

TRAINING AND EMPLOYMENT NOTICE	NO. 18-24
	DATE December 31, 2024

TO: STATE WORKFORCE AGENCIES

FROM: JOSÉ JAVIER RODRÍGUEZ /s/
Assistant Secretary

SUBJECT: Customer Experience Checklist and Resources for Unemployment Insurance Programs

1. **Purpose.** To provide State Workforce Agencies (SWAs) the customer experience (CX) checklist (which describes principles to improve CX, as well as operational, experience, and outcome metrics) and related resources, with the goal of helping states to develop a baseline of current practices and identify areas needing improvement in their unemployment insurance (UI) programs.
2. **Action Requested.** The U.S. Department of Labor’s (Department) Employment and Training Administration (ETA) requests that State Administrators provide the information in this Training and Employment Notice (TEN) to appropriate staff, and ETA encourages states to begin utilizing the CX checklist to evaluate their state’s UI online systems, phone systems, and in-person services to improve CX.
3. **Summary and Background.**
 - a. Summary – Effective CX occurs when individuals can effectively and efficiently interact with state UI systems across all access points such as phone, website, online portal, mobile application, or in-person. Facilitating effective CX can reduce potential barriers that impact individuals’ ability to complete required tasks that are associated with UI processes, such as submitting an initial claim, engaging in fact-finding for adjudication, requesting and participating in appeals, completing weekly certifications, and improper payment reduction and overpayment recovery activities. If CX considerations and improvements are interwoven with a SWA’s existing processes, then individuals are more likely to complete tasks accurately, timely, and more independently (*i.e.*, requiring fewer SWA staff interactions). Information about CX is most effective when utilized as a tool for continuous improvement, with states tracking CX metrics at regular intervals, making changes that can address pain points, and measuring CX again to see if it has improved. By embracing a customer-centric approach, SWAs can achieve:
 - **Increased level of trust and satisfaction:** Building confidence and trust by making the UI process easier for claimants, employers, and agency staff.
 - **Reduced administrative burden:** Streamlining processes and improved self-service options that lead to greater operational efficiency.

- **Strengthened public perception:** Positive UI experiences contributing to a stronger image of state agencies and the UI system as a whole.

Effective CX involves addressing the experience of different stakeholders in the UI processes, including but not limited to:

- Individuals interested in learning about and/or applying for UI benefits,
- Claimants throughout the claim process,
- Claimant representatives (including advocates),
- Employers (including third-party administrators (TPAs)),
- Labor market information staff and other researchers, and
- SWA staff.

Providing effective CX contributes to reducing barriers to equitable access that might otherwise negatively impact individuals navigating the UI processes. Effective CX allows claimants and employers to quickly and accurately submit information required, helping eligible workers get benefits timely without unnecessary adjudications and appeals, and reducing improper payments based on inaccurate information submitted. ETA provides the following additional resources to SWAs as a supplement to this TEN: CX Checklist (Attachment I), Additional Information on Improving Mobile Usability (Attachment II), and Additional CX References and Resources (Attachment III).

- b. Background – The Department has invested over \$780 million provided under the American Rescue Plan Act (ARPA) to help states modernize their UI programs,¹ including by improving the claimant experience. Activities funded through this funding included leveraging multidisciplinary teams to identify actions states could take to improve CX (*see* Unemployment Insurance Program Letter (UIPL) Nos. 02-22 and its subsequent changes, and 11-23); providing funds to promote equitable access to unemployment compensation (UC) programs (*see* UIPL No. 23-21 and its subsequent changes); establishing pilot projects to support SWAs in delivering timely benefits to workers, especially individuals in groups that are historically underserved, marginalized, and adversely affected by persistent poverty and inequality (*see* UIPL No. 11-22); and supporting modular and evidence-driven approaches to IT modernization (*see* UIPL No. 11-23 and its subsequent changes).

Providing equitable access is an important part leading to an effective CX. The Department issued UIPL No. 01-24 in November 2023 to provide clarity around use of the terms “access” and “equitable access” and further describe how program integrity is positively impacted by efforts to ensure equitable access to UC programs. The Department announced publication of an updated UI Equitable Access Toolkit in May 2024 to help states identify and address barriers workers face when seeking UI benefits (*see* TEN No. 30-23). Additionally, the importance of providing effective CX has been mentioned in various Executive Orders to highlight the need that the government must

¹ *Insights and Successes: American Rescue Plan Act Investments in Unemployment Insurance Modernization*, published November 2023, <https://www.dol.gov/agencies/eta/ui-modernization/arpa-success-stories>.

ensure its products and services are equitable and effective to communities that have been historically underserved.

In April 2024, the Department published a UI Transformation Plan that describes the Department's ongoing and planned efforts to build a more resilient UI system and highlights proposed legislative reforms.² Among other things, the plan highlights efforts towards improving CX and service delivery as one of seven key action areas to improve the UI program.

The oversight community also has an interest in CX and has been monitoring efforts to improve CX at the federal and state levels. For example, from 2016 through 2023, the Government Accountability Office issued multiple reports (*see* Attachment III), highlighting challenges that impeded CX from the claimants' perspective when applying for and receiving UI benefits (*e.g.*, insufficient staff, inadequate administrative funding, and outdated information technology systems).

4. **Content.** The Department identifies four areas that SWAs are encouraged to focus on for improving CX in their UI programs: a) Accessibility standards; b) Principles to improve CX; c) Baseline CX metrics; and d) Identifying areas needing improvement. Sections 4.b, 4.c, and 4.d correspond with the CX checklist in Attachment I to this TEN.

In addition to improving CX for individuals applying for UI benefits, SWAs should also consider the experience of employers/TPAs and internal customers (SWA staff). States can leverage the accompanying checklist (Attachment I) to improve the CX of all customers, both internal and external. Using the CX checklist to assess current processes and to drive operational changes will help improve CX in the SWA's UI program.

- a. **Accessibility Standards.** When creating content (*i.e.*, information, resources, programs, activities, digital tools, among other items related to accessing, navigating, and interacting with the UI system), SWAs must ensure this content meets Federal accessibility requirements to provide access for people with disabilities, including but not limited to visual and hearing impaired, limited mobility, and limited access, including requirements in the Web Content Accessibility Guidelines (WCAG) 2.1,³ Americans with Disabilities Act (ADA, *see also* 29 CFR § 38.15), Section 508 of the Rehabilitation Act (Section 508), UIPL No. 02-16, and UIPL No. 02-16, Change 1. Building for accessibility means ensuring that the greatest number of people can successfully interact with any UI content to accomplish their end goal. Accessibility Standards mandated by federal regulations must be considered the foundation and minimal baseline when improving CX in state systems.
- b. **Principles to Improve CX (Attachment I – Section A).** The Department identifies six principles to improve CX which expands on the list of principles published in a June 30,

² *Building Resilience: A Plan for Transforming Unemployment Insurance*, published April 2024, https://oui.doleta.gov/unemploy/transformation_plan.asp.

³ Web Content Accessibility Guidelines <https://www.w3.org/TR/WCAG21/>.

2023, blogpost, entitled “Customer Experience Principles.”⁴ Application of these principles can help to increase user satisfaction, reduce administrative burden, and strengthen public perception.

Attachment I to UIPL No. 01-24 describes how states can review each step of the claim cycle or “claimant journey” for opportunities to improve service delivery. Attachment I to this TEN builds on that resource to provide a checklist for SWAs to evaluate specific areas within their UI system for individuals and employers/TPAs – whether accessed by phone, online, or in-person – as the state conducts iterative reviews of their systems to strengthen CX.

- i. ***Use “Plain Language” (Attachment I – Section A.1).*** UI programs are complex, and this complexity can cause increases in errors in applications and responses to SWAs’ requests for information. These errors then may result in improper payments (overpayments and/or underpayments), erroneous denials, and, ultimately, increased SWA staff workloads in connection with correcting errors. For this reason, it is important that SWAs create UI content – initial application forms, weekly certification forms, notices, and web content, among other types – using plain language.

The U.S. General Services Administration provides resources at [Plainlanguage.gov](https://www.plainlanguage.gov) and includes a definition of this concept as “communication so your audience can understand the first time they read or hear it.” Plain language also includes emphasizing actions and next steps (as explained below) and presenting forms and communications to individuals in their preferred language when possible and/or when required by law.

To support this effort, the Department’s UI Equitable Access Toolkit⁵ describes Plain Language Standards in Chapter 3. The Department has also published a Language Portfolio⁶ with several resources including:

- Plain Language Workshops’ slides to provide states with technical assistance on plain language content;
- A repository of templates, notices, and forms that can be customized for each state;
- A UI Lexicon that provides sample meanings for terms commonly used in UI content; and
- A bank of UI application questions based on work with various SWAs and based in plain language principles.

⁴ Customer Experience Principles, <https://dol.gov/agencies/eta/ui-modernization/customer-experience/cx-principles>.

⁵ USDOL UI Equitable Access Toolkit, https://www.workforcegps.org/resources/2023/04/UI_Content/Public_Equitable_Access_Toolkit.

⁶ USDOL UI Modernization Language Portfolio, <https://www.dol.gov/agencies/eta/ui-modernization/language-portfolio>.

- ii. ***Focus on action instead of information (Attachment I – Section A.2).*** Materials that are poorly written or full of jargon can pose challenges to the reader, especially for those with low English literacy, limited English proficiency, or disabilities. It is important that SWAs ensure that individuals who access the UI system are presented with clear directions on how to apply for benefits and the ongoing requirements to receive benefits, if they are found eligible. SWAs can refer to the National Association of State Workforce Agencies (NASWA) Behavioral Insights (BI) Toolkit for examples of strategies to implement that focus on actions, instead of information, in processes such as clarifying work search requirements and reporting earnings and promoting claimant understanding of UI eligibility requirements.⁷ When UI communications focus on actions customers must take, rather than background on legal requirements, they are more likely to produce the desired response.

Section 4.c. of this TEN describes methods for states to identify areas for continuous improvement. Establishing robust and ongoing feedback loops with customers is an important way to avoid making assumptions of how users interpret the clarity of a state’s instructions.

- iii. ***Personalize the content (Attachment I – Section A.3).*** When possible and to the extent allowed by relevant federal and state privacy and disclosure laws, use information already on file about a claimant to provide personalized messaging and reminders. SWAs must not include the claimant’s full Social Security Number (SSN) in any personalized messaging.⁸ Examples of personalization include addressing form letters to the specific individual by name, as well as providing communications to individuals in their preferred language when possible and/or when required by law.⁹ These CX improvements will increase claimants’ level of trust and satisfaction.

Another effective way to personalize content is implementing reminders. This action can improve CX through informing users of upcoming deadlines that are specific to that individual, as well as actions that need to be completed including but not limited to completing weekly certifications, attending re-employment workshops, responding to requests for information, appeal deadlines, etc. SWAs may find by implementing reminders that they will receive more responses to requests for information which allows for staff to make more informed decisions when adjudicating issues and potentially resulting in positive impact on improper payment rates.

To the extent permissible by state law, states should deliver reminders through opt-in SMS messages and/or mobile app reminders. This supports claimants who are not regular users of email. SWAs are encouraged to also review the “Reminders and Planning Prompts BI Principles” in the NASWA BI Toolkit.

⁷ NASWA BI Toolkit, <https://library.naswa.org/bitoolkit>.

⁸ UIPL No. 18-13, <https://www.dol.gov/agencies/eta/advisories/unemployment-insurance-program-letter-no-18-13>.

⁹ For reference, see CX principles for online applications, <https://www.dol.gov/agencies/eta/ui-modernization/customer-experience/improve-applications/cx-principles>.

- iv. ***Proactively and clearly state instructions to support navigation and wayfinding (Attachment I – Section A.4).*** SWAs can reduce calls and office visits from claimants by providing claim status proactively and clearly. As described in Section 4.d.i.D. of UIPL No. 01-24, a status tracker that explains next steps and indicates whether the next step is the responsibility of the state or claimant, along with expected agency response times in processing a claim, may reduce claimant inquiries and confusion.

To support this effort, the Department published a Claims Status Playbook¹⁰ that includes a prototype for creating a status tracker; considerations for a state interested in starting a claims status project; steps to take after identifying objectives and priorities; and ways to pursue continuous improvement of processes, data notifications, and communications.

- v. ***Improve mobile usability (Attachment I – Section A.5).*** Mobile usability refers to the ease with which individuals can accomplish tasks on mobile devices, such as smartphones or tablets. Mobile usability also encompasses mobile responsiveness which has been mentioned in materials previously published by the Department.¹¹ Almost 97 percent of Americans own a cell phone, and 90 percent own a smart phone; furthermore, 15 percent of them do not have broadband at home, instead depending on their mobile device for Internet usage.¹² A good mobile experience enables people to do the same things they would do on a desktop computer while considering mobile devices' constraints.

Across different mobile devices, the look and feel of an UI application and site may change depending on the screen size, but their functionality and usability should remain the same regardless of the screen size, operating system, data plan, or available internet bandwidth. Mobile usability should not be classified as simply good or bad; various website functions can range from unusable to very easy to use. For this reason, it is important that SWAs design their UI content, including websites, applications, and portals, to be responsive and user-friendly on a variety of mobile screen sizes. See Attachment II for more information on specific ways to improve mobile usability.

- vi. ***Provide appropriate digital off-ramps (Attachment I – Section A.6).*** Recognizing an existing digital divide between those who have broadband access at home and those who have limited or no access, as well as those who do not possess digital literacy to navigate online applications, states are required to offer multiple, meaningful pathways for individuals to learn about, apply, and receive UI benefits. UIPL No. 02-16 and UIPL No. 02-16, Change 1 describe states' obligation to provide accessible

¹⁰ USDOL Claims Status Playbook, <https://www.dol.gov/agencies/eta/ui-modernization/customer-experience/claims-status>. A webinar describing this tool is also available at https://ui.workforcegps.org/announcements/2023/09/19/18/29/Claims_Status_Playbook_Webinar_2023. You must be a member of the Workforce GPS UI community to access this event.

¹¹ Improve Mobile Usability, <https://www.dol.gov/agencies/eta/ui-modernization/customer-experience/mobile-usability>.

¹² Pew Research Center, *Mobile Fact Sheet*, published January 31, 2024, <https://www.pewresearch.org/internet/fact-sheet/mobile/>.

alternatives to web-based technology. States may offer individuals the option of receiving certain information and services via electronic methods but are not permitted to require that individuals communicate only through electronic means. Such policies unduly restrict program access, as not all individuals have the ability or capacity to communicate electronically.

For persons unable to access or effectively utilize a web-based system, the state must offer non-digital alternative options for accessing information and benefits, such as by telephone or in person, in a manner that ensures effective and meaningful access to the UI system. Digital off-ramps can provide digital and/or non-digital alternatives for individuals to easily obtain information, and receive assistance, when experiencing difficulties in a digital process. Additionally digital off-ramps should provide clear instructions as to next steps when an individual falls out of a digital interaction to improve their confidence, trust, and stay connected to the UI system.

- c. **Baseline CX Metrics (*Attachment I – Section B*)**. There are three categories of CX metrics the Department is recommending that SWAs use to evaluate the current status of their UI system. While all states are encouraged to use these metrics, we especially encourage states that have a grant for IT modernization and/or equitable access to benefits through (UIPL Nos. 11-23 and 23-21 respectively) to carefully review this information as they seek to carry out the requirement to measure the impacts of those grants on customer experience. These metrics can highlight areas demonstrating effective CX, areas for improvement, and the impact of current practices on internal and external customers.¹³
- i. Operational metrics, also called interaction metrics, are centered around transactions and measure specific parts of UI application processes and the UI system. Some examples of what can be measured is how many individuals accessed their online portal in a week, how long it takes an individual to complete tasks, number of minutes it takes to answer a phone call, and more.
 - ii. Experience metrics are based on how the individual felt about their interaction with the state agency and are captured via surveys or questions asked after an in-person, online, or phone interaction. The answers are typically a scale that ranges from extremely dissatisfied to extremely satisfied, with a neutral middle. Some metrics that can be baselined and measured at various intervals are trust, satisfaction, ease of use, timeliness, helpfulness of staff interaction, etc. It is important to remember that these metrics are completely based on the perception of the individual.
 - iii. Outcome metrics are based on actions completed by individuals and are used to evaluate and determine where improvements can be made in SWAs' UI processes. Click-through rates between sections of the UI application, number of errors resulting

¹³ Customer Experience Metrics <https://www.dol.gov/agencies/eta/ui-modernization/customer-experience/cx-metrics> and Evaluating customer experience with survey design <https://www.dol.gov/agencies/eta/ui-modernization/customer-experience/survey-design>.

at the end, and percentage of claimants who do not complete their application or weekly certification (abandonment rates) are some examples of outcome metrics.

d. **Identify Areas for Continuous (Needing) Improvement (*Attachment I – Section C*).**

ETA encourages SWAs to engage in efforts to identify areas in their program operations that need improvement or continuous improvement regarding CX. SWAs are encouraged to:

- i. Conduct direct observations and interviews (*Attachment I – Section C.1*) – Direct observations produce more accurate results by identifying where individuals encounter confusion with any part of the UI system or its processes. However, many individuals choose to interact with the UI system independently without directly engaging with the SWA or its staff. Interviews are a good second choice; recruiting participants who have recent experience with the UI program or are about to apply for benefits may result in more accurate findings. SWAs may also develop focus groups including working with community-based organizations, claimant advocacy groups, and employers or their TPAs to gain feedback into the claimant and employer experiences. Additionally, these groups can assist with identifying a diverse group of individuals who traditionally struggle with the UI system, such as those with limited digital access, limited English proficiency, or seasonal workers. Fliers or social media channels can also be used to inform potential participants of the purpose of the interviews.
- ii. Implement surveys (*Attachment I – Section C.2*) – SWAs are encouraged to develop and use a simple survey to capture individuals’ feedback about their experience at points in a customer’s experience with the UI program. Surveys should include an open-ended comment field to collect qualitative data about their challenging experiences. Keep the rest of the survey brief, ask about one topic per question, and use plain language.

States can deploy various surveys at different parts of the UI experience:

- Always-on surveys (also called persistent) (*Attachment I – Section C.2.a*) – to identify chronic challenges – these help to identify the areas that need the most improvement and provide a consistent feedback mechanism allowing for long-term monitoring of CX across the UI program.
- Intercept surveys (*Attachment I – Section C.2.b*) – these surveys are intended to catch attention by popping up at specific points in the claim process. Some examples of potential locations for these surveys are at the end of an application or certification process, at common points of abandonment, on webpages where the individual has exceeded a pre-determined amount of time, etc.
- Ad-hoc surveys for enhancements and redesigns (*Attachment I – Section C.2.c*) – these are short surveys provided on newly designed or redesigned sections of the UI application or process for a short period of time can help to test the effectiveness of the change.

5. **Inquiries**. Please direct inquiries to the appropriate ETA Regional Office.

6. References.

- Section 303 of the Social Security Act;
- Section 1137 of the Social Security Act, 42 U.S.C. § 1320b-7;
- 29 U.S.C. § 794d (Section 508 of the Rehabilitation Act of 1973);
- Plain Writing Act of 2010, Pub. L. No. 111-274 (codified at 5 U.S.C. § 301 note);
- 29 Code of Federal Regulations Part 38;
- Executive Order 14058, “Transforming Federal Customer Experience and Service Delivery To Rebuild Trust in Government,” issued December 13, 2021, <https://www.federalregister.gov/documents/2021/12/16/2021-27380/transforming-federal-customer-experience-and-service-delivery-to-rebuild-trust-in-government>;
- Executive Order 13571, “Streamlining Service Delivery and Improving Customer Service,” issued April 27, 2011, <https://www.federalregister.gov/documents/2011/05/02/2011-10732/streamlining-service-delivery-and-improving-customer-service>;
- Executive Order 12862, “Setting Customer Service Standards,” issued September 11, 1993; <https://www.archives.gov/files/federal-register/executive-orders/pdf/12862.pdf>;
- UIPL No. 11-23, Change 1, *Announcing an Extension of Period of Time that Funding will be Available to Cover Transaction Costs and Announcing the Establishment of a Deadline for States to Enter into Data Sharing Agreements (DSAs) for the National Identity Verification Offering (NIDVO) Established in Unemployment Insurance Program Letter (UIPL) No. 11-23*, issued April 29, 2024, <https://www.dol.gov/agencies/eta/advisories/uipl-11-23-change-1>;
- UIPL No. 01-24, *Equitable Access in the Unemployment Insurance (UI) Program*, issued November 8, 2023, <https://www.dol.gov/agencies/eta/advisories/uipl-01-24>;
- UIPL No. 11-23, *Announcement of Grant Opportunities and National Identity (ID) Verification Offering under the American Rescue Plan Act (ARPA)*, issued July 13, 2023, <https://www.dol.gov/agencies/eta/advisories/uipl-11-23>;
- UIPL No. 11-22, *Grant Opportunity for States to Participate in the American Rescue Plan Act (ARPA) Unemployment Insurance (UI) Navigator Program*, issued January 31, 2022, <https://www.dol.gov/agencies/eta/advisories/unemployment-insurance-program-letter-no-11-22>;
- UIPL No. 02-22, *Grant Opportunity to Support States Following a Consultative Assessment for Fraud Detection and Prevention, Promoting Equitable Access, and Ensuring the Timely Payment of Benefits, including Backlog Reduction, for all Unemployment Compensation (UC) Programs*, issued November 2, 2021, <https://www.dol.gov/agencies/eta/advisories/unemployment-insurance-program-letter-no-02-22>;
- UIPL No. 23-21, *Grant Opportunity for Promoting Equitable Access to Unemployment Compensation (UC) Programs*, issued August 17, 2021, <https://www.dol.gov/agencies/eta/advisories/unemployment-insurance-program-letter-no-23-21>;

- UIPL No. 02-16, Change 1, *State Responsibilities for Ensuring Access to Unemployment Insurance Benefits, Services, and Information*, issued May 11, 2020, <https://www.dol.gov/agencies/eta/advisories/unemployment-insurance-program-letter-no-02-16-change-1>;
- UIPL No. 02-16, *State Responsibilities for Ensuring Access to Unemployment Insurance Benefits*, issued October 1, 2015, <https://www.dol.gov/agencies/eta/advisories/unemployment-insurance-program-letter-no-02-16>;
- UIPL No. 18-13, *Rules for the Appropriate Use of and Access to Social Security Numbers*, issued May 24, 2013, <https://www.dol.gov/agencies/eta/advisories/unemployment-insurance-program-letter-no-18-13>;
- UIPL No. 21-05, *Use of Identifying Information on Unemployment Insurance (UI) Documents*, issued April 18, 2005, <https://www.dol.gov/agencies/eta/advisories/unemployment-insurance-program-letter-no-21-05>; and
- TEN No. 30-23, *Availability of the Unemployment Insurance (UI) Equitable Access Toolkit*, May 8, 2024, <https://www.dol.gov/agencies/eta/advisories/ten-30-23>.

7. Attachment(s).

- Attachment I: Customer Experience (CX) Checklist.
- Attachment II: Additional Information on Improving Mobile Usability.
- Attachment III: Customer Experience (CX) Additional References and Resources.