Applicant Feedback on PUA Application Process
Compiled by Community Legal Services and Philadelphia Legal Assistance, May 8, 2020

Late in the evening of Friday, April 17, 2020, the PA Department of Labor and Industry released its online application for Pandemic Unemployment Assistance (PUA) benefits. By the next morning, people who had been waiting to apply were attempting to use it, in surprisingly large numbers. At that time, the application was slow to load, and PUA claimants found it confusing and glitchy. Although the slowness of the application has been ameliorated, the public's confusion about the application has not.

Philadelphia Legal Assistance (PLA) and Community Legal Services (CLS) attempted to gather feedback from individuals, but were hampered by our small sample size. Consequently, PLA prepared an online form seeking feedback from PUA applicants, which was released on April 20th. This report summarizes the findings from feedback submitted by 150 applicants by April 23rd. Based on our findings, we make the following recommendations.

- **The Department must provide a better guide and better instructions on each page of the application to help confused applicants through the process.**

- **Barriers that keep applicants from completing the application must be eliminated.**

    o **The application should always be allowed to be finished**.
    o **Written, appealable determinations must be issued where a person is not eligible.**

- **The "employment history" question of the application must be improved.**

- **The document upload portion of the application must be improved.**

- **An automated confirmation email should be sent after the application is submitted to confirm successful filing.**

Overview of Applicant Feedback

The results of the survey indicate that many applicants found that the PUA application was incompatible to the reporting of non-traditional employment, such as independent contractors/freelancers, self-employed individuals and gig workers. These types of jobs comprise the majority of the working population that the program was created to support.

Of about 150 survey responses, 77 people – more than half -- reported a reason they were unable to finish the application. The largest number of these reported "the system would not let me." Others specified that they got into an endless loop or received error messages. Many people

made multiple attempts to apply. 62 people stated that they had to try 3 to 4 (or "several") times, 7 had to try 5 to 10 times, and 6 tried 11+ times.

Many of the specific complaints centered on the "Employment History" section of the application, which asks applicants to put in the name of their employer and company, and then auto-populates with information. In many cases, a company or employer was not included, or the person completing the application is self-employed. In these instances, many were unsure about how to proceed.

The requirement to upload documents presented more difficulties. Some people could not figure out how to upload, or did not have the correct documents. Others reported that their documents seemed to "disappear" after upload, and some completed the application still unsure if the documents were successfully attached.

As they moved through the process, some applications were marked with "unresolved issues" that the applicant was unsure how to fix. Others, especially those with W-2s, were rejected and told to file for traditional unemployment instead – even if the W-2s did not represent their main source of income. One person who is self-employed full-time was rejected because they received a W-2 for doing "a cleaning job on the side for 12 hours. I made a total of $84 after taxes."

Many suggestions for improvement were posited. One of the most cited was the creation of a separate section for self-employed, in which applicants aren't required to answer questions that aren't relevant to their situation. Others hoped for some FAQ or other guidance, such as pop up boxes explaining terms, as well as less confusing or technical terms on the application itself.

Some people who seemed to complete the process successfully felt unsure about their status in the system afterward, and how to check up on their application. One person said when they went back to check, it seemed like they were no longer in the system. Others got an error message when they tried to log back in, claiming that their username and password were invalid. "After registering and receiving a confirmation number, I cannot log into the portal today to confirm the status. It says my account does not exist." Yet others remain confused about whether they are eligible for PUA, or if they should go back and apply for traditional UC. "Many of these questions were for standard W2 workers and didn't apply to me, which makes me fear I am denied not because I am not eligible but because I don't know how to fill out the form properly."

Results

Survey Respondents

As noted, 150 persons filled out PLA's survey between its inception on April 20th and the time that the data was pulled for analysis on April 23rd. Much of the information was collected by free text box, so that individuals could provide information in their own words.

Of the 150 people, 62 were self-employed and 60 were independent contractors/freelancers. Only 9 were gig workers, and 8 were W-2 workers who did not qualify for UC. The remaining 11 respondents were distributed among other categories,

Able to Complete Application?

Unfortunately, more people said that they were unable to complete the application than that they could, by a count of 77 to 72.

Were you able to complete the application?

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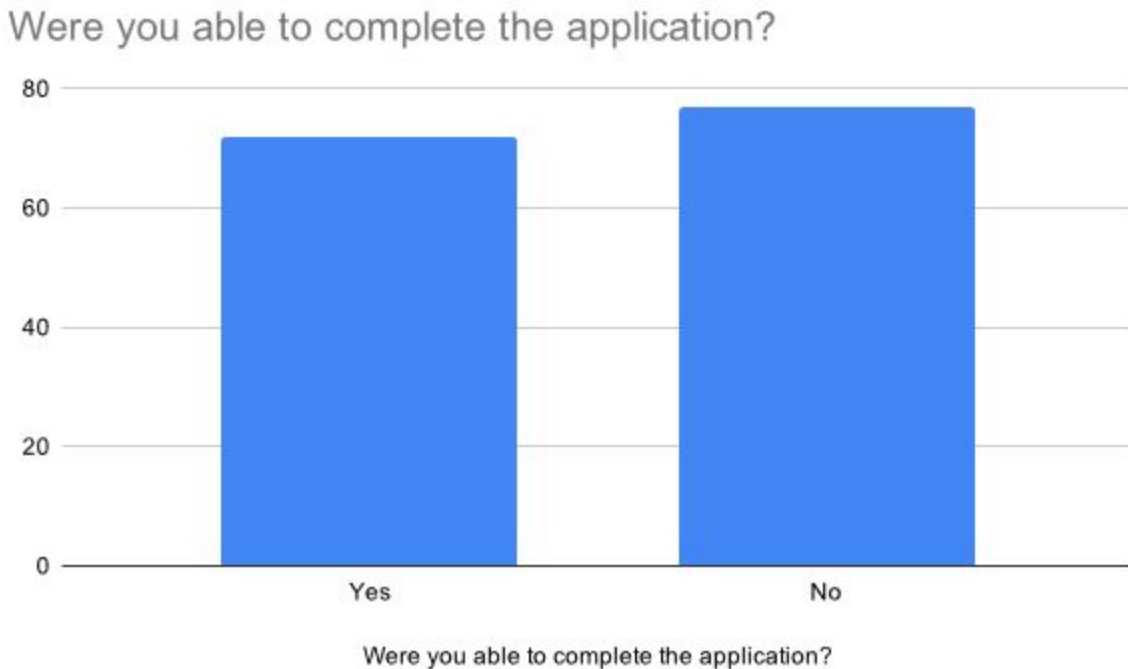
Of the 77 people who were unable to complete the application, the reasons given were:

- System would not let me (35)
- Didn't have enough information to complete it (14)
- Encountered an error message (11)
- System would not accept my evidence of work history (11)
- Technical problems with site (7)
- System told me to file for regular UC (6)
- System did not recognize employer for which I put in information (6)
- Unable to upload documents (3)

As to the number of attempts each person made, the top responses were:

- 1-2 (71)
- 3-4 (62)

- 5-10 (7)
- More than 11 (6)

What's confusing?

Notable answers to this question:

- Employment history question, overall (39)
- Questions confusing, don't apply to me, not sure if I qualify (32)
- Tech issues, overall (32)
- Company, employer not listed, or I'm self-employed (also included in "employment history")(28)
- Told to file for UC/W2 rejection/"still working" rejection (17)
- "Open issues" I can't resolve/not sure why I'm "ineligible" (9)
- Can't finish (endless loop or error message) (7)
- Glitches/freezing/errors (7)
- Everything (6)
- Nothing (6)

As previously noted, mandatory questions in the "employment history" section of the application did not seem to be relevant to the self-employed and independent contractors who make up the bulk of the respondents. "I don't fit the criteria," one person said, and "there is no way to bypass the questions that don't apply to me." Some implied that they had to get creative, or even make something up. One user reported that the job title question did not include any "job title that matches freelancers, artists, independent contractors, or really most things that people do as … 1099 workers." Yet another found that the application "required an end date… I was a never given an end date, it was open ended. I had to make one up to move forward."

Problems Providing Documents

A small majority of respondents were able to upload documents, by an 82 to 67 count.

Were you able to upload documentation?
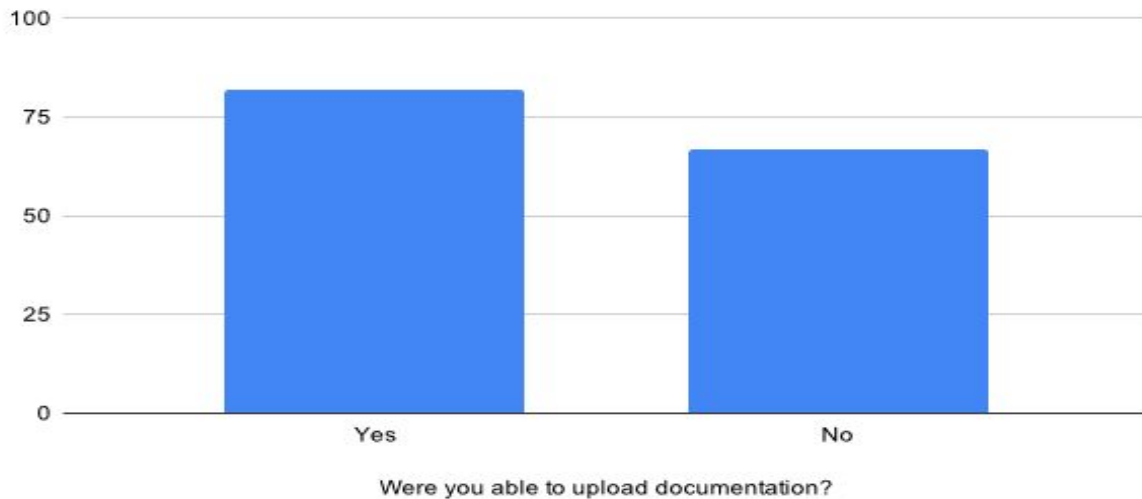
The most common reasons for why the 67 people were unable to upload documents were:

- System would not let me/I don't know how (31)
- Did not get that far (19)
- Uploaded files "disappeared"/Worried they didn't attach/Repeated tries (9)
- Did not have the needed documents (6)

What you liked best about the application/what changes you recommend

When asked what they liked, 70 applicants did not respond. Among those who did, the top responses were:

- Nothing/complaints (55)
- It's finally up/it exists (9)
- Straightforward/simple (8)
- Ease of navigation (6)

Though not many positives were reported, some were simply happy that relief for non-traditional workers exists. A few respondents did report that they thought the application was fairly simple and straightforward, and others said that it flowed easily and had good navigation.

There was a range of changes that respondents would like to see. Among the top answers:

- Make it work (15)
- Clearer instructions/less technical language (14)
- Easier, more streamlined, simpler (11)
- Separate section/portal for 1099/self-employed workers – don't require everyone to answer questions re: W-2s (11)
- Tips/FAQs/guidance/helpful pop-up boxes to explain terms (10)

- Make system receive & accept employment history for self-employed – or don't require it at all (8)
- Save/archive entries to allow user to step away/make changes/resubmit (7)
- Ability to check status of application/confirm completion (7)
- Space for brief narrative to explain complex/unusual situations (6)

The last question asks for any other feedback. The top answers reiterate the confusion and frustration evident in responses to previous questions.

- Process was extremely frustrating (12)
- Very frustrated to have to wait so long for compensation (10)
- Confusing (8)
- Don't know if I successfully submitted application (8)
- Can't log back in/username or password invalid (7)
- Unable to get answers from Dept to questions about application (6)

Conclusions

Listening to expressions of confusion and frustration is one thing, and is valid in and of itself. But our goal is to provide constructive recommendations from the respondents' lived experiences. So here we go.

1) ***The Department must provide a better guide and better instructions on each page of the application to help confused applicants through the process.*** The online application questions are not self-evident. A guide has since been prepared. But it is not very helpful and must be revised.

2) ***Barriers that keep applicants from completing the application must be eliminated.*** These include glitches that "kick people out" of the application and "issues" that applicants cannot resolve. These barriers prevent eligible individuals from applying, frustrate many who are ultimately successful, and violate due process by denying governmental benefits without notice or opportunity to be heard.

    - ***The application should always be allowed to be finished***. Deficiencies can be resolved when the application is reviewed.
    - ***Written, appealable determinations must be issued where a person is not eligible.*** Depriving people of PUA benefits by not letting them complete an application is still a denial, to which constitutional obligations attach. People who previously have been denied by the application not being completed must be, at the least, invited to reapply.

3) ***The "employment history" question of the application must be improved.*** This is one of the top reasons why applicants were confused or unsuccessful. Feedback from the self-employed and independent contractors has been loud and clear: the question, as drafted and set up, does not speak to their models of work. It must be reworked to have

more clarity, instruction and functionality for independent contractors and the self-employed.

- The instructions must be clearer, that this question includes – and might only include – the applicant's current work arrangement, which could be the applicant himself/herself or his/her business.
- The applicant must be allowed to put in his/her current work into the system. If, for instance, an applicant is self-employed, his/her "employer" does not auto-populate.

4) ***The document upload portion of the application must be improved.***

- ***Much better instructions are needed***, especially for applicants who are not tech savvy.
- A ***help desk*** should actually be provided to help applicants handle the documents, and an email address offered as an alternative way to submit documents.
- ***Make clear that completion of the application is possible without the attachment of documents***. Under the CARES Act, applicants are to have 21 days to submit documents. Moreover, a minimum payment is to be made even if no verification is attached. So an applicant not attaching documents should not be a roadblock.

5) ***An automated confirmation email should be sent after the application is submitted to confirm successful filing.***

This report was prepared through the joint efforts of Community Legal Services) (Jessa Boehner, Sharon Dietrich, and Brendan Lynch) and Philadelphia Legal Assistance (Julia Simon-Mishel, Aaron Sommer).