Request for Information (RFI) on Public and Private Sector Uses of Biometric Technologies: Responses

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November 29th, 2021

To: Dear White House Office of Science and Technology Policy (OSTP) Staff

From: Daniel Ravizza, Philadelphia Unemployment Project

I’m Daniel Ravizza, an organizer with the Philadelphia Unemployment Project (PUP), a non-profit advocacy group serving the Philadelphia region for over 45 years in the area of unemployment compensation advocacy. Since 1975, the Philadelphia Unemployment Project has organized the poor and unemployed to fight for economic justice, bringing diverse groups together to bring about major changes that benefit millions of unemployed and impoverished people. PUP has helped the unemployed link with coalition partners in the labor, religious, community, civil rights, and women’s movements to increase our power.

Recently, Pennsylvania’s Department of Labor and Industry (DLI) implemented online ID verification (IDV) systems to verify claimant’s identity through the use of documents uploads and a “selfie” picture that was used to prevent fraud and abuse for both the Pandemic Unemployment Assistance (PUA) and regular Unemployment Compensation (UC) systems. While touted a panacea that would ease the ability of eligible unemployed claimants to quickly receive benefits, our experience has been quite different.

Online identity verification through the use of this technology has impacted claimants and potential claimants who are not fully digitally literate and raises questions of the effectiveness of the program. After the rollout of ID.me in 2021, PUP found ourselves advocating for in-person assistance for individuals who could not complete multi-step online processes required to create and a digital account with the PA Department of Labor and Industry in order to start or continue receiving benefits.

An alarming number of cases of benefits stopping without a final determination has taken place since this summer. Since mid-August, 25% of 384 cases have had benefits stopped in some manner without a final determination, a violation of the Supreme Court Java ruling. Of those who contacted PUP who may have had their benefits stopped in violation of Java, 10% cited ID.me as a factor in our communications. PUP has received reports from unemployed persons that have been owed the full amount of PUA (>50 weeks of unemployment) and have been in the appeals process for months after the ending of the program with no resolution. These findings only represent the small fraction of the population that contacted PUP; many more undoubtedly exist in Pennsylvania.

We have had mixed results with claimants who have been sent to do in-person IDV with CareerLink staff. Some have been able to successfully apply in person, yet some have continued having trouble with staff that do not have a knowledge of the protocol or are struggling with resources. Ultimately, it does not bridge the digital divides in our communities that have left many still seeking verification- and thus compensation. For those that are successful in completing ID.me or identity verification, some still are still waiting for benefits to be distributed for weeks or months after completing the process.

ID.me may be a process that exacerbates PA DLI’s poor record on promptness of payment. The federal standard for unemployment dictates that 80% of eligible claimants receive their first check 21 days after their first compensable week. Currently, only 32% claimants are receiving their checks within that timeframe. The state’s performance continues to lag in later payments as well, as total response time has trended downward since the beginning of the summer of this year.

https://oui.doleta.gov/unemploy/btq.asp
ID.me and digital IDV will continue to challenge communities that a) do not have access to digital devices such as camera-equipped smartphone, laptops, and tablets b) do not have digital literacy skills allow them to create email accounts and upload files to password-protected online portals and c) do not have any sort of internet access at all.

Our concern remains that the expansion of these technologies will leave our most vulnerable communities in a continued loop of confusion without any access to the monetary benefits they are entitled to.

Best,

Daniel Ravizza
Organizer
Philadelphia Unemployment Project

Exhibit A: