

# Consent-Based Verification Pilot Data and Insights

Last updated July 25, 2025

## Background and context

The data summarized in this document reflects the team's current knowledge. It summarizes the results of 3 completed pilots and early data from 1 pilot that is still underway.

### Fall 2024 proof-of-concept pilots

Two small scale pilots launched in the Fall of 2024 to assess the viability of CBV.

- **Pilot A for SNAP**

*At renewal, a caseworker cold called eligible clients that needed to submit income documentation and offered the option of using CBV. If the client agreed, they received the link via email.*

- **Pilot B for SNAP**

*At SNAP phone interviews for applications and renewals, a caseworker sent eligible clients a link to CBV via email.*

### Spring and summer 2025 pilots

In an effort to rely on less manual work from caseworkers, we worked with two State agencies to integrate CBV into existing requests for income verification.

- **Pilot C for Medicaid** (completed, planning a second phase for August 2025)

*After checking Quarterly Wage Data, clients whose income was flagged to be over the eligible income limit were texted a link to CBV and sent a paper notice.*

- **Pilot D for SNAP** (currently in-progress, planning a second phase for Fall 2025)

*At recertification, clients who indicated a change in income were sent an email inviting them to CBV. The process was marked as optional for clients.*

## Learnings across all pilots

Hypothesis	Validated / Invalidated	Explanation
Caseworkers will be willing to share the link to CBV over the phone (at interview or recert).	<b>Partially Validated</b>	This is an extra step, and it can be easy to skip introducing CBV.
Clients will use CBV to submit income verification.	<b>Partially Validated</b>	There is drop-off across the steps required to complete CBV. Product iteration is still required to fully validate.
Clients will provide income documentation faster with CBV than other methods.	<b>Validated</b>	
Clients will be able to find their platform and log in.	<b>Validated</b>	
CBV will contain comparable data to TWN.	<b>Validated</b>	
CBV will provide clearer, easier to use data than uploaded documents.	<b>Validated</b>	
CBV will provide complete information, so workers do not need to reach out to the client again.	<b>Partially Validated</b>	This is important to strive for but was not consistently achieved across cases.
Caseworkers will trust the data CBV pulls into the Income Report.	<b>Validated</b>	

### *What works well*

- Client comments are helpful to both caseworkers and clients.
- Keep client trust and confidence at the center of all future iterations.
- Providing low, medium, and high technical integration options to meet States where they are.

### *Ongoing tweaks and adjustments*

- Introduce CBV when the client's most important step is verifying their income. There is too much happening in SNAP interviews to introduce another step. The SNAP interview is also too late an intervention as many clients have already submitted their income documentation at this point.

- Make it easier for clients to identify the platform they need to log into.
- Aim for CBV to get as close as possible to one-touch verification.
- Continue to learn what earned income data is available across platforms and integrate it into the Income Report for caseworkers.

## CBV Cross-Pilot Impact Summary

### Coverage

- **On the back end of CBV we use Argyle and Pinwheel to connect directly with clients' pay platforms. They claim to cover between 85 – 92% of employers and gig platforms.**
  - We are still learning about our precise coverage rates in specific geographies and employer sizes. The rate listed above is a national coverage rate.

### Timeliness

- **Overall, it takes the median clients 6.5 minutes to complete CBV. 90% of clients finish the flow in 15 minutes or less**
  - In Pilot C, it took the median client 6.6 minutes to complete CBV. 90% of clients finish the flow in 15.5 minutes or less.
  - In Pilot D, it took the median client 5.3 minutes to complete CBV. 90% of clients finish the flow in 12 minutes or less.
- **Clients quickly return CBV when requested at the right point in the benefit journey.** *In Pilot D, the median client submitted their CBV report back to the state 22 minutes after it was requested from them via email. 99% of clients in Pilot D submitted their CBV report back to the state within 3 days of the information being requested via email. This could not be measured in Pilot C due to the structure of the pilot.*
- **CBV's Income Report provides robust, recent income data to caseworkers which eases and speeds up the income verification process.** *In Pilot C, 139 caseworkers completed a survey after the pilot concluded. In that survey, caseworkers said it was:*
  - **Easier to verify income using CBV:** 79% agreed or strongly agreed
  - **Faster to verify income using CBV:** 80% agreed or strongly agreed
  - **More complete information using CBV:** 73% agreed or strongly agreed
- **A majority of CBV Income Reports contain income data from the last 14 days.**

- 84% of reports have a payday within the last 14 days
- 7% of reports have a payday between 14 days and 90 days
- 9% of reports don't have a pay day within the last 90 days. This confirms that the person has not been paid by that employer in the last 90 days which can help a caseworker verify a client's lack of income.
- In case reviews the team found that CBV provided proof of termination sooner than commercial sources of income data such as Equifax. This helped verify recent loss of income.

## Accuracy

*Note: Data shared in this section is based on 22 case reviews that have been done to-date across pilots. This is done in partnership with caseworkers to evaluate CBV Income Reports and compare it to Equifax's The Work Number and/or paystubs submitted.*

- **Case reviews have shown that CBV Income Reports provide the same information as Equifax's The Work Number.**
  - 14 cases that submitted CBV Income Reports also contained results in TWN.
    - TWN and CBV had the same data: 8 cases
    - CBV had more data than TWN: 2 cases
    - TWN had more data than CBV: 4 cases
- **In some cases, CBV Income Reports provide more information than TWN.**

*Of the 22 cases reviewed:*

  - 8 cases that submitted CBV Income Reports provided more information than TWN. In these 8 cases, TWN did not return results.

## Data Granularity

*Context: CBV works with hundreds of different payroll providers/gig platforms and thousands of employers. These different platforms have different levels of data fidelity and return information using different structures. To account for the varying data fidelity, we lightly validate and standardize some data elements before generating the income report.*

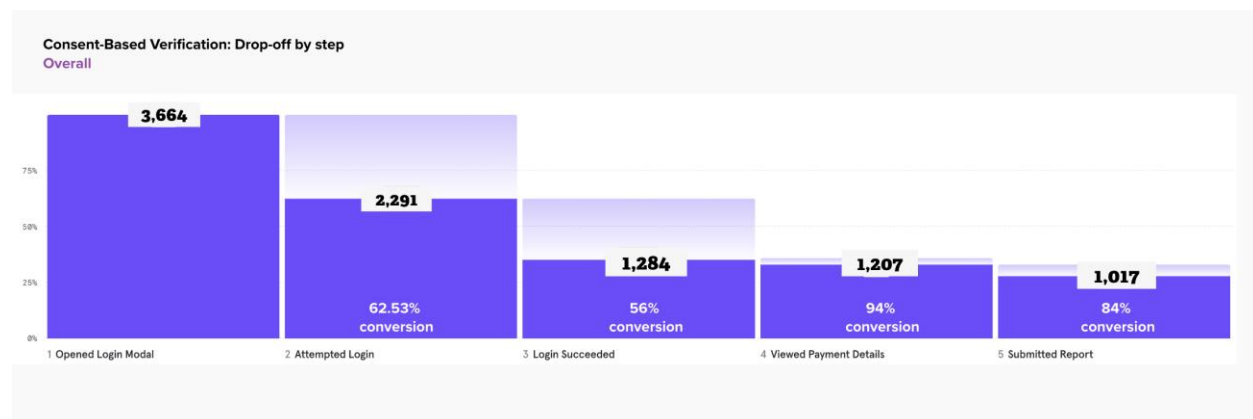
- **Data in the accounts CBV connects to is valid for income verification 99.5% of the time.** Reasons an account might not meet the valid data threshold:
  - Payroll account does not contain the name of the employer making the payments
  - No gross income/net income but evidence of hours worked

- **Across CBV Income Reports, hours worked has been available 88% of the time for W2 platforms and 98% of the time for gig platforms.**
  - 88% of W2 accounts connected include the hours worked in the pay period. For the accounts that don't include hours worked, the team could divide the hours worked by the federal minimum wage to create an estimate.
  - 98% of gig platform accounts connected include the duration of the gigs worked. The only gig platform in our data that does not return duration is Grubhub.
- **In cases where W2 employment was recently terminated, a specific termination date was included 96% of the time.**
- **Employer phone number was included for 99% of W2 jobs.**

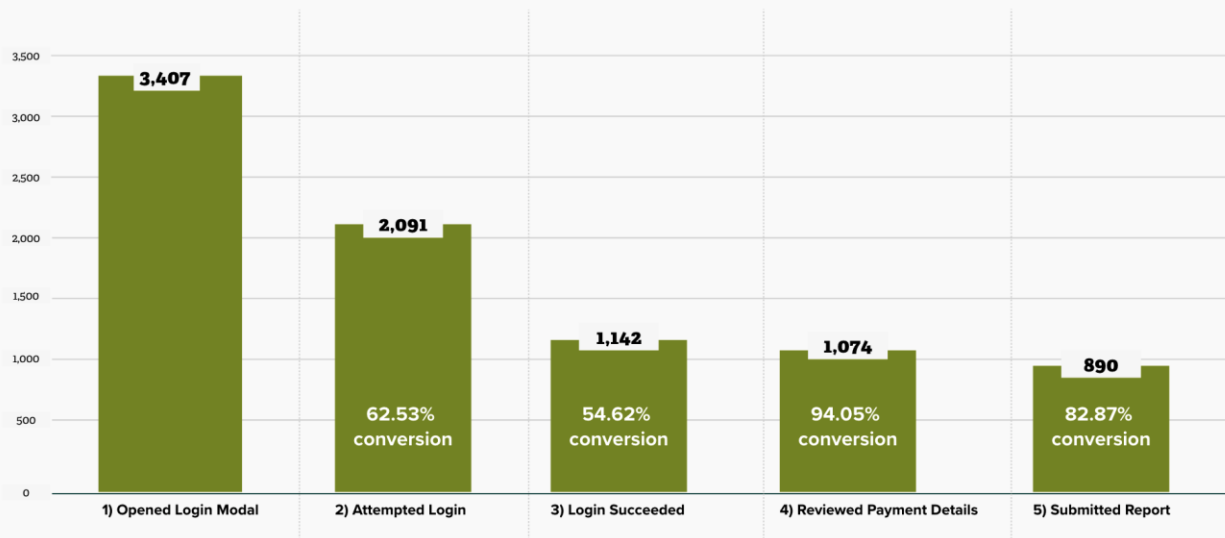
## Adoption

*Note: Data shared in this section is based on sessions not on unique users or even devices. Our team is working to update our analytics tracking to better understand if someone drops from the flow and returns that it is the same person. We will have better tracking capabilities in the next 6 weeks.*

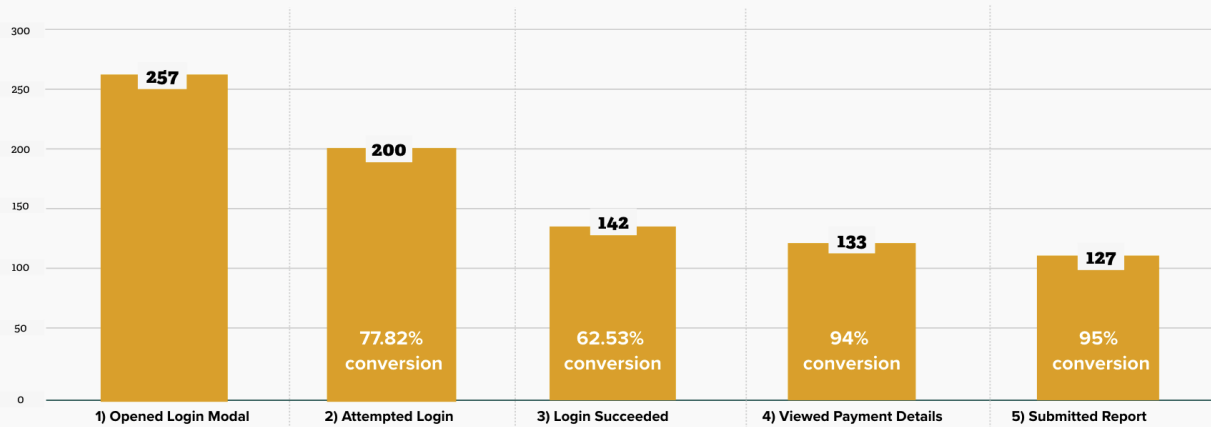
*Additional context - Pilot C's intervention was sent to a much larger pool of beneficiaries therefore the overall numbers are heavily skewed by Pilot C's integration and design.*



Consent-Based Verification: Drop-off by step  
Pilot C for Medicaid



Consent-Based Verification: Drop-off by step  
Pilot D for SNAP



- **When clients are able to log into their pay platforms, they are likely to submit their Income Report.**
- **Finding Employer, Payroll Provider, or Gig Platform:** Overall 64% of sessions who land on the search page find an employer, payroll provider, or gig platform and take the next step to open the log in modal.
  - In Pilot C, this number is lower at 63%
  - In Pilot D, this number is higher at 77%
- **Login:** Overall, 33% of sessions succeed at logging into their account after finding their employer, payroll provider, or gig platform account.
  - In Pilot C, this number is lower at 33%
  - In Pilot D, this number is higher at 55%

- **Review payment details:** Overall 94% of sessions viewed their payment details after successfully connecting their account. There was no discrepancy between the two pilots at this step - both had a 94% continuation rate. The team hypothesizes that drop off here indicates the real time syncing of income data taking too long and the user losing interest and leaving the site.
- **Submit report to agency:** 84% of the sessions that successfully logged in and continued on to review the information payment details submitted their report to the agency.
  - In Pilot C, this number is lower at 83%
  - In Pilot D, this number is higher at 95%

**Completion Rate.** Once someone finds their employer or payroll provider, what percentage of people succeed at linking their account and then go on to submit the income report to the state agency:

- Pilot C – 26% of sessions who found their pay account submitted an income report.
- Pilot D – 49% of sessions who found their pay account submitted an income report.