

NC Department of Health and Human Services
Division of Child and Family Well-Being
Untimely Supplemental Nutrition Assistance Program Payments
Raleigh, NC



Performance Audit Report

October 2025

State Auditor
Dave Boliek

A Constitutional Office of the
State of North Carolina





North Carolina Office of the State Auditor
Dave Boliek, State Auditor

Auditor's Transmittal

The Honorable Josh Stein, Governor
The Honorable Phil Berger, President Pro Tempore
The Honorable Destin Hall, Speaker of the House
Honorable Members of the North Carolina General Assembly
Dr. Devdutta Sangvai, Secretary, Department of Health and Human Services
Yvonne Copeland, Director, Division of Child and Family Well-Being

To all:

Our performance audit of the SNAP program in North Carolina found tens of millions of dollars in financial assistance payments to recipients were delayed in recent years, and corrective actions were never taken in response.

The top finding in our report shows that during the period January 1, 2021, through December 31, 2024, North Carolinians were delayed in receiving approximately \$83 million in financial assistance. In total, there were over 290,000 SNAP benefit payments that were not made within the timeframe standards set by the federal government.

Oversight and administration of SNAP benefits in North Carolina ultimately falls under the North Carolina Department of Health and Human Services (DHHS), Division of Child and Family Well-Being. When a county Department of Social Services office fails to meet federal timeliness requirements, the Division of Child and Family Well-Being has the authority to enforce corrective actions. Our audit found DHHS leadership made the decision not to issue formal corrective actions between February 1, 2020, and December 31, 2024.

The lack of corrective action occurred when several counties issued as many as 20-25% of benefit payments in an untimely manner.

Recommendations for DHHS and the Division of Child and Family Well-Being to take include having consistent monitoring of the timeliness of county SNAP benefit payments, enforcing corrective actions, and ensuring access to data necessary to administer and monitor SNAP benefit payments.

I'd like to thank the staff and leadership at DHHS and the Division of Child and Family Well-Being for their assistance in conducting this performance audit.

Respectfully submitted,

Dave Boliek
State Auditor

Executive Summary

The Office of the State Auditor (OSA) has completed a performance audit in accordance with Chapter 147, Article 5A of the North Carolina General Statutes concerning the timeliness of Supplemental Nutrition Assistance Program (SNAP)¹ benefit payments by the Food and Nutrition Services Program overseen by the Department of Health and Human Services, Division of Child and Family Well-Being.

SNAP provides benefits to low-income families to support their food budget to increase food security, reduce hunger, and improve access to nutritious food. SNAP benefits are funded by the federal government, while states cover costs of administering the program.



The U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS) administers the Supplemental Nutrition Assistance Program (SNAP) at the federal level, setting the rules and guidelines, and authorizing and monitoring retailers that accept SNAP benefits.

In North Carolina, SNAP is administered by state and local agencies. SNAP applications are certified by county Department of Social Services (DSS) offices. The Department of Health and Human Services (Department), Division of Child and Family Well-Being (Division) is **ultimately responsible** for the administration of SNAP in accordance with federal law, including ensuring that SNAP benefit payments are **issued timely**.

The Food and Nutrition Act of 2008² sets specific deadlines within which SNAP applications must be processed. Specifically, all eligible households must receive SNAP benefits within **30 days** of application or **seven days** if eligible for expedited service.³ USDA FNS requires that at least **95%** of applications be processed within these timeframes.⁴

During the period January 1, 2021, through December 31, 2024, the state of North Carolina certified **3.7 million** SNAP benefit applications⁵ and paid approximately **\$15.7 billion** in SNAP benefit payments.

¹ Known as the Supplemental Nutrition Assistance Program (SNAP) at the federal level. It is historically known as the Food Stamp program.

² Food and Nutrition Act of 2008, Section 11.

³ These households are determined to be in "immediate need." Includes households with less than \$150 in monthly gross income, less than \$100 in liquid resources like cash or checking account funds, or migrant or seasonal farmworkers with little to no income at the time of application.

⁴ [SNAP - Updated Guidance for Improving State Agency Application Processing Timeliness Rates](#).

⁵ Includes initial applications, expedited applications, and all recertifications.

Executive Summary (Continued)

Objective:

The objective of this audit was to:



Determine whether the Department of Health and Human Services, Division of Child and Family Well-Being **ensured that SNAP benefit payments were made timely** during the period of January 1, 2021, through December 31, 2024.

Finding:

SNAP benefit payments were not always made **timely**⁶ during the period January 1, 2021, through December 31, 2024. Specifically,

- 98% of SNAP benefit payments were timely during the period January 1, 2021, through December 31, 2021.
- 91% of SNAP benefit payments were timely during the period January 1, 2022, through December 31, 2024.⁷



While the state-wide performance in issuing SNAP benefit payments was not significantly below the required USDA FNS federal timeliness standard (**95%**), several counties issued as many 20-25% of benefit payments in an untimely manner.

As a result, approximately **\$83 million**⁸ of financial assistance meant to help North Carolinians with limited incomes purchase food were not received when needed.

SNAP help families with children, elderly people, and those with disabilities with limited incomes supplement their budgets so they can purchase food. Receiving these benefits timely allow these recipients to purchase food allowing them to spend more of their budgets on other basic needs, such as housing, electricity, and medical care. When payments are delayed, it can have a major effect on the day-to-day lives of North Carolinians.

In 2024,⁹ more than 66% of SNAP participants were families with children, more than 34% were families with older or disabled adults, and more than 46% were working families.¹⁰

⁶ USDA FNS required that at least **95%** of applications be processed within **30 days** of application or **seven days** if eligible for expedited service.

⁷ See Appendix for detailed list of SNAP benefit payment timeliness by county.

⁸ According to the Department, there were approximately \$15.7 billion of SNAP benefit payments during the scope period. The Division was **unable to provide** the actual dollar value attached to the late payments. To estimate, auditors calculated the approximate dollar amount of late payments using the average North Carolina payment amount of \$287 for all late payments.

⁹ Federal fiscal year (October 1, 2023, through September 30, 2024).

¹⁰ [snap factsheet north carolina.pdf](#).

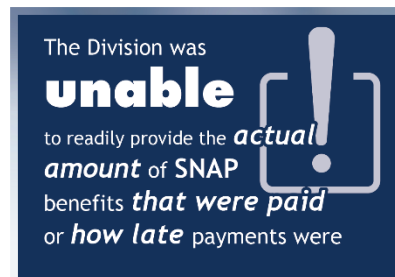
Executive Summary (Concluded)

Recommendations:

- ① To ensure SNAP benefit payments are timely, the Division should **consistently systematically** monitor the timeliness of county SNAP benefit payments including the **enforcement of corrective actions**. Specifically, the Division should identify counties that do not issue SNAP benefit payments in accordance with the federal timeliness standard, collaborate with counties on identifying the root causes of untimeliness, require performance improvement plans to address the root causes of untimeliness, and **enforce corrective actions** with those counties in accordance with the county Memorandum of Understanding.

As part of its monitoring activities, the Division should identify what county DSS offices that are issuing SNAP benefit payments timely are doing well. These 'best practices' should be used in developing performance improvement plans and **corrective actions** to drive improvement at lower performing county DSS offices.

- ② Division management should ensure it readily has access to the data necessary to effectively administer and monitor SNAP benefits in North Carolina. This includes knowing the **extent (how late)** of untimely SNAP benefits and the **amount** of SNAP benefits paid in North Carolina, including the amount paid untimely. For example, for untimely payments, the Division does not know whether the SNAP benefit payments were paid one day late or 30 or more days late.



Having quality information is necessary to effectively administer and monitor a program. Obtaining and analyzing the **extent (how late)** of untimely payments and/or the **amount** of SNAP benefit payments paid by each county could assist with the Division's monitoring and oversight of SNAP. Knowing how late SNAP benefit payments are, rather than just the fact that they're late, could assist the Division in allocating resources to focus on counties with larger number of significantly late payments. This is important because the consequences of delays grow more severe with time, especially for individuals relying on these benefits to eat. Food is a daily, non-deferrable need. **These counties may be deemed higher-risk and warrant additional monitoring, oversight, and corrective actions.**

According to the U.S. Government Accountability Office, management should obtain data, such as the extent of the delays in SNAP benefits paid by each county, on a timely basis so that they can be used for effective monitoring. Quality information is necessary to make informed decisions and to evaluate the entity's performance in achieving key objectives and addressing risks.¹¹

¹¹ United States Government Accountability Office, Standards for Internal Control in the Federal Government, September 2014, § 13.04 & 13.05.



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Chapter 147, Article 5A of the North Carolina General Statutes gives the Auditor broad powers to examine all books, records, files, papers, documents, and financial affairs of every state agency and any organization that receives public funding. The Auditor also has the power to summon people to produce records and to answer questions under oath.



Background

Supplemental Nutrition Assistance Program:

The Food and Nutrition Services (SNAP)¹² program provides benefits to low-income families to support their food budget to increase food security, reduce hunger, and improve access to nutritious food. SNAP benefits are funded by the federal government, while states cover costs of administering the program.



The U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS) administers SNAP at the federal level, setting the rules and guidelines, and authorizing and monitoring retailers that accept SNAP benefits.

In North Carolina, SNAP is administered by state and local agencies. The Department of Health and Human Services (Department), Division of Child and Family Well-Being (Division) is ultimately responsible for SNAP. The Division is responsible for:

- General program administration.
- Policy development.
- Program integrity and Quality Control.

The Division has delegated the certification of SNAP applications and issuance of SNAP benefit payments to county Department of Social Services (DSS) offices. There is one county DSS office in every county to ensure applicants and beneficiaries are served in the county in which they reside.

In 2024, SNAP helped 1,415,600 North Carolinians, representing 1 in 8 (13%) of the state's residents. Within North Carolina, more than 66% of SNAP participants are in families with children, more than 34% are in families with older or disabled adults, and more than 46% are in working families.¹³

County DSS offices gather application information, perform interviews, and submit documentation for SNAP benefit applicants to the Division through NC FAST.¹⁴ Eligibility for SNAP benefits is determined by income, household size, assets, and many other factors. Applicant eligibility determinations are made electronically within NC FAST.

If approved, funds are automatically issued to the applicant on an electronic benefit transfer (EBT) card by a third-party vendor. To continue to receive SNAP benefits, recipients must apply for and have their eligibility recertified every six months.¹⁵

¹² The Food and Nutrition Services (FNS) program is known as the Supplemental Nutrition Assistance Program (SNAP) at the federal level. It is historically known as the Food Stamp program.

¹³ [snap factsheet north carolina.pdf](#).

¹⁴ North Carolina Families Accessing Services through Technology (NC FAST). The system used by the Department, Division, and County DSS offices to share information.

¹⁵ This requirement was waived during the COVID-19 Public Health Emergency and was reinstated in January 2022.

The Food and Nutrition Act of 2008¹⁶ requires that all eligible households receive SNAP benefits timely. Specifically, the law requires that all eligible households receive SNAP benefits within **30 days** of application or within **seven days** for those eligible for expedited service.¹⁷ Further, the FNS federal timeliness standard requires that **at least 95%** of applications be processed within these timeframes.¹⁸ This applies to initial applications, expedited applications and all recertifications.

SNAP Monitoring Activities

The Department has Memorandums of Understanding (MOUs) with all 100 county DSS offices. The MOU outlines the mandated performance requirements for SNAP, as well as the monitoring and enforcement responsibilities of the Department. If county DSS offices do not meet mandated performance requirements, such as certifying SNAP applications timely, the Department has the ability to develop performance improvement plans and enforce corrective actions including withholding state and/or federal funding. The Department's monitoring activities are performed by the Department's Division of Social Services as part of the Continuous Quality Improvement (CQI) cycle.

While SNAP responsibilities are shared by state and local agencies, the Division maintains ultimate responsibility for administering SNAP in accordance with federal law, including ensuring that payments are issued timely.¹⁹

During the period January 1, 2021, through December 31, 2024, the state of North Carolina certified **3.7 million** SNAP benefit applications²⁰ and paid approximately **\$15.7 billion** in SNAP benefit payments.

Responsible parties discussed in this report include:

North Carolina Department of Health and Human Services, Division of Child and Family Well-Being (Division) – The Division is responsible for the general administration of the SNAP, including program integrity, policy guidance, and technical assistance in the state of North Carolina.



County Division of Social Services (DSS) Offices – County DSS offices are responsible for eligibility determination and the issuance of benefits to eligible households. County DSS offices are subject to the Division's oversight, monitoring, and enforcement to ensure the SNAP is administered in accordance with federal law.

¹⁶ Food and Nutrition Act of 2008, Section 11.

¹⁷ These households are determined to be in "immediate need." Includes households with less than \$150 in monthly gross income, less than \$100 in liquid resources like cash or checking account funds, or migrant or seasonal farmworkers with little to no income at the time of application.

¹⁸ [SNAP - Updated Guidance for Improving State Agency Application Processing Timeliness Rates](#).

¹⁹ Food and Nutrition Act of 2008.

²⁰ Includes initial applications, expedited applications, and all recertifications.

U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS) – The USDA FNS administers SNAP, and benefits are 100% federally funded. The USDA FNS sets the rules and guidelines and authorizing and monitoring retailers that accept Food and Nutrition Services Program benefits. USDA FNS works with state agencies to ensure eligible individuals and households can make informed decisions about applying for the program and access nutrition assistance benefits. USDA FNS also provides technical assistance as needed.



Findings and Recommendations



\$83 Million of Food and Nutrition Services SNAP Benefits Not Paid Timely

Food and Nutrition Services Program (SNAP)²¹ benefit payments were not always made **timely** during the period January 1, 2021, through December 31, 2024.²² Because a portion of SNAP benefit payments were not made timely, North Carolinians were delayed in receiving approximately \$83 million²³ in needed financial assistance.

SNAP helps families with children, elderly people, and those with disabilities with limited incomes supplement their budgets so they can purchase food. Receiving these benefits timely allow these recipients to purchase food allowing them to spend more of their budgets on other basic needs, such as housing, electricity, and medical care. When payments are delayed, it can have a major effect on the day-to-day lives of North Carolinians.

In 2024,²⁴ more than 66% of SNAP participants were families with children, more than 34% were families with older or disabled adults, and more than 46% were working families.²⁵

The Food and Nutrition Act of 2008²⁶ requires that all eligible²⁷ households receive SNAP benefits timely. Specifically, the law requires that all eligible households receive SNAP benefits within **30 days** of application or within **seven days** for those eligible for expedited service.²⁸ Further, the United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) federal timeliness standard requires that **at least 95%** of applications be processed within these timeframes.²⁹ This applies to initial applications, expedited applications and all recertifications.

During the period January 1, 2021, through December 31, 2021, auditors found that, generally, SNAP benefit payments **were** made timely. According to USDA reports, North Carolina issued 466,737 (**98%**)³⁰ of SNAP benefit payments in accordance with the federal timeliness standard.³¹ See Table 1, on the following page.

²¹ Officially referred to as the Food and Nutrition Services Program in North Carolina and as the Supplemental Nutrition Assistance Program (SNAP) at the federal level. It is historically known as the **Food Stamp program**.

²² See Appendix for detailed list of SNAP benefit payment timeliness by county.

²³ There were approximately \$15.7 billion of SNAP benefit payments during the scope period. The Division was **unable to provide** the actual dollar value attached to the late payments. To estimate, auditors calculated the approximate dollar amount of late payments using the average North Carolina payment amount of \$287 for all late payments.

²⁴ Federal fiscal year (October 1, 2023, through September 30, 2024).

²⁵ [snap factsheet north carolina.pdf](#).

²⁶ Food and Nutrition Act of 2008, Section 11.

²⁷ Determined by income, household size, assets, and many other factors.

²⁸ These households are determined to be in "immediate need." Includes households with less than \$150 in monthly gross income, less than \$100 in liquid resources like cash or checking account funds, or migrant or seasonal farmworkers with little to no income at the time of application.

²⁹ [SNAP - Updated Guidance for Improving State Agency Application Processing Timeliness Rates](#).

³⁰ There were a total of 477,386 applications during the period January 1, 2021, through December 31, 2021.

³¹ Requires at least 95% of eligible households to receive SNAP benefits within **30 days** of application or within **seven days** for those eligible for expedited service.

Findings and Recommendations

Table 1: Application Timeliness by Type
January 1, 2021 – December 31, 2021

	Initial (within 30 days)	Expedited (within 7 days)	Recertifications (within 30 days)	Totals
2021				
Timely Applications	180,148	90,307	196,282	466,737
Untimely Applications	6,627	2,563	1,459	10,649
Percent Timely	96%	97%	99%	98%
Totals	186,775	92,870	197,741	477,386

Source: Auditor Analysis of Division data.

However, this was substantially due to the USDA waiving eligibility recertification requirements for most SNAP benefit recipients due to the COVID-19 public health emergency. Normally, SNAP benefit recipients must apply for and have their eligibility recertified every six months to continue to receive benefits.³²

During the period January 1, 2022, through December 31, 2024, once the recertification requirement was reinstated, auditors found that SNAP benefit payments **were not** made timely. According to USDA reports, North Carolina issued 2.9 million (**91%**)³³ of SNAP benefit payments in accordance with the federal timeliness standard. See Table 2 below and Chart 1 on the next page for the trend of SNAP benefit payment timeliness during the entire scope period.

Table 2: Application Timeliness by Type
January 1, 2022 – December 31, 2024

	Initial (within 30 days)	Expedited (within 7 days)	Recertifications (within 30 days)	Totals
2022				
Timely Applications	250,678	150,612	471,303	872,593
Untimely Applications	28,618	4,484	48,623	81,725
Percent Timely	90%	97%	91%	91%
2023				
Timely Applications	258,712	153,626	622,364	1,034,702
Untimely Applications	29,490	6,500	63,237	99,227
Percent Timely	90%	96%	91%	91%
2024 (*)				
Timely Applications	274,043	160,614	624,877	1,059,534
Untimely Applications	32,662	22,816	44,159	99,637
Percent Timely	89%	88%	93%	91%
Totals				
Total Timely	783,433	464,852	1,718,544	2,966,829
Total Untimely	90,770	33,800	156,019	280,589
Total Applications	874,203	498,652	1,874,563	3,247,418
Total % Timely	90%	93%	92%	91%

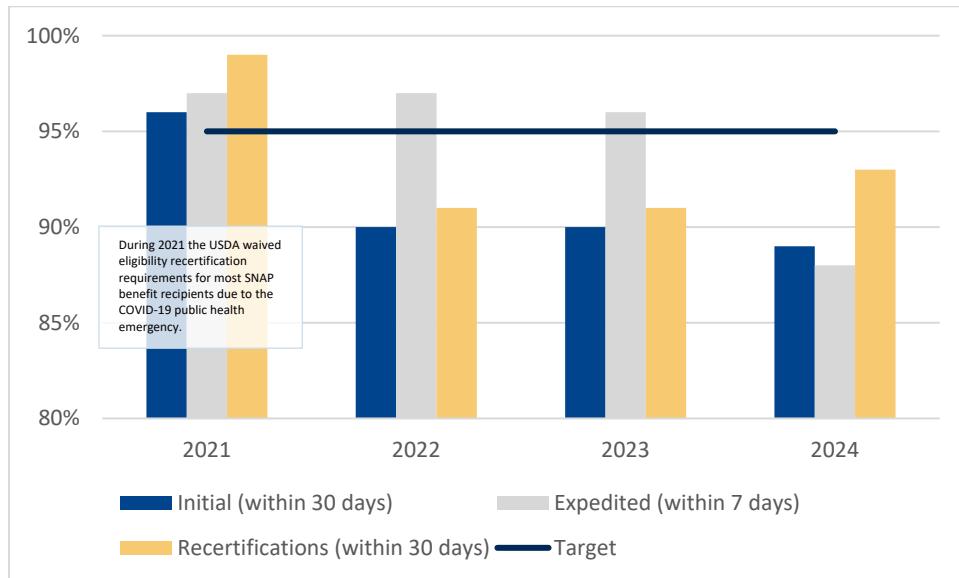
Source: Auditor Analysis of Division data.

(*) During November 2024, the USDA allowed NC a waiver to extend certification periods for recertifications for three months resulting in decreased recertification applications.

³² This requirement was reinstated in January 2022.

³³ There was a total of 3.2 million applications during the period January 1, 2022, through December 31, 2024.

Chart 1: SNAP Benefit Payment Timeliness Trend
January 1, 2021 - December 31, 2024



While the state-wide performance in issuing SNAP benefit payments timely was not significantly below the required USDA FNS federal timeliness standard (**95%**), several counties issued as many 20-25% of benefit payments in an untimely manner.

In an effort to identify common factors driving untimely SNAP benefit payments, auditors identified the seven counties performing the worst in regard to meeting the federal timeliness standard during the period January 1, 2022, through December 31, 2024. See Table 3 below.

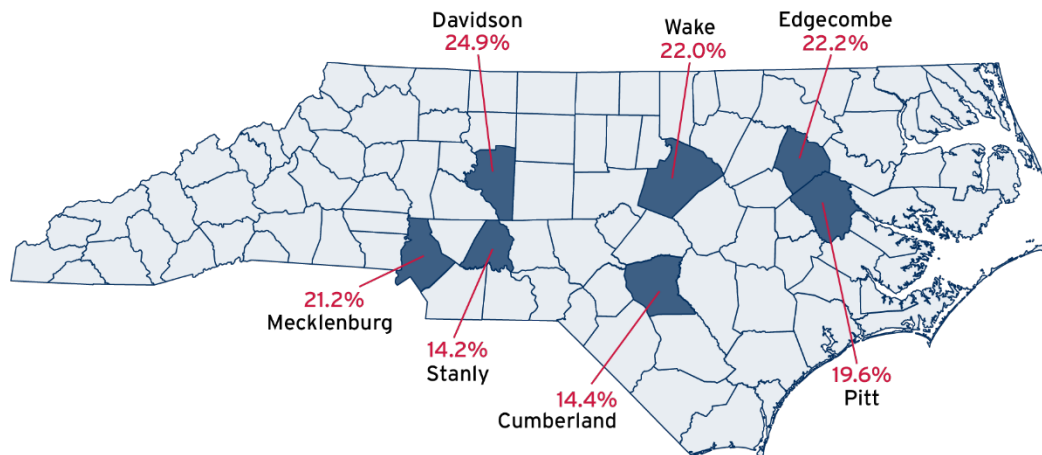
Table 3: Untimeliness by County
January 1, 2022 – December 31, 2024

County	Total Applications ³⁴	Timely Applications	Untimely Applications	Untimely (%)
Davidson	61,562	46,232	15,330	24.9%
Edgecombe	35,560	27,675	7,885	22.2%
Wake	177,031	138,086	38,945	22.0%
Mecklenburg	336,209	264,824	71,385	21.2%
Pitt	80,511	64,710	15,801	19.6%
Cumberland	182,969	156,647	26,322	14.4%
Stanly	22,136	18,990	3,146	14.2%

Source: Auditor Analysis of Division data.

(*) During November 2024, the USDA allowed NC a waiver to extend certification periods for recertifications for three months resulting in decreased recertification applications. Data does not include August 2024; county breakdown was unavailable.

³⁴ Total Applications included all initial (non-expedited and expedited) and recertification applications from January 1, 2022, through December 31, 2024.



While the Division monitors and tracks the timeliness of SNAP benefit payments made in North Carolina, it does not track and therefore does not know the extent of untimely SNAP benefit payments (**how late the payments were**). For example, for Davidson County, the Division does not know whether the SNAP benefit payments were paid one day late or 30 days late.

Knowing how late SNAP benefit payments were, rather than just the fact that they're late, could assist the Division in allocating resources to focus on counties with larger number of later payments. This is important because the consequences of delays grow more severe with time, especially since these individuals are relying on these benefits to eat. Food is a daily, non-deferrable need. **Counties with a larger proportion of significantly late payments may be deemed higher-risk and warrant additional monitoring, oversight, and corrective actions.**

Resulted in \$83 Million of Financial Assistance Not Received by North Carolinians Timely.

Because SNAP benefit payments were not made timely, North Carolinians were delayed in receiving approximately \$83 million³⁵ in needed financial assistance.

The financial assistance received from SNAP helps families with children, elderly people, and those with disabilities with limited incomes supplement their budgets so they can purchase food. Receiving these benefits timely allow these recipients to purchase food allowing them to spend more of their budgets on other basic needs, such as housing, electricity, and medical care.

In 2024,³⁶ more than 66% of SNAP participants were families with children, more than 34% were families with older or disabled adults, and more than 46% were working families.³⁷

³⁵ According to the Department, there were approximately \$15.7 billion of SNAP benefit payments during the scope period. The Division was **unable to provide** the actual dollar value attached to the late payments. To estimate, auditors calculated the approximate dollar amount of late payments using the average North Carolina payment amount of \$287 for all late payments.

³⁶ Federal fiscal year (October 1, 2023, through September 30, 2024).

³⁷ [snap_factsheet_north_carolina.pdf](#).

When payments are delayed, it can have a major effect on the day-to-day lives of North Carolinians. A March 2024 news article³⁸ reported on the impact delays in receiving SNAP benefit payments were having on families and the elderly. One parent was quoted as saying “How can we feed our children?” Another individual cited in the article stated that they recently spoke to a woman in her 80s who told her that she had not eaten in two days.

SNAP Benefit Payments Were Not Timely for Three Reasons

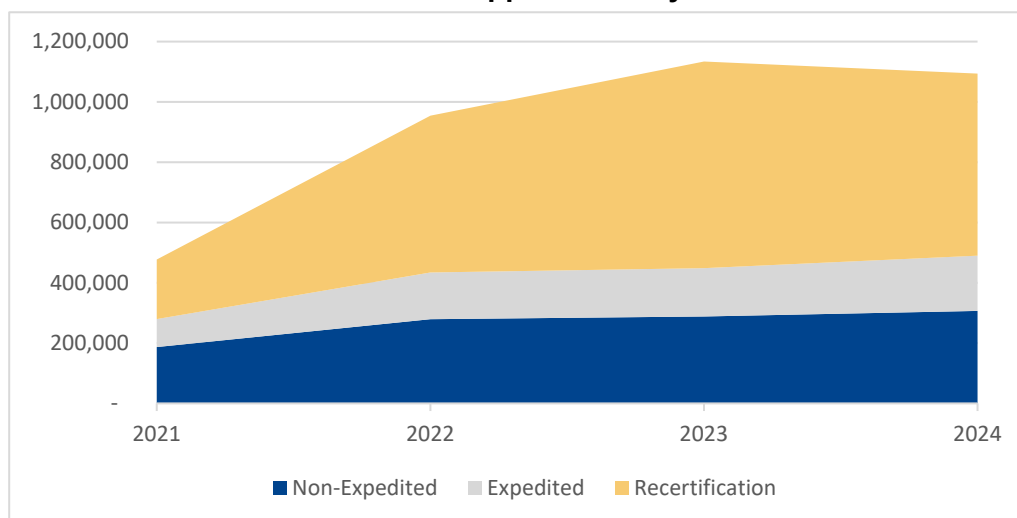
Food and Nutrition Services Program benefit payments were not issued timely for three reasons.

First, there was an overall increase in SNAP benefit applications beginning in January 2022. Recertification applications increased significantly starting in January 2022 when the USDA waiver of eligibility recertification requirements was rescinded. During the COVID-19 public health emergency, North Carolina received a waiver from the USDA to allow most SNAP recipient households to continue to receive benefits without having to recertify every six months as normally required by federal rules. Recertifications were required to resume in January 2022.

Additionally, Division management stated that the volume of SNAP applications peaked in the summer months of 2022, with June through August 2022 averaging 75,000 new applications each month. According to Division management, the increase in application for food assistance occurred while food inflation reached record-high levels. Food prices increased by 9.9% in 2022 (faster than any year since 1979). It is likely that many families felt the impact of rising grocery costs on their budgets and turned to SNAP to help supplement their ability to pay for food.

See Chart 2 below depicting the total number of SNAP applications during the period January 1, 2021, through December 31, 2024, by application type.

Chart 2: Applications by Year



Source: Auditor Analysis of Division data

³⁸ <https://www.charlotteobserver.com/news/local/article286754395.html>.

Findings and Recommendations

Second, the Division did not ensure that development plans were instituted, or corrective actions were developed or enforced for county Department of Social Services (DSS) offices when SNAP benefit payments did not meet the timeliness requirements established in the Memorandum of Understanding (MOU). The MOUs give the Division the authority and ability to institute development plans and enforce corrective actions (including withholding state and/or federal funding) on county DSS offices when SNAP benefit payments are not timely. However, the Division did not take any formal corrective actions related to the MOU performance measures during the period February 2020, through December 2024.³⁹

The Division stated that prior to January 1, 2025, county DSS offices were still required to meet the requirements outlined in the MOU between the Department and county DSS offices, such as the 95% timeliness requirement for SNAP benefit payments. However, Department leadership made the decision not to issue formal corrective actions related to MOU performance between February 1, 2020, and December 31, 2024. This decision was made at first due to the impact of COVID-19 on daily business operations and then continued due to ongoing barriers that counties faced (including increases in requests for safety net services, Medicaid unwinding, Medicaid expansion, Tailored Plan launch, and workforce shortages).

Third, county DSS offices reported workforce challenges had a big impact on the timeliness of SNAP benefit payments especially considering the increase in applications that were received. Auditors reviewed documentation for six⁴⁰ of the lowest performing counties during the period January 1, 2022, through February 29, 2024. All six reported significant challenges related to recruiting, retaining, compensating and training employees. According to Mecklenburg County, even if new staff members are added it “takes approximately nine months for new FNS [SNAP] staff to get up to speed.”

Federal Law Required SNAP Benefit Payments to be Timely

Federal law⁴¹ required SNAP benefit payments to be made timely. Initial applications and recertifications must be completed within **30 days** of application or within **seven days** for those eligible for expedited service.⁴²

Further, USDA guidelines (federal timeliness standard) specifically required at least 95% of SNAP benefit payments to be made within the above timeframes.⁴³

Recommendations

- ① To ensure SNAP benefit payments are timely, the Division should **consistently systematically** monitor the timeliness of county SNAP benefit payments including the **enforcement of corrective actions**. Specifically, the Division should identify counties that do not issue SNAP benefit payments in accordance with the federal timeliness standard, collaborate with counties on identifying the root causes of untimeliness, require performance improvement plans to address the root causes of untimeliness, and **enforce corrective actions** with those counties in accordance with the county Memorandum of Understanding.

³⁹ The Division initially planned to reinstate corrective actions beginning January 2024; however, the timeline was adjusted to January 2025.

⁴⁰ Wake County was excluded from the cause evaluation due to participation in a concurrent USDA audit.

⁴¹ The Food and Nutrition Act of 2008 (also known as Public Law 88-525).

⁴² Food and Nutrition Act 2008, Section 11.

⁴³ [SNAP - Updated Guidance for Improving State Agency Application Processing Timeliness Rates](#).

As part of its monitoring activities, the Division should identify what county DSS offices that are issuing SNAP benefit payments timely are doing well. These ‘best practices’ should be used in developing performance improvement plans and **corrective actions** to drive improvement at lower performing county DSS offices.

- ② Division management should ensure it readily has access to the data necessary to effectively administer and monitor SNAP benefits in North Carolina. This includes knowing the **extent (how late)** of untimely SNAP benefits and the **amount** of SNAP benefits paid in North Carolina, including the amount paid untimely. For example, for untimely payments, the Division does not know whether the SNAP benefit payments were paid one day late or 30 or more days late.

Having quality information is necessary to effectively administer and monitor a program. Obtaining and analyzing the **extent (how late)** of untimely payments or the **amount** of SNAP benefit payments paid by each county could assist with the Division’s monitoring and oversight of SNAP. Knowing how late SNAP benefit payments are, rather than just the fact that they’re late, could assist the Division in allocating resources to focus on counties with larger number of significantly late payments. This is important because the consequences of delays grow more severe with time, especially for individuals relying on these benefits to eat. Food is a daily, non-deferrable need. **These counties may be deemed higher-risk and warrant additional monitoring, oversight, and corrective actions.**

According to the U.S. Government Accountability Office, management should obtain data, such as the extent of the delays in SNAP benefits paid by each county, on a timely basis so that they can be used for effective monitoring. Quality information is necessary to make informed decisions and to evaluate the entity’s performance in achieving key objectives and addressing risks.⁴⁴

⁴⁴ United States Government Accountability Office, Standards for Internal Control in the Federal Government, September 2014, § 13.04 & 13.05.



Objectives, Scope, and Methodology



The objective of this audit was to determine whether the Department of Health and Human Services (Department), Division of Child and Family Well-Being (Division) **ensured that SNAP benefit payments were made timely** during the period of January 1, 2021, through December 31, 2024.

To achieve the audit objective, auditors:

- Reviewed laws and regulations relevant to SNAP and SNAP benefit payments.
- Reviewed performance measures instituted by the U.S. Department of Agriculture (USDA), Food Nutrition Service (FNS) for timeliness of SNAP benefit payments.
- Interviewed Division personnel.
- Reviewed Division policies and procedures for (1) certifying SNAP benefit applications, and (2) monitoring and enforcing federal and state laws and regulations relevant to SNAP.
- Reviewed Division management evaluations and technical assistance meeting reports of county DSS offices and any applicable performance improvement plans or corrective action plans.
- Reviewed USDA FNS management evaluations of county DSS offices any applicable performance improvement plans or corrective action plans.
- Reviewed and analyzed monthly SNAP benefit certification timeliness data at the county level.

Whenever sampling was used, auditors applied a risk-based, nonstatistical approach. Therefore, results could not be projected to the population. This approach was determined to adequately support audit conclusions.

Because of the test nature and other inherent limitations of an audit, together with limitations of any system of internal and management controls, this audit would not necessarily disclose all performance weaknesses or lack of compliance.

This audit was designed to identify, for those programs, activities, or functions included within the scope of the audit, deficiencies in internal controls significant to our audit objectives. As a basis for evaluating internal control, auditors applied the internal control guidance contained in professional auditing standards. However, our audit does not provide a basis for rendering an opinion on internal control, and consequently, we have not issued such an opinion.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.



Appendix

**Highest 10 Counties in Overall % Timely
2021 - 2024**

County Name	Total Applications & Recertifications			Applications		Recertifications (*)(**)
	Processed	Timely	% Timely	Regular	Expedited	
ALLEGHANY	3,899	3,884	99.6%	98.8%	98.9%	100.0%
PERQUIMANS	5,825	5,796	99.5%	99.4%	98.6%	99.7%
CHEROKEE	11,476	11,418	99.5%	99.3%	98.7%	99.8%
BLADEN	18,749	18,643	99.4%	99.4%	98.6%	99.6%
MCDOWELL	20,358	20,233	99.4%	98.9%	98.9%	99.8%
ANSON	16,279	16,178	99.4%	99.5%	98.1%	99.7%
MADISON	7,711	7,663	99.4%	99.2%	97.3%	99.8%
DAVIE	11,598	11,518	99.3%	99.0%	99.3%	99.5%
WILKES	28,586	28,382	99.3%	98.9%	97.6%	99.9%
MITCHELL	5,856	5,813	99.3%	98.8%	97.3%	99.8%

**Lowest 10 Counties in Overall % Timely
2021 - 2024**

County Name	Total Applications & Recertifications			Applications		Recertifications (*)(**)
	Processed	Timely	% Timely	Regular	Expedited	
DAVIDSON	61,578	46,236	75.1%	82.1%	87.7%	68.0%
EDGECOMBE	35,639	27,709	77.7%	73.7%	68.1%	80.9%
MECKLENBURG	336,260	264,856	78.8%	69.2%	88.9%	80.8%
PITT	80,579	64,739	80.3%	74.0%	79.3%	84.1%
WAKE	203,908	164,326	80.6%	82.1%	89.0%	76.3%
CUMBERLAND	183,000	156,664	85.6%	92.5%	89.9%	80.6%
STANLY	22,139	18,990	85.8%	89.1%	96.2%	81.6%
ROWAN	51,545	44,282	85.9%	93.3%	94.4%	80.4%
PENDER	18,374	15,954	86.8%	84.9%	93.2%	86.2%
SCOTLAND	25,234	22,499	89.2%	93.0%	94.2%	86.5%

**Overall % Timely by County
(Alphabetical Listing)
2021 - 2024**

County Name	Total Applications & Recertifications			Applications		Recertifications (*)(**)
	Processed	Timely	% Timely	Regular	Expedited	
ALAMANCE	61,495	60,160	97.8%	96.2%	97.0%	98.8%
ALEXANDER	11,494	11,342	98.7%	98.4%	97.5%	99.2%
ALLEGHANY	3,899	3,884	99.6%	98.8%	98.9%	100.0%
ANSON	16,279	16,178	99.4%	99.5%	98.1%	99.7%
ASHE	9,525	9,362	98.3%	98.8%	99.4%	98.0%
AVERY	4,679	4,631	99.0%	98.3%	98.0%	99.5%
BEAUFORT	22,886	22,406	97.9%	96.7%	97.0%	98.7%
BERTIE	11,544	11,440	99.1%	98.9%	95.1%	99.9%
BLADEN	18,749	18,643	99.4%	99.4%	98.6%	99.6%
BRUNSWICK	37,387	36,983	98.9%	97.9%	99.5%	99.3%
BUNCOMBE	85,596	83,755	97.8%	97.1%	97.1%	98.5%
BURKE	30,896	30,331	98.2%	98.2%	98.7%	98.0%
CABARRUS	58,345	55,496	95.1%	94.4%	96.6%	95.1%
CALDWELL	34,059	32,779	96.2%	95.0%	97.3%	96.7%
CAMDEN	2,135	2,093	98.0%	97.3%	96.3%	99.0%
CARTERET	18,163	17,779	97.9%	97.2%	97.4%	98.4%
CASWELL	10,182	10,067	98.9%	98.5%	96.3%	99.5%
CATAWBA	58,569	57,851	98.8%	98.7%	98.0%	99.1%
CHATHAM	13,122	12,847	97.9%	97.2%	97.3%	98.4%
CHEROKEE	11,476	11,418	99.5%	99.3%	98.7%	99.8%
CHOWAN	6,993	6,869	98.2%	97.1%	97.1%	98.9%
CLAY	3,628	3,572	98.5%	98.5%	96.8%	98.8%
CLEVELAND	54,141	52,463	96.9%	96.4%	96.1%	97.4%
COLUMBUS	30,136	29,291	97.2%	96.0%	94.6%	98.2%
CRAVEN	34,973	33,892	96.9%	96.5%	95.3%	97.6%
CUMBERLAND	183,000	156,664	85.6%	92.5%	89.9%	80.6%
CURRITUCK	4,534	4,218	93.0%	90.0%	90.6%	95.6%
DARE	6,911	6,851	99.1%	99.5%	98.1%	99.2%
DAVIDSON	61,578	46,236	75.1%	82.1%	87.7%	68.0%
DAVIE	11,598	11,518	99.3%	99.0%	99.3%	99.5%
DUPLIN	22,587	21,798	96.5%	95.1%	97.3%	97.1%
DURHAM	91,572	83,107	90.8%	90.5%	94.6%	89.8%
EDGECOMBE	35,639	27,709	77.7%	73.7%	68.1%	80.9%
FORSYTH	148,101	138,200	93.3%	91.5%	94.8%	93.8%
FRANKLIN	22,593	22,341	98.9%	98.9%	98.1%	99.1%
GASTON	98,359	96,047	97.6%	96.2%	98.1%	98.2%
GATES	3,718	3,658	98.4%	96.4%	95.7%	99.6%
GRAHAM	3,498	3,366	96.2%	95.2%	93.9%	97.4%

County Name	Total Applications & Recertifications			Applications		Recertifications (*)(**)
	Processed	Timely	% Timely	Regular	Expedited	
GRANVILLE	18,371	18,107	98.6%	96.8%	96.6%	99.7%
GREENE	9,130	8,776	96.1%	97.1%	93.5%	96.2%
GUILFORD	236,561	226,687	95.8%	94.9%	97.0%	95.8%
HALIFAX	37,141	36,380	98.0%	97.3%	94.5%	98.9%
HARNETT	45,650	44,561	97.6%	97.9%	95.9%	97.9%
HAYWOOD	20,721	20,365	98.3%	97.4%	97.0%	99.1%
HENDERSON	25,251	24,252	96.0%	96.9%	97.6%	95.2%
HERTFORD	14,565	14,257	97.9%	98.3%	91.3%	99.0%
HOKE	23,174	21,955	94.7%	92.6%	88.1%	97.5%
HYDE	2,181	2,124	97.4%	97.7%	90.5%	98.7%
IREDELL	35,543	34,171	96.1%	93.6%	98.9%	97.4%
JACKSON	11,582	11,387	98.3%	98.0%	96.6%	99.0%
JOHNSTON	64,544	63,685	98.7%	98.0%	98.4%	99.1%
JONES	4,508	4,340	96.3%	95.3%	90.8%	97.9%
LEE	21,797	21,383	98.1%	97.4%	97.4%	98.7%
LENOIR	34,644	33,201	95.8%	95.1%	94.8%	96.5%
LINCOLN	25,017	24,427	97.6%	97.7%	99.1%	97.2%
MACON	10,042	9,925	98.8%	98.4%	96.8%	99.5%
MADISON	7,711	7,663	99.4%	99.2%	97.3%	99.8%
MARTIN	12,329	11,976	97.1%	95.1%	91.0%	99.0%
MCDOWELL	20,358	20,233	99.4%	98.9%	98.9%	99.8%
MECKLENBURG	336,260	264,856	78.8%	69.2%	88.9%	80.8%
MITCHELL	5,856	5,813	99.3%	98.8%	97.3%	99.8%
MONTGOMERY	9,782	9,699	99.2%	98.7%	98.1%	99.6%
MOORE	25,376	25,076	98.8%	97.8%	98.8%	99.3%
NASH	43,025	40,738	94.7%	91.1%	88.2%	97.7%
NEW HANOVER	72,018	70,484	97.9%	96.7%	97.9%	98.5%
NORTHAMPTON	11,893	11,776	99.0%	97.8%	97.8%	99.7%
ONSLow	52,164	48,736	93.4%	90.2%	94.4%	95.3%
ORANGE	27,331	24,612	90.1%	91.6%	93.9%	87.9%
PAMLICO	4,497	4,376	97.3%	97.8%	94.6%	97.7%
PASQUOTANK	18,622	18,353	98.6%	97.7%	96.8%	99.4%
PENDER	18,374	15,954	86.8%	84.9%	93.2%	86.2%
PERQUIMANS	5,825	5,796	99.5%	99.4%	98.6%	99.7%
PERSON	16,688	16,493	98.8%	99.0%	98.1%	98.9%
PITT	80,579	64,739	80.3%	74.0%	79.3%	84.1%
POLK	5,105	5,028	98.5%	99.2%	97.1%	98.5%
RANDOLPH	53,775	49,116	91.3%	93.1%	94.2%	89.7%
RICHMOND	33,091	32,832	99.2%	98.7%	99.0%	99.5%
ROBESON	102,993	95,070	92.3%	91.4%	88.6%	93.7%
ROCKINGHAM	42,609	42,278	99.2%	99.0%	97.3%	99.8%
ROWAN	51,545	44,282	85.9%	93.3%	94.4%	80.4%
RUTHERFORD	32,588	32,140	98.6%	98.5%	99.0%	98.6%

Appendix

County Name	Total Applications & Recertifications			Applications		Recertifications (*)(**)
	Processed	Timely	% Timely	Regular	Expedited	
SAMPSON	29,271	28,654	97.9%	97.5%	95.8%	98.5%
SCOTLAND	25,234	22,499	89.2%	93.0%	94.2%	86.5%
STANLY	22,139	18,990	85.8%	89.1%	96.2%	81.6%
STOKES	14,597	13,715	94.0%	96.2%	96.4%	92.3%
SURRY	29,258	28,537	97.5%	97.3%	96.3%	98.0%
SWAIN	4,951	4,867	98.3%	97.6%	97.3%	99.2%
TRANSYLVANIA	8,801	7,994	90.8%	92.0%	93.4%	89.5%
TYRRELL	1,676	1,658	98.9%	98.8%	97.1%	99.3%
UNION	45,797	43,024	93.9%	89.4%	91.4%	97.3%
VANCE	30,632	28,797	94.0%	94.4%	93.6%	93.9%
WAKE	203,908	164,326	80.6%	82.1%	89.0%	76.3%
WARREN	10,589	10,489	99.1%	98.2%	97.0%	99.7%
WASHINGTON	6,942	6,850	98.7%	98.8%	98.1%	98.7%
WATAUGA	6,785	6,520	96.1%	96.1%	86.5%	97.7%
WAYNE	56,212	52,927	94.2%	93.8%	91.3%	94.9%
WILKES	28,586	28,382	99.3%	98.9%	97.6%	99.9%
WILSON	41,629	40,796	98.0%	97.2%	97.5%	98.5%
YADKIN	11,565	11,080	95.8%	95.6%	96.2%	95.8%
YANCEY	6,896	6,793	98.5%	97.1%	97.9%	99.2%

(*) August 2024 recertification data by county was unavailable.

(**) Due to Hurricane Helene, in November 2024, NC received a USDA waiver to extend recertification periods for three months.

Appendix county summary data is based on Auditor Analysis of data provided by Division.



State Auditor's Response

The Office of the State Auditor (OSA) is required to provide additional explanation when an agency's response could potentially cloud an issue, mislead the reader, or inappropriately minimize the importance of the auditor findings.

Generally Accepted Government Auditing Standards state,

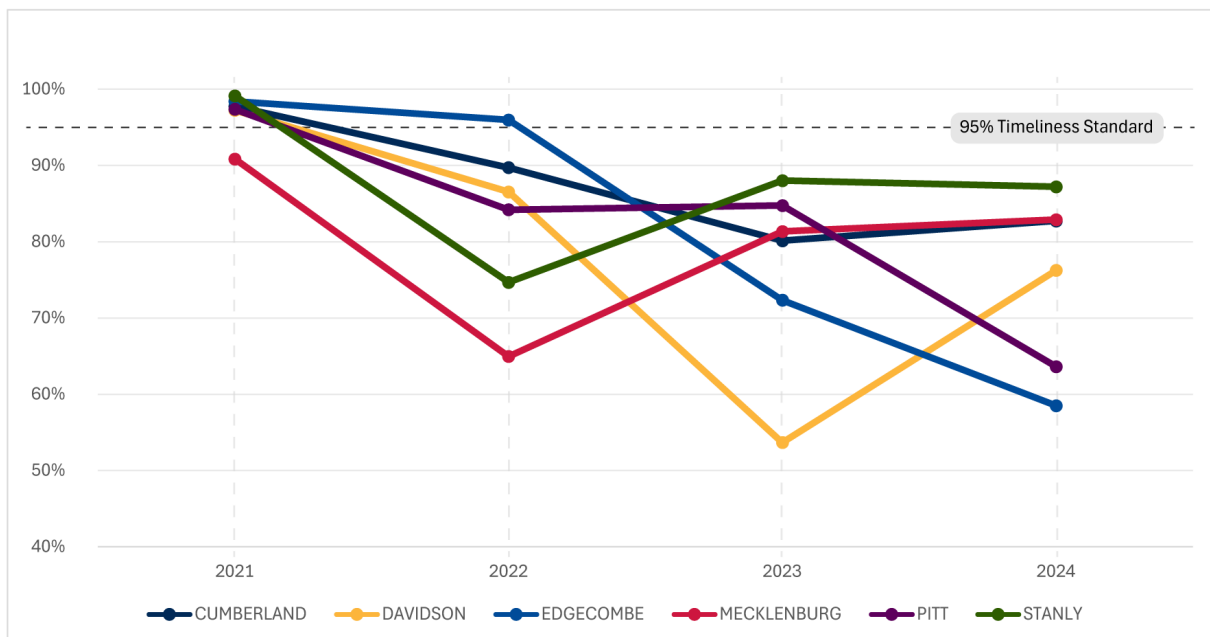
When the audited entity's comments are inconsistent or in conflict with the findings, conclusions, or recommendations in the draft report, the auditors should evaluate the validity of the audited entity's comments. If the auditors disagree with the comments, they should explain in the report their reasons for disagreement.

The Department of Health and Human Services, Division of Child and Family Well-Being (Division) response included statements that could **mislead the reader** or **minimize the importance** of the auditor findings. To ensure availability of complete and accurate information, OSA offers the following clarifications.

FIRST, in its response to Recommendation 1, the Division described the State DSS Continuous Quality Improvement Specialists (CQIS) program and stated that the process was performed during the entire audit scope.

While OSA acknowledges that the CQIS process was conducted, OSA **questions the effectiveness** of CQIS monitoring without formally requiring or taking corrective action (as recommended in this audit report). Specifically, during the time that the CQIS process continued, timeliness **did not improve** to the 95% timeliness standard at any of the lowest performing counties cited in this audit. In fact, in some cases, timeliness worsened and did not improve back to even the 90% timeliness threshold while under the CQIS program. See below.

Average SNAP Payment Timeliness: 2021 to 2024



State Auditor's Response

SECOND, in its response to Recommendation 2, the Division disagreed with the part of the recommendation to analyze the **amount** of SNAP benefits that were untimely. In its response, the Division stated:

- Tracking and analyzing untimely benefit amounts will not have a significant impact on addressing the root causes of untimely certifications.
- They are not able to track or analyze the untimely benefit payment amounts
- Additional funding would be necessary to track and evaluate untimely benefit payment amounts.

OSA's recommendation was made because having ready access to data of the dollar **amount** of untimely payments could assist with the Division's **monitoring and oversight** of SNAP. For example, the Division may determine that counties with **higher dollar amounts** of untimely payments are higher-risk and warrant additional monitoring, oversight, and corrective actions than those with lower dollar amounts of untimely payments. OSA's recommendation was not made for the Division to be better able to identify root causes of untimeliness in each county.

To be clear, the Division is responsible for the general administration of SNAP, including program integrity, policy guidance, and technical assistance in the state of North Carolina. However, currently the Division is **not readily able to provide** the actual **amount of SNAP benefits paid** in North Carolina, let alone the **amounts that were paid untimely**.



Response from the Department of Health and Human Services



NC DEPARTMENT OF
**HEALTH AND
HUMAN SERVICES**

JOSH STEIN • Governor

DEVPUTTA SANGVAI • Secretary

MICHAEL LEIGHS • Deputy Secretary for Opportunity and Well-Being

Untimely Supplemental Nutrition Assistance Program Payments Performance Audit Report Response

The North Carolina Department of Health and Human Services, Division of Child and Family Well-Being (NCDHHS/DCFW) is responsible for the supervision of the Supplemental Nutrition Assistance Program (SNAP), known as the Food and Nutrition Services (FNS) program in North Carolina, which includes general program administration, policy development, program integrity, and quality control. SNAP must be administered in accordance with federal law, which includes application timeliness standards. In authorizing and establishing SNAP in North Carolina, N.C. Gen. Stat. § 108A-51 delegates responsibility for local administration and operations of the program to the county departments of social services. This delegated responsibility includes application processing and eligibility determinations, which can be highly technical given the complexity of SNAP's eligibility and allotment calculation rules. North Carolina's program administration structure is unique as one of only ten county-administered SNAP states in the country.

DCFW accepts the Office of State Auditor's (OSA) finding that SNAP benefit payments were not always made timely during the period of January 1, 2021 through December 31, 2024. During that period, North Carolina processed 3.7 million applications and recertifications for SNAP benefits, which infused \$15.7 billion in federal investment into our economy and directly into the hands of North Carolinians.

SNAP supplements the food purchasing power of low-income, food-insecure households, sustaining and promoting their well-being and positive health outcomes. It is one of North Carolina's vital poverty-ameliorating programs, reaching North Carolinians in all 100 counties of our state. The Center on Budget and Policy Priorities estimated that 238,000 North Carolinians, including 101,000 children, were lifted above the poverty line per year between 2015 and 2019, on average, due to participation in SNAP.

OSA's Performance Audit Report recognizes that in 2024, SNAP continued to serve many of North Carolina's most vulnerable residents, with more than 66% of SNAP households including families with children, and more than 34% of households including families with older or disabled adults. SNAP is also a key nutritional support for North Carolina's working families, with more than 46% of households participating in work but still struggling to meet their nutritional needs without the

NC DEPARTMENT OF HEALTH AND HUMAN SERVICES • OFFICE OF THE SECRETARY

LOCATION: 1915 Health Services Way, Raleigh, NC 27607

MAILING ADDRESS: 2001 Mail Service Center, Raleigh, NC 27699-2001

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program's support. Food insecurity is a reality for many North Carolina families, and 10.9% of North Carolinians have been assessed as having limited access to adequate food due to lack of money and resources.

We agree that when payments for these benefits are delayed, it can have a major effect on the day-to-day lives of North Carolinians, especially on our most food insecure households. Recognizing this, it is a priority for DCFW to ensure timely payments of SNAP benefits.

Overall, North Carolina remained close to the USDA's 95% timeliness standard during this period. According to OSA's estimates, approximately \$83 million in benefits were not delivered on time to North Carolina families over the four-year span during a time when North Carolina distributed \$15.7 billion in benefits statewide.

Although the USDA considers an application processing timeliness rate of 95% and above to be acceptable, a margin of error recognizing the complexity of administering SNAP's application timelines, DCFW understands that even a single untimely certification can have real consequences. It might mean a missed meal for a child or a difficult choice for an older adult between filling a prescription and putting food on the table. We recognize that reality, and it underscores the vital role SNAP plays in helping North Carolinians achieve the positive health outcomes that reflect our state's commitment to its residents. Given SNAP's vital role in our State, OSA's recommendations are welcome.

Below is our response to the audit findings and recommendations, including completed and planned corrective actions.

Finding: Food and Nutrition Services Program (SNAP) benefit payments were not always made timely during the period January 1, 2021, through December 31, 2024.

Recommendation 1:

To ensure SNAP benefit payments are timely, the Division should consistently systematically monitor the timeliness of county SNAP program benefit payments including the enforcement of corrective actions. Specifically, the Division should identify counties that do not issue SNAP benefit payments in accordance with the federal timeliness standard, collaborate with counties on identifying the root causes of untimeliness, require performance improvement plans to address the root causes of untimeliness, and enforce corrective actions with those counties in accordance with the county Memorandum of Understanding.

As part of its monitoring activities, the Division should identify what county DSS offices that are issuing SNAP benefit payments timely are doing well. These 'best

practices' should be used in developing performance improvement plans and corrective actions to drive improvement at lower performing county DSS offices.

NCDHHS/DCFWS Response to Recommendation 1:

DCFWS agrees that SNAP benefits were not always issued timely and that corrective action enforcement should be reinstated. While we acknowledge OSA's full recommendation, we want to highlight the oversight that DCFWS, in partnership with the Division of Social Services (DSS), performed throughout the review period.

The Department resumed corrective action enforcement activities for failure to meet timeliness performance requirements effective April 2025. Corrective actions may include, but are not limited to, withholding state and/or federal funding when appropriate and feasible. The Department had suspended formal corrective actions starting February 1, 2020 due to the impact of the COVID-19 public health emergency and its impact on daily county operations. The Department continued to stay formal corrective action enforcement after the public health emergency due, in part, to the increased pressures on county DSS. During this time, counties were required to perform mass eligibility redeterminations in the Medicaid program, they were working to enroll 600,000 newly eligible North Carolinians as part of Medicaid expansion, and Tailored Plans were launched as part of Medicaid. At the same time, USDA reinstated many program requirements in SNAP, which had been waived during the public health emergency. Throughout this time, counties were dealing with major workforce shortages in the staff who determine eligibility and enroll North Carolinians in both Medicaid and SNAP.

Despite not formally taking corrective action under our Memorandums of Understanding (MOUs) with all 100 county DSS offices during this temporary suspension, DCFWS was still actively engaged in oversight of county application processing timeliness. The process for state DSS oversight, which has been and continues to be in place, is summarized below.

State DSS Continuous Quality Improvement Specialists (CQIS) receive weekly FNS application reports and monthly FNS recertification reports from NC FAST, the state's IT system for FNS and other benefit and health access programs. Specialists review the FNS Dashboard to obtain real time data regarding FNS applications and recertification timeliness. Specialists are located regionally in the State and host monthly touchpoint meetings with the counties within their region. Continuous Quality Improvement Specialists also conduct biannual in-person regional meetings to train counties on priority issues identified through data analysis.

During monthly touchpoint meetings, the specialists meet with county leadership to discuss FNS timeliness performance. Counties meeting federal requirements are documented. If a county's timeliness is between 90% and 95%, the specialists:

- discuss the timeliness trends in detail,

Response from the Department of Health and Human Services

- work with the counties to determine the root cause(s) of processing delays,
- provide recommendations,
- and support the counties with applying recommendations to improve performance.

If a county is below 90% timeliness, the CQIS has an initial touchpoint with the county to discuss timeliness performance and implements the same process above with weekly (versus monthly) follow-up meetings to track the county's progress, determine whether strategies need to change, and identify improvement trends. The CQI program manager tracks underperforming counties to determine if additional measures are needed.

In addition, the Department has more recently implemented the above weekly follow-up oversight with all counties that fall below 90% timeliness as of August 2025.

Because the CQI process is in the scope of the Department's State DSS portfolio, state DSS leadership is in regular communication with DCFW leadership on all measures being taken to provide support to counties who are not meeting timeliness standards. This is a collaborative effort where state DSS staff provides technical assistance to the counties and DCFW provides policy guidance and regulatory oversight.

We agree with OSA that reviewing 'best practices' from counties that are consistently meeting USDA timeliness standards is important for the Department's monitoring activities. While recognizing that North Carolina's counties may have unique challenges when serving their residents' needs, assessing and implementing 'best practices' from counties that are consistently above USDA timeliness thresholds is central to our monitoring work. Consistent with OSA's recommendations, it will continue to be so.

Date of Implementation: NCDHHS resumed corrective action enforcement activities under the terms of the MOUs for failure to meet timeliness performance requirements in April of 2025.

Responsible for Implementation: Allison Smith, Deputy Director, Division of Social Services, Economic and Family Services, NCDHHS

Recommendation 2:

Division management should ensure it readily has access to the data necessary to effectively administer and monitor SNAP program benefits in North Carolina. This includes knowing the extent (how late) of untimely SNAP program benefits and the amount of SNAP program benefits paid in North Carolina, including the amount paid untimely. For example, for untimely payments, the Division does not know whether the SNAP benefit payments were paid one day late or 30 or more days late.

Having quality information is necessary to effectively administer and monitor a program. Obtaining and analyzing the extent (how late) of untimely payments or the amount of SNAP benefit payments paid by each county could assist with the Division's monitoring and oversight of the SNAP program. Knowing how late SNAP benefit payments are, rather than just the fact that they're late, could assist the Division in allocating resources to focus on counties with larger number of significantly late payments. This is important because the consequences of delays grow more severe with time, especially for individuals relying on these benefits to eat. Food is a daily, non-deferrable need. These counties may be deemed higher-risk and warrant additional monitoring, oversight, and corrective actions.

According to the U.S. Government Accountability Office, management should obtain data, such as the extent of the delays in SNAP benefits paid by each county, on a timely basis so that they can be used for effective monitoring. Quality information is necessary to make informed decisions and to evaluate the entity's performance in achieving key objectives and addressing risks.

NCDHHS/DCFV Response to Recommendation 2:

NCDHHS/DCFV agrees with this recommendation, in part.

After reviewing this recommendation, DCFV determined that current systems will allow us to monitor and track the degree of untimeliness, measured as the number of days exceeding SNAP certification processing timelines. Thus, DCFV will monitor this metric and incorporate it into our oversight and assessment of counties that are not compliant with USDA timeliness standards. We will review this metric in assessing different strategies a county may employ to clear a backlog in certifications.

DCFV disagrees with OSA's recommendation to analyze the amount of SNAP benefits that are untimely. The underlying problem is timeliness of the eligibility determination or recertification processes. Tracking and analyzing untimely benefit amounts will not have a significant impact on addressing the root causes of untimely certification practices and processes. It is also not a USDA performance measure for assessing SNAP application processing timeliness rates. Further, NC FAST is not programmed to track or analyze untimely benefit payment amounts and DCFV would need additional funding to begin tracking and evaluating this metric.

SNAP benefit allotment calculations are primarily a function of household size, income, and allowable deductions, e.g., medical expense deductions for older or disabled adults. There is no correlation between certification application timeliness and benefit allotment amounts. Thus, benefit amount is neither an indicator nor a factor affecting timeliness issues. However, DCFV does agree that tracking the degree of untimeliness will be beneficial to overall monitoring.

Response from the Department of Health and Human Services

Date of Implementation: NCDHHS will begin monitoring and tracking the degree of untimeliness, measured as the number of days exceeding SNAP certification timelines, as of November 2025.

Responsible for Implementation: Jerquitta Hicks-Smallwood, Assistant Director, Division of Child and Family Well-Being, Food and Nutrition Services Section.

Conclusion:

NCDHHS/DCFW appreciates OSA's report, which highlights the significant impact that SNAP has on North Carolina's families in addressing food insecurity in North Carolina. We agree with OSA that food is a daily, non-deferrable need. SNAP addresses that fundamental need for North Carolina's most vulnerable households. During the period of January 1, 2021 through December 31, 2024, approximately \$15.7 billion in SNAP benefit payments were made to North Carolina families. Those benefits help put nutritious food on the kitchen tables of North Carolina's families to supplement their grocery budget. Those benefits also put money into the North Carolina economy, which includes 9,300 USDA-authorized retailers that accept SNAP benefits. Timeliness of SNAP applications and recertifications are a top priority for NCDHHS/DCFW and we appreciate OSA's assessment and recommendations to ensure that all North Carolinians receive their benefits timely.

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