



Date: February 6, 2026

DMS Operations Memo 26-05

To: Income Maintenance Supervisors
Income Maintenance Lead Workers
Income Maintenance Staff

Affected Programs:

- | | |
|---|--|
| <input type="checkbox"/> BadgerCare Plus | <input type="checkbox"/> Caretaker Supplement |
| <input checked="" type="checkbox"/> FoodShare | <input type="checkbox"/> FoodShare Employment and Training |
| <input type="checkbox"/> Medicaid | |
| <input type="checkbox"/> SeniorCare | |

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National Accuracy Clearinghouse (NAC) for FoodShare

CROSS-REFERENCE

- 7 CFR [§ 272.18](#) and [§ 273.12\(c\)\(3\)\(iv\)](#)
- [Agriculture Improvement Act of 2018](#)

EFFECTIVE DATE

February 23, 2026

PURPOSE

This operations memo announces the implementation of a federal data exchange designed to prevent individuals from receiving Supplemental Nutrition Assistance Program (SNAP) benefits in more than one state or territory in the same month.

BACKGROUND

Individuals may only receive SNAP benefits in one state or territory during a given month, and it should be the state in which they reside. One exception to this is situations where they received SNAP benefits and are now applying for SNAP while residing in a shelter for victims of domestic violence (see FoodShare Wisconsin Policy Handbook, [Section 3.2.1.9 Shelters for Victims of Domestic Violence](#)).

The Agriculture Improvement Act of 2018 (also known as the Farm Bill) included a provision for United States Department of Agriculture (USDA) to create and implement a National Accuracy Clearinghouse (NAC). The NAC, administered by the Food and Nutrition Service (FNS), is a data exchange that enables states and territories that administer SNAP benefits to share SNAP participation information. This system is designed to identify and prevent concurrent participation in SNAP in more than one state or territory.

In Wisconsin, SNAP is known as the FoodShare Program.

POLICY

Effective February 23, 2026, Wisconsin will begin sending and receiving daily files of all active SNAP participants through the NAC.

NAC queries must be conducted at application, renewal, and when a person is added to a FoodShare food unit (see FoodShare Wisconsin Policy Handbook, [Section 3.3.1.3 Relationship Rules](#)). NAC queries will be completed for ongoing members through an automated monthly match process.

Before a NAC query can be conducted for an individual, their SSN and Wisconsin residency must be verified. The identity of the primary person on the case must also be verified.

When a match is found, the household must be notified, giving them the opportunity to refute the match before any action is taken to deny, end, or reduce benefits. The due date for members to provide a response will follow regular FoodShare verification rules. When a match results in denial, closure, or reduction of benefits, a notice of decision must be sent to the household informing them of the decision.

NAC MATCHES

Initial match information received from the NAC is not considered verified upon receipt. Once the match is identified, any additional information received directly from the matching state or territory, whether via the NAC or direct contact, is considered verified upon receipt and must be acted upon by Wisconsin. If the additional information from the other state would result in a closure or denial, negative action must not be taken for FoodShare until the household responds or the due date given when the household was notified of the match, whichever is earlier.

At application, renewal, or person add, the household must provide proof that benefits in the other state or territory have ended.

During the monthly match process and when other states or territories query NAC, the household must provide proof of Wisconsin residency to confirm Wisconsin is the correct state for SNAP eligibility.

When a household verifies their Wisconsin residency following a monthly match or match initiated by another state, Wisconsin benefits must remain open, and this verification must be entered into the case record as the final disposition for the match. Once the final disposition is entered in Wisconsin's case, the other matching state must take the necessary action to terminate SNAP eligibility in their state.

If there is a conflict between the information provided by the household and another state or territory, benefits must be issued based on the household's statement that benefits were not received in the other

state or territory. However, if duplicate benefits are issued, the household will be responsible for their repayment.

PRIORITY SERVICE, EXPEDITED BENEFITS, AND NAC MATCHES

When an application or a late renewal is found to be eligible for priority service and/or expedited issuance, and residency, SSN, and the primary person's identity have been verified within the expedited processing window, the NAC must be queried for all individuals in the food unit before benefits are issued.

If the query results in a match showing that any individual(s) in the household are receiving benefits in another state or territory, the application is no longer eligible for priority service and reverts to a standard 30-day processing.

Note: An exception to this policy applies when at least one member of the household resides in a shelter for victims of domestic violence. If the match is found only for the member living in a domestic violence shelter and the household meets all other FoodShare eligibility criteria, the household remains eligible for expedited benefits despite the pending NAC match.

DEEMING AND NAC MATCHES

Individuals excluded from an assistance group due to a failure to respond to notification of a NAC match will be included in the food unit as a pro-rated deemer.

VULNERABLE INDIVIDUALS

If someone is a vulnerable individual, states must take steps to not disclose information about their location obtained through NAC matches. A vulnerable individual, for the purpose of the NAC, includes, but is not limited to, any person who could be endangered by the dissemination of their information, regardless of age or gender; anyone enrolled in the Safe at Home program; any resident of a domestic violence shelter; or, any person who self-identifies as fleeing domestic violence at any point during application, renewal, or when adding a new household member.

BENEFIT RECOVERY AND INTENTIONAL PROGRAM VIOLATION

If a NAC match is identified at application, renewal, or person add, and the agency issues duplicate benefits without taking action on the NAC match, this is considered a non-recoverable agency error overpayment. If residency was verified at application, renewal, or person add, and FoodShare benefits are subsequently ended due to a NAC match in another state, this is not an error, and no benefit recovery is required.

If a NAC match is identified through the monthly matching process or via another state's query, and the individual verifies current Wisconsin residency, they must continue receiving SNAP benefits in Wisconsin. The other state will be considered the state of duplicate issuance and is responsible for taking appropriate action to terminate eligibility and recoup any duplicate benefits issued.

FAIR HEARINGS

Households whose eligibility is denied, closed, or reduced as a result of an action related to a NAC match have the right to request a fair hearing once the action is taken on their case and the final disposition is entered.

CONTACTS

DHS CARES Problem Resolution Team

DHS/DMS/BEEP/CH

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