of this resolution. If the IE issue has been resolved, do counties plan to revert back to IE or will they continue managing multiple browsers?
- **Information for the NC FAST Post-Implementation Review (PIR)**: FNS staff have worked with DHHS staff to schedule a conference call for December 13, 2013 to clarify questions about the information provided.

A response to this advanced notification must be provided within 14 days of this letter. FNS expects that the corrective action plans will include, at a minimum, a description of the deficiencies, analysis of the root cause(s) of the issues, identification of specific strategies to address the root cause(s), who will be responsible for implementing the corrective action strategies, plans for monitoring and evaluating the effectiveness of the strategies, and a projected date for correction of the issues. If DHHS fails to implement significant corrective action within 60 days, FNS may have no other option than to issue a formal warning that your Agency is subject to suspension or disallowance of SNAP administrative funds.

Peggy Fouts, Regional Director of the Supplemental Nutrition Assistance Program, is available at (404) 562-7099, or Kathy Tankersley, State Systems Office, is available at (617) 565-6467 to answer questions.

Sincerely,

DONALD E. ARNETTE
Regional Administrator

cc: Jason Donaldson
    Sherry Bradsher
    Joe Cooper
    Anthony Vellucci
    James Blackie
    Dian Carrol
    Dean Simpson