



March 24, 2023

National Institute of Standards and Technology
US Department of Commerce

RE: Comment on Digital Identity Guidelines

Transmitted Electronically

Dear National Institute of Standards and Technology (NIST),

We are pleased to have the opportunity to contribute the following information to your solicitation for comments regarding the updated guidelines on Cybersecurity and Digital Identity technologies.

We hope that as you develop guidelines around digital security, you keep in mind that privacy matters most to those whom society already values. We need to develop systems that emphasize and enable values-aligned data creation, particularly for underserved communities and those often ignored by the commercial data markets. Rather than rules primarily allow those with power to talk about how they are “protecting” undervalued segments of our society from being included in the data that shapes algorithmic understanding and referral, we should work toward data markets that allow communities to share in the value of their data and build market incentives for data that better reflects their priorities and serves them.

Public Democracy America (PDA) is a nonprofit (501c3) organization. Our mission is to support better outcomes in society by addressing bias in order to create more equitable systems. Our primary focus is to understand where incomplete data causes algorithmic, policy, and/or marketplace divisions that result in undervaluing of certain communities; and, as a result, cause barriers that prevent equitable access and engagement.

Our systems engage thousands of people a day on issues from economic trust to health equity and civic participation. These engagements not only deliver important information and resources to audiences most often undervalued and disenfranchised, but also have resulted in an extensive understanding of how and where known dis- and misinformation is targeting these same audiences to create anxiety or divisions that suppress participation and further exacerbate the problem of incomplete data.

As NIST continues to consider policy guidelines and framework for better digital security, we want to offer our insights where we believe we can be most helpful. Specifically, we want to address the issue of user-created data and the importance of trust in the system.

As your request for comment queries:

“How might government agencies build trust with communities and individuals, including through technology design choices?”

Our data hypothesis is rooted in the heart of our work: **By engaging individuals in undervalued communities at both the human and algorithmic levels, we can build data that addresses bias, and identifies paths to more equitable solutions for underserved communities.**

Systemic and implicit biases in data and AI create barriers and disenfranchised communities. Our approach has always been collaborative and starts with our fundamental belief that everyone has value. We identify what is missing in the data and seek ways to understand gaps in data through engagement. Our process results in more inclusive communal data.

To protect our data online, create equitable value, and make technology more accessible to meet the needs of every community we must start by allowing communities a voice in the use of their data, and an equitable share in its value.

Behavioral data is a huge social exercise in crowdsourcing. Patterns and insights in our data can only be mined because so many people have charted a course to those solutions already or demonstrated gaps in service and understanding that create inequality.

Sadly, the incredible potential this communal data holds to rebalance power and economic systems is largely missed because of the false assumptions by those in power and decision-making positions that people are merely “users,” rather than co-creators of data.

Thus, our data is hoarded by monopolies and built and analyzed to sell ads and products. When people are commoditized, those who have less net worth are valued less. And as the system continues to fail them, these communities trust it and those who run it less.

As solutions and needs of undervalued communities continue to be overlooked, the untapped value of the data they are creating continues to grow. Economic inequality and injustice are market inefficiencies. But most efforts to correct these imbalances have failed by focusing on individual choice and individual value-share when data needs to be aggregated to have worth.

Most efforts to correct data misuse focus on privacy and governance. But privacy matters most to those whom society already values. Rather than creating more restrictions on how data from undervalued communities can be used and created, entrenching current biases and imbalances – we seek to give communities an opportunity to decide for themselves and show the market what they value & need.

To serve communities that have been disparately impacted by incomplete and biased data, we start by valuing those communities in our policy framework, in our marketplaces, and with the data that drives those decisions. We proactively reward inclusive and collaborative approaches that support, contribute to, and teach others the value in communal data approaches.

Our programs have been successful because we shift the focus from what experts think communities “need” to what communal data demonstrates they value and can achieve. Our contribution is to identify holes in data and fill those gaps by delivering better communal data and insights on what truly matters to each community.

The opportunity to approach data created by individuals and engage communities further and deeper online through data-trusts is before us. Your guidance request also asks:

“In what ways should technology providers and government agencies be more transparent about what they do with the information they collect from individuals, communities, and environments.”

We recommend a Data co-op model. We are currently executing a prototype of this with our own Values Data™ and our nonprofit partners’ data to transform disparate data sources into Community Insights & Indices designed to better inform outcomes-driven decisions by policymakers, corporate ESG and impact investors, and protect the individual and community level data collected at the same time.

Public Democracy has developed a database of tens of millions of Americans engaged through email, social media, and digital ads collected through a myriad of outreach campaigns. The database reflects trillions of data points, with billions of behavioral tags; it is based on values-driven engagements, when people believe their response to civic engagement, and their action will matter and make a difference.

This first person/empathy-based response data forms our core psychometric Values Data™. It is used to provide far deeper insights than traditional approaches that attempt to define people by demography, attention metrics, or purchase behavior. We utilize our core Values Data™ to

develop PII-free behavioral models and drive our digital engagement strategy. When combined with communal data from our nonprofit partners & data co-ops, our Values Data™ provides deep community insights into what each local population or group truly needs and values, and where investments are likely to drive outcomes.

From the beginning, we recognized the value of data as a ledger of historical actions with the power to create new insights that could help shape the future in meaningful ways. Every engagement recorded in our database reflects a point when a person believed that something we were offering them could make a difference and that their participation could matter. We believe that through better data, and the more meaningful AI it creates, we can empower individuals, improve communities, and advance the common good. That belief is what drives our work.

Another important consideration as we contemplate community trust in online engagement, digital technologies, and data is the ongoing battle we face with computational propaganda and disinformation as well as predatory and fraudulent practices that target our most vulnerable populations the most.

We began to map disinformation networks through our work on COVID-19 health equity and combating systemic racism in economic opportunity. We have uncovered, and continually monitor Russian and alt-right networks in our battle against these bad actors, which prey on vulnerable communities.

We treat disinformation as a public health problem: protecting and inoculating those most at-risk of exposure; we utilize data-driven and actionable solutions, and behavior-changing communication strategies, and aggressively attacking the primary source of disinformation spread—algorithmically driven propaganda.

At a fundamental level, scaling our data-coops is the solution to win this war against disinformation – serving the people better by presenting them with better options through targeted and algorithmically-aware anchor truths, emotional nudges, and more accessible social services and economic systems. We increase the likelihood that people will find paths online to economic opportunity and participate in financial and health systems, such as inclusive trials, while reducing the chance of people choosing to use disinformation as a cause of harm.

As NIST considers data collected from online technologies it is essential to acknowledge and better understand how every audience creates value. NIST has an opportunity through this and future guidance and policies to better understand the link between digital identity technologies, communal data, and the importance of audience-based approaches in order to provide more equity in the use of these systems.

We appreciate your work in this area and hope that the comments we have provided add value to your work. We remain available to provide further information and partnership as your work continues.