FoodShare Unclear Information Resource Guide

DHS/DMS/BEOT Training

April 2025

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The Webinar Scenarios included on pages 10-16 will be discussed during the webinar training, please disregard these during the FoodShare Unclear Introduction training.

Definitions

Hold	The information and associated page element are not used in the FoodShare (FS) eligibility determination. The information is addressed at the next SMRF or renewal.
Act	To use information on the case in the FS eligibility determination (send the VCL or confirm the change).
Clear Information	The information is verified or not questionable and the impact on the case is clear. When the information is clear the worker can process and confirm the change on the case.
	Example: Marina applied for FS and is eligible for benefits starting September 12th. At the time of application, she did not have earned income and had an exemption from the FS work requirement. The FS Type category is HREG, and she will need to complete a SMRF in 6 months.
	On December 9th, Marina submits a change report through ACCESS, to inform the agency that she started working at Shells Gift Shop in October. The change report includes her last 30 days paystubs as verification. In this situation, the change was reported before the next certification period, and it is considered clear.
Unclear Information	Unclear information is not verified, or partially verified, and additional verification is needed to process and confirm the change. When the information is unclear the worker will need to determine the next steps for processing and/or holding the change until the next SMRF or renewal.
	Example: Dessie applied for FS and is eligible for benefits starting October 3rd. At the time of application, he was working at Farmer's Liability Inc. and was meeting the FS work requirement. The FS Type category is HCAT (HH is above 130% of FPL), and he will need to complete a SMRF in 6 months.
	On February 17th Dessie's local agency receives a handwritten letter by mail. Dessie wrote "In November of this year, I went to the casino and won a payout of about $7,500. I have spent the earnings here and there." No other information was provided.
	The worker updates the Begin Month to February on the Lottery or Gambling page. Then selects "Hold" on the collapsible field. The worker then can run and confirm eligibility. A verification checklist will not be sent. This is unclear because the verification provided gave an estimate of earnings rather than a specific amount.

|	
Significantly Conflicting At The Time of Certification	Information that was required to be provided at the application, SMRF, or renewal, and was omitted by the applicant or member, or worker error. This includes information that was mis-reported or misrepresented, and if it was correct, it would have made them ineligible.
	Example: Maury says he has been working off and on for the last five-years for his cousin's auto body shop. He never reported this employment at application or renewal. This is considered to be significantly conflicting information, and the worker sends a VCL to verify this unclear information.
Information Known To The Agency	Information that is received from a data match, third party, or household member. Not all known information is considered verified upon receipt.
Verified Upon Receipt	Information provided by a reliable source that is considered accurate and does not require further verification, allowing the agency to take immediate action based on that information. Changes reported by a member that do not require further verification, and changes for which adequate verification has already been submitted are also considered verified upon receipt.
Impact On Case Is Clear	There are enough required details to make an eligibility determination (confirm the case), even if there is no change in benefit amount. The reported changes are used in the eligibility determination.
FoodShare Held Information Summary Page	The CWW page where workers can access all held information.
Two Calendar Months	The information is less than two (full) calendar months old, from when the change becomes known to the agency.
	Example 1: In September, a third party provides unclear information to the agency regarding a change that is required to be reported. The information does not significantly conflict with what was used at application or renewal. The worker looks at the information and it is from June. It is considered old information, because it is older than two calendar months (August and July) from when it was reported. The unclear information is then held until SMRF or renewal. **Example 2:** In September, a third party provides unclear information to the agency regarding a change that is required to be reported. The information does not significantly conflict with what was used at application or renewal. The worker looks at the information and it is from August. It is considered new information, because it is less than two calendar months from when we received it. The worker sends a VCL asking for verification of the unclear information.

Data Exchanges

Data exchanges that workers have access to are not all considered verified upon receipt. When the data exchange is verified upon receipt, the information is considered clear, you must act by processing the information and confirming the case.

For all other data exchanges, decide whether the best course of action is to act by sending a VCL or holding the information reported by the data exchange.

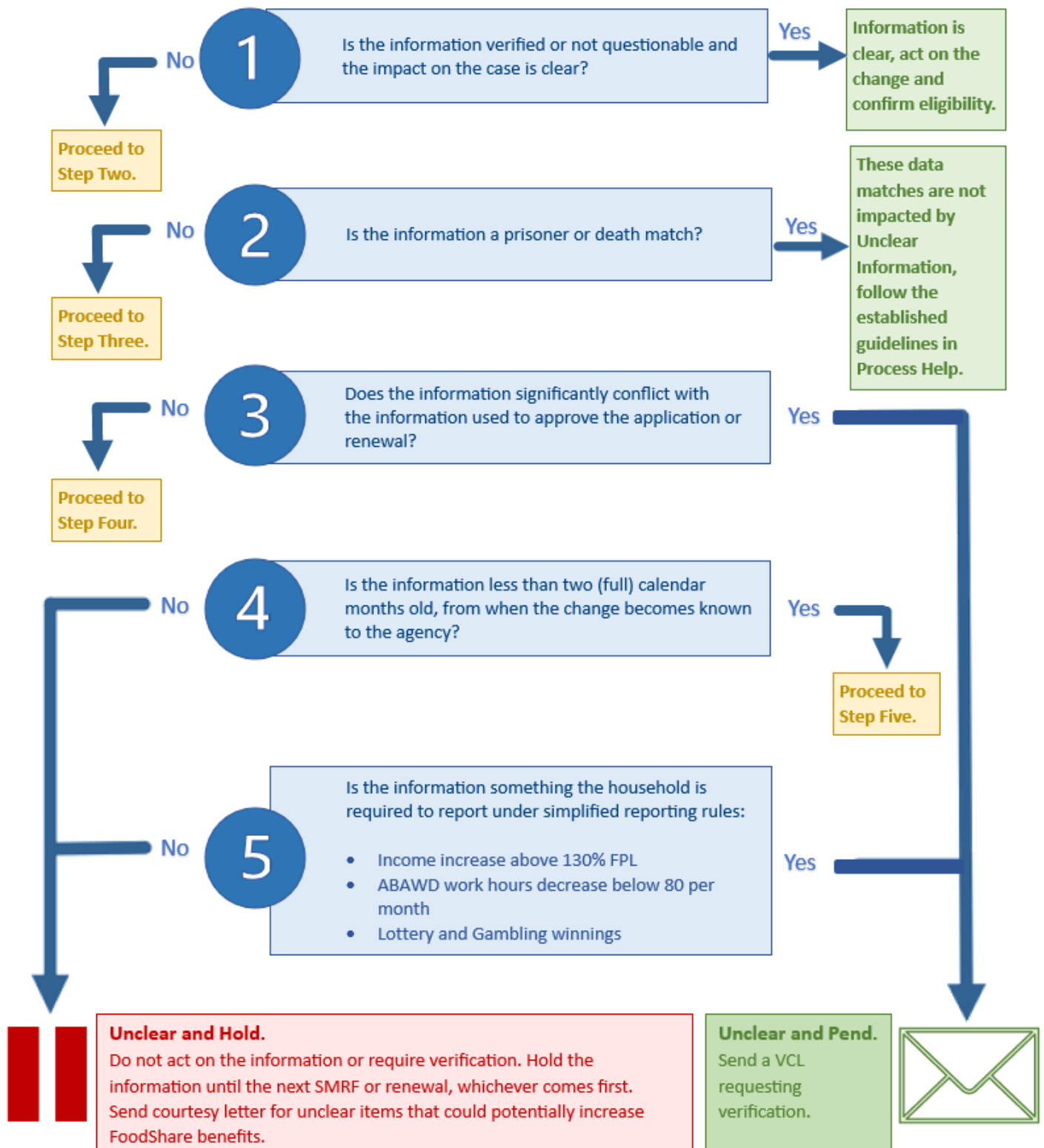| Source	Purpose	Verified upon Receipt	Act or Hold
Social Security Administration (BENDEX)	Verifies: Social Security Numbers, Medicare information, Social Security Income and Supplemental Security Income payments, citizenship, identity, date of birth, name, date of death, forty quarters of work, and incarceration data.	Yes	Act
SOLQI State Online Query - Internet Based	SOLQI web service initiates at applications, renewals/reviews, person add, and program adds to verify SSNs and other Social Security information.	Yes	Act
Employer Verification of Health Insurance (EVHI)	Information about employer policies related to employer sponsored health insurance.	Yes	Act
Low Income Home Energy Assistance Program LIHEAP/WHEAP	Information about energy assistance payments from Wisconsin Department of Administration (DOA)	Yes	Act
Disability Determination Bureau (DDB)	Information about disability from the Wisconsin Disability Determination Bureau (DDB)	Yes	Act
Unemployment Insurance Benefits (UIB)	Information about unemployment insurance benefits from DWD.	Yes	Act
Vital Records Death Record Query	Information for individuals whose death has been reported to Wisconsin Vital Records Office.	Yes	Act
Vital Records Birth Query	Information about residency, citizenship, and identity from DHS. This is for individuals born in Wisconsin.	Yes	Act
Federal Data Services Hub (FDSH) (Immigration and wage verification)	Performs real-time verification of immigration status information for most individuals applying for health care.	Yes	Act
	Provides states with real-time verification of earnings based on data from Equifax, this data exchange is only available when there is a health care request on the case.	No	Act or Hold
SAVE (Systematic Alien Verification for Entitlements)	Verifies lawful presence and Immigration status for Non-Medicaid individuals.	Yes	Act
State Data Exchange (SDX)	Weekly process that updates the State SSI and SSI-E unearned income in CWW and updates any Federal SSI information that has changed since the last update.	Yes	Act

System	Description		
Kids Information Data System (KIDS)	Provides information about child support, family support, and maintenance payments .	Yes	Act
Wisconsin New Hire	Provides details about newly hired employees from DWD.	No	Act or Hold
National New Hire	Provides details about newly hired employees from National Directory of New Hires (NDNH). This data exchange is only available when there is a health care request on the case.	No	Act or Hold
Electronic Disqualified Recipient Systems (EDRS)	Provides information about Intentional Program Violations for FS (IPVs) from Food and Nutrition Services (FNS)	No	Act or Hold
Third Party Liability (TPL) Coverage	Provides information about Medical coverage from interchange (iC).	No	Act or Hold
Public Assistance Reporting Information System (PARIS)	Exchanges data with Dept of Defense, Federal Veteran's Administration, and all 50 states, including territories. Details Federal employee wage and pension information, Veterans benefits and Individuals who have received assistance in another State. This includes TANF and IM programs.	No	Act or Hold
Automated Asset Verification System (AVS)	Verifies liquid assets and potentially undisclosed assets for Elderly Blind or Disabled Medicaid recipients.	No	Act or Hold
Electronic Residency Verification (ERV)	Provides potential leads for individuals who do not reside in Wisconsin.	No	Act or Hold
State Wage Information Collection Agency (SWICA)	Quarterly employee wage information from Department of Workforce Development (DWD).	No	Act or Hold
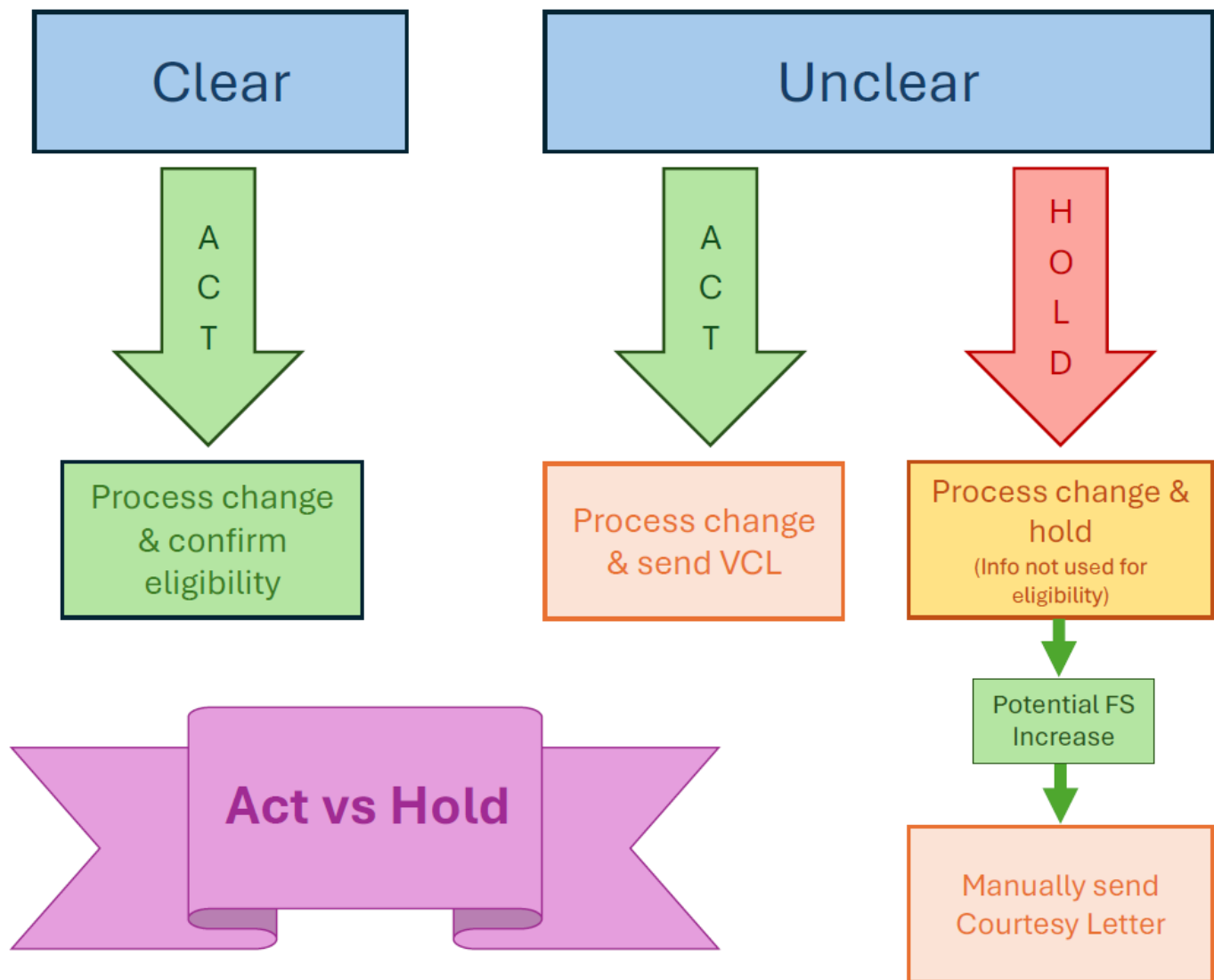
Note: All changes reported are *processed* in CWW whether they are acted on or held.

Processing Reported Changes Flowchart

1 Is the information verified or not questionable and the impact on the case is clear?

Yes → Information is clear, act on the change and confirm eligibility.

No → Proceed to Step Two.

2 Is the information a prisoner or death match?

Yes → These data matches are not impacted by Unclear Information, follow the established guidelines in Process Help.

No → Proceed to Step Three.

3 Does the information significantly conflict with the information used to approve the application or renewal?

Yes →

No → Proceed to Step Four.

4 Is the information less than two (full) calendar months old, from when the change becomes known to the agency?

Yes → Proceed to Step Five.

No →

5 Is the information something the household is required to report under simplified reporting rules:

- Income increase above 130% FPL
- ABAWD work hours decrease below 80 per month
- Lottery and Gambling winnings

Yes →

No →

Unclear and Hold.
Do not act on the information or require verification. Hold the information until the next SMRF or renewal, whichever comes first. Send courtesy letter for unclear items that could potentially increase FoodShare benefits.

Unclear and Pend.
Send a VCL requesting verification.

FoodShare Assistance Group Type Key

HREG: Regular FoodShare case for reduced reporters
FEBD: Case includes all Elderly, Blind, or Disabled individuals with no earned income
SHOM: FoodShare Group with all individuals in temporary housing situation
SMIG: FoodShare Group with at least one migrant worker who is categorically eligible
HCAT: FoodShare Group that is Categorically Eligible with income above 130% FPL

Reporting Requirements for Households with Income Below 130% FPL				
FS AG Type	**HH Gross Income increases above 130%**	**ABAWD work hours decrease below 80 hours per month**	**Substantial Lottery or Gambling Winnings**	**SMRF Required?**
HREG	Yes	Yes	Yes	Yes
FEBD	Yes	No (EXEMPT)	Yes	No
SHOM	Yes	No (EXEMPT)	Yes	No
SMIG	Yes	Yes	Yes	No
HCAT	N/A	N/A	N/A	N/A

Reporting Requirements for Households with Income Above 130% FPL				
FS AG Type	**HH Gross Income increases above 130%**	**ABAWD work hours decrease below 80 hours per month**	**Substantial Lottery or Gambling Winnings**	**SMRF Required?**
HREG	N/A	N/A	N/A	N/A
FEBD	No	No	Yes	No
SHOM	No	No	Yes	No
SMIG	No	No	Yes	No
HCAT	No	Yes	Yes	Yes

Ruth is eligible for FoodShare as of November 20th. Her FS AG Type category is FEBD, and she is below 130% of the FPL. She has a 36-month certification period because she does not have earned income.

The agency receives a handwritten letter from Ruth today, reporting that she has an outstanding medical bill from physical therapy totaling $500 from January. She did not provide verification of the medical expense.

What action does the worker take?

Follow the Processing Reported Changes flowchart.

1) Is the information verified or not questionable?

   _____

2) Is the information a prisoner or death match?

   _____

3) Does the information significantly conflict with the information used at application?

   _____

4) Is the information less than 2 calendar months old?

   _____

Webinar Scenario 2

Billiam is eligible for FoodShare as of October 24th. His FS Type Category is HREG. He is currently working part-time at Woodman's as a cashier and is receiving unearned income from his royalties for writing a jingle. When Billiam became eligible for FS his income was below 130% of the FPL.

Billiam calls in today to report he received a raise and is now the team lead. He started his new position April 1st. He states he will be making $18 per hour working full time.

What action does the worker take?

Follow the Processing Reported Changes flowchart.

1) Is the information verified or not questionable?

_____

2) Is the information a prisoner or death match?

_____

3) Does the information significantly conflict with the information used at application?

_____

4) Is the information less than 2 calendar months old?

_____

5) Is the information something the household is required to report?

_____

After receiving the courtesy letter, Ruth submits a copy of her medical bill to the agency on June 5th. The worker determines that they can allow the entire $500 as a medical expense deduction for the month of July. Now that we have verification of the medical expense we can resolve the held item.

What action does the worker take?

_____

_____

_____

_____

> **Bexley** applied for FoodShare on July 22nd; at the time of the application she was working full time as CNA. The FS AG Type category is HCAT (HH is above 130% of the FPL), and she will need to complete a SMRF in 6 months.
>
> At the end of August, Bexley enrolled in school, but she did not report this change. On November 2nd, she submits a letter to report a decrease in work hours below 80 hours per month because she is now in school and was having a difficult time keeping up with her classes while working full-time. Her work hours have decreased as of October.

What action does the worker take?

There are two changes being reported that need to be evaluated for unclear information.

Begin by considering the school enrollment change.

1) Is the information verified or not questionable?

   _____

2) Is the information a prisoner or death match?

   _____

3) Does the information significantly conflict with the information used at application?

   _____

4) Is the information less than 2 calendar months old?

   _____

5) Is the information something the household is required to report?

   _____

Now, consider the change in employment hours.

1) Is the information verified or not questionable?

_____

2) Is the information a prisoner or death match?

_____

3) Does the information significantly conflict with the information used at application?

_____

4) Is the information less than 2 calendar months old?

_____

5) Is the information something the household is required to report?

_____

Jimothy applied for FoodShare and Health Care and is eligible for benefits as of March. At the time of the application, Jimothy was working at Consultants Laboratory and was meeting the FS work requirement. His household size is 3 and his FS AG Type category is HCAT (HH is above 130% FPL), and he will need to complete a SMRF in 6 months. He is also open for MAGC.

Today, he calls to report that he picked up a second job working at a record store every other weekend. He was hired on May 7th, and he worked his first shift on May 10th. He reports he is getting paid $12 per hour and works 8 hours bi-weekly; he has not provided verification.

What action does the worker take?

Follow the Processing Reported Changes flowchart.

1) Is the information verified or not questionable?

_____

2) Is the information a prisoner or death match?

_____

3) Does the information significantly conflict with the information used at application?

_____

4) Is the information less than 2 calendar months old?

_____

5) Is the information something the household is required to report?

_____

Jimothy provides an employer letter to the agency in June. The document was received timely and verifies that he is working 8 hours bi-weekly at the pay rate reported, $12.00 an hour.

What action does the worker take?

_____

_____

_____

_____

Notes

Frequently Asked Questions

Workers must follow Unclear Information policy when deciding how to respond to all reported information from a data-match, third party or the household member.

1. What is the purpose for this rule/change?
The Supplemental Nutrition Assistance Program (SNAP) introduced the unclear information provision during the Food, Conservation and Energy Act of 2008 (also known as the 2008 Farm Bill). The reason for the unclear information provision was to reduce the number of household contacts and closures due to failing to return verification for things not required to be reported during the certification period.

2. Does the Unclear Information rule apply to all financial and non-financial eligibility factors?
Yes.

3. Does the Unclear Information rule only apply to non-member reported information?
No. This rule applies to all information received during the certification period, regardless of the source of information. Information can originate from a data exchange/match, other third-party source, or the household members.

4. How does the Unclear Information rule apply when information is required to be acted on and verified for other programs, but held for FoodShare?
The FoodShare Unclear Information rule does not change any other program's rules. Continue to act and verify for the other programs per that program's requirements. If the information is unclear for FoodShare, use the flow chart to determine whether to act or hold, and send a courtesy letter as necessary.

5. When verification is received for other programs, should eligibility workers act on it for FoodShare?
If the documentation or verification received provides all the details need to make an eligibility determination for FoodShare, then the information is considered clear, and it must be acted on and the held item should be resolved.

6. Will there be changes to fair hearing guidance?
No. The FoodShare Unclear Information rule will not change the fair hearing process. The Division of Hearings and Appeals (DHA) receives notification of all policy changes.

7. Would there ever be a fair hearing because information was held and not acted on?
FoodShare members always have the right to file a fair hearing. During the fair hearing process, a case review will include evaluating if information was appropriately held or acted on based on the FoodShare Unclear Information rule and other applicable policy requirements.

8. How does FoodShare Unclear Information rule impact overpayments for FoodShare?
The FoodShare Unclear Information rule will not change member reporting requirements. It is still the household's responsibility to report complete and clear information for us to be able to act on it. If a member fails to accurately 1) report a change that is required to be reported and 2) provide enough information so that the eligibility worker can act on the change, and receives more benefits than they were entitled to, an overpayment may be established if it meets overpayment claim establishment policy.