



A Committee of the
Council of the Inspectors General
on Integrity and Efficiency

441 G STREET, NW, SUITE 1517, WASHINGTON, DC 20548

MEMORANDUM

February 16, 2022

***MITRE Report:
Best Practices and Lessons Learned from the Administration of
Pandemic-Related Unemployment Benefits Programs***

The Pandemic Response Accountability Committee (PRAC) is charged with conducting oversight of pandemic-related spending to prevent and detect fraud, waste, abuse, and mismanagement. In May 2021, we engaged MITRE, a not-for-profit federally funded research and development center, to conduct an independent study of lessons learned from the administration of pandemic-related emergency funding for unemployment insurance (UI) benefit programs in a sample of states. An estimated \$872 billion has been allocated to UI benefit programs to address the economic downturn created by the COVID-19 pandemic. The objective of this study was to increase understanding of how states implemented pandemic UI benefit programs and how their different implementation approaches may have reduced the fraud risk, including identity theft-related fraud. MITRE, in coordination with the U.S. Department of Labor (DOL), contacted all 54 state and territory workforce agencies (SWAs) and 12 responded. This report summarizes the responses of those 12 SWAs except where otherwise indicated.

The use of the term “best practices” recognizes those instances where responding SWAs’ actions may have reduced fraud risk and these practices are spotlighted so they can be replicated and expanded elsewhere; use of the term is not intended to suggest that the DOL or the SWAs have or have not done enough to combat UI fraud and improper payments. The DOL Office of Inspector General (OIG) has raised significant concerns regarding the DOL and SWAs’ ability to deploy UI benefits expeditiously and efficiently while ensuring integrity and adequate oversight, particularly during the pandemic and in response to national emergencies and disasters. As the DOL OIG reported, improper payment rates in the UI program have historically been among the highest in the federal government. Moreover, the unprecedented infusion of federal pandemic UI funds provided individuals and organized criminal groups a high-value target to exploit. Despite DOL’s efforts in issuing new guidance, distributing additional antifraud funding, and providing technical assistance, improper payments stemming from fraudulent activity continue to pose a significant threat to the integrity of the nation’s UI program. The DOL OIG has a large body of audit and investigative work on this topic, with more oversight projects on-going. This work is posted on the [DOL OIG pandemic response website](#). Moreover, MITRE’s independent observations and suggestions should be read in context with the PRAC’s December 2021 report, [Key Insights: State Pandemic Unemployment Insurance Programs](#), which summarized the findings of state auditors overseeing UI benefits.



BEST PRACTICES AND LESSONS LEARNED FROM THE ADMINISTRATION OF PANDEMIC RELATED UNEMPLOYMENT BENEFITS PROGRAMS

Record of Changes

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EXECUTIVE SUMMARY

The Pandemic Response Accountability Committee, a committee within the Council of the Inspectors General on Integrity and Efficiency tasked by Congress to promote transparency and conduct oversight of the pandemic response related to the Coronavirus Aid, Relief, and Economic Security Act, the Continued Assistance for Unemployed Workers Act, and the American Rescue Plan Act, seeks to identify best practices and lessons learned for minimizing fraud risk from the implementation of pandemic unemployment insurance (UI) benefits programs.

Over the course of the pandemic, state workforce agencies (SWAs) have worked to minimize UI fraud while providing timely benefits to claimants, employing a range of fraud prevention and deterrence methods. Produced by MITRE, a not-for-profit organization and operator of federally funded research and development centers authorized by Federal Acquisition Regulation 35.017, this report showcases interviewed SWAs' UI fraud prevention practices and lessons learned and offers key considerations for potentially overcoming some of the challenges to UI program administration that emerged during the pandemic. It draws on federal and state UI program implementation documentation and reporting as well as interviews with federal and state UI stakeholders. This work is intended to inform stakeholders in Congress, the executive branch, state and local governments, and the public about the status quo and potential of state UI fraud prevention strategies and tactics.

MITRE corresponded with all 54 states and territories to elicit their responses. A limited number of states responded, and this report summarizes their narratives. MITRE recognizes the Department of Labor (DOL) Office of Inspector General (OIG) has repeatedly reported significant concerns with DOL and SWAs' ability to deploy UI program benefits expeditiously and efficiently while ensuring integrity and adequate oversight, particularly during the pandemic and in response to national emergencies and disasters. MITRE's observations and key considerations are based on the analysis of the SWA responses.

Observations – State Best Practices for Preventing UI Fraud During the Pandemic

Drawing on a fraud prevention framework produced by the Organisation for Economic Co-operation and Development, MITRE organized the observations gathered from federal and state UI documents and interviews into the following categories:

- Standard Operating Procedures
- Eligibility Phase Controls
- Public Communications
- Risk Management

Standard Operating Procedures

Interstate and interagency coordination and exchange of information about emerging UI fraud schemes and technical practices to prevent, detect, and deter fraudsters took on heightened importance as fraud tactics evolved over the course of the pandemic. The National Association of State Workforce Agencies UI Integrity Center provided open lines of communication and data resources for states.

Coordination between SWAs, federal and state law enforcement, OIG investigators, and states' attorneys general was critical for investigating and prosecuting fraud and recovering fraudulent payments deposited with financial institutions.

SWAs utilized federal and state emergency grant funds to hire and train new staff. Furthermore, some SWAs invested emergency funds into building out their technology and data analytics expertise for fraud prevention and fraudulent payment recovery.

Eligibility Phase Controls

SWAs implemented a wide array of eligibility phase controls to identify and freeze fraudulent UI claims.

Upfront identity verification tools were critical to stopping fraudsters in their tracks. While identity verification tools are not foolproof, SWAs that implemented them claimed to have seen a reduction in UI fraud associated with identity theft. Additionally, multifactor authentication and bot prevention and detection technologies augmented identity verification tools in freezing fraudulent claims.

SWAs pursued different approaches to conditionally paying claimants with unverified identities. Each approach is a technique to mitigate the losses from unverified claims continuing to be paid.

Some SWAs iteratively updated the fraud indicators and filters used in their fraud prevention data analytics and cross-matching. Fraud indicators look for commonalities among data points across multiple claims and multiple data environments.

Public Communications

Much of the public communication conducted during the pandemic by the interviewed SWAs was less focused on deterring fraud through forceful messaging than it was on educating the public about the risks of fraud and identity theft and instructing the public on how to effectively communicate with the SWA.

Some SWAs increased their phone line capacity to accommodate higher call volumes, stood up contact centers, and made their websites easier for UI claimants to navigate in order to find key information.

Risk Management

SWAs did not specifically mention use of risk management frameworks aside from risk-based scoring matrices used to quantify the relative fraud risk associated with a particular claim. However, they did note cultural shifts and tactical innovations that could help them identify and reduce fraud risk.

Tactical innovations for risk management include novel vendor engagement and embrace of artificial intelligence and machine learning (AI/ML) for fraud discovery. One SWA director was particularly adamant about the use of AI/ML for fraud discovery, arguing that effective use of automation is paramount for 21st century UI fraud prevention.

Considerations for Further Exploration

Synthesized from review of the observations above, the following key considerations are opportunities to couple with existing Department of Labor Employment and Training

Administration or Office of Unemployment Insurance Modernization strategic initiatives to deliver transformational impact:

- Standardize policies and practices for administering payments to claimants self-certifying unemployment and claimants with unverified identities.
- Establish a recommended baseline for risk tolerance for UI fraud associated with self-certification and unverified identities, both under normal circumstances and during severe emergencies.
- Develop and standardize conditional payment options to mitigate fraud losses when administering emergency UI programs where claimant information and identity verification is difficult.
- Develop and conduct regular UI demand surge stress tests to prepare for future emergencies.
- Require timely financial institution compliance with fraudulent payment recovery.
- Support SWAs in determining eligibility and making informed eligibility decisions through requirements that collect additional detail, such as enhanced wage records.
- Develop UI fraud prevention (pre-award) performance measures.
- Explore requirements for consistent data usage and claim adjudication risk assessment protocols to prevent fraud.

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1. BACKGROUND OF UNEMPLOYMENT INSURANCE DURING THE PANDEMIC

The COVID-19 pandemic has caused an unprecedented negative impact on the well-being of the American people. Aside from the catastrophic health impacts and the devastating loss of life in the United States, the economic effects of the pandemic have been among the most challenging for the U.S. government and citizens. State lockdown mandates and measures to enforce social distancing have massively disrupted normal business operations, resulting in an unprecedented spike in unemployment across the country as employers have permanently or temporarily reduced their labor force. Newly unemployed or furloughed workers have suffered the brunt of this painful adjustment, and the surging ranks of unemployed Americans have translated into surging demand for unemployment insurance (UI). U.S. Department of Labor (DOL) data reflect the immense scale of this demand (see Figure 1).

Jointly administered by the DOL and state workforce agencies (SWAs), “unemployment insurance programs provide unemployment [cash] benefits to eligible workers who become unemployed through no fault of their own and meet certain other eligibility requirements.”¹ SWAs administer their own UI programs under state law while adhering to standard federal guidelines, and they “establish requirements for eligibility, benefit amounts, and the length of time that benefits can be paid.”² Meanwhile, the DOL Employment and Training Administration (ETA) provides federal UI program direction and oversight.³

¹ U.S. Department of Labor, “How Do I File for Unemployment Insurance?,” Accessed 11 November 2021, <https://www.dol.gov/general/topic/unemployment-insurance>.

² U.S. Department of Labor Office of Inspector General, “DOL-OIG Oversight of the Unemployment Insurance Program,” 6 October 2021, <https://www.oig.dol.gov/doloiguioversightwork.htm>.

³ Ibid.

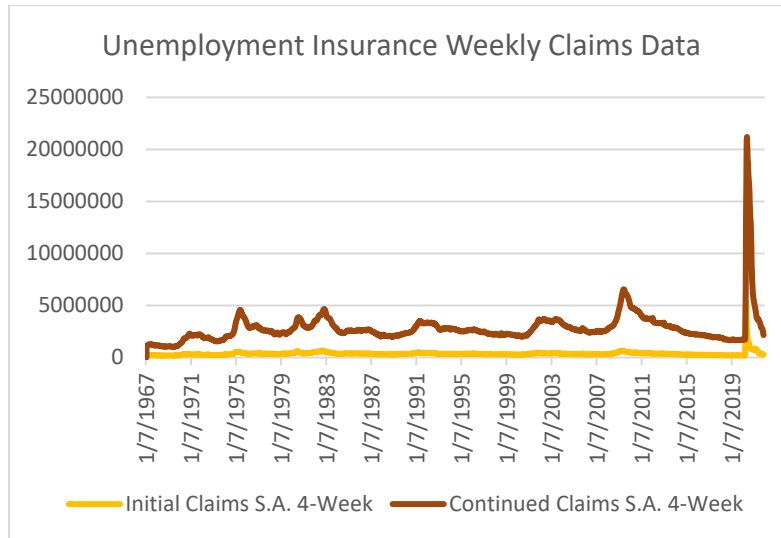


Figure 1. DOL ETA UI Claims Data⁴

The scale of the pandemic UI demand surge is captured in UI weekly claims data recorded by ETA (see Figure 1). Between March 14, 2020, and April 18, 2020, the seasonally adjusted (S.A.)⁵ four-week average of initial unemployment claims filed across the country skyrocketed from 225,500 to a peak of 5,301,250. Between March 14, 2020, and May 16, 2020, the seasonally adjusted four-week average of continued unemployment claims filed across the country skyrocketed from 1,730,750 to a peak of 21,199,000. This spike dwarfs all other surges in UI demand since 1967, the earliest year for which ETA provides UI weekly claims data; as shown in Figure 1, the UI demand surge during the Great Recession between 2007 and 2009 pales in comparison to the COVID-19 pandemic UI demand surge in 2020.⁶

Even before the onset of the COVID-19 pandemic and this unprecedented spike in UI demand, the efficiency and integrity of UI programs nationwide were of serious concern. The DOL Office of Inspector General (DOL-OIG) notes that “historically the UI program experienced some of the highest improper payment rates among federal government benefits programs. The reported improper payment estimate for the regular UI program has been above 10 percent for 14 of the last 17 years.”⁷ Among the areas of concern related to UI raised by DOL-OIG at the outset of the

⁴ U.S. Department of Labor Employment & Training Administration, “Unemployment Insurance Weekly Claims Data,” 10 November 2021, <https://oui.doleta.gov/unemploy/claims.asp>.

⁵ Seasonal adjustment is a statistical technique that attempts to measure and remove the influences of predictable seasonal patterns to reveal how employment and unemployment change from month to month.

⁶ U.S. Department of Labor Employment & Training Administration, “Unemployment Insurance Weekly Claims Data,” 10 November 2021, <https://oui.doleta.gov/unemploy/claims.asp>.

⁷ U.S. Department of Labor Office of Inspector General, “DOL-OIG Oversight of the Unemployment Insurance Program,” 6 October 2021, <https://www.oig.dol.gov/doloiguioversightwork.htm>.

pandemic were “state preparedness, initial eligibility determinations, benefit amount, return to work, improper payment detection and recovery, and program monitoring.”⁸

Improper payment detection and recovery stems in part from the federated nature of UI programs nationwide, which enables fraudsters, both individuals and organized criminal entities, to exploit enforcement gaps within and across states. The rate and magnitude of the increase in UI claims filed across the country during the pandemic and the expansion of both UI eligibility and benefits that were legislated through the Coronavirus Aid, Relief, and Economic Security (CARES) Act, the Continued Assistance for Unemployed Workers (Continued Assistance) Act, and the American Rescue Plan (ARP) Act placed unprecedented administrative strain on SWAs and created openings for heightened fraudulent activity. Considering this, DOL-OIG estimates that “UI program improper payments, including fraudulent payments, will be higher than 10 percent.”⁹ Considering the hundreds of billions of dollars of federal funding allocated to the UI program, this could translate into tens of billions of dollars of improper, including fraudulent, payments.

More specifically, the CARES Act established three new UI programs — Pandemic Unemployment Assistance (PUA), Pandemic Emergency Unemployment Compensation (PEUC), and Federal Pandemic Unemployment Compensation (FPUC) — whose scale and implementation structures were exploited by fraudsters in unprecedented ways. PUA “extended UI benefits to individuals who were not traditionally eligible for UI benefits until December 31, 2020,” including “self-employed workers, independent contractors, those with limited work history, and others.”¹⁰ PEUC “provided up to an additional 13 weeks of unemployment compensation to individuals who had exhausted their regular unemployment benefits until December 31, 2020.”¹¹ Lastly, FPUC “provided a supplemental payment of \$600 per week to individuals receiving traditional and non-traditional UI benefits until July 31, 2020.”¹² Despite the intention of these congressional efforts to strengthen the social safety net through wider UI coverage and more generous benefits, the massive infusion of funds into the UI program and corresponding ambiguity about the implementation of the new CARES Act programs made the UI programs extremely lucrative targets for fraudsters.

DOL-OIG has documented the primary sources of improper UI payments, including fraud, in a series of audit reports since April 2020, identifying the following high-risk areas for UI fraud: “individuals with social security numbers filed in multiple states,” “individuals with social security numbers of deceased persons and federal inmates,” and “individuals with social security

⁸ U.S. Department of Labor Office of Inspector General, *Pandemic Response Oversight Plan*, 27 April 2021, https://www.oig.dol.gov/public/oaprojects/DOL_OIG_Updated_Pandemic_Response_Oversight_Plan.pdf.

⁹ U.S. Department of Labor Office of Inspector General, “DOL-OIG Oversight of the Unemployment Insurance Program,” 6 October 2021, <https://www.oig.dol.gov/doloiguioversightwork.htm>.

¹⁰ U.S. Department of Labor Office of Inspector General, *COVID-19: States Struggled to Implement CARES Act Unemployment Insurance Programs*, 28 May 2021, <https://www.oig.dol.gov/public/reports/oa/2021/19-21-004-03-315.pdf>.

¹¹ Ibid.

¹² Ibid.

numbers used to file for UI claims with suspicious email accounts.”¹³ DOL-OIG also found that “state reliance on self-certifications alone to ensure eligibility for the PUA program” made state UI programs particularly susceptible to fraud.¹⁴

Delivering unemployment benefits to claimants in a timely manner without compromising payment integrity is critical. Throughout the pandemic, SWAs have had to prioritize getting benefits to claimants while minimizing fraud. To accomplish this, they have employed a collection of techniques and fraud prevention and deterrence methods, including through collaboration with external partners and organizations and cultivation of new relationships with public and private entities, to meet their obligations to safeguard UI trust fund dollars while mitigating the disastrous economic impact of the pandemic for legitimate claimants.

2. PURPOSE

The purpose of this report is to identify best practices and lessons learned for minimizing fraud risk during the implementation of pandemic UI benefits programs. Because of the scope and scale of the estimated UI fraud during the pandemic, the Pandemic Response Accountability Committee (PRAC), a committee within the Council of the Inspectors General on Integrity and Efficiency tasked by Congress to promote transparency and conduct oversight of the pandemic response related to the CARES Act, the Continued Assistance Act, and the ARP Act, contracted with The MITRE Corporation (MITRE) to conduct this work. As a federally funded research and development center operator authorized by Federal Acquisition Regulation 35.017, MITRE provides unbiased and conflict-free advice, guidance, and technical subject matter expertise to government sponsors. To develop this report, MITRE’s analysis included evaluation of federal and state approaches, policies, technology, and processes for implementing pandemic UI benefits programs. The analysis was conducted through review of federal and state documentation and reporting on UI program implementation as well as interviews with federal and state UI stakeholders.

3. SCOPE

MITRE was tasked to provide technical expertise, assessment, and guidance to support the PRAC’s strategic goal of improving the transparency of pandemic-related funding, focusing in this report on UI fraud prevention. This report includes:

- A description of states’ approaches to implementing pandemic unemployment programs and their efforts to prevent UI fraud
- Key considerations related to proposed alternatives for program implementation to minimize fraud risk

With this analysis, the PRAC can summarize lessons learned from implementation of pandemic UI programs to date and share best state practices for UI fraud prevention. This work is intended

¹³ U.S. Department of Labor Office of Inspector General, *Pandemic Response Oversight Plan*, 27 April 2021, https://www.oig.dol.gov/public/oaprojects/DOL_OIG_Updated_Pandemic_Response_Oversight_Plan.pdf.

¹⁴ Ibid.

to inform stakeholders in Congress, the executive branch, state and local governments, and the public about the status quo and potential of state UI fraud prevention strategies and tactics.

4. OBSERVATIONS – STATE BEST PRACTICES FOR PREVENTING UI FRAUD DURING THE PANDEMIC

MITRE engaged with 12 state UI agencies¹⁵ to determine how they successfully addressed the unprecedented challenges of UI program administration during the COVID-19 pandemic. Furthermore, MITRE sought information about the vulnerabilities and gaps exposed during the pandemic that the SWAs hope to remedy moving forward. MITRE synthesized the observations below from interviews, responses to MITRE’s request for information, and reports from 12 SWAs. The Appendix A environmental scan references and source documentation list the specific SWAs engaged for this research.

5. FOCUS AREAS FOR FRAUD PREVENTION AND DETERRENCE

The scope of this report is to showcase successful practices and lessons learned by SWAs to prevent fraud — the intentional deception to obtain benefits. During the pandemic, most of the misappropriated distribution of claimant benefits was performed by external entities. This type of fraud differs from internal fraud committed by staff. The report also does not include unintentional errors by claimants in applying for, or SWAs in processing, claims for UI benefits. Furthermore, this report does not address waste — the thoughtless or careless expenditure, mismanagement, or abuse of resources.¹⁶

MITRE leveraged global industry best practices on fraud detection, including an international report – *Countering Fraud in Social Benefit Programmes: Taking Stock of Current Measures and Future Directions*¹⁷ – produced by the Organisation for Economic Co-operation and Development (OECD). The OECD established guidance on steps to prevent and deter external fraud based on lessons learned from the administration of social benefits programs across numerous nation states.

The observations from interviews with SWA stakeholders are categorized and grouped below within the fraud prevention key focus areas laid out in the OECD report.

¹⁵ This report articulates the summarized narratives expressed by the SWAs that participated in this project. MITRE corresponded with all 54 states and territories to elicit their responses. A limited number of states responded, and this report summarizes their narratives. Reference to SWA activities does not necessarily mean all states performed the activities, but rather a number of states did. MITRE recognizes DOL-OIG has repeatedly reported significant concerns with DOL and SWAs’ ability to deploy program benefits expeditiously and efficiently while ensuring integrity and adequate oversight, particularly during the pandemic. MITRE’s observations and key considerations are based on analysis of the SWA responses.

¹⁶ Information regarding payment accuracy and improper payments as well as the effective stewardship of taxpayer funds is a critical responsibility of the Federal Government. Payment accuracy focuses on the prevention and recovery of improper payments while ensuring the right individuals and communities benefit from federal funds; <https://www.paymentaccuracy.gov/>.

¹⁷ OECD, *Countering Fraud in Social Benefit Programmes: Taking Stock of Current Measures and Future Directions*, OECD Publishing, Paris, 2020, <https://doi.org/10.1787/71df2657-en>.

Table 1. Fraud Prevention Key Focus Areas¹⁸

Key Fraud Prevention Focus Area	Description and Application
Standard operating procedures – strengthening strategies, goals, and objectives for combating fraud	This includes public organizations incorporating fraud prevention into their strategies, objectives, and procedures, and making sure that they strike the right balance between prevention, detection, and prosecution measures. Fraud prevention techniques are essentially integrated into standard operating procedures.
Eligibility phase controls – targeting prevention measures at the registration phase	To minimize the chance of fraudulent tactics succeeding at this high-risk phase, governments must ensure that they put in place adequate policies, controls, and measures to verify identities and data submitted during the registration process, in particular during the registration phase of unemployment benefits administration.
Public communication – tailoring communication campaigns and messaging to improve fraud deterrence	By integrating behavioral perspectives into their prevention approaches, public organizations can develop nuanced communication campaigns that include a range of messages to deter fraud, for example by including soft messages and reminders and outlining the penalties for committing fraud.
Risk management – focusing on the highest risks	Risk management and assessments can contribute to savings and promote efficiency by targeting the application of preventive controls and identifying areas that are most susceptible to false claimants and fake registrations; includes risk models and scoring to apply risk mitigation strategies.

6. OBSERVATIONS BY FOCUS AREA

The OECD recommends a holistic approach to reduce and mitigate external fraud by examining benefits program strategies within the key focus areas in Table 1. MITRE conducted interviews with SWAs to glean insights on how states addressed fraud within these key focus areas. The observations from the SWA fraud prevention narratives describe successful efforts to thwart fraud as well as opportunities to enhance existing UI resources, processes, and technologies.

6.1.1. Standard operating procedures

MITRE found that interstate and intrastate coordination related to UI programs administration matured over the course of the pandemic. SWAs from neighboring states or within a particular region established working groups with regular meetings to exchange information about the fraudster tactics and techniques they were identifying. The National Association of State Workforce Agencies (NASWA) UI Integrity Center played a critical role in both connecting and maintaining open lines of communication for states, and the number of SWAs regularly interacting with NASWA and utilizing its data resources for UI claim cross-matching increased considerably over the course of the pandemic.¹⁹ Cross-matching was used to identify fraudulent

¹⁸ Ibid.

¹⁹ Employment and Training Administration, *Response to the Office of Inspector General Alert Memorandum: The Employment and Training Administration needs to Issue Guidance to Ensure State Workforce Agencies Provide*

Table 2 Study Sources

Title/Name	Author	Date	Description
Advisory Report – CARES Act: Initial Areas of Concern Regarding Implementation of Unemployment Insurance Provisions	Department of Labor Office of Inspector General (DOL-OIG)	Apr-20	Report
Alert Memorandum: The Pandemic Unemployment Assistance Program Needs Proactive Measures to Detect and Prevent Improper Payments and Fraud	DOL-OIG	May-20	Memorandum
Unemployment Insurance Program Letter No. 23-20: Program Integrity for the Unemployment Insurance (UI) Program and the UI Programs Authorized by the Coronavirus Aid, Relief, and Economic Security (CARES) Act of 2020 – Federal Pandemic Unemployment Compensation (FPUC), Pandemic Unemployment Assistance (PUA), and Pandemic Emergency Unemployment Compensation (PEUC) Programs	Department of Labor Employment and Training Administration (DOL ETA)	May-20	Memorandum
Response to the Office of Inspector General’s (OIG) Alert Memorandum: The Pandemic Unemployment Assistance Program Needs Proactive Measures to Detect and Prevent Improper Payments and Fraud	DOL ETA	Jun-20	Memorandum
Top Pandemic Challenges Facing the U.S. Department of Labor	DOL-OIG	Jun-20	Report
Unemployment Insurance Program Letter No. 25-20: Benefit Accuracy Measurement (BAM) Program Operations in Response to the Coronavirus Disease of 2019 (COVID-19) Pandemic	DOL ETA	Jun-20	Memorandum
Countering Fraud in Social Benefit Programmes: Taking Stock of Current Measures and Future Directions	OECD	Jul-20	Report
COVID-19: More Can Be Done to Mitigate Risk to Unemployment Compensation Under the CARES Act	DOL-OIG	Aug-20	Report
Unemployment Insurance Program Letter No. 28-20: Addressing Fraud in the Unemployment Insurance (UI) System and Providing States with Funding to Assist with Efforts to Prevent and Detect Fraud and Identity Theft and Recover Fraud Overpayments in the Pandemic Unemployment Assistance (PUA) and Pandemic Emergency Unemployment Compensation (PEUC) Programs	DOL ETA	Aug-20	Memorandum
COVID-19: States Cite Vulnerabilities in Detecting Fraud While Complying with the CARES Act UI Program Self-Certification Requirement	DOL-OIG	Oct-20	Report
Unemployment Insurance Program Letter No. 9-21: Continued Assistance for Unemployed Workers Act of 2020 (Continued Assistance Act) – Summary of Key Unemployment Insurance (UI) Provisions	DOL ETA	Dec-20	Memorandum

Title/Name	Author	Date	Description
Alert Memorandum: The Employment and Training Administration (ETA) Needs to Ensure State Workforce Agencies (SWAs) Implement Effective Unemployment Insurance Program Fraud Controls for High Risk Areas	DOL-OIG	Feb-21	Memorandum
Update: Top Challenges in Pandemic Relief and Response	Pandemic Response Accountability Committee (PRAC)	Feb-21	Report
Response to the Office of Inspector General’s Alert Memorandum: Employment and Training Administration Needs to Ensure State Workforce Agencies Implement Effective Unemployment Insurance Program Fraud Controls for High Risk Areas	DOL ETA	Mar-21	Memorandum
2021 State of the Workforce Report: Responding to the Pandemic	National Association of State Workforce Agencies (NASWA)	Mar-21	Report
Unemployment Insurance Program Letter No. 14-21: American Rescue Plan Act of 2021 (ARPA) – Key Unemployment Insurance (UI) Provisions	DOL ETA	Mar-21	Memorandum
Pandemic Response Oversight Plan	DOL-OIG	Apr-21	Report
Unemployment Insurance Program Letter No. 16-21: Identity Verification for Unemployment Insurance (UI) Claims	DOL ETA	Apr-21	Memorandum
COVID-19: States Struggled to Implement CARES Act Unemployment Insurance Programs	DOL-OIG	May-21	Report
Unemployment Insurance Program Letter No. 20-21: State Instructions for Assessing Fraud Penalties and Processing Overpayment Waivers under the Coronavirus Aid, Relief, and Economic Security (CARES) Act, as Amended	DOL ETA	May-21	Memorandum
Unemployment Insurance Program Letter No. 19-21: Benefits Held by Banks and Financial Institutions as a Result of Suspicious and/or Potentially Fraudulent Activity and the Proportional Distribution Methodology Required for Recovering/Returning Federally Funded Unemployment Compensation (UC) Program Funds	DOL ETA	May-21	Memorandum
Alert Memorandum: The Employment and Training Administration Needs to Issue Guidance to Ensure State Workforce Agencies Provide Requested Unemployment Insurance Data to the Office of Inspector General	DOL-OIG	Jun-21	Memorandum
Alert Memorandum: The Employment and Training Administration Does Not Require the National Association of State Workforce Agencies to Report Suspected Unemployment Insurance Fraud Data to the Office of Inspector General or the Employment and Training Administration	DOL-OIG	Jul-21	Memorandum

Title/Name	Author	Date	Description
Unemployment Insurance Program Letter No. 23-21: Grant Opportunity for Promoting Equitable Access to Unemployment Compensation (UC) Programs	DOL ETA	Aug-21	Memorandum
Unemployment Insurance Program Letter No. 22-21: Grant Opportunity to Support States with Fraud Detection and Prevention, Including Identity Verification and Overpayment Recovery Activities, in All Unemployment Compensation (UC) Programs	DOL ETA	Aug-21	Memorandum
Lessons Learned in Oversight of Pandemic Relief Funds	Pandemic Response Accountability Committee (PRAC)	Aug-21	Report
Fact Sheet: Unemployment Insurance Modernization – American Rescue Plan Act Funding for Timely, Accurate and Equitable Payment in Unemployment Compensation Programs	DOL ETA	Aug-21	Memorandum
Top Management and Performance Challenges Facing the U.S. Department of Labor	DOL-OIG	Nov-21	Report
Pandemic Response Accountability Committee (PRAC)	-	-	Interview
Department of Labor Employment and Training Administration (DOL ETA)	-	-	Interview
Department of Labor Office of Unemployment Insurance Modernization (DOL OIUM)	-	-	Interview
Department of Labor Office of Inspector General (DOL-OIG)	-	-	Interview
National Association of State Workforce Agencies (NASWA) UI Integrity Center	-	-	Interview
Identity Theft Resource Center (ITRC)	-	-	Interview
Nevada Department of Employment, Training and Rehabilitation (DETR)	-	-	Response to Request for Information
Oregon Employment Department (OED)	-	-	Response to Request for Information
Iowa Workforce Development (IWD)	-	-	Response to Request for Information
Georgia Department of Labor	-	-	Interview
Connecticut Department of Labor	-	-	Interview
Washington State Employment Security Department (ESD)	-	-	Interview
Idaho Department of Labor	-	-	Interview

Title/Name	Author	Date	Description
New Jersey Department of Labor and Workforce Development	-	-	Interview
Michigan Department of Labor and Economic Opportunity (LEO)	-	-	Response to Request for Information
Arizona Department of Economic Security	-	-	Report
Colorado Department of Labor and Employment	-	-	Interview
Virgin Islands Department of Labor	-	-	Interview

APPENDIX B – ACRONYMS

Acronym	Definition
AI	Artificial Intelligence
ARP	American Rescue Plan
CARES	Coronavirus Aid, Relief, and Economic Security Act of 2020
DOL	Department of Labor
ERM	Enterprise Risk Management
ETA	Employment and Training Administration
EWR	Enhanced Wage Records
IDH	Integrity Data Hub
MITRE	The MITRE Corporation
ML	Machine Learning
NASWA	National Association of State Workforce Agencies
OECD	Organisation for Economic Co-operation and Development
OIG	Office of Inspector General
OUIM	Office of Unemployment Insurance Modernization
PEUC	Pandemic Emergency Unemployment Compensation
PII	Personally Identifiable Information
PRAC	Pandemic Response Accountability Committee
PUA	Pandemic Unemployment Assistance
SWA	State Workforce Agency
Treasury	U.S. Department of the Treasury
UC	Unemployment Compensation
UI	Unemployment Insurance
UIPL	Unemployment Insurance Program Letter