



**North Carolina Department of Health and Human Services
Division of Social Services**

Pat McCrory
Governor

Richard O. Brajer
Secretary

Wayne E. Black
Director

September 2, 2015

Jane Duffield, Chief
State Administration Branch
Program Accountability and Administrative Division
Supplemental Nutrition Assistance Program
U.S. Department of Agriculture
Food and Nutrition Service
3101 Park Center Drive, Room 818
Alexandria, VA 22302

RE: Comments on the Proposed Revisions to the FNS-366B
Federal Register Number: 2015-16476

Dear Ms. Duffield:

Thank you for the opportunity to comment on the proposed revisions to the FNS-366B. North Carolina has several concerns about the proposed revisions. Much of the proposed information is not currently available in our automated systems. Collection and reporting this information will cause great hardship on the State, or may even be impossible to capture with any accuracy. We feel that the proposed collection of information is not necessary for the proper performance of the functions of the agency. The following items are the main issues we face with these modifications to the report:

Section E., (g) (Investigation Costs) and (h) (Investigation FTE)

North Carolina is a State-supervised and County-administered Social Services model. Each of the 100 counties within North Carolina has a unique structure and they determine who in their county performs investigations and how this work is conducted. The proposed information (Investigation Costs and FTEs) is not captured in any current state or county reporting system. The investigators work on multiple cases of varying types including IHE, IPV, AE, Medicaid, and TANF throughout the complete investigative process. Many counties in the State do not have dedicated fraud staff. Staff must split their time between investigations and other program duties. It will be a burden on the State and counties to obtain this information for this report.

Section F. (f) – Cost Savings

This information is not available in the North Carolina Program Integrity claims management system. This claims management system is separate from the program case management system used throughout the State. This information could be affected by several factors and is difficult, if not impossible, to be provided with any degree of accuracy.

Section G. (f) – Cost Savings

As stated above, this information is difficult, if not impossible, to be provided with any degree of accuracy.

Section G. (h) – Reclaimed for ADH

North Carolina is unable to capture information regarding individuals who are referred, but no action by prosecutor and reclaimed for ADH. Our claims management system does not track this data.

www.ncdhhs.gov • www.ncdhhs.gov/dss
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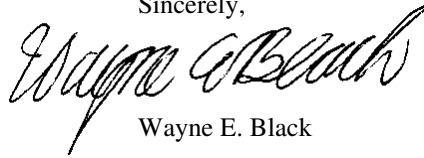
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Thank you again for the opportunity to share our concerns about the proposed revisions to the FNS-366B. North Carolina is very concerned that these changes will place a great hardship on our already limited resources if these changes are implemented. If you have further questions, please contact Robin Register at Robin.Register@dhhs.nc.gov or at 919-527-6268.

Sincerely,

A handwritten signature in black ink, appearing to read "Wayne E. Black". The signature is fluid and cursive, with the first name "Wayne" being more prominent and the last name "Black" following in a similar style.

Wayne E. Black

WEB:rr/bm