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Assessing the Medicaid Work Requirement Vendor Landscape

As states prepare to implement the mandates from the July 2025 reconciliation law, H.R. 1, they are actively exploring solutions to update their Medicaid eligibility and enrollment systems to support a new work requirement (also known as “community engagement” or CE). The work requirement will take effect in most states in January 2027 and system updates need to be completed well before then. While coverage loss from this new policy is inevitable, some loss can be mitigated through effective implementation, and states are being offered an array of products from vendors. How states and vendors work together to implement the new work requirement will have a substantial impact on costs, administrative burden, and, most importantly, how many eligible people will be able to get and retain Medicaid coverage.

This paper provides background on the work requirement, outlines system changes that will be needed, describes different approaches states will take toward implementation, highlights considerations for evaluating vendors, and provides detailed descriptions of some of the vendor products being offered across different categories (based on product demos and conversations with the vendors).

Background

The work requirement is mandatory for states offering coverage to adults in the Medicaid expansion group, including states that provide full coverage to similar populations through waivers. Individuals subject to the work requirement must report compliance (such as working, attending school, participating in a workfare program, and/or volunteering 80 hours in a month or having income over \$580 per month)¹ or exemption status (such as being the parent or guardian of a child under 14, participating in a drug or alcohol treatment program, or being “medically frail”) for the month(s) prior to application, at renewal, and, at state option, more frequently.

This new eligibility requirement means states will have to make substantial changes to their forms, notices, and eligibility systems to determine whether someone is exempt from or compliant with the work requirement. These changes, along with the additional eligibility staff necessary to administer the work requirement, will be costly for states. H.R. 1 does provide \$200 million in implementation funding to be distributed to all states and the District of Columbia, although the expected costs will far exceed this

limited amount of funding.² Consistent with long-standing Medicaid law, there are also enhanced federal matching funds available for additional costs.³

- **A 90 percent match for the design, development, and implementation (DDI) of IT systems.** The 90 percent federal match is available for system builds and development, such as expanding integration and interfacing capacity for work requirement compliance and exemption determination. These funds also cover state staff managing vendors for additional capacity.
- **A 75 percent match for the maintenance and operations (M&O) of these systems.** The M&O matching rate also covers most costs for Medicaid eligibility workers, production of notices, and training for providers on eligibility system operations.

The implementation date for the Medicaid work requirement is January 2027. States can implement earlier through a waiver or state plan amendment, and may be able to get a good faith exception to delay implementation up to two years if the state is experiencing significant barriers to implementation (although the Centers for Medicare and Medicaid Services (CMS) has indicated it will issue a limited number of exceptions to delay implementation).⁴ CMS must issue an interim final rule by June 1, 2026, leaving states to make implementation decisions prior to receiving full guidance (although CMS has begun releasing some sub-regulatory guidance to states). To implement the work requirement in January 2027, states will have to send enrollees notices no later than August 31, 2026, and will need to have other system logic changes completed and ready for testing in late 2026. This is an incredibly tight timeframe for states to operate within, especially given the numerous other changes from H.R. 1 that also require significant attention from policymakers and IT staff.

States can reduce the complexity of the changes needed (and ensure eligible people remain covered) through policy and operational decisions that lessen the burden on clients and eligibility workers (such as a one-month lookback period at application, verifying compliance only at renewal, and accepting self-attestation where permissible).⁵ To implement the work requirement on this short timeframe, most states will enlist vendors to assist them, and their performance will have a major impact on how this new policy plays out on the ground. As CMS has flagged, "without proper alignment between policy design and technological capabilities, states may create administrative burdens that undermine program effectiveness and cost-efficiency"⁶⁷

CMS recently announced that many vendors have pledged to support states in implementing the work requirement by agreeing to discounted rates negotiated by the federal government.⁸ Some of these pledged vendors are included in the landscape below. This development may lower some costs for the federal government and states, but states should still evaluate the overall cost of implementation, integration with existing systems, and user experience for clients and eligibility workers to determine which solutions may be the best fit for their needs.

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System Changes Needed for the Work Requirement

While every state's system is different, there are some common components that will need to be changed to implement the work requirement, and vendors are offering products to meet the needs for one or more of these components.

A critical consideration for states is how the work requirement will integrate with their existing processes. While states have the option of requiring more frequent compliance checks (such as monthly reporting of activities, an expensive option that will lead to larger administrative burdens), the majority of work requirement activity information will be collected as part of the existing application and renewal process. And many of the steps needed to track compliance with the work requirement – gathering information from the individual, validating against data sources if necessary, collecting documents if necessary, sending notices, etc. – are part of the existing process of verifying financial and non-financial factors to determine Medicaid eligibility. Therefore, states should carefully consider how work requirement processes fit into these existing system components and avoid setting up duplicative processes for the work requirement only. For instance, information for work requirement compliance and exemption status should be collected as a part of the existing application, not requested through a separate interaction with the client.⁹

Further, changes made to implement the work requirement can potentially improve existing parts of the eligibility and enrollment system. For example, improving income verification to streamline compliance determinations for the work requirement can also be used to streamline financial eligibility determinations for all applicants and enrollees. Similarly, improving processes for uploading and validating documents for work requirements can also streamline document processing for other factors or eligibility.

System changes needed for the work requirement include:

- **Additional Information Collection (Client Portal and Forms)**

- Changes Needed. States will need to change applications and renewals, both paper forms and online systems, to collect additional information necessary to determine whether someone is exempt from or compliant with the work requirement. While some information, such as income, is already collected, questions will need to be added to capture additional information including volunteer hours and participation in drug or alcohol treatment programs.
- Vendor Role. Many vendors are offering client reporting portals where individuals can report exemptions as well as hours of work, volunteering, and other activities.
- Considerations. States should carefully consider how client reporting solutions offered by vendors are integrated into their *existing* application and renewal processes. Collecting information for work requirement compliance determinations through an additional, separate step (such as requiring applicants to go to a different portal to report work

requirement-related information after they have completed the regular application) may generate significant additional work for individuals and eligibility workers and could lead to applicant or enrollee drop off.

• **Verification Through Data Sources**

- Changes Needed. While states currently verify income for financial eligibility determinations, most will look to enhance their income verification process to capture more comprehensive information, including income from gig work and other self-employment. In addition, states will need to add data sources for other factors related to the work requirement, (depending on where self-attestation is permitted), such as claims data to identify medical frailty and databases to confirm student enrollment status.
- Vendor Role. Many vendors are offering enhanced income verification products, including consent-based verification (CBV, discussed further below) which can be used to create income reports for gig workers and other self-employed people whose income may not appear in standard databases. Some are offering additional data connections to national sources, such as student enrollment databases, or connections to state TANF and SNAP systems in states without integrated eligibility.
- Considerations. States should leverage improvements made for work requirement verification to streamline their overall income verification process. For example, if a state implements CBV with the goal of collecting hour and income information for work requirement compliance verification, it should also use it to verify income for financial eligibility purposes (including for individuals not subject to the work requirement). States would benefit from combining improvements like CBV with the current implementation approach, like traditional income verification providers.

• **Document Submission**

- Changes Needed. While most states have a pathway for individuals to submit documents electronically, the added volume of submissions due to the work requirement will push many states to seek to streamline document processing.
- Vendor Role. Vendors are offering solutions that help states process documents, including by using artificial intelligence (AI) to categorize documents (e.g., pay stub vs. log of volunteer hours), pull relevant information from the document (e.g., hours worked), and populate that information into the state's eligibility system. Some products can also tell the user if the image submitted is blurry, unreadable, or the wrong type, and ask users to submit a new image.
- Considerations. This is another component that should be integrated with the system's existing document submission process so applicants and enrollees can upload all required documents through the same interface, and so all documents go to the same state

repository. Further, like income verification, enhancements made for work requirement purposes should be available across the broader eligibility determination process.

- **Caseworker Portal**

- Changes Needed. Eligibility workers will need an interface available to them to view and track whether an individual is subject to the work requirement, if they are exempt and for what reason, if they are compliant and how they complied, and to validate documents submitted as verification.
- Vendor Role. Vendors are offering system views for eligibility workers with role-based permissions to view work requirement compliance status, manage tasks, and review submitted documents.
- Considerations. States should carefully consider how eligibility workers will review work requirement status and how it fits into their overall case processing flow. Work requirement views, where possible, should be integrated into the existing case processing flow as an additional set of screens alongside residency, income, and other factors currently reviewed. There will likely be additional burden for workers if the work requirement portal is separate from the traditional case processing flow.

- **Eligibility Determination and *Ex Parte*¹⁰ Renewal Logic**

- Changes Needed. States will need to add eligibility determination logic¹¹ to determine if someone is subject to the work requirement, meets an exception, or is compliant, and whether the necessary supporting attestation or documentation has been submitted. This logic will have to be in place for applications, change reports, and renewals, *including ex parte* renewals (where the state attempts to confirm ongoing eligibility without requiring action by the enrollee). This new logic will need to be integrated into the existing rules logic that determines eligibility based on residency, age, income, etc.
- Vendor Role. Some vendors are offering to include the eligibility determination logic within their products and pass to the state's eligibility system determinations of whether the individual is compliant or non-compliant with the work requirement. Other vendors will pass the specific information collected, such as income, to the state system where the work requirement logic will reside and run. Most vendors have not yet shared specific designs for helping with *ex parte* renewals.
- Considerations. It may require less work on the state system side if the logic is embedded in an external vendor product, though the product would need to have access to all of the information necessary to make an eligibility determination, including information collected by the state or obtained through the state's data connections. Alternatively, the vendor product may collect pieces of information relevant to the work requirement compliance determination and pass that to the state system, which will put it together with additional information it has to make a compliance and eligibility determination. States should also pay

particular attention to how they will incorporate the work requirement into *ex parte* renewals and what the vendor's role will be.

• **Notices and Client Outreach**

- Changes Needed. States will have to communicate with individuals about the work requirement. This includes new notices, such as outreach notices ahead of implementation and notices of non-compliance, as well as modification to existing notices, like requests for information when the state doesn't have enough information to make an eligibility determination, and approval and denial notices. Some notices will have to be sent through multiple modalities (in addition to mailing or emailing) such as texting and posting on websites. States may also send outreach through text or email to complete certain eligibility checks (like in CBV, below). Further, agencies may need additional call center staff to address questions about the work requirement.
- Vendor Role. Vendors are offering multiple solutions, including generating work requirement-related notices and conducting text-based outreach. Some also offer to supply staff for call centers and other outreach and communication tasks.
- Considerations. As with the other aspects of work requirement implementation, there is significant overlap with existing state functions, and the work requirement should integrate with those where possible. For example, there should be a single request for information that includes information needed for financial and non-financial factors as well as work requirements. And individuals should be able to call a single call center to get information about their case, not one to speak to eligibility workers and another to get information about the work requirement.

• **Data Analytics and Reporting**

- Changes Needed. States will have to collect additional data to report and monitor outcomes from the work requirement. Although guidance has not been released, CMS may require certain data elements as part of their performance indicators monthly data, and states will want to monitor key metrics to identify areas of improvement in their outreach, communication, and information processing procedures. Key data points may include the number of applicants and enrollees subject to the work requirement, determined exempt, determined compliant, and denied or terminated for non-compliance.
- Vendor Role. Vendors will likely offer various data analytics reports as part of their work requirement products, such as number of clients offered CBV or number of people who logged into a client reporting portal after being sent a text. They may also provide states with the ability to analyze trends in reporting or highlight problem areas.
- Considerations. In addition to meeting federal or state requirements, states should ensure they establish robust data reporting processes that help them monitor the vendor's and

state's performance. This will allow quick identification of issues and help to make modifications as needed to ensure accurate determinations.

Types of State Approaches

While each state has a unique technical landscape, needs, and resources, states will likely fall into one of three implementation categories:

- 1. In-House Implementation:** In-house implementation is an approach where the technical solutions are developed with internal state resources, rather than relying on external vendors. States that take this approach will need to have deep internal technical resources and expertise, including well-developed engineering teams, project management resources, and knowledge of their technical architecture and roadmaps. While they might contract with additional staff to add capacity, the effort is fully managed in-house. This may be a lower cost approach but does require deep state technical talent.
- 2. Multiple Vendor Integration:** Multiple vendor integration is an approach where the technical changes needed to implement the work requirement are broken down into smaller, more manageable pieces. These pieces are then implemented by multiple vendors, or a combination of vendors and the state. Each piece performs a specific function (for example, verifying income or uploading documents). This mirrors modular implementation, which is the practice of breaking a large product down into small pieces. These modules can be developed, implemented, or upgraded separately leading to greater flexibility and customization. States that choose this approach may have some resource limitations (time, technical staff) but will need procurement and project management capacity. These states may also already have some or many of the components needed for work requirement implementation (like income verification) and are seeking vendors to fill the implementation gaps.
- 3. Single Vendor Integration:** Single vendor integration is an approach that seeks to find one external vendor to manage and implement most of the components of the system changes needed for the work requirement. A state may look to find a vendor that offers a comprehensive work requirement system, including client reporting modules, data integration, and compliance/exemption logic. States may pursue this model if they have limited internal capacity or significant dependence on their existing system vendor. While this approach may reduce the immediate administrative effort for the state, it may also result in elevated costs, diminished control over implementation outcomes, and challenges in enforcing vendor accountability.

Key Variables to Consider

As states navigate complex processes to procure additional resources for work requirement implementation and evaluate vendor offerings, key variables to consider include:¹²

System Compatibility and Customization: Because there are many different state system architectures, states should ensure that their chosen vendors can adapt to fit their system needs. States

have some options on implementation and will have to make decisions before CMS guidance comes out. They should ensure that vendors can meet their specific policy decision needs and can adjust as CMS expectations are made clear.

Industry Expertise: Selecting a vendor with deep policy knowledge and hands-on experience in public benefits programs (particularly Medicaid or SNAP) can significantly strengthen implementation efforts. Vendors who understand the regulatory landscape, eligibility rules, and operational complexities are better positioned to anticipate challenges, design compliant solutions, and provide proactive guidance throughout the process.

Integration Timeline: Given the short implementation window, it is essential that vendors provide a clear, realistic integration timeline tailored to the state's specific technical and operational environment. Vendors that adopt iterative development practices, like those outlined in the AGILE methodology,¹³ and offer frequent progress updates can help maintain transparency and accountability. This approach reduces the risk of scope creep, cost inflation, and significant delays, ensuring the project remains on track and aligned with state objectives.

Data Integration: Work requirement implementation will include adding new data into the eligibility system and potentially passing data back and forth with vendors. States should be clear with their vendors about where the data is coming from, and which party is responsible for providing access to the data. Some vendors provide their own data aggregation or facilitate state connections to external data sources through Application Program Interfaces (APIs).¹⁴ Other vendors will rely on the state to funnel the data through the product offering.

Data Privacy and Security: Regardless of who is providing connections to data, it is important that states, and by extension their vendors, prioritize privacy and security when collecting or accessing this data. States should ensure that they are only collecting the information necessary to determine eligibility, minimizing the access that external parties have to that data, and practicing proper data hygiene by only retaining data when necessary.

Price Model: Depending on the frequency of use, and subscription vs. per-call models, some vendor solutions may provide better value.

Human-Centered Design and Usability: Usability should be a high priority, especially within the already established user experience for both applicants and case workers. A work requirement solution that is hard to use increases risks of wasted funds and coverage losses for eligible people. In addition to client experience, usability for eligibility workers should also be a top consideration given the substantial additional workload the work requirement will add.

Glossary of Select Terms

Consent-Based Verification (CBV) is a newer form of income verification that relies on users logging into their personal payroll, bank, or other accounts and consenting to sharing their income information with the state. CBV is expected to play a critical role in implementing the work requirement because it enables income reporting for all worker types – including 1099/gig workers, and self-employed workers – for whom more standard forms of verification may not be sufficient to establish income.

Eligibility determination logic is the rules-based process by which state agencies determine if an applicant is eligible for benefits. When there are policy changes, like with the work requirement, states must update these rules to ensure the proper determination for benefits.

Application Program Interfaces (API) is an interface that allows different systems (including some government systems and third-party applications) to communicate with each other, share data, and integrate services.

SaaS is an acronym for Software As A Service, a product delivery model where a consumer accesses the purchased product as a separate application. While there is still some coding required to integrate state systems with SaaS products, consumers (in this case, the state) do not manage or control the underlying infrastructure like the code, operating systems, or data integrations. These products may, however, provide some configurable options to states.

Low code implementation is an approach to product development that utilizes drag and drop interfaces and premade components to reduce the amount of code that needs to be written. It simplifies the development process and reduces the time and technical resources needed to launch new features.¹⁵

Open source means the code for the product is made publicly accessible, allowing anyone to view, audit, or copy it for free. Open source code increases collaboration, transparency, and accountability. A state can copy any open source code and implement it themselves or with the original product creators. The state can choose to leave their own code open or closed (private).

Vendor Overview

This section organizes selected vendor offerings within the Medicaid work requirement landscape by categorizing solution types that states might be most focused on as part of their necessary system updates to implement the work requirement; providing an overview of each product; and highlighting key features and differentiators, as well as cost to states, when known. It also identifies the state operational and technical conditions under which each solution is most effective, helping states assess which options align best with their resources, timelines, and policy requirements. It's critical to note this is not an exhaustive list of every possible vendor or feature, but instead is an overview of solutions with examples, as vendor offerings are constantly evolving. The information provided here was collected through demos and conversations with vendors.

System Integrators

Eligibility and enrollment systems in most states are developed and implemented by large vendors such as Deloitte, Accenture, Curam, and KPMG. These vendors are also offering states solutions to implement the work requirement that may be customized for the state or an off-the-shelf product that the state configures. Regardless of whether the state uses a solution from their system integrator or a different

vendor, the system integrator will be involved in connecting the solution to the existing system. This paper does not explore products from these system integrators, largely because their solutions are customized or proprietary, with limited visibility to outside parties.

Consent-Based Verification Vendors

Consent-based verification (CBV) is a newer form of income verification that relies on users logging into their personal payroll, bank, or other accounts and consenting to sharing their income information with the state. CBV is expected to play a critical role in implementing the work requirement because it enables income reporting for all worker types – including 1099 (gig workers)¹⁶ and self-employed workers – for whom more standard forms of verification may not be sufficient to establish income.¹⁷ While each CBV vendor has unique implementation logic and details, the core process is similar: applicants are prompted to verify income by logging into relevant accounts (such as payroll providers like ADP, gig platforms like Uber, or in some cases, a financial institution) using their own credentials (username and password). Some solutions also provide the option to upload documents (like paystubs) in addition to these virtual options, and some allow reporting of self-employment expenses. The product then aggregates those data sources and creates a single standardized income report that is submitted to the Medicaid agency.

The Medicaid agency then uses these income reports to verify eligibility or compliance with the work requirement. These reports reduce manual submission and streamline the applicant and eligibility worker experience. They are also generally less costly than other income verification vendors. All products listed below allow users to connect to payroll providers and gig platforms, but vary in their experience in the public benefits space, access to and analysis of financial institution data, validation of submitted information, and how the user interacts with the data before it is submitted. In implementing CBV, states should be thoughtful to avoid requesting unnecessary verification and to consider where CBV sits in the client experience, what data is stored, and who may have access to that data (especially if personal banking information is included).

Argyle¹⁸

Product Description: Argyle is a Software as a Service (SaaS) CBV platform that provides direct connections to payroll data, gig data, and bank accounts. It also provides the ability to manually submit income through paystub document submission, which is then processed with OCR (optical character recognition) to properly classify the paystubs and add them to the income report. The individual's income information from the various sources is then compiled in a standardized report that is sent to the Medicaid agency. As a standalone tool, Argyle can be integrated directly into the state and renewal process or accessed through a unique link. Argyle is also used as a data aggregator for multiple other CBV tools that add functionality, including DiCIT, SteadyIQ, and Emmy (see descriptions below).

Information to Consider:

- Low code implementation for states

- Options to verify payroll providers, gig platforms, bank accounts
- After their initial interaction with an Argyle system, applicants can reverify their income through one-click reverification

Initially created in the mortgage lending and tenant screening space, expanded to public benefits

Emmy (Eligibility Made Easy) by CMS^{19,20}

Product Description: Emmy, formerly known as IVAAS (Income Verification as a Service) is a CBV tool built by the federal agency Centers for Medicare and Medicaid Services (CMS).²¹ Emmy follows the typical CBV model and is built primarily for use in Medicaid. It is in the piloting stage, and it is intended to include additional modules for community engagement, such as education and volunteering verification.

Information to Consider:

- Open source code base
- Built around Argyle (see above)
- Options to verify payroll and gig data; does not access banking data
- Co-piloted in four states with DiCIT, additional pilots in the works
- Built by CMS in partnership with CMS policy experts
- Applicants can review report before submission and add comments to provide additional context to the income report
- Can be integrated directly into the state application process, or accessed through a separate link (via text and/or email) or paper notice
- Created with public benefits and government as the primary audience

Digital Consent-based Income Tool (DiCIT) by Digital Public Works²²

Product Description: DiCIT is a CBV tool built by Digital Public Works, a new nonprofit composed of former U.S. Digital Services staff who have worked in government on launching digital tools. DiCIT and Emmy (see above) were branched off the same original code base but each tool has been further developed so there are measurable differences between the two. As a CBV product, DiCIT places a particular emphasis on service delivery and state system improvements to reduce errors. The tool can be integrated in multiple ways, depending on state needs. DPW offers a free pilot, with the option to expand to full implementation. Their pilots include service design,²³ support, and data analysis for the income data's journey from a payroll provider to benefit delivery. In addition to the typical CBV features, DPW analyzes data and case flow (including applicant, caseworker, and backend integration) to make suggestions to the state for improving their income verification process.

Information to Consider:

- DPW publishes all code as open source code base²⁴
- Built around Argyle (see above)
- Options to verify payroll and gig data; does not access banking data
- Co-piloted in four states with Emmy prior to DPW's launch; currently live in two states independent from Emmy.
- Applicants must review and approve the income report before submission
- Cost model is built on offering a free pilot and then further verifications at cost, which is about \$3 per successful verification.
- Not integrated directly into the state portal; accessed through a unique link texted or emailed to applicants and enrollees
- Applicants can access DiCIT through a unique link in the state portal sent in a physical notice or texted or emailed to applicants and enrollees

Income Passport by SteadyIQ²⁵

Product Description: Income Passport is a CBV offering from SteadyIQ. Steady's configurable SaaS solution allows users to connect to payroll providers and gig platforms, as well as digital wallets and bank accounts to verify income, employment, and work hours. It uses AI and human-in-the-loop²⁶ design to classify, clean, and de-duplicate income data to produce income reports for eligibility determinations. Steady's Income Passport started during the pandemic in Unemployment Insurance and has now shifted to other benefits programs, including SNAP and Medicaid.

Information to Consider:

- Launched in eight states
- Created with public benefits and government as the primary audience
- Integrates data from multiple aggregators
- Options to access payroll providers, gig platforms, bank accounts, and digital wallets (such as Venmo and Paypal)
- Can be integrated directly into the state application and renewal process or accessed through a unique link texted or emailed to applicants
- Users see all verified income included in the report and must review and approve the income report before submission
- Once a user links their account, their income is updated in real time and can be resubmitted through one click

- Flat rate annual subscription negotiated with the state

Truv²⁷

Product Description: Truv is a SaaS CBV platform that provides direct connections to payroll data, gig data, and banks. They have developed the entirety of their solution in house, rather than building on top of other products like Argyle. Truv has additional verification, including a volunteer verification tool, which supports the uploading of documentation for community service hours, and an education verification solution, which connects to a data source from educational institutions.

Information to Consider:

- Initially launched in the mortgage ecosystem; made the shift to CBV in public benefits
- Partnered with seven states across multiple benefits programs
- Has options to access payroll providers, gig platforms, bank accounts
- Can be integrated directly into the state application and renewal process or accessed through a unique link texted or emailed to applicants
- Applicants can review report before submission

Traditional Income and Employment Verification Vendors

Traditional income verification tools aggregate data from a number of payroll providers into a single central repository database. State agencies then make calls to this database to produce an income report without requiring user action. The income information received through these vendors is usually very current and accurate, making it useful for public benefits programs. However, these databases do not cover all traditional W-2 employees and do not contain income information about 1099/gig workers. These vendors have also added a CBV component to try to capture additional types of income. Some income verification vendors have exclusive contracts with particular payroll providers, so agencies may want to inquire about the coverage of the most popular employers or payroll providers in their states. States can maximize the breadth of their income and employment verification by using a combination of CBV and these traditional income verification providers.

Experian Verify

Product Description: Experian Verify is a SaaS income and employment verification product in the public benefits space created to give a lower cost alternative to Equifax The Work Number (see below). States can use Experian Verify with only traditional income verification or with their newer CBV component, which includes a tool for document upload.

Information to Consider:

- Has exclusive contracts with some employers and payroll providers

- Actively used in SNAP in several states through Food and Nutrition Services (FNS) contract

The Work Number and Complete Income by Equifax²⁸

Product Description: The Work Number is a SaaS income and employment verification tool that has been used in public benefits for several years, with growing frustration from states about the rising cost. The Work Number covers many W-2 workers but does not meet the needs of 1099 workers. Equifax also has a more expansive offering called Complete Income that includes The Work Number and a CBV tool, intended to cover both W-2 and 1099 workers.

Information to Consider:

- Provides instant information about the most W-2 employees among the income verification vendors
- Highest cost income verification option at about \$15 per income report²⁹ (price varies by state)
- States can utilize The Work Number for Medicaid through the Federal Data Sources Hub's verify current income service,³⁰ but due to recent changes states must now pay their share of the cost
- Actively used in most states' public benefits programs
- Has exclusive contracts with some payroll providers
- Complete Income (CBV) is a newer product for Equifax

Truework³¹

Product Description: Truework is a SaaS income and employment verification platform that utilizes multiple verification methods to provide income reports for the state. If Truework cannot establish an income report through the typical data aggregation from payroll providers, they provide states with three additional options. First, there is an option for Truework to conduct "Smart Outreach" which is contacting employers on behalf of the state to verify work and income. Alternatively, applicants can use their CBV platform. Lastly, users can manually upload income documents. These features are optional and configurable by the state.

Information to Consider:

- Initially used in the background check ecosystem with about 45 million screenings a year (acquired by Checkr)³²
- Can be integrated directly into the state application and renewal process or accessed through a unique link texted or emailed to applicants
- No prior experience in public benefits integration or implementation

Products Launched in Direct Response to the Work Requirement

Some vendors have created solutions for the specific use case of work requirement implementation. Although the individual products are new, each company has varying experience in the public benefits space. While each product approach is different, there are a few features they have in common: they all have an applicant-facing and eligibility worker-facing portal, a way to report hours worked and income earned, a platform to upload supporting documents, and embedded rules to analyze whether individuals are compliant with or exempt from the work requirement. Some also gather information about exemptions and other types of compliance such as volunteering and student status. Further, some integrate data sources directly into their products while others pass along the collected information to the state without comparing it to data sources.

Community Engagement Verification Intelligence Platform by Gainwell³³

Product Description: Gainwell's work requirement verification tool is a configurable SaaS product that uses multiple data sources to verify eligibility and exemptions. It uses a data driven verification platform that integrates state and commercial data sources through an API, prioritizing automated verification. When additional steps are required, connects applicants to resources that support compliance. The tool has an applicant-facing portal that includes tools like CBV, document submission, and a reporting portal. It also includes a caseworker-facing portal to review submitted information and reduce manual verification.

Information to Consider:

- Integrates state data sources with commercial data sources
- Independent of the state system – can be integrated without requiring system replacement or changes to eligibility logic
- Document submission includes AI document review with configurable rules and caseworker oversight
- Partners with other vendors to expand data verification and referrals for qualifying employment and volunteering opportunities
- Pricing varies by state scope, volume, and implementation model and typically includes a per-enrollee/applicant fee and fixed implementation costs

Community Engagement Verification System by Healthy Together³⁴

Product Description: Healthy Together's Community Engagement Verification System is a SaaS configurable module that guides users through logging hours, uploading documents, and tracking the completion of the work requirement. It uses an AI-powered rules engine that can be configured to validate exemptions and qualifying activities, including education, volunteer, and income status. Healthy Together's forward deployed engineering model³⁵ means the company provides the technical staff

needed to launch the tool, leading to more streamlined integration and a quicker launch. Healthy Together used a similar model when launching Summer EBT under a rapid response timeline.

Information to Consider:

- Sold to states as an annual license subscription
- Deployable system ready to launch in 90 days
- Healthy Together is live in benefits programs in ten states and territories
- Can integrate data sources provided by the state, or Healthy Together can contract with data sources and pass the data along to states
- Provides technical staff needed for launch through (forward deployed engineering model)
- Designed to work alongside existing eligibility system, not replace it
- Can be integrated directly into the state application and renewal process, or accessed through a unique web or mobile app

Medicaid Express by Vimo³⁶

Product Description: Medicaid Express is a SaaS offering from Vimo, the company that also runs the state-based marketplace platform Get Insured. Medicaid Express is a configurable end-to-end Medicaid Eligibility System with multiple modules, including a newly launched Community Engagement as a Service module. This module uses the same type of rules engine as Get Insured. States can use any number of modules from Medicaid Express, including a document uploader, applicant outreach, and their single streamlined application that will have updated questions relevant to the Medicaid work requirement. Regardless of the modules chosen, Medicaid Express can integrate with any state system. The community engagement module can also integrate with other tools like the income verification and CBV tools discussed above.

Information to Consider:

- States can use end-to-end eligibility system or just Community Engagement as a Service module
- Can integrate with other products like CBV and income verification
- Verification hierarchy available for states to choose which data sources to use in which orders

MedicaidKeeper³⁷

Product Description: MedicaidKeeper is a SaaS reporting tool for enrollees to report their exemptions and activities (including work, school, and volunteering). It is intended to be an addition to the current state eligibility system. It has an enrollee-facing portal and an eligibility worker-facing portal. It allows users to report their activities and upload supporting documents. This reporting and submission can be done through SMS, email, or a web-based platform. The tool uses AI to sort submitted documents and extract relevant information for the caseworker and eligibility system.

Information to Consider:

- Small product team supported by a large development and integration firm
- Low cost tool at \$1 per enrollee per year
- Relies on state provided data sources, which can be integrated through API or batch processing
- Applicants can submit information through SMS and email, as well as the traditional application portal

OSKER (Open Source Community Engagement Reporting) by Nava

Product Description: OSKER is a “sidecar”³⁸ reporting and case management tool that works alongside existing Medicaid systems. It includes a configurable rules engine that screens for exemptions and determines what, if anything, the applicant needs to report. The tool then guides the applicant through submitting qualifying activities that meet the work requirement like income, hours worked, school, and volunteering. States can choose to implement OSKER in one of three ways. First, they can pull directly from the open source code base and manage the implementation themselves. Alternatively, they can implement through an existing state vendor or system integrator, with the state maintaining oversight. Finally, they can contract directly with Nava for implementation, where the state owns the final product and Nava provides technical, product, and policy support.

Information to Consider:

- Open source code base³⁹
- Can be integrated directly into the state application and renewal process or accessed through a unique link texted or emailed to applicants
- Nava has experience in multiple public benefits programs
- Nava has frequent public Demo Days⁴⁰ of its tool for transparency and clarity
- Relies on state provided data sources
- Available at no cost if implemented directly from the code base, or through flexible contracting arrangements when Nava provides implementation support

Salesforce⁴¹

Product Description: Salesforce is a SaaS product with multiple use cases in the private and public sector. In public benefits, more than 20 states use the tool for their application portal, contact center, outreach and marketing, case management, system integration, and/or analytics. Salesforce’s Medicaid work requirement offering is a new configurable tool that includes an applicant-facing portal to report qualifying activities and exemptions, a caseworker-facing portal for reviewing information, and a communications and analytics portal for insights into the Medicaid population. The client-facing portal also has an AI-powered chatbot that guides users through the document submission process.

Information to Consider:

- Can be integrated with CBV offerings like SteadyIQ
- Experience integrating with a variety of state IT systems
- Integrates state data sources with commercial data sources
- Low code implementation

Vendor Overview Summary

This chart summarizes the vendors included in this paper, categorizing them by product type. It also describes which of the system changes needed for the work requirement the product may be able to address. (Note that many products only cover a piece of system changes. For example, CBV products only address document submission for income.) Finally, the chart summarizes key attributes about the product. For more in-depth information, visit the corresponding section above.

Product	Type	Possible System Changes	Key Information
Argyle	CBV	Verification Through Data Sources (income) Document Submission (income) Notices and Client Outreach (income)	<ul style="list-style-type: none">• CBV technology can be used standalone, but also as data aggregator for other CBV tools like DiCIT, SteadyIQ, and Emmy• Provides access to verified payroll, gig, and banking data through direct source connections• One-click reverification for applicants• Created in the mortgage lending and tenant screening space, expanded to public benefits
Emmy by Centers for Medicare & Medicaid Services (CMS)	CBV	Verification Through Data Sources (income) Document Submission (income) Notices and Client Outreach (income)	<ul style="list-style-type: none">• Provides direct connections to payroll and gig data; no connection to banking data• Open source code base• Developed by CMS in partnership with policy experts at CMS

Product	Type	Possible System Changes	Key Information
			<ul style="list-style-type: none"> Applicants can provide comments with their income report to give additional information to caseworkers
DiCIT by Digital Public Works	CBV	Verification Through Data Sources (income) Document Submission (income) Notices and Client Outreach (income)	<ul style="list-style-type: none"> Provides direct connections to payroll and gig data; no connection to banking data Open source code base Provides service delivery analysis alongside typical CBV work Created by former U.S. Digital Services staff Provided at cost to states
Income Passport by Steady IQ	CBV	Verification Through Data Sources (income) Document Submission (income) Notices and Client Outreach (income)	<ul style="list-style-type: none"> Provides direct connections to payroll data, gig data, financial institutions, and digital wallets Users must review their income report before submission Includes an AI-powered engine for grouping, auto-classifying, and de-duplicating income data Created initially in the government space Flat rate annual subscription negotiated with the state
Truv	CBV	Verification Through Data Sources (income) Document Submission (income) Notices and Client Outreach (income)	<ul style="list-style-type: none"> Provides direct connections to payroll data, gig data, and financial institutions Does not rely on other products for connections to payroll providers or financial institutions Created in the lending space, expanded to public benefits Additional volunteering and education verification
Experian Verify	Traditional Income and Employment Verification and CBV	Verification Through Data Sources (income) Document Submission (income) Notices and Client Outreach (income)	<ul style="list-style-type: none"> Currently free to use in SNAP Experian Verify has a more expansive offering that includes CBV
The Work Number and Complete Income by Equifax	Traditional Income and Employment Verification and CBV	Verification Through Data Sources (income) Document Submission (income)	<ul style="list-style-type: none"> Currently the most common income and employment verification in government Provided at a cost per report (high cost - up to \$15/report)

Product	Type	Possible System Changes	Key Information
		Notices and Client Outreach (income)	<ul style="list-style-type: none"> Complete Income is a more expansive offering that includes CBV
Truework	Traditional Income and Employment Verification and CBV	Verification Through Data Sources (income) Document Submission (income) Notices and Client Outreach (income)	<ul style="list-style-type: none"> Initially used in the background check ecosystem (acquired by Checkr) Includes CBV, document submission, and “Smart Outreach” (Truework contacts applicants on behalf of the state)
Community Engagement Verification Intelligence Platform by Gainwell	Launched in Direct Response to the Work Requirement	Additional Information Collection (Client Portal and Forms) Verification Through Data Sources Document Submission Caseworker Portal Eligibility Determination and <i>Ex Parte</i> Renewal Logic (partial) Notices and Client Outreach Reports and Analytics	<ul style="list-style-type: none"> Integrates state data sources with commercial data sources to verify eligibility and exemptions Document submission includes AI document review with configurable rules and caseworker oversight Works alongside the state system, does not replace it Pricing varies by state scope, volume, and implementation (typically a per-enrollee fee and fixed implementation costs)
Community Engagement Verification System by Healthy Together	Launched in Direct Response to the Work Requirement	Additional Information Collection (Client Portal and Forms) Verification Through Data Sources Document Submission Caseworker Portal Eligibility Determination and <i>Ex Parte</i> Renewal Logic (partial) Notices and Client Outreach Reports and Analytics	<ul style="list-style-type: none"> Sold to states as an annual license subscription SaaS product to guide applicants through the work requirement AI-powered rules engine to validate exemptions and qualifying activities Works alongside the state system, does not replace it Provides technical staff needed for launch to ensure quick deployment (forward deployed engineering model)
Medicaid Express	Launched in Direct Response to the Work Requirement	Additional Information Collection (Client Portal and Forms) Verification Through Data Sources Document Submission Caseworker Portal	<ul style="list-style-type: none"> Product with options for an end-to-end Medicaid eligibility system or just Community Engagement as a Service module Can integrate with other products like CBV and income verification Verification hierarchy available for states to choose which data sources to use in which orders

Product	Type	Possible System Changes	Key Information
		<p>Eligibility Determination and <i>Ex Parte</i> Renewal Logic (partial)</p> <p>Notices and Client Outreach Reports and Analytics</p>	
Medicaid Keeper	Launched in Direct Response to the Work Requirement	<p>Additional Information Collection (Client Portal and Forms)</p> <p>Document Submission Caseworker Portal</p> <p>Notices and Client Outreach</p>	<ul style="list-style-type: none"> • Client-facing reporting portal for reporting exemptions, work, income, volunteering, and school • Document submission and AI-powered document classification • Applicants can submit information through SMS, email, or the traditional web portal • Provided at \$1 per enrollee per year • Works alongside the state system, does not replace it
OSCER by Nava	Launched in Direct Response to the Work Requirement	<p>Additional Information Collection (Client Portal and Forms)</p> <p>Verification Through Data Sources</p> <p>Document Submission Caseworker Portal</p> <p>Eligibility Determination and <i>Ex Parte</i> Renewal Logic (partial)</p> <p>Notices and Client Outreach</p>	<ul style="list-style-type: none"> • Rules engine screens for exemptions and determines reporting needs • Open source code base • Client-facing portal for reporting work, income, volunteering, school, and exemption screening • Nava has experience in multiple public benefits programs • Public Demo Days • Works alongside the state system, does not replace it • Available at no cost if implemented directly from the codebase, or through flexible contracting arrangements when Nava provides implementation support
Salesforce	Launched in Direct Response to the Work Requirement	<p>Additional Information Collection (Client Portal and Forms)</p> <p>Verification Through Data Sources</p> <p>Document Submission Caseworker Portal</p> <p>Eligibility Determination and <i>Ex Parte</i> Renewal Logic (partial)</p> <p>Notices and Client Outreach Reports and Analytics</p>	<ul style="list-style-type: none"> • Client-facing portal for reporting work, income, volunteering, and school • AI-powered chatbot that guides users through the document submission process • Experience integrating with a variety of state IT systems • Low code implementation

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- ¹ H.R.1 - An act to provide for reconciliation pursuant to title II of H. Con. Res. 14, 2025, 139 Stat. 78, Subchapter D, Sec. 71119, <https://www.congress.gov/bill/119th-congress/house-bill/1/text>.
- ² H.R. 1 allocates \$100 million in funding across all states (including states that don't have a population subject to the work requirement but have to make other changes mandated by H.R. 1) and an additional \$100 million based on the state's population subject to the work requirement.
- ³ Centers for Medicare & Medicaid Services (CMS), CMCS Informational Bulletin Re: Section 7119 of the "Working Families Tax Cut" Legislation, Public Law 119-21: Requirements for States to Establish Medicaid Community Engagement Requirements for Certain Individuals, December 8, 2025, <https://www.medicaid.gov/federal-policy-guidance/downloads/cib12082025.pdf>.
- ⁴ Ibid.
- ⁵ Jennifer Wagner, Symonne Singleton, and Maani Stewart, "A Guide to Reducing Coverage Losses Through Effective Implementation of Medicaid's New Work Requirement," CBPP, November 3, 2025, <https://www.cbpp.org/research/health/a-guide-to-reducing-coverage-losses-through-effective-implementation-of-medic aids>.
- ⁷ CMS, *op cit*.
- ⁸ CMS, "Fact Sheet: Pledges from Medicaid Technology Companies to Support Community Engagement Implementation and Related Medicaid System Improvements," January 29, 2026, <https://www.cms.gov/newsroom/fact-sheets/fact-sheet-pledges-medic aid-technology-companies-support-community-engagement-implementation-related>.
- ⁹ While integration is key, states should also incorporate an "off switch" to changes that are specific to the work requirement in case an area in the state (or entire state) meets an exception for high unemployment or an emergency or disaster declaration or federal policy changes.
- ¹⁰ Jennifer Wagner, "Streamlining Medicaid Renewals Through the *Ex Parte* Process," CBPP, March 4, 2021, <https://www.cbpp.org/research/health/streamlining-medic aid-renewals-through-the-ex-parte-process>.
- ¹¹ Eligibility determination logic is the rules-based process by which state agencies determine if an applicant is eligible for benefits. When there are policy changes, like with the work requirement, states must update these rules to ensure the proper determination for benefits.
- ¹² See also Maxwell Mazzocchi and Danielle Heymann, "Five Questions to Ask When Evaluating Technical Products," Code for America, December 4, 2025, <https://codeforamerica.org/news/five-questions-to-ask-when-evaluating-technical-products/>.
- ¹³ Government Accountability Office, "Agile Assessment Guide: Best Practices for Agile Adoption and Implementation GAO-20-590G," September 28, 2020, <https://www.gao.gov/products/gao-20-590g>.
- ¹⁴ An Application Program Interface (API) is an interface that allows different systems (including some government systems and third-party applications) to communicate with each other, share data, and integrate services. See more: Greg Slater, "What's an API and Why Do You Need One," Government Technology, March 26, 2014, <https://www.govtech.com/archive/whats-an-api-and-why-do-you-need-one.html>.
- ¹⁵ Salesforce, "Guide to Low-Code Development," <https://www.salesforce.com/platform/low-code-development-platform/what-is-low-code/>.

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- ¹⁶ A 1099 worker is an independent contractor or self-employed individual, not a traditional employee of the company they work for. The name comes from the IRS Form 1099-NEC (Nonemployee Compensation) that a business uses to report payments of \$600 or more made to the individual during the tax year. Gig workers, like Uber drivers and DoorDash delivery people, fall into this category. See more: IRS, "Independent contractor defined," <https://www.irs.gov/businesses/small-businesses-self-employed/independent-contractor-defined>.
- ¹⁷ When talking about worker types, people are often categorized by the type of tax forms they receive for their work. W-2 workers are people that work for a company as an employee, and 1099 contractors are self-employed workers and gig workers. Critical for the work requirement implementation is the fact that W-2 workers are included in data from traditional income verification sources (like quarterly wage data and large commercial databases) and CBV solutions, while 1099 workers are usually not included in traditional income verification but are covered by CBV.
- ¹⁸ Argyle, "Automate income and employment verifications for benefits," <https://argyle.com/industries/government-benefits/>.
- ¹⁹ CMS IVAAS Github open source code, available at <https://github.com/DSACMS/iv-cbv-payroll>.
- ²⁰ In an interview on Face The Nation, CMS Administrator Dr. Mehmet Oz spoke about pilots that prove the ease of implementing the work requirement. He referenced pilots that do consent-based verification in Louisiana and Arizona, pilots which were run by IVAAS and DiCIT. CBS, "Face The Nation with Margaret Brennan," broadcast on August 3, 2025, available at <https://youtu.be/mUWuQzJrqWw?si=WoMckpSatROIKTHc>.
- ²¹ CMS, "Medicaid Technology Companies Pledge \$600M in Savings to Support Community Engagement and Related State Medicaid System Improvements," January 29, 2026, <https://www.cms.gov/newsroom/press-releases/medicaid-technology-companies-pledge-600m-savings-support-community-engagement-related-state>.
- ²² Digital Public Works, <https://digitalpublicworks.org/>.
- ²³ Service design is the practice of improving programs and services through methods such as user research, stakeholder management, and human-centered design.
- ²⁴ DiCit Github open source code, available at <https://github.com/Digital-Public-Works/iv-cbv-payroll>.
- ²⁵ Steady IQ, <https://steadyiq.com/>.
- ²⁶ Human-in-the-loop is an AI guardrail that requires humans to be involved in the process to ensure accuracy and provide accountability.
- ²⁷ Truv, <https://truv.com/government>.
- ²⁸ Equifax Income Verification, <https://totalverify.equifax.com/solutions/complete-income>.
- ²⁹ Sarah Kliff, Margot Sanger-Katz, and Asmaa Elkeurti, "'A Big Positive': How One Company Plans to Profit From Medicaid Cuts," New York Times, November 3, 2025, <https://www.nytimes.com/2025/11/03/health/medicaid-cuts-equifax-data.html>.
- ³⁰ The Federal Data Services Hub, also known as The Hub," is a support system for federal and state programs that require verification of consumer data. The Hub serves as an electronic conduit of data and as a single interface point through which parties may exchange data, while also providing support for common functional services such as exchanging data, verifying coverage data, and determining eligibility." For more information, visit the CMS CyberGeek Federal Data Services page at <https://security.cms.gov/pia/federal-data-services-hub>.
- ³¹ Truework, <https://www.truework.com/>.
- ³² Truework, "Truework Acquired by Checkr to Bring Automated Verifications to More Markets," May 14, 2025, <https://www.truework.com/resource-center/blog/truework-acquired-by-checkr>.

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- ³³ Gainwell, <https://www.gainwelltechnologies.com/>.
- ³⁴ Healthy Together Community Engagement Verification System, <https://www.healthytogether.co/solutions/medicaid-cevs>.
- ³⁵ Forward Deployed Engineers, also known as deploy engineers, are engineers that work directly on the vendor product and integrate directly into a state team.
- ³⁶ Medicaid Express, <https://www.vimo.com/medicaid-express/>.
- ³⁷ Medicaid Keeper Home Page, <https://medicaidkeeper.replit.app/>.
- ³⁸ A sidecar is a smaller system that runs alongside a larger more complex system to provide additional functionality with requiring deep integration. Many tools in this paper fall into this category.
- ³⁹ OSCER Github open source code, available at <https://github.com/navapbc/oscer>
- ⁴⁰ Nava, "H.R. 1 Response," <https://www.navapbc.com/tags/hr-1-response>.
- ⁴¹ Salesforce for Community Engagement, <https://salesforce.highspot.com/viewer/8285754d0c115b58e16645635b514b79>.