



To: Economic Affairs Interim Committee  
Law and Justice Interim Committee  
Information Technology Board  
From: Montana Department of Labor & Industry  
Re: Use of Facial Recognition Report  
Date: August 25, 2025

Pursuant to Mont. Code Ann. § 44-15-111, the Department of Labor & Industry reports its continued use of facial recognition technology as permitted by Mont. Code Ann. § 44-15-108. In particular, this technology is used, in limited circumstances, by the Unemployment Insurance Division for the purpose of confirming the identity of applicants for unemployment insurance benefits. The Department utilizes a third party vendor, ID.me, for facial recognition services.

As required by Mont. Code Ann. § 44-15-111(4)(a), the vendor states:

To ensure timely reporting, we are informing you that we have not received any warrants, subpoenas, or court orders requesting facial recognition services for any Montana residents for the past calendar year.

Mont. Code Ann. § 44-15-111(4)(b) requires the Department to submit a copy of the report received to the committees and board.