# Policy As Code: Enabling Timely Unemployment Insurance Improvements

Team Oak 🌳
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Tech Executive
Leadership Initiative

# Team Oak 🌳

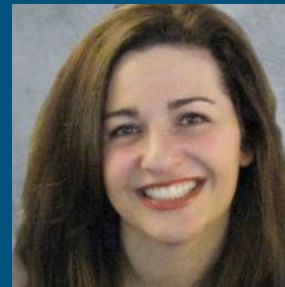Ossama
Alami

Barbara
Cohn

Steve
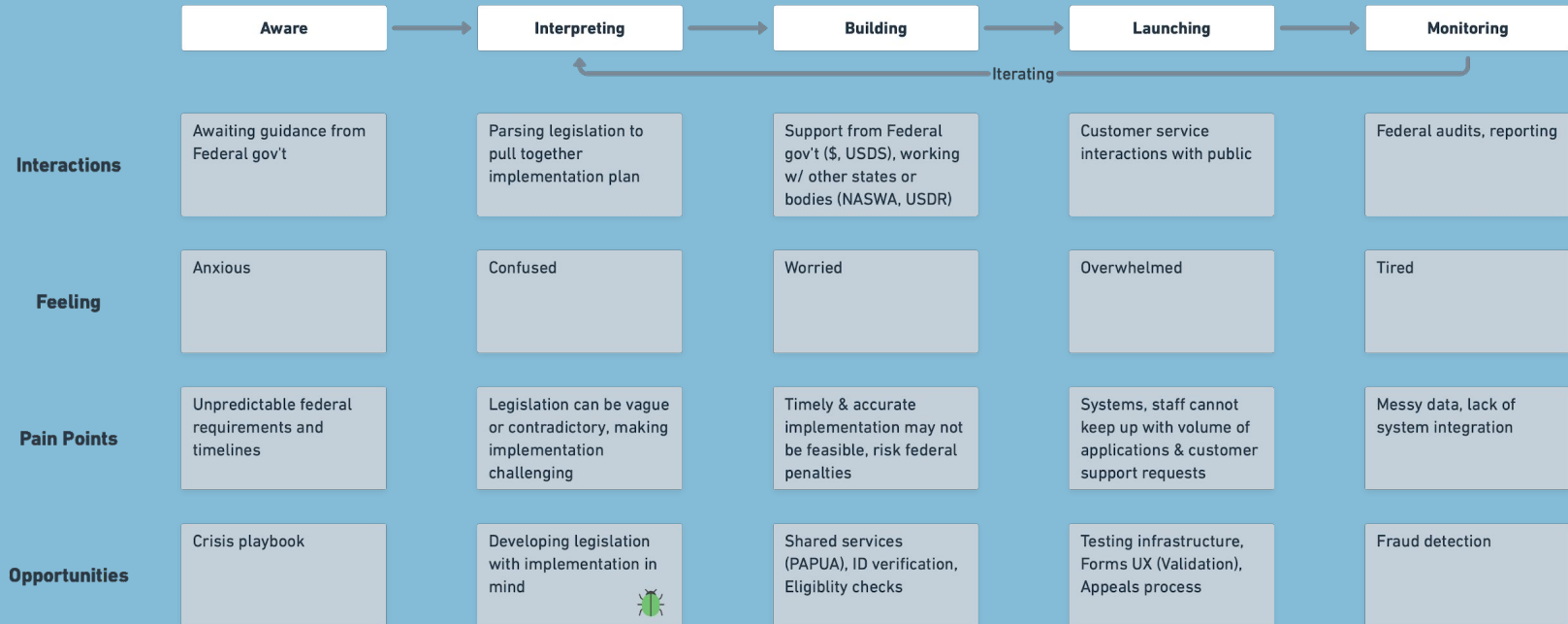Leibman

Mimi Liu

Jessica
Rossman

# Problem Statement

State unemployment insurance (UI) agencies struggle in quickly adopting changes to UI laws and implementing Federal Department of Labor (DOL) guidance in a consistent and compliant manner.  Key challenges include:
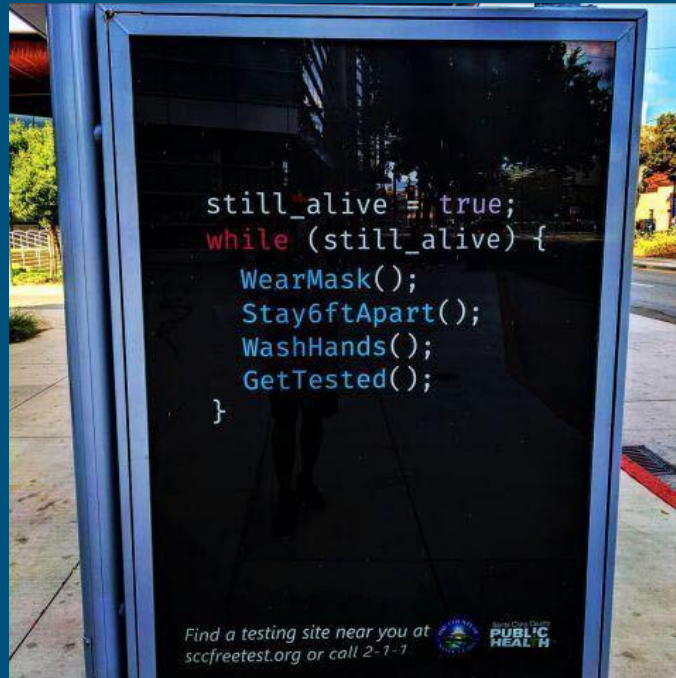
- Implementation time pressures during times of crisis
- Complex and vague laws that interplay with previous regulations and state UI benefit systems in unanticipated ways
- Collaboration challenges between state and federal agencies

# Key Opportunities in the State Agency Journey

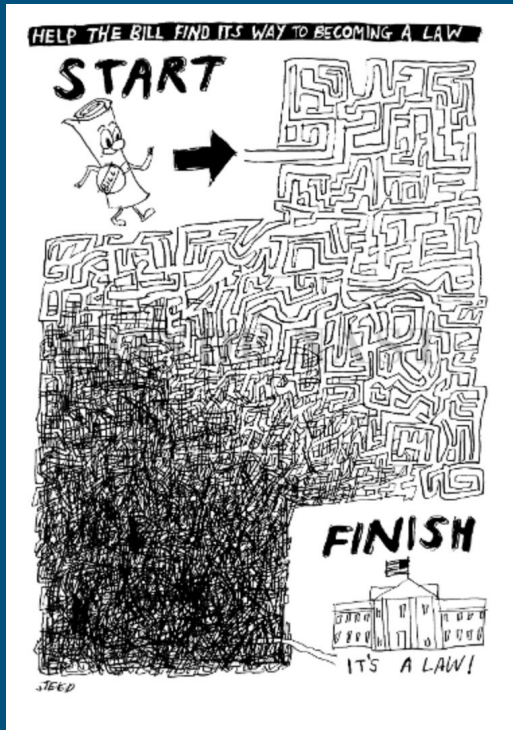## User Journey Map: State Agencies Implementing UI Changes

| | Aware | → | Interpreting | → | Building | → | Launching | → | Monitoring |
|---|---|---|---|---|---|---|---|---|---|

Iterating (arrow from Monitoring back to Interpreting)

| | Aware | Interpreting | Building | Launching | Monitoring |
|---|---|---|---|---|---|
| **Interactions** | Awaiting guidance from Federal gov't | Parsing legislation to pull together implementation plan | Support from Federal gov't ($, USDS), working w/ other states or bodies (NASWA, USDR) | Customer service interactions with public | Federal audits, reporting |
| **Feeling** | Anxious | Confused | Worried | Overwhelmed | Tired |
| **Pain Points** | Unpredictable federal requirements and timelines | Legislation can be vague or contradictory, making implementation challenging | Timely & accurate implementation may not be feasible, risk federal penalties | Systems, staff cannot keep up with volume of applications & customer support requests | Messy data, lack of system integration |
| **Opportunities** | Crisis playbook | Developing legislation with implementation in mind 🐛 | Shared services (PAPUA), ID verification, Eligiblity checks | Testing infrastructure, Forms UX (Validation), Appeals process | Fraud detection |

# Solution: Policy as Code

# Solution: Why Policy As Code?



Conway's Law:

    Broken Communication = Broken Experiences

For CARES Act alone, the DOL's Employment & Training Administration (ETA) issued:

    30 program letters consisting of

    460 pages of guidance, which includes

    364 references and

    63 attachments.

# Solution: Policy As Code

```python
# Individuals

if unemployed:
    applyForBenefits()


# States

if applicant_is_eligible_for_pua:
    givePandemicUnemploymentAssistance()
```
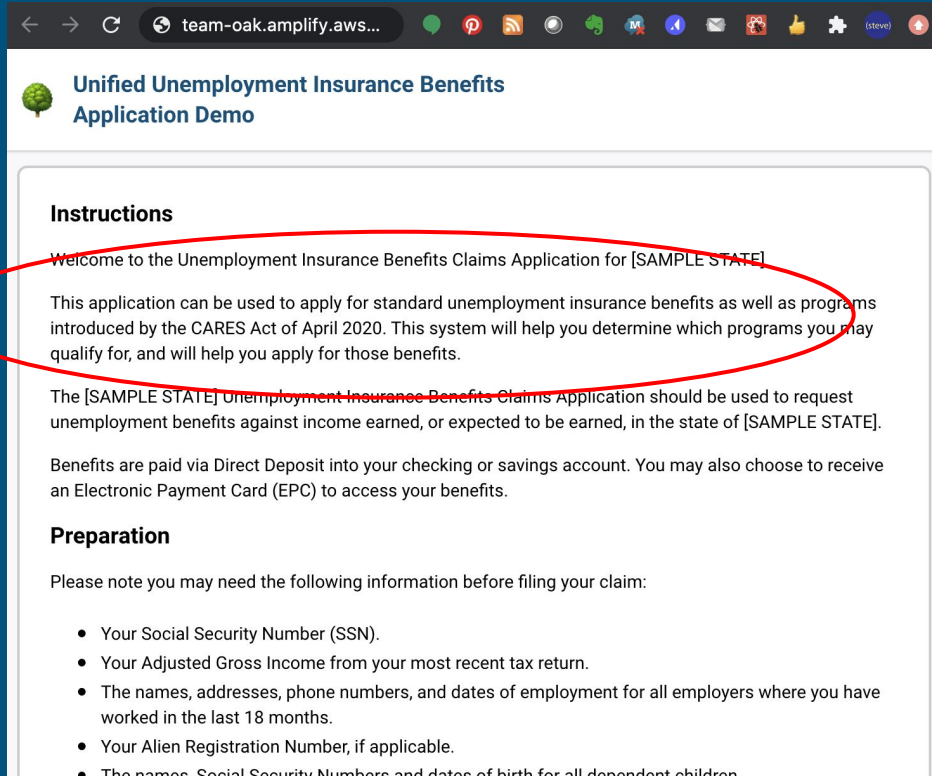
**NOT what was previously administered:**
Learn about the qualification criteria for regular unemployment insurance and PUA and PEUC, figure out which you are eligible for and apply for that one, but note that if you're applying for PUA you should first apply for regular UI, wait for your rejection, and only then submit your PUA claim, which at that point should be backdated, but only if your state form allows you to backdate the claim... .

# Solution: Policy As Code



Create one application that guides the applicant to the benefits appropriate for their scenario.

(A "TurboTax"-like system for unemployment applications)

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The screenshot shows:

**Unified Unemployment Insurance Benefits Application Demo**

**Instructions**

Welcome to the Unemployment Insurance Benefits Claims Application for [SAMPLE STATE]

This application can be used to apply for standard unemployment insurance benefits as well as programs introduced by the CARES Act of April 2020. This system will help you determine which programs you may qualify for, and will help you apply for those benefits.

The [SAMPLE STATE] Unemployment Insurance Benefits Claims Application should be used to request unemployment benefits against income earned, or expected to be earned, in the state of [SAMPLE STATE].

Benefits are paid via Direct Deposit into your checking or savings account. You may also choose to receive an Electronic Payment Card (EPC) to access your benefits.

**Preparation**

Please note you may need the following information before filing your claim:

- Your Social Security Number (SSN).
- Your Adjusted Gross Income from your most recent tax return.
- The names, addresses, phone numbers, and dates of employment for all employers where you have worked in the last 18 months.
- Your Alien Registration Number, if applicable.
- The names, Social Security Numbers and dates of birth for all dependent children

# Solution: Policy As Code

**Unified Unemployment Insurance Benefits Application Demo**

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# Policy as Code Rollout

1. **Hackathon** to enable co-development of policy as code between federal and state agencies
2. **Multi-State Council** to uncover impediments to implementation early
3. **Reference Implementation** to reduce burden of starting implementation

# Impact: What does success look like?

For state agencies: Reduction in time for implementation of new UI guidance

For end beneficiaries: Reduction in benefit delivery (ideally to < 21 days)

# Future Work

1. Iterate & validate on the solution

   - Complete additional interviews
   - Incorporate user feedback

2. Develop a playbook

   - Document best practices and lessons learned from Policy as Code with specific sections focused on:
     - Crisis and unexpected events; and
     - Implementation of non-crisis federal legislation and regulations

# Conclusion

*Policy as Code* is intended to be an enabler of collaboration, not a replacement for it.

The broadest solutions are best informed by a combination of automation and human skill.

The recommendations contained herein should not be considered to be a single perfect process but, rather, a framework in which processes can evolve. They should be living and iterative to adjust to changes and circumstances in both crisis and non-crisis.