



OFFICE OF INSPECTOR GENERAL

United States Department of Agriculture



June 18, 2025

Ms. Yvonne Copeland
Director
Division of Child and Family Well-Being
NC Department of Health and Human Services
2001 Mail Service Center
Raleigh, North Carolina 27699-2000

Dear Ms. Copeland:

On May 29, 2025, the U.S. Department of Agriculture (USDA), Office of Inspector General (OIG), initiated an inspection (OIG Inspection Number 27801-0005-22) to determine whether the State of North Carolina used USDA Food and Nutrition Service (FNS) Supplemental Nutrition Assistance Program (SNAP) administrative funds to provide benefits to participants and to perform analytics on participant data to evaluate its quality and integrity.¹ As part of its inspection, OIG requested records and information from North Carolina's Department of Health and Human Services (NC-DHHS) on the same date.²

On May 30, 2025, in support of its objective on evaluating participant data quality and integrity, OIG supplemented its original request for SNAP participant data.³ The data request included the following requirements:

- Individuals approved for SNAP (Found eligible and received SNAP benefits in FY24)
- For the Federal FY24 (10/1/2023 – 9/30/2024)
- To include data collected on the application about the individual (key fields below but the request is not limited to these)
 - Case Number/Household Number
 - Name
 - Date of birth
 - SSN
 - Address
 - Phone

¹ See Memorandum for James C. Miller, Administrator, FNS, from Brett Siefers, Acting Deputy Inspector General for Audit, OIG, *Re: Evaluation of North Carolina's Use of Supplemental Nutrition Assistance Program Administrative Funds for Participants' Benefits* (May 29, 2025).

² See *id.*, Attachment.

³ See E-mail for Amanda Musgrove, Director, Office of Internal Controls, Audits, and Investigations, FNS, from Erin Grimm, Branch Chief, Office of Analytics and Innovation, OIG, *Re: Data Request: 27801-0005-22 – North Carolina SNAP Administrative Funds – DATA REQUEST* (May 30, 2025, 9:33 AM EDT).

- Email
- Citizenship
- Gender
- Race/Ethnicity
- Income
- Employment status
- Disability Status
- Asset Information
- Monthly benefit amount
- Approval date
- Start date
- Verification information (any fields that help the state verify the applicant information – SSN, name, address, income, etc.)

As stated in our June 5, 2025, e-mail to NC-DHHS,⁴ OIG is conducting its inspection pursuant to the Inspector General Act (IG Act).⁵ Pursuant to the IG Act, the Inspector General (IG) is required to conduct independent and objective audits, investigations, and inspections as the IG deems necessary or desirable.⁶ The IG Act authorizes OIG's access to the records and information summarized above "notwithstanding any other provision of law."⁷

As stated in our June 9, 2025, e-mail to NC-DHHS,⁸ OIG will protect the confidentiality of any records produced by NC-DHHS in compliance with applicable statutes, rules, and regulations. OIG will store the records on our network and data warehouse, which comply with the Federal Information Modernization Act of 2014.⁹ Further, in accordance with section 208 of the E-Government Act, OIG issued its privacy impact assessments (PIAs) for OIG's system(s) related to the request.¹⁰

In accordance with the Privacy Act of 1974 (Privacy Act),¹¹ OIG also has published its systems of records notices (SORN) in the Federal Register, which discuss the relevant administrative,

⁴ See E-mail for Rajeev K. Premakumar, Deputy General Counsel, NC-DHHS, from Cyrus Geranmayeh, Assistant Counsel to the Inspector General, OIG, *Re: 27801-0005-22 - Evaluation of North Carolina's Use of SNAP Funds of Participants' Benefits* (June 5, 2025, 6:26 PM EDT).

⁵ 5 U.S.C. §§ 401-424.

⁶ See *id.* §§ 402(b)(1), 406(a)(2).

⁷ See *id.* § 406(a)(1), (a)(3).

⁸ See E-mail for Rajeev K. Premakumar, Deputy General Counsel, NC-DHHS, from Cyrus Geranmayeh, Assistant Counsel to the Inspector General, OIG, *Re: 27801-0005-22 - Evaluation of North Carolina's Use of SNAP Funds of Participants' Benefits* (June 9, 2025, 2:22 PM EDT).

⁹ 44 U.S.C. § 3551, *et seq.*

¹⁰ See *id.* ch. 36. The PIAs are publicly available at <https://www.usda.gov/privacy-policy/privacy-impact-assessments>.

¹¹ 5 U.S.C. § 552a.

technical, and physical safeguards and the policies for retention and disposal of records.¹² The system of records applicable to this inquiry is “Office of Analytics and Innovation’s (OAI) Holistic Information Analytics and Visualization Environment (HIAVE) System, USDA/OIG–8.”¹³ OIG analytics staff and one contractor who manages our data warehouse system, all of whom have an official need for the information to perform their official duties, will have access to the data.

OIG intends to disclose summary data, without personally identifiable information (PII) of any individual, to the public via the inspection report. Summary data would include data counts or percentages and other relevant totals or statistics. OIG would process any request for additional information pursuant to the Privacy Act, as discussed in our relevant SORN, and therefore in accordance with applicable Federal laws. Further, in accordance with the Freedom of Information Act,¹⁴ prior to making reports publicly available, OIG reviews the report and applies redactions, as appropriate, to prevent the release of information exempt from disclosure by the FOIA.

On June 13, 2025, NC-DHHS requested OIG consolidate the prior written requests and communications regarding the above-referenced data request in a single formal document. This letter provides OIG’s response to the request.

If you have any questions or need additional information, please contact me at 816-926-7644 or craig.goscha@oig.usda.gov, or Dedra Chandler, Director, at 202-302-1987 or dedra.chandler@oig.usda.gov.

Sincerely,

Craig M. Goscha
Acting Assistant Inspector General for Analytics and Innovation

cc:

Rajeev K. Premakumar, Deputy General Counsel, NC-DHHS
Jerquitta Hicks-Smallwood, Assistant Director, Food and Nutrition Services Section, NC-DHHS
Amanda Musgrove, Director, Office of Internal Controls, Audits, and Investigations, FNS
Dedra Chandler, Director, Office of Audit, OIG
Shaquenta Morris, Assistant Director, Office of Audit, OIG
Cyrus Geranmayeh, Assistant Counsel, Office of Counsel, OIG

¹² See *Privacy Act of 1974; Systems of Records USDA/OIG—1 through USDA/OIG—9*, 87 Fed. Reg. 62,066 (Oct. 13, 2022).

¹³ See *id.* at 62,076.

¹⁴ 5 U.S.C. § 552.