



NC DEPARTMENT OF  
**HEALTH AND  
HUMAN SERVICES**

**JOSH STEIN** • Governor

**DEV DUTTA SANGVAI** • Secretary

**YVONNE COPELAND** • Director, Division of Child and Family Well-Being

June 27, 2025

Craig M. Goscha  
Acting Assistant Inspector General for Analytics and Innovation  
United States Department of Agriculture  
Office of Inspector General

Dear Mr. Goscha,

The North Carolina Department of Health and Human Services (NCDHHS) is in receipt of your June 18, 2025, letter requesting data from North Carolina's Food and Nutrition Service (FNS) Program. Specifically, your office requested detailed data of every individual in North Carolina who was approved for the Supplemental Nutrition Assistance Program (SNAP) during the Federal Fiscal Year 2024. Much of this information would include Personally Identifiable Information (PII) including name, date of birth, SSN, address, phone, citizenship, income, disability status, asset information, and monthly benefit amount. Given the sensitivity of the data your office is requesting, we appreciate your office engaging with NCDHHS on multiple occasions and the time you have given us to review your request in light of our obligation to keep this information private.

NCDHHS has an obligation to protect the PII of applicants for and beneficiaries of our State's FNS program. Pursuant to 7 USC 2020(e)(8), North Carolina is required to enter into a State Plan with the U.S. Department of Agriculture (USDA) that provides "safeguards which prohibit the use or disclosure of information obtained from applicant households[.]" 7 USC 2020(e)(8) does provide for sixteen (16) exceptions that allow disclosure, including to "persons directly connected with the administration or enforcement" of the program, the Comptroller General of the United States, and to "agencies of the Federal Government ... for purposes of collecting the amount of an overissuance[.]" However, neither the Office of the Inspector General (OIG) specifically, nor the purpose of the inspection identified in your May 29, 2025, engagement memorandum (Insp. No. 27801-0005-22), falls within any of these exceptions.

As you are certainly aware, failure by a state to comply with Federal law or to violate the provisions of its State Plan puts the state at risk of losing either part or all of its Federal Financial Participation. North Carolina is further required to turn over any program information (including individual applicant information) requested by the U.S. Secretary of Agriculture (Secretary) for the purpose of "inspection and audit." 7 USC 2020(a)(3)(B) This information would be turned over directly to the Secretary and subject to "data and security protocols agreed to by the State agency and Secretary[.]" 7 USC 2020(a)(3)(b)(i) Finally, N.C. Gen. Stat. § 108A-80 prohibits

**NC DEPARTMENT OF HEALTH AND HUMAN SERVICES • DIVISION OF CHILD AND FAMILY WELL-BEING**

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NCDHHS and the various county departments of social services from disclosing any “information concerning persons applying for or receiving public assistance ... except for the purposes directly connected with the administration of the programs[.]” Given these obligations under both Federal and State law, North Carolina was required to review and evaluate your request for sensitive PII of our most vulnerable populations carefully and thoroughly.

During various discussions, your staff has made clear that OIG is not requesting the information pursuant to 7 USC 2020(a)(3)(b) and has asserted that OIG is not subject to the safeguards provided in 7 USC 2020(e)(8). Instead, OIG asserts it has the power to request the information pursuant to the Inspector Generals Act, specifically 5 USC § 406(a)(1) & (a)(3). Further, your letter assures North Carolina that you will comply with the various Federal data privacy and security laws, including the Privacy Act of 1974.

In your letter you state that:

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.

NCDHHS has reviewed OIGs published Systems of Record Notices (SORNs) and, while the allowed disclosures are more broad than necessary for OIG to complete its work and meet its statutory reporting requirements (see specifically routine uses Nos. 10 & 12), they appear to be sufficient to protect North Carolina’s information from being improperly disclosed. Further, your letter assures NCDHHS that OIG will “[review any] report and [apply] redactions, as appropriate, to prevent the release of information exempt from disclosure by the FOIA.”

Based on the authority cited in your June 18, 2025, letter and the privacy assurances made therein, NCDHHS has determined that disclosure of the requested information, including any PII, can be done without violating its obligations under State and Federal law. NCDHHS expects that OIG will keep the information provided safe, secure, and will not redisclose this information to any other Federal, state, local, or private entities without (1) a lawful reason to do so, and (2) notice of the disclosure to NCDHHS. We trust that this information request is solely for the purpose described in your May 29, 2025, memo.

NCDHHS staff will work with your staff to coordinate the actual exchange of data in the form and format that you require. Further, as North Carolina utilizes a state-county system to operate its social service and public benefit programs, NCDHHS will be providing notice of this data request and NCDHHS’s compliance with the request to the county director of each county’s department of social services. This notice will go out prior to any data exchange.

North Carolina looks forward to working with the USDA Office of Inspector General to complete this inspection and to showcasing the hard work of our program staff, at both the State and county level. If you have any questions or need any further information, please contact Jerquitta Hicks Smallwood at (919) 707-5619 or [jerquitta.smallwood@dhhs.nc.gov](mailto:jerquitta.smallwood@dhhs.nc.gov).

Sincerely,

Signed by:  
  
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Yvonne Copeland

Director  
Division of Child and Family Well-Being  
North Carolina Department of Health and Human Services