

NC DEPARTMENT OF
**HEALTH AND
HUMAN SERVICES**

JOSH STEIN • Governor

DEV DUTTA SANGVAI • Secretary

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

Dear County Directors of Social Services

Date: August 17, 2026

Attention: County Directors of Social Services, Food and Nutrition Services Administrators, Managers, Supervisors, and Income Maintenance Caseworkers; Program Integrity Supervisors and Investigators; all users of The Work Number for FNS

Subject: The Work Number (TWN): Consolidated Usage Guidance and NC FAST Automation for Food and Nutrition Services (FNS) Cases

Priority: Action Required

The Division strongly encourages staff to query The Work Number as a routine part of income verification at application, at recertification, and when a change of circumstance is reported ([FNS-305.05.B](#); [FNS-160.01.B](#)). A query that returns no information costs nothing; charges apply only when a query returns data on the individual. When TWN verifies the reported income, staff should not request additional documentation such as paystubs.

The Work Number (TWN), an Equifax service, is one of North Carolina's electronic data sources for verifying employment and earned income in the Food and Nutrition Services (FNS) program. Guidance on its use has accumulated across several Dear County Director Letters, listserv messages, and the NC FAST Help Job Aids, and counties have told the Division that those sources are inconsistent and confusing. This letter consolidates the guidance, states when and how staff use TWN, and describes TWN income-evidence functionality now in NC FAST. It supersedes the prior letters listed under Supersession below.

1. Using The Work Number in FNS cases

Gross non-exempt income, including earned income, is a mandatory verification and must be verified before certification ([FNS-435.01.A.6](#)). TWN is one of the sources staff use to meet that requirement. The FNS Manual lists TWN both as an electronic Online Verification System (OVS) source and as documentary evidence ([FNS-305.05.A](#)).

The Division strongly encourages staff to query TWN as a routine part of income verification at application, at recertification, and when a change of circumstance is reported ([FNS-305.05.B](#); [FNS-160.01.B](#)). Staff should run the query at the interview whenever the household reports earned income. Earlier guidance counseled staff to use TWN sparingly or as a last resort. **That instruction is withdrawn.** Staff should attempt electronic verification, including TWN, before issuing a DSS-8650, Notice of Information Needed, to the household. When a household cannot obtain a required verification, the FNS Manual directs staff to try telephone or electronic means before issuing a written request to the source ([FNS-305.05.A](#)), and TWN is an electronic means.

When TWN data is current and reasonably consistent with the household's statement, the income is verified. Staff may not require a specific type of verification ([FNS-305.05.A.3.d](#); [FNS-435.02.G](#)); if TWN adequately verifies the income, additional employer documentation such as

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paystubs should not be requested. Households sometimes report employment and ask staff to query TWN so they do not have to obtain wage documentation from their employer; staff should honor that request and run the query. Staff should run TWN on household members aged 18 or older who are employed or whose employment is in question, not on every household member as a standard practice. Do not run TWN on individuals who are not included in the application or case.

Use of TWN is neither mandatory nor sufficient in every case. At recertification, verification of income is not required when the source is unchanged and the amount has changed by \$50 or less, unless the information is incomplete, inaccurate, inconsistent, or outdated (FNS-305.05.B.2.b). “Outdated” is not given a precise definition in the FNS Manual at this time. The Department is considering issuing formal guidance based on county feedback. Continue to exercise prudent judgment to discern when information is incomplete, inaccurate, inconsistent, or outdated. Payment accuracy is one of the Department’s highest priorities, and use of TWN is a tool to achieve that accuracy.

In the case record, staff must document the date TWN was accessed; the employment and income information obtained; the determination that the data is or is not reasonably consistent with the household's statement; any additional verification requested and received; and the final eligibility decision (FNS-435.02.J).

Where documentary evidence cannot be obtained or is insufficient, a collateral contact or home visit may be used; acceptable collateral contacts include the employer (FNS-435.02.A, FNS-435.02.H, FNS-435.02.I).

2. Determining the income to budget

To determine eligibility and the monthly benefit amount after verification, staff budget the representative income — income received during the base period that reflects the household's future income (FNS-305.01.D). The base period is generally 30 calendar days before the application or recertification is received (FNS-305.02). Base period income is considered nonrepresentative when it is irregular, changed, new, or terminated. Staff must not carry nonrepresentative income forward; they must explore other budgeting methods to arrive at the monthly benefit amount the household can reasonably expect to receive during the certification period (FNS-305.01.E).

3. Creating income evidence from TWN data in NC FAST

For FNS, NC FAST can create earned-income evidence directly from TWN data, and staff should ordinarily create it using the program's pre-selected base-period pay dates. To do so, follow the Job Aid section 'Creating Evidence/Base Period Selection from The Work Number Data,' subsection 'FNS and CA/WFFA Using Pre-Selected Base Period Pay Date(s)':

- From the TWN Data pop-up, click Create Income Record (Step 1);
- Select the program (Step 2);
- The base-period pay dates are pre-selected; click Next (Step 3);
- Enter comments if needed and click Finish (Step 4).

When the base-period wages are not representative and pay dates outside the base period are needed, follow the subsection 'FNS and CA/WFFA NOT Using Pre-Selected Base Period Pay Date(s).' The system requires staff to select a Reason and enter Comments explaining why pay dates outside the base period were used (Job Aid, Step 4 of that subsection).

4. Selecting the time period and managing cost

When requesting TWN, the Time Period defaults to 3 months of employer and income details, and selecting 3 months requires no reason. Any longer period (6 months, 1 year, 3 years, or all records) requires staff to select a Reason from the drop-down (Job Aid, Step 3; Fact Sheet).

The Division strongly encourages staff to keep the 3-month default. Information older than three months is rarely needed to determine eligibility, and a longer period should be selected only when the case requires it, such as a program integrity investigation.

TWN is a paid service. The State's cost is based on usage — the number of attempts yielding data on the individual — and each county is charged its share of that cost based on the county's transactions as a percentage of total statewide billable transactions (BG-03-2017). Selecting only the time period the case requires holds down both usage and county cost. In addition, Equifax only charges for a “billable hit.” If the query returns a null response, there are no charges for the query.

5. Resolving discrepancies in TWN information

If TWN returns wages the household has not reported, or wages that differ from what was reported, staff must follow up with the household to resolve the discrepancy and obtain verification as needed (FNS-305.05.B). When the information surfaces during the certification period, follow the unclear-information procedure in FNS-515.07: give or mail the DSS-8650, allow ten calendar days for the household to respond, and react to the result under the applicable section of FNS-515.

6. Operational parameters

The mechanics of running a request are in the NC FAST Help Job Aid and Fact Sheet. Key parameters include:

- TWN may be requested for an Application, Recertification, or Change of Circumstance, subject to the exceptions listed in the Job Aid Overview; it cannot be requested on an application in Closed or Disposed status.
- TWN may be requested only for a participant registered in NC FAST who is 18 or older, with or without an SSN.
- TWN cannot be requested more than once per day for the same participant, and the system displays a message when a request was made for that participant within the previous 45 days.
- Request Status outcomes are listed at Job Aid Step 5: Results Found; No Employment Found; Employer is not eligible for Social Services Verification; TWN data is not available if the individual is under 18 years old; Multiple individuals may be associated with this SSN; and System Error.
- Usage reports (Detail, Summary Usage, and Usage by Program per County) are available in NC FAST.
- Program Integrity has View Only access in NC FAST and continues to use the TWN website.

Information obtained through TWN becomes part of the case record and must be safeguarded in accordance with FNS-125, which restricts use and disclosure to authorized persons, including those directly connected with the administration and enforcement of the program.

7. TWN guidance in other programs

In addition to FNS, TWN is available in NC FAST to several other programs, including Medicaid, Special Assistance, Work First, and Subsidized Child Care Assistance. This letter governs the

use of TWN in FNS cases only. Staff working an FNS case should follow this guidance and the FNS Manual; they should not apply another program's TWN instructions to an FNS determination.

8. Client rights and adverse actions

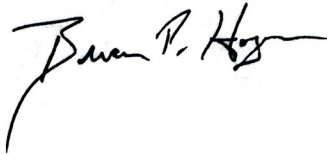
- Before taking adverse action based on TWN information that conflicts with the household's statement, staff must give the household the opportunity to clarify and resolve the discrepancy and must obtain any verification the FNS Manual requires (FNS-305.05.B; FNS-515.07).
- All adverse actions must comply with timely and adequate notice requirements (FNS-170; Notice of Adverse Action, DSS-8553).

Supersession

This letter supersedes EFS-FNSEP-09-2011, EFS-FNSEP-03-2016, DIR-04-2016, EFS-FNSEP-28-2018, EFS-FNSEP-11-2019, and EFS-FNSEP-31-2019. To the extent any prior letter, listserv message, or informal guidance conflicts with this letter, this letter controls.

If you have any questions regarding this matter, please contact your Continuous Quality Improvement Specialist.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian P. Hogan". The signature is fluid and cursive, with a long horizontal stroke at the end.

Brian P. Hogan
Deputy Director for Nutrition
Division of Child and Family Well-Being