

ACKNOWLEDGMENTS

The BQC Evaluation Team wishes to thank its members for their tireless efforts in appraising the BQC program. The team members consisted of a unique "partnership" among State, Regional and National Office staff, thus providing invaluable insight in all areas of the BQC program. The impartial analyses which follows would not have been possible if not for each team members' totally objective contributions. The Team members are - -

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PREFACE

The purpose of this report is to provide an assessment of the Benefits Quality Control (BQC) program as conducted by the BQC Evaluation Team. This was accomplished by (1) evaluating to what extent the BQC program was meeting its current objectives, and by (2) examining these objectives to determine if modifications are necessary based on the evaluation results and the thrust of the National Performance Review. The findings and recommendations are based on the: (1) Review and analysis of Error Rates data, (2) Review and analysis of Program Improvement (PI) activities/data, and (3) a Review and analysis of data provided through surveying "customers" of the BQC program.

In the summer of 1993, Vice President Gore announced his National Performance Review (NPR). One of the DOL issues became to "Change the Focus of the Unemployment Insurance Benefits Quality Control Program to Improve Performance." (DOL21). The department committed itself to reexamining the BQC program and how its resources can best be divided between measurement, analysis and direct support for program improvement. This review was also to address whether BQC should consider to examine only paid claims or include denial decisions or other activities. This issue as a whole dovetailed nicely with the Performance Enhancement (PE) review which was being organized, and so DOL made the PE review the vehicle for addressing it. The explicit examination of BQC became Phase II of the PE Review.

EXECUTIVE SUMMARY

In response to a National Performance Review recommendation that DOL "Change the Focus of the Unemployment Insurance Benefits Quality Control Program to improve performance (DOL-21), the UIS Performance Enhancement Group charged a "Team" with evaluating the current BQC system.

The BQC Evaluation consisted of two major efforts developed to demonstrate an accurate picture of current BQC performance and customer perceptions. The first effort was an analysis of the components of the program, the data itself and the BQC program improvement activities. The second effort was obtaining the opinions of the customers of the program. This included the end users as well as the administrators.

A "Team" was established to provide a forthright and candid evaluation of the BQC program. To that end, members of the Team included State, Regional and National Office staff embodying a wide range of expertise among the Team participants. There were three (3) Team meetings held, with numerous exchanges of ideas/comments provided by the Team members throughout the evaluation process. The following is an overview of that process.

1. The Team used a 9-step evaluation process for the purpose of maintaining focus and direction within the group. The Team identified "all" customers of the BQC program and used the brainstorming technique to determine their customer requirements.

2. The Team developed Customer survey instruments which after clearing the Department and OMB, were mailed to the following customers identified by the evaluation Team. These customers consisted of State staff, Regional Office staff, National Office non-QC staff, and Independent Interest groups. The information gleaned from the survey instruments was instrumental in assisting the Team in determining perceptions of the current performance of the BQC program.

3. The Team conducted an analysis of error rates to determine if specific reasons for error rate fluctuations could be identified and if potential trends existed that could lead to additional conclusions.

4. The Team reviewed the Program Improvement (PI) studies and grant processes to determine their overall impact on the BQC program. 134 PI study reports and 13 PI Grant reports were reviewed for their recommendations and impact on their States.

The evaluation team created the evaluation process as a reflection of the program itself. It was not developed to force responses or to come up with a predetermined outcome. Perhaps most importantly, the evaluation was a broad brush effort to look

at the program. Given certain findings, it would have been nice to have more details for some of the results. However, like any study, a detailed tool cannot be developed at the front end since the outcomes are unknown at that time. Rather, a big picture is taken and then more detailed analysis is conducted based on outcomes and future direction of the program. Therefore, some conclusions point to the need to conduct additional analysis. This was viewed by the evaluation team as a positive outcome of the instrument.

FINDINGS

BQC as a whole was intended to fulfill two main purposes. It was designed to measure the accuracy of paid claims, and intended that States would use this information to prevent future mispayments, especially overpayments.

First and foremost, data analysis and surveys indicate the BQC program has successfully met its primary goal of measuring the accuracy of UI benefits paid. This has been accomplished at a cost of 1.1 percent of the entire UIS administrative resources. The review of the error rates revealed that most of the overpayments identified were due to non-agency responsibility, which only BQC measures. This reinforces the need of the UI system to measure the accuracy of benefits paid and demonstrates that BQC is the tool to conduct this measurement.

Given the program areas sampled in BQC, and the investigative approach BQC takes to the cases once sampled, the BQC universe embraces a very large portion of the UI program. In 1993, BQC covered approximately 86 percent of all UI decisions. Because of the size of the program areas it covers, it sampled from 94 percent of the dollars paid. The primary areas excluded; interstate and denied claims could be added giving BQC almost total UI coverage if the policy decision is made to include them.

The analysis also revealed that the BQC program has evolved over the years from mostly a pure measurement system to one that attempts increasingly to promote UI program improvement. Several tools such as Program Improvement Studies and Grants have been provided to States along with additional positions for analysts and extensive training opportunities at the UI Training Center. Based on PI Study/Grants participation and Survey responses, it can be concluded that States are conducting analyses of the BQC data, and have taken actions to improve their UI programs.

Although the BQC evaluation determined that the program is meeting its objectives as a measurement system and that it is being utilized by States, the BQC Evaluation Team's analysis of the findings did result in the identification of 12 issue areas. Several of these issues were closely related and it became apparent that action on any one of these issues would have a direct effect on the related issues. Other

issues were very specific and stood alone. For purposes of this report, the 12 issues were placed into five major issue groups;

- 1) Program Improvement
- 2) Error Rates/Data
- 3) State Public Release of Results
- 4) Inclusion of Denials, Interstate or EB
- 5) Resource Flexibility.

In general, issues identified in a report are followed by a specific recommendation. However, for this report, the BQC Evaluation Team was requested instead, to provide several different options for each issue and to include pros and cons for each option. Whenever possible, these options were generated directly from the customer survey outcomes.

The BQC Evaluation Team has provided the Performance Enhancement Group with several concrete findings regarding the BQC program as well as five groups of issues. The Team feels that in order to deal with the issues, the Performance Enhancement Group must first achieve consensus on **what** the UIS system needs in terms of accuracy measures and program improvement. After that has been accomplished, **how** the BQC program can help provide what is desired can be addressed.

The Team also concluded that the BQC program with its measurement and program improvement components, is reflective of the Performance Enhancement principles of "continuous improvement" and "co-ownership". The Team feels this structure could be enhanced even more to serve to as a UI model of Performance Enhancement.

The BQC Evaluation Team stands ready to support the Performance Enhancement Group in additional research/analysis that may be required in order to make informed recommendations on the future of the BQC program.

QC EVALUATION REPORT

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SECTION I

A. THE ORIGINS OF BQC

In August 1983, the Assistant Secretary for Employment and Training convened the Benefit Payment Control Oversight Committee (BPCOC), a group of experts in payment control from various agencies. They met in Charlottesville, VA, to consider issues raised by the findings of the Random Audit (RA) program and a 10-State audit by the Office of Inspector General which found problems worse than reported and States' responses inadequate. At the time, 15 States' UI programs were insolvent and borrowing from the Treasury. Based on an average 12.5 percent RA error rate, the committee addressed a "UI overpayment problem" of \$3.7 billion in FY 1983 due to a combination of fraud and errors. Therefore, the distinct need to measure the accuracy of benefit payments existed.

The BPCOC's first recommendation was that UI expand RA into a Quality Control program. It noted that UI, the third-largest entitlement program, was the only major program without a QC program. It projected that a QC program could save some \$600 million in UI outlays over 5 years.

The Department began to develop the Benefits QC (BQC) program in late 1983, based on the RA program then being operated in 46 SESAs. After a policy review ordered by then-Secretary Bill Brock in the summer of 1985, States began implementing BQC voluntarily in 1986. The BQC regulation at 29 CFR 620 was promulgated on September 3, 1987 and the program became mandatory on October 5, 1987.

B. BQC AND THE REVIEW OF UI PROCESSES

1. Benefits QC versus Random Audit

The structure of the RA program provided an implicit answer to a very fundamental question: **What is the UI system's objective with respect to the accuracy of benefit payment decisions?** Its answer was, The system should strive to pay benefits in accordance with written State laws and policies. Even though administrative resources might be insufficient to achieve this in every instance—always to obtain complete and correct information from claimants, employers or third parties, for example—the system's concern goes beyond fraud and administrative errors by UI staff. RA implied that both Federal and State partners in the system required knowledge of all sources of mispayments.

The BPCOC did not challenge these premises; indeed, it recommended that UIS build on them to create ultimately a system that would not only measure the extent of errors but also lead to preventing them in the future by remedying their causes. Therefore, BQC was designed to supply Federal and State partners with data on all sources of mispayments.

Benefits QC was built on these operational building blocks inherited from RA:

- Clearly defined universe of paid intrastate claims (a week paid) covering the major permanently-authorized UI programs;
- Weekly random sampling of payments so that inferences can be made with known precision to that universe;
- In-person verification of all information relevant to determining the sampled claimant's eligibility for the week's payment and its size by contacting the claimant, employers and third parties and reviewing case documents;
- Standard definitions and procedures to be followed by each State's QC unit and sampling software;
- Periodic Federal review of cases, procedures, and sample selection to minimize sampling and nonsampling errors;
- A rich data record on each sampled case noting amount, type, cause and responsibility for all errors and much information on the claimant and his circumstances so that analysis can be done by computer.

In common with RA, therefore, the BQC program embodies the following simple premise:

A detailed look at a small sample, under strictly defined methods, allows a State to confidently identify the accuracy rate for the whole population of payments.

Added to the RA program to increase the capacity or impetus for program improvement were:

- Larger sample sizes for greater precision;
- Dedicated QC computers in every State with a customized database and analytic software, and regular training and handbooks to give State staff continuous access to all QC investigative findings for analysis; and

- A data publication requirement to inform stakeholders and involve them in the program improvement process.

In brief, BQC as a whole was intended to fulfill two main purposes. It was designed to measure accuracy of paid claims, and intended that SESAS would use this information to prevent future mispayments, especially overpayments.

- Measurement:** As a measurement system, BQC is to provide statistically valid (1) information relevant to identifying and correcting overpayment and underpayment errors; and (2) that and other information on the claimant population to guide policy formulation, legislative development, and basic UI research.
- Program Improvement System:** BQC intended that the Annual Publication of error rates would provide enough interest and incentive to encourage States to take program improvement action when needed.

2. Coverage and Thoroughness.

Given the program areas sampled, and the investigative approach QC takes to the cases once sampled, the QC universe embraces a very large portion of the UI program. In 1993, QC covered approximately 86 percent of all UI decisions. Because of the size of the program areas it covers, it sampled from 94.2 percent of the dollars paid.

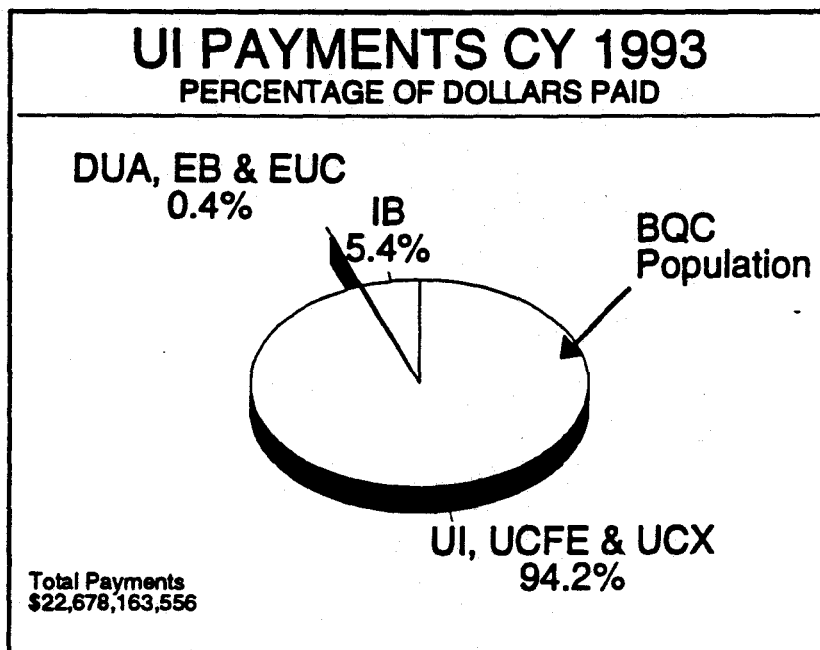


Chart A on the following page indicates the UI claims flow and those areas impacted by the BQC review. The major program area it leaves uninvestigated is **Interstate benefits**; however, because many of IB processes are the same as intrastate benefits and handled by the same staff, QC does assess and influence the quality of those operations. The major decisions not reviewed by QC are **negative determinations (denial decisions)**; these are not reviewed by QC because it only samples paid weeks. Chart A, outlining the steps in the claims process, indicates the source and volume of denial decisions for CY1994 as well as the magnitude of basic claims flows. The figures shown in the chart are expressed in thousands, and for Initial Claims the 11 million represent those initial claims from which the BQC sample is drawn. Because the QC universe does not include denial decisions, it is assumed that QC estimates only a minor portion of **underpayments**. QC has consistently estimated that underpayments in which claimants received payments smaller than due are about 0.9 percent of benefits paid. A 1987 pilot study of the accuracy of denial decisions using QC methodology suggested that underpayments due to such denials may be several times greater than what QC now estimates.

The UI claims process comprises three major stages as indicated below. Given its methodology of examining all decisions which may have a bearing on the claimant's eligibility for the dollar amount of the sampled week's payment (called the "key week"), QC touches them all:

Stage I: Monetary.

QC interviews the claimant and on the questionnaire the claimant lists all base period employers. QC compares this with the computerized monetary, contacts all base period employers to verify amounts, and recomputes MBA and WBA.

Stage II: Separation.

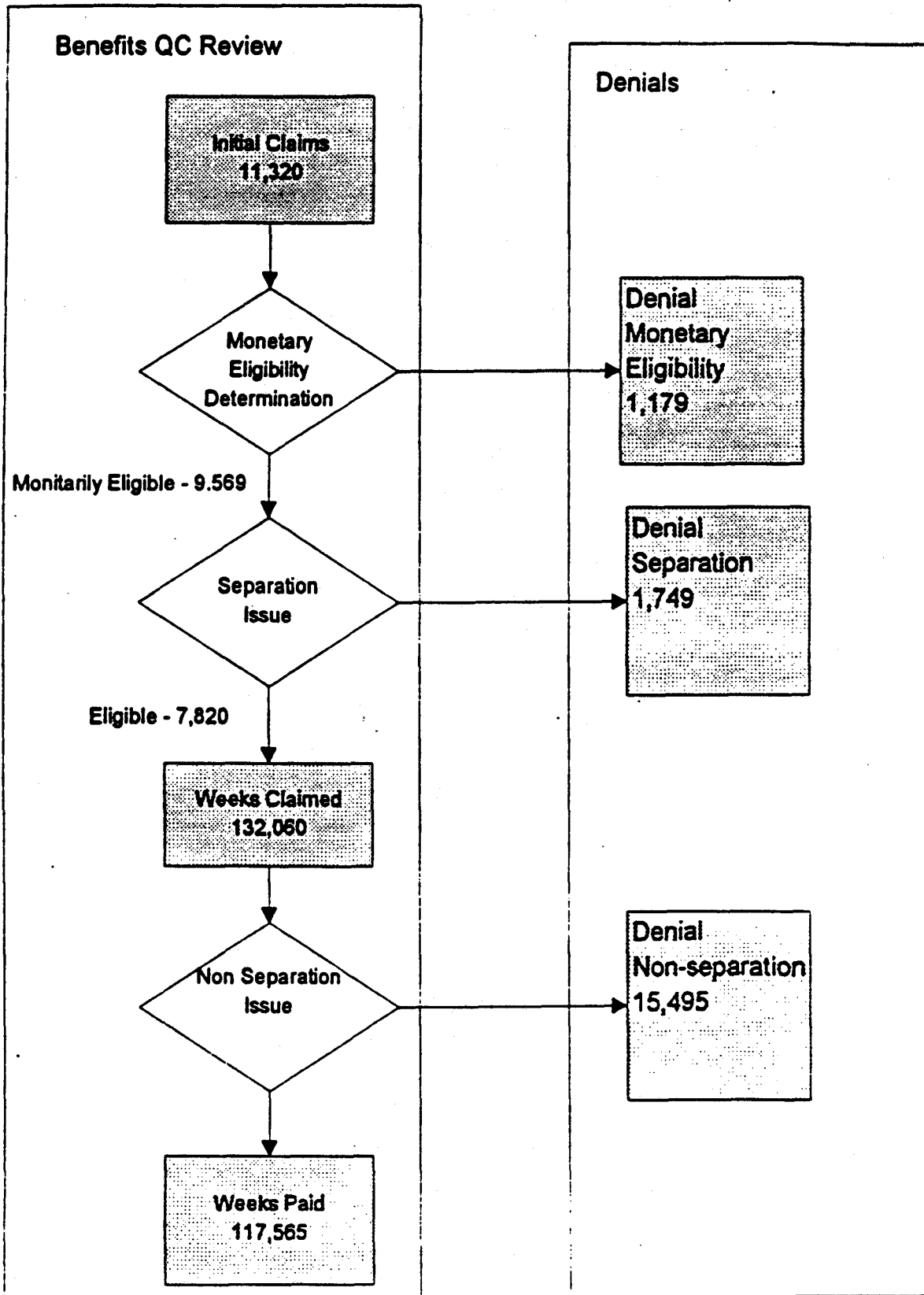
Working from the claimant interview, case record and questionnaire, QC contacts all employers for whom separation issues could potentially affect key week eligibility to verify reason for separation.

Stage III: Weekly Elig.

In accordance with State laws regarding ability, availability and work search, QC contacts appropriate **work search employers, third parties, and the claimant**. If State law requires **registration with the E.S. or union**, QC reviews. Records regarding disqualifying income during the key week are reviewed and the key week payment amount is

Simplified UI Claims Flow

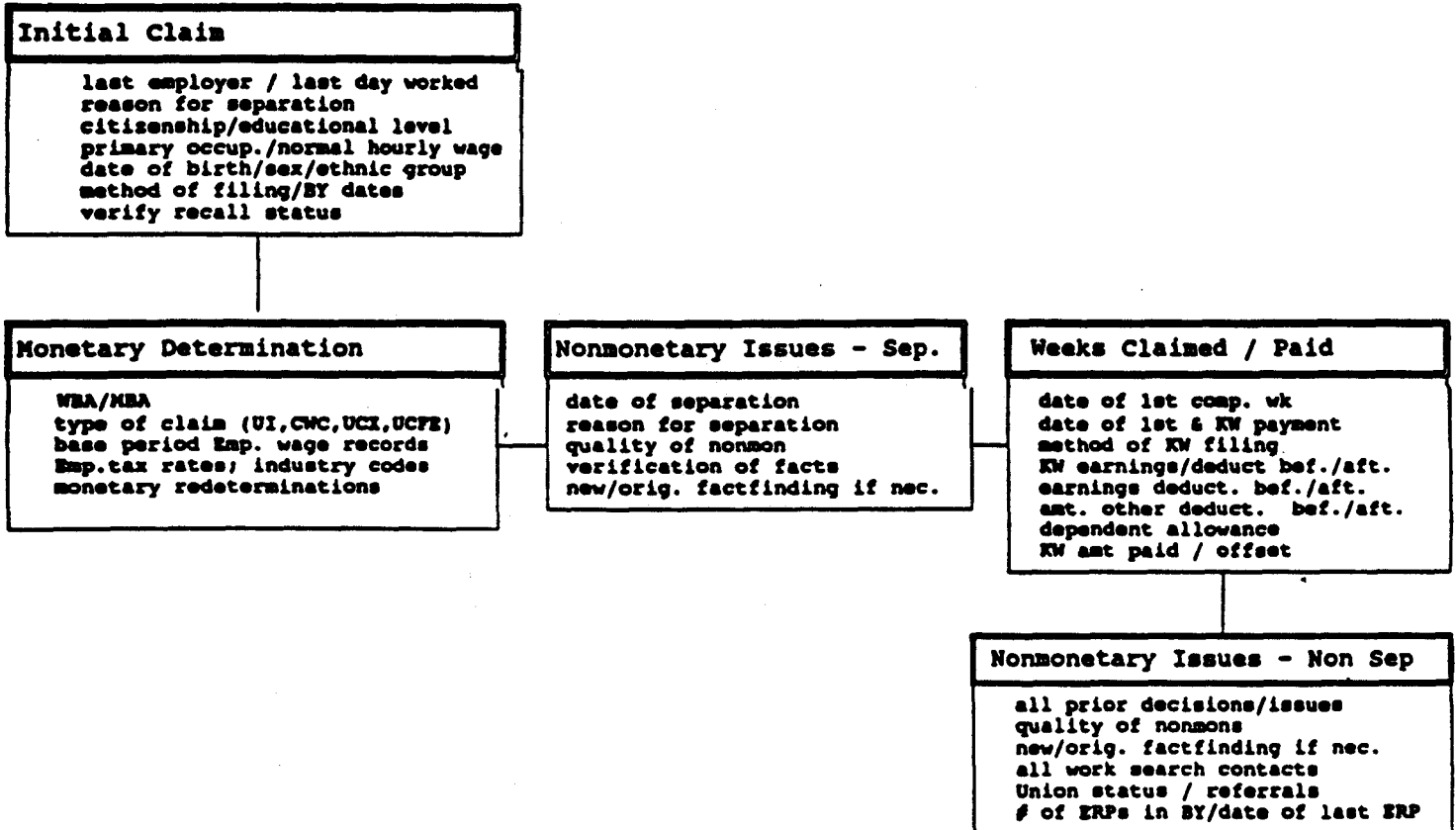
Regular UI Interstate data for CY 1994



recomputed. QC also follows up on any listed employers where the claimant worked during the key week. (This is QC's major methodological weakness: if a claimant is careful to conceal sources of earnings during the key week, QC will probably only discover them by accident, e.g., contacting a former employer and finding the claimant continued to work there occasionally.)

What QC reviews in the course of verifying accuracy at each of the above steps in the claims process is presented graphically in the following Chart.

WHAT BQC REVIEWS IN THE UI PROCESS

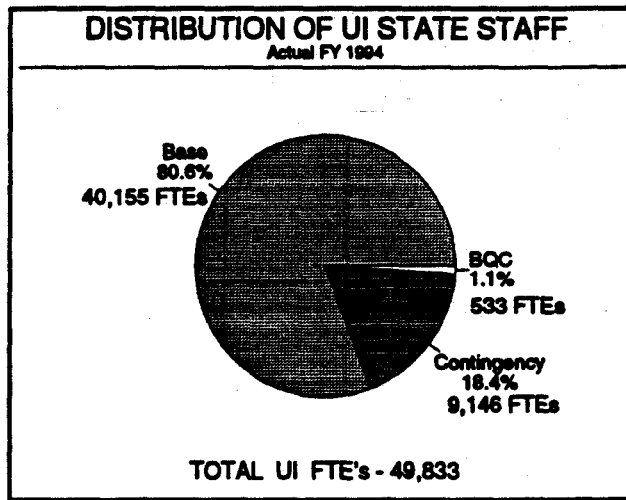


3. Where the Errors Occur and Who's Responsible.

Briefly, the following table shows what QC has discovered over the 1988-93 period about the sources of overpayments at the three determination stages, and the parties responsible. These are national averages; the ratios vary considerably from State to State.

Errors by Determination Stage	<u>Overpayments as Percents of</u>	
	<u>Dollars Paid</u>	<u>\$ Paid in Error</u>
Stage I: Monetary	0.89	10.6
Stage II: Separation	1.45	17.3
Stage III: Weekly Elig.	5.60	66.8
* Work Search	(2.08)	(24.8)
* Key Wk. Earnings	(2.07)	(24.7)
* Other Elig. Iss.	(1.45)	(17.3)
<u>Other errors</u>	<u>0.44</u>	<u>5.3</u>
	8.38	100.0
Errors by Responsibility		
Claimant Only	4.44	53.0
Agency Only	1.70	20.3
Agency (w/ emp'ers & clmts)	1.00	11.9
Employer Only	0.66	7.9
<u>Other joint resp.</u>	<u>0.58</u>	<u>6.9</u>
TOTAL	8.38	100.0

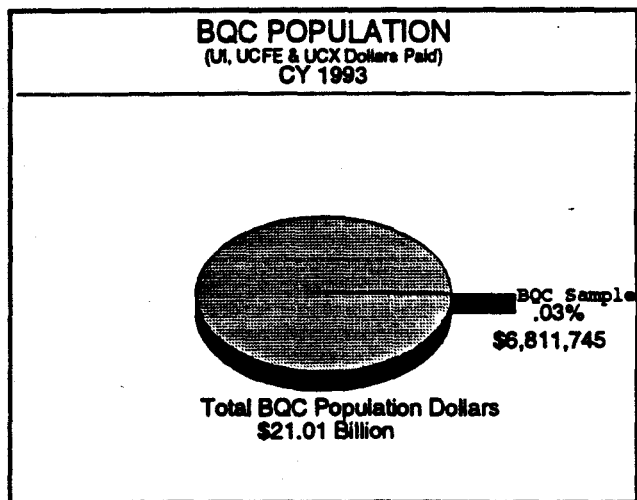
4. Benefits QC's Size and Costs



For FY 1994, the States received about 533 positions specifically for the Benefits QC program (this excludes from the base QC grant 52 positions allocated for RQC, and 52 for ADP systems support. As the chart illustrates, this represented slightly over one percent of base plus contingency staffing. At its height in 1985, the RA program allocated 351

positions nationwide (0.9 percent of all UI staff). Specific BQC positions reached a maximum of 678 positions in FY 1989 (1.8 percent of all UI staff.)

Another sense of the scale of QC is the number of cases (weeks paid) investigated. Since 1988, this has held relatively constant at about 40,000 per year. (actual sample allocations have averaged about 43,000; the difference represents QC investigator effort devoted to program improvement-related studies.) The chart indicates that the dollars paid in the cases investigated in FY 1993 accounted for about 0.03 percent of all dollars in the QC population. That is, QC makes inferences about the extent of payment accuracy in the entire universe of UI payments by examining roughly 3 in every 10,000 of the dollars paid. Approximately the same ratio of actual payments was sampled as dollars.



5. Benefits QC as a Program Improvement (PI) System

a. **Initial Concept.** Specific assumptions guided QC's design as a PI system. It was assumed that States want to fix any problems with their programs and, rather than ignoring the findings or changing laws or policies in order to legislate the problems out of existence, they would give high priority to obtaining, understanding, and responding to QC findings. Another assumption was that error rates were not comparable between States because of differences in State law, policy, and economic/demographic environments. Since data integrity would be crucial to the credibility of QC data, it was assumed QC should be organizationally independent of any benefit unit. Perhaps the most controversial assumption was that public release of QC findings would substitute for the establishment of accuracy standards and/or requirements to take PI action in response to QC findings. Also, deciding when and how to take program improvement action is a State, not DOL, responsibility.

The BQC program incorporated these assumptions by requiring controlled and reviewed methodology, organizational independence for BQC, and the annual release of findings through public channels using a standard format. However, DOL made no attempt to set standards or require corrective action (other than to correct the deficiencies of the QC program itself).

b. **Promotion of Data Use and Program Improvement Activity.** Even while the program was being implemented voluntarily, the Department began taking "supply side" actions to encourage States to use QC data for program improvement and to ease away from the initial assumptions about how program improvement would occur. These were actions designed to increase States' capabilities to use data, do sophisticated analysis, to lower the cost of doing PI-related studies, or lower the cost of implementing PI actions. The major steps taken were as follows.

- A data analyst position was funded for QC and States received a prototype position description in April 1986.
- States were provided with a statistical TAG and training at the National QC Training center to facilitate their use of QC data.
- In June 1992, the Department issued A Guide for Planning UI Program Improvement Studies, prepared by Pennsylvania QC staff.
- Guidelines for approval of program improvement (PI) studies, conducted with staff freed up by reductions in required sampling levels, were first issued in December 1987 (UIPL 9-88). The criteria were broadened a year later via UIPL 33-89 and reviewed in August 1991 (UIPL 37-91).

- In June 1988, the UIS established a clearinghouse for PI studies to facilitate the sharing of information on completed PI studies.
- Actual funding for the implementation of PI activities began with funding of projects in three States in FY 1990. This evolved into a regular "PI Grants" effort. Through FY 1994, States had received funding totalling \$1.85 million.

C. FORMING THE TEAM

The BQC Evaluation "Team" was formed for the purpose of examining and reviewing the entire BQC program. This examination is intended to provide information, and subsequent findings and recommendations, to other UI Management Committees on the general welfare of the BQC program.

The "Team" concept was used to underscore UIS's commitment to the newly instituted "partnership" principle within the Employment and Training Administration (ETA). This partnership would allow for representation of all potentially affected parties or customers. Additionally, and perhaps more importantly, this partnership principle would lend itself to more impartial findings by the Team.

In an effort to have a diversified team with varying degrees of expertise, views, and opinions, the Team was comprised of participants from the three major stakeholders. These stakeholders included (1) the State Employment Security Agencies (SESAs), (2) the Regional Offices (RO's), and (3) the National Office (NO). Each participant played an integral role during this evaluation process.

This venture into the "team" process was our first attempt at combining State, Regional Office and National Office staff acting as one to reach a common goal. All evaluations in the past were either done internally or contracted-out, so the "team" required some additional time to adjust to this new working environment. Budget constraints that came up during the year also provided a challenge in that five (5) scheduled meetings were reduced to three (3).

The "Team" had the responsibility for addressing the overall goal and objectives of the BQC program. The "team" concept and process techniques were used throughout the entire evaluation process, with each team member having equal opportunities to effect outcomes. A mission statement, as well as ground rules and procedures, were developed by the Team. Consensus voting was required for all issues.

Following the completion of each team meeting, a summary was provided via E-mail to each team member detailing the results of the meeting and soliciting further comments. Where circumstances prevented a team member from being present

during any of the sessions, they were given the opportunity to provide input and voice their opinions utilizing the E-mail method. Although this was a slow and cumbersome process, it afforded each member the chance to voice their opinions and or objections, and as the team moved forward, each member was a part of each decision that was made.

Development of the 9-Step Process. The team realized the need to conduct a systematic evaluation with specific identifiable steps. This was critical since the team was comprised of members from all parts of the country, and due to budget constraints, team meetings were infrequent. To meet this need, the BQC Evaluation Team developed and utilized a problem solving process, referred to as the 9-step process. It was necessary to adhere closely to this process in order to maintain continuity in a "group" of this size. The following provides a description of this 9-step process.

1. Define the Process. The process developed by the Team consists of nine steps. In broad terms, the steps can be grouped into (1) selecting/developing an evaluation process, (2) identifying customers and determining their requirements, (3) determining current performance, (4) analyzing survey outcomes to determine if and where deficiencies exist, (5) present findings.

2. Identify Customers. Consider using brainstorming technique to identify all customers of BQC. Customer list should be separated and identified as "direct" and "indirect".

3. Determine Customer Requirements. Provide a listing of what the group perceives as customer requirements, again using the brainstorming technique. Use the results as the impetus for further identifying customer requirements through the development and issuance of customer survey instruments.

4. Determine Current Performance. The Team will review and analyze BQC data to determine the overall effectiveness of the BQC Program. It may be possible to include in the survey instrument mentioned in item 3, appropriate questions to ascertain if the SESA has conducted any analyses and if so, is it in sufficient detail to provide the Team with enough data to assist us, and perhaps limit the number of States' data the Team would review.

5. Review and Analyze Survey Outcomes. Following the receipt and review of the survey instruments, and analyzing the BQC data, there should be sufficient information to identify if and where

problems exists. In addition, where problems are found, any obstacles to alleviating these problems should be identified to determine the feasibility in further addressing these problems.

6. Select Problems(s) Scope. It will be necessary for the Team to select problems to be addressed based on the breadth of these problems identified in item 5.

7. Analyze Root Cause If Problems Exist. Review/analyses of the data should provide the Team with some insight as to the root cause of some of the problems identified. In cases where this is not evident, it will be necessary for the Team to further analyze the data collected to determine the root cause for each selected problem.

8. Identify/Prioritize Possible Solutions. The Team should use the previous steps to provide the information necessary to assist in identifying possible solutions, taking care not to attempt to jump ahead to this step much earlier in the process. After the possible solutions have been identified, they should be prioritized in order of implementation feasibility.

9. Provide Recommendations. Furnish the Performance Enhancement Group with a final report, which should indicate both the positive and negative findings in the BQC program and offer potential recommendations.

D. USE OF OBJECTIVES

The BQC Evaluation Team established a goal which was to:

Conduct an evaluation of the Benefits Quality Control Program in State Employment Security Agencies to see how the objectives of the BQC system are being accomplished.

In addition, the QC regulations provided the impetus for the program stating that "the QC program will be a major tool to assess the timeliness and accuracy of State administration of unemployment insurance in order to improve program performance and revenue collection, and to reduce inaccurate benefit payments and claims denials." This was further defined in stated objectives provided in ETA Handbook No. 395.

The Team then identified the need to evaluate (1) to what extent the BQC program was meeting its current objectives, and (2) examine these objectives to determine if modifications are necessary based on the evaluation results and the thrust of the National Performance Review.

In order to meet this goal, the Team identified three (3) major objectives based on current BQC Regulations and ETA Handbook No. 395. These 3 objectives follow:

1. Assess the impact of State and Federal laws and requirements on the system's accuracy and integrity,
2. Encourage more efficient administration, and
3. Achieve improvements in program accuracy, integrity, quality, and solvency through error reduction.

In pursuit of the goal, the team elected to use several types of information, including an internal analysis of error rates and other data contained in the QC database, analysis of Program Improvement activities, and the surveying of customers.

The team reviewed the State, Regional, and National Office survey statements/items and assigned each of these statements/items to one of the objectives shown above. In addition, a fourth "miscellaneous" category was created for use when the survey statements did not appear suitable for either of the 3 objectives.

By assigning survey statements/items to the individual objectives, the Team was better able to evaluate the success or failure of these objectives, through application of the rating indicated for each survey statement/item.

SECTION II

A. ERROR RATES DATA

The purpose of this section of the evaluation is to **describe** what QC has found out about the performance of the 51 SESAs (excluding Michigan) reporting Benefits QC data over the 1988-93 period, and then to **assess or interpret** what those data might mean in the context of QC's original purposes. The central measure toward which BQC is oriented is the correspondence between the sampled actual weekly benefit payment and the investigator's reconstruction of what should have been paid given the State's law, policies and procedures, following a thorough field investigation. Although the BQC database contains over 100 elements, this analysis concerns basically those relating to the nature, extent, causes and responsibilities of overpayment errors. The analysis is carried out in terms of standardized error rates, i.e., the ratio of dollars overpaid relative to total dollars paid out in benefits during the time period in question. Underpayments are ignored: the overall UP rate, which excludes incorrect denials, has consistently averaged slightly less than 1 percent of reported benefit payments over the period.

B. DESCRIPTION OF ERROR RATE EXPERIENCE, 1988-93

1. **Average Error Rate (weighted).** Each year we report a weighted average of all State OP and UP rates, arrived at by dividing the sum of all dollars reported overpaid by all States by all dollars reported as paid. It declined steadily between 1988 and 1991 a total of 19 percent but over 1992-93 it seems to have stabilized at the 1990 level.

1988	9.3%
1989	8.8%
1990	8.0%
1991	7.5%
1992	8.0%
1993	8.1%

2. **The Distribution of Individual State Rates.** The weighted averages noted above can vary for many reasons; even if every individual state rate remained unchanged the weighted average could move as the distribution of workload changes among the States.

	<u>1988</u>	<u>1989</u>	<u>1990</u>	<u>1991</u>	<u>1992</u>	<u>1993</u>
Highest error rate (%)	30.6	25.6	19.3	19.7	22.5	19.0
Lowest error rate (%)	2.3	2.7	3.1	2.5	2.5	1.5
Range (pct. pts.)	28.3	23.0	16.2	20.1	17.6	17.6

	<u>1988</u>	<u>1989</u>	<u>1990</u>	<u>1991</u>	<u>1992</u>	<u>1993</u>
Ave. Er Rate, High 5	23.3	22.8	17.4	17.5	18.8	16.8
Ave. Er Rate, Low 5	2.9	3.3	3.5	3.1	3.1	3.0
1st Qrtile (lowest 25%)	5.7	6.2	5.8	5.1	6.3	6.2
Next Quartile (2nd 25%)	9.1	9.9	8.6	8.0	8.8	8.8
Third Quartile (3rd 25%)	15.0	13.1	11.2	10.3	12.3	11.7
Range of mid-50% of States (Q3 - Q1)	9.3	6.9	5.4	5.2	6.0	5.5

3. Stability of the Distribution: Changes in Position. We examined how extensively individual States' error rates might have changed over the 6 years by examining movement basically among quartiles.

a. Number of Quartiles Appearing in, 1988-93

- 1 = 11 States
- 2 = 23 States
- 3 = 15 States
- 4 = 2 States

b. Most Stable, Most Variable States: The Stability was concentrated in the highest and lowest quartiles

i. In Lowest Error Rate Quartile all Six Years:

CT, HI, MA, ND, PA, WV

ii. In Highest Error Rate Quartile all Six Years:

AL, DE, IN, LA

iii. In second quartile all six years: CA

iv. Appeared in all 4 Quartiles: RI, VT

v. Appeared in the same quartile for at least 5 of the 6 years: 21 States

4. Summary and Conclusions on the Distribution: Overall, the distribution of States' error rates has been relatively stable, with an overall downward drift occurring mostly between 1988 and 1990. However, the distribution has become

somewhat compressed, because the high-error-rate States have reduced their overpayment error rates. The maximum error rate has fallen from 31 to 19 percent, and the rate marking the 75 percent percentile has fallen from 15 to 12 percent. At the same time, the lowest error rate, and the rate marking the 25th percentile, have remained virtually constant. There has been little change in the overall distribution of rates over the 1990-1993 period except for a one-time dip between 1990 and 1991 which was then reversed in the next year. Between 1990 and 1991, 30 States' error rates declined or remained constant; the following year, 35 rose or stayed constant.

C. DESCRIBING MAJOR STATE CHANGES, AND WHAT CHANGED

This section identifies States with major changes in overpayment error rates between 1988 and 1993 and notes major changes in cause or responsibility that were associated with them. A "major change" is defined, somewhat arbitrarily, as a decline of 25 percent or more in the OP rate, or an increase of 40 percent or more.

<u>SESA</u>	<u>Change 1988-1993</u>		<u>Major Causes Operative</u>
	<u>Pct.</u>	<u>Pts.</u>	
Improving States			
Alabama	- 6.9	-30	Other Elig -6.2 pts
Arkansas	- 7.8	-42	Wk Sch -4.8 pts
Arizona	- 7.6	-42	WS -6.6 pts
Connecticut	- 1.8	-34	WS -0.9, OE -0.9
Delaware	- 6.2	-25	WS -4.9 pts
Hawaii	- 4.6	-45	across the board
Iowa	- 3.4	-50	across the board
Indiana	-17.0	-56	WS; other elig.
Kansas	- 8.0	-61	WS; other elig.
Maine	- 9.1	-42	WS; other elig.
Maryland	- 4.6	-26	WS -3.7 pts
North Carolina	- 4.5	-26	BY earn;WS;seps up
North Dakota	- 1.2	-46	across the board
New Jersey	- 6.2	-44	WS -6.0 pts
New Mexico	- 7.8	-49	Ben Yr Earn -4.4 pts
New York	- 2.8	-28	Seps -2.0
Oregon	- 3.6	-40	WS -4.4 pts 92-93
Rhode Island	-10.7	-69	WS -2.5; OE -6.9
Texas	- 5.6	-47	WS -6.6 pts
Wyoming	- 6.2	-41	All but WS

Worsening States

Idaho	+ 4.2	+ 61	WS, other elig.
Illinois	4.9	86	WS, other elig.
Massachusetts	3.6	157	BY earn, OE, other iss
Minnesota	4.5	47	OE
Missouri	3.5	117	across the board
New Hampshire	5.2	127	WS +3.6 pts
Nevada	9.2	137	WS +8.2 pts
Ohio	7.4	104	WS +7.6
South Carolina	5.3	58	OE, WS, BYE, S
South Dakota	2.1	40	WS +2.7 pts

States with Error Rate "Blips" (temporary increases in rates)

	<u>pct. pts</u>	<u>yrs.</u>	<u>Major Causes Operative</u>
Colorado	+ 4.5	91-92	WS
Georgia	+ 3.4	88-89	WS
Montana	+ 4.4	91-92	WS
Utah	+ 4.1	88-90	WS., BYE
Virginia	+ 4.0	88-89	WS., Seps
Vermont	+14.6	88-89	WS., Other Iss.

Scanning the above lists, Work Search (WS) appears as the major, or one of the major, reasons for swings both up and down, figuring in about 63 percent of both, if "across the board" States are excluded; including those, the percentages rise to 80 and 73, respectively. The other major change category is Other Eligibility (OE) involved in about half both of major increases and decreases (if "across the board" States are included).

2. The General Problem in Interpreting BQC Results. Benefits QC data measure program outcomes, not specific processes. They lack either national or State-specific criteria (standards or benchmarks) to automatically inform the user whether they represent "good" or "bad", up to or below expectations. Consequently they are not "self interpreting." As discussed further below, this causes numerous difficulties for interpretation.

a. On the Positive Side. Overall, the QC results over the years, and to a large extent across States, exhibit considerable **stability**. This is particularly true of the measured error rates for certain cause categories (Base Period earnings, Separations, and Other Issues). This suggests that BQC measurements are not highly subject to random sampling and nonsampling errors. As far as the major swings that have been observed within States over time, patient examination usually readily reveals the reason, although the reasons may be diverse: changes in law and policy, process

improvement, the correction of QC procedures themselves. BQC thus does measure what is going on in the States; what it finds is real.

b. The Ambiguity of the QC Error Rate. As currently structured, the BQC error rate is ambiguous. It measures accuracy by comparing each actual payment against a reconstructed payment against the State's written law, policies, and procedures. Although there does not seem to be an alternative to the methodology, the resulting measured error rate combines four (3) entangled major component elements, none of whose size is obvious:

- The normal, expected minimum error rate given the State's law and policy, at current funding levels. Even with excellently structured and administered payments process, staff will make some interpretation errors and inaccurate information will slip through, potentially leading to overpayments. The more complex or severe the law, the greater the chance for them leading to a range of "normal" or "base" error rates across States.

- Ineffective processes or administration adds another component which normally rides atop the base set by law and policy. In the short run, this component is the one which quality control or process improvement systems primarily target for reduction.

- Because it is sample-based, each QC measurement contains **sampling error** (the size of this can be estimated). Because it is operated by humans, there can be a minimal amount of expected **random nonsampling error** as well even in a program which contains no systematic nonsampling error.

D. ERROR RATES DATA FINDINGS

1. **BQC reports accuracy in accordance with existing State laws and policies.** When done in accordance with BQC methodology, BQC accurately reflects what "occurs" in the State, and the effects of various changing conditions. This is indicated by the considerable stability of measured error rates for functions and laws known to be unchanged within the States over time. It is also indicated by the fact that in most cases, States are able to explain larger movements in BQC mispayment rates by alluding to a variety of factors.

2. **BQC Results are not Self-Interpreting.** At any given time, the measured error rate reflects at least these several elements or components:

- the underlying error rate given by the State's law and policy and the structure it has designed to administer its benefit payment system;

- the efficiency and effectiveness with which its staff actually use that structure;
- the level of economic activity, which determines the characteristics of the claimant population, and the opportunities they have to find both suitable reemployment and benefit year earnings opportunities;
- the degree of adherence to QC investigative procedures; and
- sampling variability.

Judgments about the level of the measured error rate at any time, and its changes over time, require that these components be sorted out. This requires time and attention to detail, and implies a case-by-case interpretation.

3. BQC has moved State Programs in Various Directions. State and Regional interpretations of QC findings to date indicate that BQC has definitely helped States improve many aspects of their programs. Twelve out of the 30 major error rate declines were attributed at least in part to program improvements taken in response to QC findings. QC has also had the positive effect of helping States identify and quantify the effect of changes in law and policy, including many that were not being uniformly understood or consistently applied. On the other hand, other changes--in laws or interpretations--were apparently made to improve QC results, especially to lower work search errors. Many other changes made in response to QC findings have nebulous or neutral programmatic consequences--e.g., improving registration with the Job Service--while lowering QC error rates.

4. BQC Error Rates and Good UI Laws and Policies. Obviously, a low error rate is not synonymous with a good UI program, nor a high error rate with a bad one. It is possible to design UI laws and policies that yield a minuscule BQC error rate even when indifferently administered, or which do not ultimately provide satisfactory wage replacement or help induce quick reemployment. BQC thus emerges as one indicator among many and to be interpreted correctly, QC findings have to be used in conjunction with other performance indicators. These need to include indicators of reemployment and length of spells relative to economic conditions, and other indicators of good service to both employers and claimants.

The following dot points provide a brief summary of the conclusions reached for items "1 through 4" above:

- The BQC program accurately measures benefit payments to those people within the BQC population.
- BQC has had an effect on various State operations and procedures.

- BQC is a diagnostic tool for management to use for analyses.
- BQC reports accuracy in accordance with existing State laws and policies.
- BQC results are not "self-interpreting".
- BQC has moved State UI programs in various directions.
- BQC error rates and good UI laws and policies are not necessarily synonymous.

SECTION III

A. PROGRAM IMPROVEMENT STUDIES AND GRANTS PROCESS

The QC Program was "officially" implemented in FY 1987, and it was immediately apparent that the program would create a rich data base for each UI jurisdiction. It was also apparent that this data could have a significant impact on the improvement of UI Benefits payment operations if it were adequately analyzed and interpreted. In order to facilitate the analyses of these data, the Department of Labor provided the SESAs with data analysts and systems support positions to assist State UI Directors in the utilization of QC and other UI program data. QC procured their own ADP equipment and developed software using an operating system which would allow SESA analysts to easily access the data and determine the need for program improvement action. Extensive user manuals (written to be as "user friendly" as possible), training to develop analytical skills, statistical software, Stat users groups, and TAGs which included stat theory and approaches were provided to assist SESAs in the use of data.

Additionally, the Department established the QC Training Center, and provided resources for State staff to attend, in order to become more familiar with program improvement implementation methods.

B. PROGRAM IMPROVEMENT STUDIES

For those States making adequate utilization of these staffing positions, there soon became a need for additional funding for the purpose of conducting more detailed studies based on recommendations provided primarily by the data analysts and systems support positions. To reaffirm the Department's position, an Unemployment Insurance Program Letter (UIPL) was issued early in calendar year 1988. This UIPL provided the necessary instructions for allowing States the option to divert QC staff resources from sampling, with National Office approval, for the purpose of conducting UI program improvement studies. Most of the States were eager to undertake these PI studies utilizing diverted BQC staff to develop and implement these studies. In addition, some States have undertaken PI studies and implementations utilizing their own resources.

Since the earlier stages of PI Studies, there has been a steady decline in State participation. There have been a number of reasons contributing to this decline as alleged by the States, several of which follows: (1) Too many Federal requirements/restrictions; (2) Submittal procedures are too formal and time consuming; (3) States need more flexibility in conducting PI studies. The above

reasons have been taken into consideration by the BQC Evaluation team, and are reflected in the PI data findings.

There is one Region that is currently implementing a "Pilot" PI project (**Blazers**). This pilot project is a plan to better utilize the BQC program as a PI tool by customizing it to the specific needs of the individual States. Under the project agreement, the Regional Office is authorized to negotiate and approve PI study plans submitted by the States. The results of this project will be assessed and evaluated to determine its effectiveness, and a decision will be made on an effort to involve more Regions.

C. PROGRAM IMPROVEMENT GRANTS

Also, beginning in FY 1990 and continuing through the present time, the Office of Quality Control (OQC) has made resources available to the SESAs through the funding of program improvement grants. States are provided with a "submittal format outline", detailing the procedures for submittal and the information required for the PI grants proposals. A panel is established to review and score each proposal received timely. The panel is comprised of National Office UI program staff outside the OQC, who rate the proposals, and recommend funding until the amount allocated for this PI grants activity is exhausted.

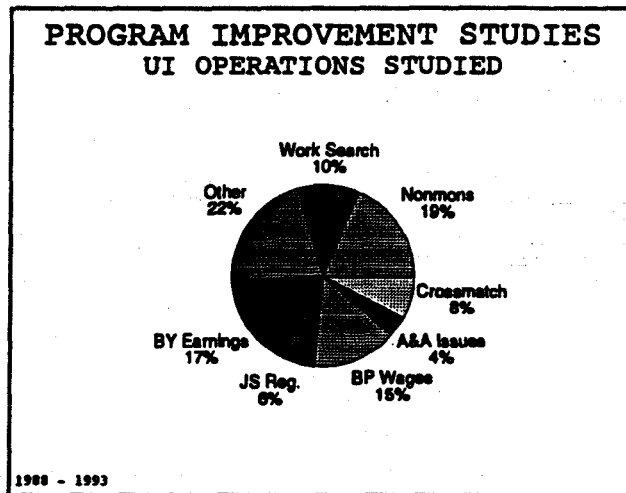
The total amount allocated for these grants has ranged from \$200,000.00 to \$500,000.00 annually. These actions underscore the Department's policy of assisting SESAs that wished to commit to in-depth analyses of UI/QC data as a means of translating general findings into practical program improvements.

These program improvement grants have covered a wide range of operational, policy, and program changes that have been implemented by SESAs to ensure continuous proper operation of the UI payment system.

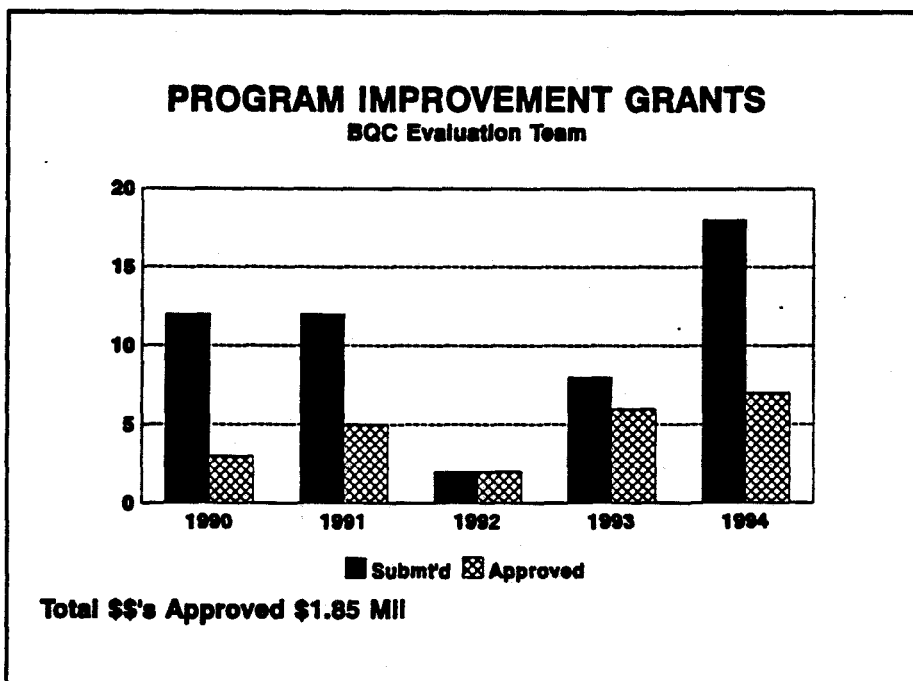
D. PROGRAM IMPROVEMENT FINDINGS

Program Improvement Studies. States are interested in using BQC data and have over the years used the PI study process to identify and implement improvements in their UI operations. There have been a total of 134 PI Studies conducted, of which 86 have been recommended for implementation into SESA UI operations. There were 41 of these recommendations actually implemented.

The major UI program areas impacted by these implementations were, (1) Nonmonetary Issues, (2) Work Search, (3) Benefit year earnings, and (4) Base period wages. It was impossible to determine if the implementation of PI studies had an impact on the decline in error rates. Additionally, final State reports reveal there was no follow-up done to determine the degree of continued success of PI study implementations. These two potential deficiencies raises bigger questions, should the BQC program include program improvement activities? And, should the program be solely a measurement system?



Program Improvement Grants. The PI grants process has been a success for those states electing to submit proposals and receiving funding for improvement



implementations. There has been an increase in proposal submittals since the PI grants process was presented at the National BQC Conference in 1993 as indicated in the chart shown above. As indicated in the chart shown above, twenty-two (22) PI grants have been approved and implemented during its brief existence. Thirteen (13)

States have used these grants for UI operational improvements from seven (7) different Regions. The total dollar amount allocated for the PI grants process since the beginning is \$1.85 million.

The major areas impacted by the PI grants were (1) Nonmonetary Determinations, (2) Early earnings detection processes, and (3) Video development for claimstaking and factfinding. As stated above for PI studies, it was impossible to determine the impact of PI grants implementations nor the degree of continued success of these implementations.

In addition to the BQC program, the PI grants process has recently involved Revenue Quality Control (RQC), and this program has received several PI grants awards.

**** For a detailed listing of States implementing PI Studies and Grants, see appendixes 1 & 2.**

SECTION IV

CUSTOMER SURVEY INSTRUMENTS

A. SURVEY PROCESS

The BQC Evaluation Team developed "Customer" survey Instruments which were intended to provide additional data relative to the effectiveness of the BQC program. Prior to the issuance of these survey instruments, it was required that they go through the Department clearance process which includes the Employment and Training Administration (ETA), the Office of the Assistant Secretary for Administration and Management (OASAM), and the Bureau of Labor Statistics (BLS).

Following Departmental clearance, the instruments were forwarded to the Office of Management and Budget (OMB) for their review and "final" clearance process. Before it would grant final approval, OMB required some modifications to the survey instruments, including the addition of a "usefulness of the program" question and an assurance of anonymity for responders. In order to meet the anonymity requirement, the surveys were mailed to all customers with pre-metered, self-addressed return envelopes. Additionally, OMB required that an explanation be provided to all potential responders indicating that the completion of the surveys was strictly voluntary. Customers were given a deadline for returning the surveys. However, all returned surveys were included in the survey data base. Including those submitted after the deadline considerably lengthened the analysis process.

Immediately following the approval of these clearance processes, the survey instruments were sent to the following customers of the BQC program for completion.

State Employment Security Agencies (SESAs)

1. SESA Administrators
2. State UI Directors/Managers
3. State QC Supervisors
4. State QC Investigators

Regional Office Staff

1. Regional Administrators
2. Regional UI Directors
3. Regional QC Teamleaders
4. "Other" Regional UI Staff

National Office Staff

1. National Office Managers
2. National Office Professional Staff
3. The Office of Regional Management

Organized Interest Groups

1. Claimants
2. Employers
3. Research

The information requested on the surveys was individually tailored to each group as the levels of responsibility and knowledge of the program varied from group to group, and even within the individual groups. Responders were asked to rate the survey statements using a scale of 1 (strongly disagree) to 9 (strongly agree), with a response of 0 equalling "no opinion".

B. SURVEY INSTRUMENTS RESPONSE RATE

The SESAs' response rates were quite varied between the State Administrators with a low response rate of 36.5 percent, to a high response rate of 88.5 percent for State QC supervisors. The team surmised that the low rate for Administrators may be due to their being greatly removed from the day to day operations of the QC program. The State UI Directors/Managers had a reasonable response rate of 65.7 percent. The QC Staff/Investigators rate of 47.2 percent was low. The reason for this low response rate among QC Staff/Investigators is believed to be a result of sampling error on the part of the States. Although the 47.2 percent rate is low, the number of responders for the QC Staff/Investigators totalled 275.

The team concluded that a 65.7 percent response rate for UI Directors/Managers was the most critical among SESA responders in view of the fact that they are the principal decision makers for UI operations. However, the results were not weighted against other customer groups.

The Regional Office response rate ranged from 50 percent for Regional Administrators, to 90 percent for UI Regional Directors. The group again surmised that Regional Administrators, like their State counterparts, were far removed from QC operations and may be the basis for their lack of response. The Regional QC Teamleaders responded at a 80 percent rate, with other UI Regional staff responding at 62.8 percent.

National Office Staff responded at a low 33.3 percent rate.

In addition, all of the three organized interest groups had very low response rates, although these groups were originally very active in the design and direction of BQC.

This was interesting since questionnaires were sent to the three major interest groups representing claimants, employers, and research, and included the original BQC consensus group. It is unclear what conclusions, if any, should be drawn from this lack of response. It has been almost 10 years since the BQC public meetings were held. Since that time, the BQC program has been implemented and has worked towards the implementation of the components desired by these groups. The opinion of the Evaluation Team is that the BQC program may no longer be a priority of any of these groups.

Due to the exceptionally low response rate for organized interest groups, the Team was unable to draw any conclusions from those responding.

A higher response rate for all surveys would have been preferred. However, the rates of response obtained are adequate to draw some basic inferences which follow. In addition, because of the Team's efforts to ensure anonymity for all responders, it was impossible to identify those not responding, making any follow-up efforts to increase response rates impractical.

C. CUSTOMER SURVEY DATA FINDINGS

The following represent those findings obtained following an in-depth analysis of the Survey Instruments received. They are shown under the goals to which they pertain to and; include State, Regional Office, and National Office survey findings, in addition to summaries and conclusions for each.

Goal: Assess the impact of State and Federal laws and requirements on the system's accuracy and integrity.

State Survey Findings.

All four of the State groups had a majority of responders in strong agreement that the BQC program provides data used to identify the causes of payment errors, and that it provides statistically valid data.

The SESA management were evenly split in thirds on the statement that BQC is an effective measurement system. The QC units felt strongly positive on that statement.

The SESA Administrators strongly agreed with the statement that BQC is used by the SESA to find out if their procedures are being followed, while UI Directors were evenly split in thirds. The QC units strongly agreed.

The SESA management were evenly split in thirds regarding two statements on the ability of BQC to assess the impact of legal requirements on their UI system.

UI Directors were evenly split in thirds in rating whether "BQC is an effective program in assessing the accuracy of our UI system."

Summary.

QC Supervisors and staff strongly agreed with all questions under this goal. Administrators and UI Directors/Managers strongly agreed that BQC provides statistically valid data that is used to identify the causes of payment error. Both management groups were fairly evenly split as to whether BQC is an effective measurement system. Administrators were more positive that BQC was used to determine if State procedures were being followed. UI Director/Managers, were more split in this area.

Conclusion.

State staff feel that the BQC program is a statistically valid measurement of the benefits paid in their UI program, and therefore the program has accomplished its primary purpose and objective. Survey results were in the middle regarding BQC effectiveness as a measurement system. This outcome could be interpreted that the program may be meeting its goal, but that improvements in this area should be pursued.

Goal: Achieve improvements in program accuracy and integrity.

Findings.

SESA Administrators were slightly in favor of the statement that BQC has helped the SESA improve program accuracy. UI Directors were evenly split across the board on this statement, while more than 50 percent of QC supervisors and staff strongly agreed with it.

SESA Administrators and QC units felt strongly that information from the BQC program has led to improvement of UI operating procedures. UI Directors were split in thirds on this point.

UI Directors were evenly split in thirds on the two statements that "BQC is an efficient management tool that has enabled us to carry out corrective actions" and that "we use the BQC program to facilitate corrective actions." The QC units rated strongly positive the statement that the SESA uses BQC for corrective action.

A majority of the QC unit responders had "no opinion" on the statements that a decline in error rates can be attributed to PI studies or PI grants.

Summary.

QC units responded favorably that the program helps improve accuracy, facilitates corrective action and leads to improvement of UI operating procedures. Administrators agreed that the program has led to improvement of UI operating procedures and were in agreement by a slight margin that the program has helped improve program accuracy. Most responders had no opinion as to whether a decline in error rates can be attributed to PI studies or PI grants. Of those who had an opinion, more supervisors disagreed with the statement than agreed, and QC staff was slightly positive on PI studies and across the board on PI grants.

Conclusion

State Administrators and QC units do feel that the BQC program is achieving our second overall goal of achieving improvements in UI program accuracy, and quality. State UI Directors and Regions gave more of a mixed response with the scoring giving an overall middle of the road position. This outcome could also demonstrate that the program is meeting its goal, but that improvements are needed so that State "decision makers" have the confidence in the BQC programs' usefulness as a tool to improve their UI program.

Goal: Encourage more efficient administration.

Findings.

SESA management gave low ratings to the statement that "the BQC program has provided information that has enabled us to better utilize our resources." Thirty-two percent of responding QC supervisors also gave low ratings to this statement, while thirty-five percent were positive. QC staff were more favorable.

SESA management and the QC supervisors were in the middle on the impact of BQC on the agency's relationship with claimants and employers, with the exception that QC supervisors felt strongly that BQC had a very positive impact on employers. There was a relatively high number of "no opinion" (10.5 percent to 26.1 percent) ratings for these statements.

The Administrators felt strongly that "The BQC program has been beneficial in the administration of the UI program."

Summary.

While Administrators indicated the program has been beneficial in the administration of the UI program, they and the UI Director/Managers indicated it has not provided information that has enabled them to better utilize resources. QC supervisors were split on this latter point while QC staff were supportive.

Management was split on whether the program had an impact on their agency's relationship with claimants and employers. QC units felt the impact was positive on claimants and very positive on employers.

Conclusion.

BQC meets its goal of encouraging more efficient administration, but does not provide information that leads to better utilization of resources.

Goal: Miscellaneous.

Findings and Conclusions.

Confidentiality.

There was unanimous positive opinion that claimant confidentiality is being maintained.

Data Publication.

SESA management feel strongly that publication of BQC information has not been constructive.

UI Directors feel strongly that the current requirements for publishing BQC data are unreasonable, while QC units strongly agree that the requirements are reasonable.

Program Efficiency.

(State Surveys Cont'd)

In response to the statement that BQC has improved performance in the intrastate program, SESA Administrators gave ratings in the middle, with 21.1 percent of Administrators having no opinion. UI Directors were split in thirds, while QC units were in strong agreement with the statement.

In response to the statement that BQC has improved performance in the UCX, UCFE and CWC program, SESA Administrators ratings were in the middle, with over 20 percent of Administrators having no opinion. UI Directors disagreed with the statement. QC units were also in the middle on this statement, and had a no opinion range of 8.7 percent to 39.5 percent.

Program Expansion.

SESA management disagreed strongly that the BQC program should be expanded to include interstate, EB and denied claims. QC supervisors also disagreed with adding EB, but they were in the middle about adding interstate and felt strongly positive about including denied claims.

Error Rate.

The current error rate system includes codes to cover both formal actions that are taken and actions that are prohibited due to State policy. Some States feel strongly that these prohibited actions should not be part of the error rate. In response to the statement that these codes should not be included, the majority of State responders that expressed an opinion said no. However, it should be noted that over 50 percent of State management had no opinion for this item. In addition, analysis of error rates for States that have publicly asked for a change, show a very low amount of cases that are covered by these codes.

Operational Flexibility.

UI Directors strongly disagreed that States have adequate flexibility in the operation of the BQC program while QC supervisors were in the middle.

Data Analysis.

There was unanimous positive opinion that States do perform their own analysis of BQC findings.

Sampling Reduction.

In response to the statement that BQC should be modified to provide for further reduction in sampling, UI Directors were evenly split with 16.2 percent having no opinion. QC units strongly disagreed that samples should be reduced.

Reduction in Coding Elements.

There was unanimous positive opinion that BQC should be modified to provide for reduction of DCI coding elements.

Hardware/Software.

UI Directors were in the middle regarding modifying BQC to provide for additional hard/software with 28.3 percent having no opinion while QC units felt strongly that it should.

Training.

UI Directors were in the middle regarding having additional training provided, while QC units felt strongly that it should be provided.

Usefulness of BQC.

In response to the request to rate the overall usefulness of the BQC program, SESA management were in agreement in rating the program in the middle with the UI Directors evenly split in thirds. QC units were in agreement in giving the program a strongly positive rating.

Regional Office Survey Findings.

Goal: Assess the impact of State and Federal laws and requirements on the systems accuracy and integrity.

Regional Office Surveys. Regional Administrators were in the middle on the statement that BQC provides a valid picture of benefit payment accuracy. The majority of other regional responses were slightly above the middle.

Regional Administrators and QC Teamleaders were in the middle on the statement that BQC provides an accurate measurement of States' compliance with their written law and policy, while UIRDs and UI staff felt strongly that BQC does provide an accurate measurement.

QC Teamleaders felt strongly that BQC provides information which is useful in the Federal oversight of the UI program. RAs, UIRDs and UI staff were in the middle on this statement.

QC Teamleaders felt strongly that BQC identifies weaknesses in the UI program. RAs, UIRDs, and UI staff were in the middle on this statement.

UIRDs felt strongly that BQC data can be used to support the results of other UI reviews. QC Teamleaders and UI staff were in the middle on this statement.

Summary.

In general, responses reflected opinions across the board which were often offsetting.

Conclusion.

The Regional responses, by a narrow margin, indicate the BQC program does meet its goal of assessing the impact of State and Federal laws on the system's accuracy and integrity.

Goal: Achieve improvement in program accuracy and integrity.

Findings.

RAs offset each other on whether BQC successfully combats fraud and abuse in the UI program. RAs were also in the middle that BQC leads to the correction of problems in the UI program.

UI Director opinions were offsetting with the majority in the middle in regard to the program improving accuracy of benefit payments, leading to the initiation of program improvements, or creating incentive to take program improvement. Regional UI staff were in the middle on these three points though not strongly. QC Teamleaders were positive with regard to BQC improving accuracy of benefit payments. They were in the middle concerning the program leading to or creating incentives for program improvement.

Summary.

The majority of Regional Office management responses were rated towards the middle with the extreme levels of opinion offsetting one another. QC Teamleaders and Regional UI staff also rated this item towards the middle.

Conclusion.

The Regional Office ratings could demonstrate that this goal is being met to some extent. However, there is some indication, particularly from Regional staff who work with the QC program, that it might not be fully meeting its goal of improving program accuracy and integrity.

Goal: Encourage more efficient administration.

Findings.

RAs, UIRDs and UI staff were in the middle on the statement that BQC encourages proper administration of the UI program. QC Teamleaders disagreed with this statement.

Regional responses were overall in the middle on the statement that BQC encourages efficient administration of the UI program. Other than the middle responses, there were more disagreement responses than agreement responses.

The majority of Regional responders were in the middle on the statement that BQC serves as a management tool in making decisions.

UIRDs and QC Teamleaders were in the middle about the program creating incentives for program improvement action. UI staff disagreed with this.

(Regional Surveys Cont'd)

Summary.

Managers were more positive than staff that the program encourages proper administration. All Regional groups responding were in the middle that the program encourages efficient administration of UI.

Conclusion.

The majority of Regional responses were in the middle. Other than the middle responses, there were more disagreement responses than agreement responses that BQC encourages efficient administration.

Goal: Miscellaneous.

Findings and Conclusions.

Secretary's Initiative.

Regional Administrators disagreed with the statement that the BQC program supports the Secretary's initiatives.

Data.

RAs, QC Teamleaders and UI staff were in strong agreement that the BQC program provides a data source for research while UIRDs were in the middle on this.

UIRDs, QC Teamleaders and UI staff were all in the middle that BQC provides a data base that can be used for Federal analysis.

UIRDs were in the middle that BQC provides data which can be used for budget or legislative purposes.

Program Expansion.

UIRDs, QC Teamleaders and UI staff were in strong agreement that BQC should be expanded to include denied claims.

While UIRDs agreed with the statement that BQC should be expanded to include interstate claims, 44 percent had no opinion. QC Teamleaders and UI staff were in the middle on this statement.

National Office Survey Findings.

Goal: Assess the impact of state and Federal laws and requirements on the system's accuracy and integrity.

The National Office UI staff were in strong agreement with the statements that BQC: provides a valid picture of benefit payment history, provides information which is useful in the Federal oversight role of the UI program and identifies weaknesses in the UI program.

National Office staff were in strong agreement that BQC provides an accurate measurement of State compliance with their written law and policy, although 20 percent of the respondents had no opinion to this statement.

National Office staff were in strong agreement (73.3 percent) with the statement that BQC data can be used to reinforce other UI reviews.

Conclusion.

BQC does assess the impact of State and Federal laws and requirements on the system's accuracy and integrity.

Goal: Achieve improvements in program accuracy and integrity.

Findings.

National Office staff were in strong agreement that BQC helps to improve the accuracy of benefit payments.

National Office staff were split fairly evenly across the board as to whether BQC creates incentives to take program improvement actions.

Conclusion.

BQC helps to achieve improvements in program accuracy and integrity, even though there is a variance in opinion as to whether it creates incentive to take program improvement actions.

Goal: Encourage more efficient administration.

Findings.

National Office staff strongly agree with the statements that BQC encourages proper and efficient administration of the UI program.

National Office staff disagreed that BQC provides data which can be used for budget purposes, although 40 percent of the responders had no opinion to this statement.

Conclusion.

BQC meets goal of encouraging more efficient administration.

Goal: Miscellaneous.

Finding and Conclusion.

National Office staff strongly agreed that the BQC program provides data that can be used for research and Federal analysis. For these two statements, there were no low ratings, however, 26.7 percent of the responders had no opinion to either statement.

SECTION V

ISSUES AND OPTIONS

The BQC Evaluation Team's analysis of the evaluation findings resulted in the identification of 12 issue areas. Several of these issues were closely related and it became apparent that action on any one of these issues would have a direct effect on the other related issues. There were other issues that were very specific and stood alone. For purposes of discussion, the 12 issues have been placed into five major issue groups; 1) Program Improvement, 2) Error Rates/Data, 3) State Public Release of Results, 4) Inclusion of Denials, Interstate or EB and 5) Resource Flexibility. In general, issues identified in a report are followed by a specific recommendation. However, for this report, the BQC Evaluation Team was requested to provide several different options for each issue and to include pros and cons for each recommendation. Therefore, following each issue are recommendation(s) and or options developed by the Team complete with pros and cons. Whenever possible, these options were generated directly from the customer surveys.

PROGRAM IMPROVEMENT

Issue No. 1 - Should the scope of the BQC program include any program improvement activities, or should BQC be solely a measurement system?

Options

1. Stop PI studies/grants and all program improvement activities altogether, and use BQC as strictly a measurement system, which means a return to the original BQC premise, that States will take any necessary improvement actions. Reduce all States to minimum sampling of 400-480. Officially redirect the resources to other UI components.

Pro Improving the UI system is not the sole responsibility of the BQC program. BQC has taken an extremely pro-active role in encouraging States to analyze their UI performance data and take improvement actions. Other UI components have taken very limited actions. If samples were reduced and analyst positions eliminated, these resources could be redirected to other UI activities.

Con A major principle of the UI Performance Enhancement group is "Continuous Improvement". To eliminate resources from BQC because States find it difficult to look at the data may appear to be contradictory to this principle.

BQC units may have the best capability to utilize the data and to provide recommendations to UI management. To reduce or eliminate this capability may be counter productive.

2. Reduce all States to minimum BQC sampling levels of 400 - 480, and give a specific number of positions to SESAs for on-going PI activities, including tracking the impact of any PI implementations on the error rates. Have States report annually on PI studies/grants actions and tracking efforts. The positions saved would then be used for other UI integrity programs.

Pro If improving the UI system is not the sole responsibility of the BQC program, a limited amount of resources should be given to BQC for PI activities. Under this option, BQC would be a measurement tool and a Program Improvement tool.

This would eliminate the current operational PI requirements for State PI activities, and allow States to conduct whatever PI activities they feel are appropriate.

Con BQC units may have the best capability to utilize the data and to provide recommendations to UI management. To reduce or eliminate this capability may be counter productive.

3. Modify BQC PI methodology to reduce PI operational requirements and allow States to have more PI resource flexibility. This would include allowing States to select operational areas to be studied and options on the implementation status of the results.

Pro Some States have indicated that the requirements for PI studies were too rigorous and therefore, they did not participate. Other States have indicated that doing studies only in areas BQC measured was too restrictive. Finally, some States indicated that prohibiting the use of BQC resources for implementation of recommendations hindered some PI actions. Modifying the current policies to allow for all these situations should improve the States ability to affect program improvements.

Con In order to have valid outcomes from any type of study, some rigor must be maintained. To open the door to anything may result in unproductive efforts and wasted resources.

Issue No. 2 - Based on a review of specific State error rates in relation to implemented Program Improvement activities, it was impossible to determine if the implementation of PI studies/grants had an impact on the decline in error rates. In addition, final State reports reveal there was no follow-up done on PI studies/grants results to determine the degree of continued success of program improvement implementations and therefore, actual impact is unknown.

Options

1. Accept that PI Studies/Grants are a first step only, and are not intended to provide information on the decline/increase in error rates. Have the Federal partner provide additional technical assistance to States on interpretations and, on how to make further use of the data through program improvement.

Pro Due to the complex nature of the UI system, it is very difficult to develop a single process that, can look in detail, at all aspects of the system. Initial studies do serve as sign posts to guide further detailed analysis.

Often several economic, process or political factors combine to effect State UI administration performance. Attempting to determine the impact of each is the continuing challenge of forecasters. It is unreasonable to assume that isolating causes can be easily done.

Con States need to identify specific root causes in order to make improvements. Making the statement that "it is difficult to identify these causes" is not a reason not to take action.

2. Alter the current procedures where PI Study/Grant recommendations are implemented, by designing methodology to track specific operational components which could impact on error rate fluctuations.

Pro By developing PI activities in a more research mode, it may be possible to narrow the range of factors that caused changes to error rates.

Con BQC was never intended to be a pure research activity. BQC should not create a PI process that is so difficult that most States will not become involved.

Conducting a pure research activity would be very resource intensive and may not result in any additional information that could be used in day to day operations.

3. Stop PI studies/grants and all program improvement activities altogether, and use BQC as strictly a measurement system, which means a return to the original BQC premise, that States will take any necessary improvement actions. Reduce all States to minimum sampling of 400-480.

Pro Improving the UI system is not the sole responsibility of the BQC program. BQC has taken an extremely pro-active role in encouraging States to analyze their UI performance and take improvement actions. Other UI components have taken very limited actions. If samples were reduced and analyst positions eliminated, these resources could be redirected to other UI activities.

Con A major principle of the UI Performance Enhancement group is "Continuous Improvement". To eliminate resources from BQC because States find it difficult to look at the data may appear to be contradictory to this principle.

BQC units may have the best capability to utilize the data and to provide recommendations to UI management. To reduce or eliminate this capability may be counter productive.

4. Reduce all States to minimum sampling levels of 400 - 480, and give a specific number of positions to SESAs for on-going PI activities, including tracking the impact of any PI implementations on the error rates. Have States report annually on PI studies/grants implementation and tracking efforts. The positions saved would then be used for other UI integrity programs.

Pro If improving the UI system is not the sole responsibility of the BQC program, a limited amount of resources should be given to BQC for PI activities. Under this option, BQC would be a measurement tool and a Program Improvement tool.

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5. Modify BQC PI methodology to reduce PI operational requirements and allow States to have more PI resource flexibility. This would include allowing States to select operational areas to be studied and options on the implementation status of the results.

Pro Some States have indicated that the requirements to do PI studies was too rigorous and therefore, they did not participate. Other States have indicated doing studies only in areas BQC measured was too restrictive. Finally, some

States indicated that by prohibiting the use of BQC resources for implementation of recommendations hindered some PI actions. Modifying the current policies to allow for all these situations should improve the States ability to affect program improvements.

Con In order to have valid outcomes from any type of study, some rigor must be maintained. To open the door to anything may result in unproductive efforts and wasted resources.

Issue No. 3 - The vast majority agree that the data collected by BQC is statistically valid. However, UI decision makers were in the middle of agreement on the impact of BQC on the effectiveness of the UI program or the efficiency of its administration.

Options

The Team concluded that encouraging UI program effectiveness and efficiency were like being for "Mom and apple pie". The Team further concluded that the success of the different components in the BQC system would contribute toward effectiveness and efficiency. Therefore, it was decided not to address this item as a separate issue.

ERROR RATES/DATA

Issue No. 4 - BQC Results are not Self-Interpreting. Although the BQC data provides a tremendous amount of information regarding each States UI system and provides significantly more detail than any other UI evaluation system, some States feel that just looking at the current standard data does not provide them with the specific information they need to improve their UI programs.

Options

1. Conduct a review of data currently collected and obtain feedback from States regarding the relevancy to their operations with consideration toward modifying the data collected.

Pro This option could potentially provide States more specific information without extensive analysis and might provide detailed information to decision makers in a more timely manner.

Con Although States now have optional coding fields, few of them use these optional fields at all, and even fewer for the purpose of making the data more interpretative. It is unknown if additional data would be utilized.

Options

1. Since the main reason for States movement in various directions appears to be the required public release of the error rates, eliminate this State requirement and only publish the National QC Annual Report.

Pro This requirement though initially effective, may have out lived its usefulness. If States really believe that eliminating this requirement will improve their ability to utilize QC in an effective manner, this recommendation should be considered.

Con One of the original guiding principles of the BQC program was that the public release of the results would provide information to interested parties that may result in improvements to a State's UI program. This interest by the "customers" of the system should not be viewed as a negative that should be eliminated.

2. Jointly review existing BQC data to determine effectiveness of the error rates on specific UI areas such as Job Service Registration and Work Search. These data should reveal what impact these components have on individual State UI systems. If it is determined that the impact is minimal, work with States to modify or change State policies in these areas.

Pro It is not the Federal position to tell States the specifics of all aspects of their law. States determine what their laws are or are not, as long as they meet Federal requirements. It is the Federal role to work cooperatively with States to make their laws and policies as effective as possible.

Con State policies such as work search and job service registration have traditionally been subjective and difficult to administer. As long as States continue to have such policies, they will continue to be awkward to deal with and likely will continue to show up as QC errors.

Issue No. 6 - BQC Error Rates and Good UI Laws and Policies. Obviously, a low error rate is not necessarily synonymous with a good UI program, nor a high error rate with a bad one. It is possible to design UI laws and policies that yield a minuscule BQC error rate even when indifferently administered, or which do not ultimately provide satisfactory wage replacement or help induce quick reemployment. BQC thus emerges as one indicator among many and to be interpreted correctly, QC findings have to be used in conjunction with other performance indicators. These need to include indicators of reemployment and length of spells relative to economic conditions, and other indicators of good service to both employers and claimants.

Options

1. The immense differences in State UI laws and policies makes relating the error rates from one State to another State's UI operations extremely difficult. This is difficult due to the differences in so called "liberal" UI operations and those that are more strict. In addition, there is a large variance in the QC operation from State to State. However, a study could be conducted of States with similar UI operations and major differences in their error rates, to measure what the "cause(s)" of these differences are.

Pro A study to reveal similar types of UI operations may lay the ground work for a best practices effort, and may show how the differences in SESA administrations relate to effective UI programs.

Con Such a study may require significant resources to conduct for an outcome already known, that the data cannot be compared between States.

2. Accept that the error rates cannot be compared between States and discourage any actions in this regard.

Pro This position is consistent with the original BQC policy that the Federal partner has continued to reinforce since the program began.

Con Comparisons of State performances will always be made as long as there is data. Therefore, saying that data should not be compared is a useless gesture.

Issue No. 7 - Some States feel strongly that certain types of errors should be excluded from the error rates.

Options

1. Exclude certain error codes from the Annual error rate such as "Technical" errors (i.e. Finality) except where the Agency is responsible.

Pro This would be a positive response to the SESA management position as indicated by the survey results.

Customer satisfaction with error rate computation would create potential for better investigation of issues leading to more accurate error rates.

Con "Technical Errors" are still improper payments and should be included in computation.

The inclusion of only issues where the agency is responsible could adversely influence the proper designation of the responsible party by the QC unit.

2. Retain current State public release requirements.

Pro Inclusion of all errors and the resulting public interest could bring about program improvement where needed.

It would eliminate the concern about proper designation of responsible party.

"Technical Errors" are still improper payments and should be included in computation.

Con This would be a negative response to the SESA management position in the surveys to eliminate this requirement.

Current system discourages full investigation of these "technical error" issues.

3. Eliminate the requirement of States to have a public release of their error rates.

Pro This would eliminate the customer objection to what data is released since no data would be released.

Con This might not satisfy the customer, since error rate calculation would not actually be changed.

STATE PUBLIC RELEASE OF RESULTS

Issue No. 8 - State management feel strongly that the required public release of QC results have not been constructive, and State UI Directors do not think the publication requirements are reasonable.

Options

1. Retain current State public release requirements.

PRO The data is public information just like any other UI performance data that is made available.

Since that action and the resulting public interest was a original design premise of the BQC program, possible interest from the public might create incentive for Agency program improvement actions.

CON Current publication methods often do not reach the public media outside the agency's in-house channel of communication.

Negative SESA management perceptions that have proven unproductive would still remain.

Publication of data and the resulting public interest necessary to influence program improvement actions has declined in recent years.

2. Eliminate the requirement for the annual public release of the BQC error rate by the States.

Pro This would be a positive response to the SESA management position as indicated by the survey results.

The incentive to encourage program improvement action as a result of the publication of the data has diminished over the years.

Con BQC program results might not be available to the public in all states if publication is not required, and incentives for program improvement action might not be brought forth when needed.

INCLUSION OF ADDITIONAL UI AREAS IN THE BQC REVIEW

Issue No. 9 - State management were very negative to the suggestion that the BQC program should include "Denials, Interstate, EB or any other UI activity.

Options

1. Abandon the plan to include all these components into the BQC program because the States do not want it, therefore, drop it.

Pro This would be a positive response to the SESA management position as indicated by the survey results.

Con Program areas that might need to be reviewed would not be included. BQC would continue to review only a portion of the UI system.

QC program would be limited to "fraud and abuse" activity and not include any type of quality assessment.

The original consensus agreement and the Federal regulation specifies the future inclusion of Denied claims.

2. Due to a possible "wording" misconception, conduct another canvassing to clarify this position, to assure that this is an accurate assessment. The phrase "should be expanded" may have given the wrong connotation.

Pro A canvassing may clarify an opinion which might have been biased due to phrasing of the question.

Con Gathering new information would be time consuming and may result in the same findings.

RESOURCE FLEXIBILITY

Issue No. 10 - A vast majority of Survey responders agreed that more flexibility is needed for BQC program/resources.

Options

1. Develop an operating plan that would allow the States more resource flexibility through sample reductions.

Pro This would eliminate a long standing SESA management position and one that was reinforced by the survey results that, States need more control of their BQC operations and specifically the ability to control the sample levels.

Allowing SESAs to determine resource usage would provide them with greater control and possibly a greater sense of ownership of the program.

Con Possible reduction of sample below minimum levels or non statistical sampling plans could lead to the loss of statistical validity of data.

2. Develop an operating plan that would allow the States more resource flexibility through investigative methodology changes.

Pro This action would be a positive response to the SESA management position as indicated by survey results.

Allowing SESAs to determine investigative methodology would provide them with a greater sense of ownership of the program.

Con Possible loss of data integrity due to usage of statistically invalid methodologies which produce less accurate information.

3. Continue to operate per current requirements.

Pro Current program produces statistically valid information.

Con Would not satisfy SESA management opinion seeking more flexibility.

SESA management would continue to perceive a lack of ownership of the program.

Issue No. 11 - States were split on the issue of sample reduction.

Options

1. The popular perception that all States wanted a lower sample was not supported by the data. It was clear that the major issue with the States was flexibility, and adjustments to the sample was an obvious way of achieving this flexibility. Therefore, sampling reductions should be considered in relation to resource flexibility and not as a separate issue.

Issue No. 12 - States were in strong agreement that the DCI should be reduced.

Options

1. Revise the DCI to be more useful to States and to capture data States feel are necessary to facilitate UI program improvements.

Pro This would satisfy SESA management opinion as indicated by survey results.

Usage of some data elements appears to be minimal by both State and Federal partners.

Con The DCI was developed based on Federal data needs and it should be DOL that determines which elements should be included or excluded.

Since many DCI elements come from existing State benefit printouts, reduction of data elements might not lead to significant reduction of data collection burden.

Reduction of data elements could lead to a potential loss of analysis capability due to the inability to isolate specific information.

2. Retain current DCI with the current ability for States to add data option fields.

Pro This would at a minimum maintain the existing analysis capability of States and it could expand this capability if States utilized option fields.

Con The current data collection burden would not be reduced.

The perception of excessive workload activity would remain.

SESA management would continue to perceive that much of the data is not useful.

APPENDIX A

QC Program Improvement Studies
Final Reports Received - Oct. '88 thru Oct. '93

STATE	PIFR	REPORT TITLE
AK	Y	(1) Missed - Concealed Separations (Jun '89)
	Y	(2) Finality (May '89)
	Y	(3) BPC Overpayment Coding (Mar '89)
	N	(4) Misreporting of Wages (May '89)
	Y	(5) Job Service Registration (Oct '88)
	Y	(6) BP Wage Record Discrepancies (Nov '91)
	N	(7) Missed A & A Issues (Dec '92)
AR	N	(1) Study of Earnings Errors - Fourth Quarter '88 (Oct '88)
	Y	(2) Quality Improvement Project: Separation Issues (Mar '91)
	Y	(3) QIP: Payment During Period of Disqualification (Mar '91)
	N	(4) QIP: Base Period Employer Charges (Mar '91)
	Y	(5) QIP: Work Search Errors (Mar '91)
CA		(1) Non-mon Determination Project (May '93)
CO	Y	(1) Employer Survey - Work Search (Aug '89)
	N	(2) Employer Survey - Earnings (Aug '89)
	Y	(3) Work Search - Error Claimant Profile (Nov '88)
	Y	(4-6) Work Search Verification (3 studies) (May '89; Jan '90; Jun '90)
	Y	(7) Misreported Base Period Wages - Form Revision (Aug '90)
	Y	(8) Earnings Verification (Jan '90)
	N	(9) Misreported Earnings Profile (Jan '90)
	Y	(10) Work Search Workshop Evaluation (Feb '90)
	N	(11) Unreported Earnings Profile (Apr '90)
	N	(12) Work Search Profile Utilization and Error Prevention (Apr '90)
	Y	(13) Misreported Base Period Wages -Information Campaign (Jul '90)
	N	(14) Wage Reverification (Oct 91)

(Related to telephone pilot)

CT	Y	(1) Employer Error in the Unemployment Insurance System (Jan '90)
ID	Y	(1) Misreported Earnings: Earnings-to-None Pattern (Mar '89)
	Y	(2) Misreported Earnings in Waiting Week or First Compensable Week (Mar '89)
	Y	(3) Form 513 Revision (Mar '89)
	Y	(4) Fully Employed (Aug '89)
	Y	(5) Retirement Income (Apr '91)
	N	(6) Model Crossmatch
	N	(7) Non-mon Determination Quality (Mar '93)
IA	Y	(1) Misreported/Nonreported Earnings (Jul '91)
	Y	(2) Quality Fact-Finding in Voluntary Quit Separations (Jul '91)
	Y	(3) Dependency Study (Aug '92)
KS	Y	(1) Incorrect Reason for Separation (Dec '90)
LA	Y	(1) Improving Quality Through Uniform Application of State Procedures (Sept '89)
	Y	(2) Misreported and Unreported Earnings (Oct '90)
	Y	(3) Comparison of Two Types of Benefits Rights Interviews (Nov '90)
MA	Y	(1) Problems in the Initial Claimstaking Process (Feb '91)
MS		(1) The Effect of an Informational Packet on the Reporting of Quarterly Wages (Mar '93)
MO	Y	(1) Missed Separation Issues (May '91)
	Y	(2) Earnings and Benefits Crossmatch Study - 1991-1992 (Feb '92)
MT	Y	(1-2) Fact-Finding (Aug '89) (Dec '90)
	Y	(3-4) Weeks of Work (Aug '89)(Dec '90)
	Y	(5-6) Misreporting of Intervening Wages Crossmatch (Aug '89) (Dec '90)
	Y	(7) FY 1991 Cost of Quality Reports:

Six COQ reports cover: experience rating, wage records, wage revisions, UCFE/UCX, overpayments, and tax report processing. (Oct '91)

- | | | | |
|----|---|------|--|
| | Y | (8) | A guide to cost of quality studies |
| | Y | (9) | Cost of Quality Studies Report (Oct '92) |
| | N | (10) | Employer Wage Reporting (Nov '93) |
| NE | Y | (1) | Misreported Earnings (May '90) |
| | Y | (2) | Work Search (Aug '90) |
| | N | (3) | Misreported Earnings within \$5.00 of One Half or the Whole WBA (Mar '91) |
| | Y | (4) | Employer Wage Reporting (Jul '91) |
| | N | (5) | Modified Eligibility Review: Work Search Effort (Jul '91) |
| | N | (6) | Employer Wage Reporting: Can a Profile Be Developed of Wage Misreporting Employers (July '91) |
| | N | (7) | Monetarily Ineligible Claimants: Wage Reporting Error (Nov '91) |
| NV | N | (1) | Employer Reporting Errors: Unreported and Misreported Wages (Oct '90) |
| | Y | (2) | Mailed In Initial Claims (Dec '91) |
| | N | (3) | Quarterly Contribution Reports Submitted with Missing SSNs (Mar '93) |
| NJ | | (1) | Missed Separation Issues (April '91) |
| | | (2) | Alternative Work Search Study (July '92) |
| NM | Y | (1) | Eligibility Benefit Rights Interviews (EBRI) Evaluations (Jun '90) |
| | Y | (2) | Claimant Survey (Jun '90) |
| | N | (3) | Charging Benefits to Base Period Employers (Oct '89) |
| | N | (4) | Layoff Separations (Nov '90) |
| | Y | (5) | Review of Work Search Plan and Formal Warning Policy and Procedures (May '91) |
| | N | (6) | Review of Applicant Registration and Services Provided to UI Claimants (May '91) |
| OK | N | (1) | Incorrectly Reported Base Period Wages (Oct '89) |
| | Y | (2) | Magnitude of Mispayments Resulting from Disqualifying Separations not Revealed in Continued Claims Process (Oct '89) |
| | N | (3) | Oklahoma School Crossmatch (Oct '89) |
| | N | (4) | Noncharging of Nonseparating Base Period Employers Due to Employer-related Reason for Claimant Separation (Oct '89) |

- N (5-6) Verification of Earnings on Partial Claims (2 studies) (Oct '89)
(Sep '90)
- N (7) Work Search Instructions Provided Claimants (Oct '89)
- Y (8) Non-countable Nonmonetary Quality Enhancement Study (Jun '90)

- OR (1) Continued Claims (Aug '89)
- (2) A Study to Develop More Effective Crossmatch
Selection Criteria (Sept '89)
- (3) Partial Earnings (Sept '89)
- (4) Selected Separation Issue Errors (Sept '89)
- (5) Central Office Handling of the Employer Response (Sept '89)
- (6) Return to Work Indicator (Sept '89)
- (7) Benefit Year Earnings (Sept '91)
- (8) Recomputation of Overpayment Recovery Rates
(Sept '91)
- (9) Appeals Reversals of Separation and Job Refusal Decisions
(Sept '91)
- (10) Eligibility Profile (Oct '91)
- (11) Use of Computer Line Flag in the Detection/Prevention of Benefit
Mispayment (Oct '91)
- (12) UI Reform - Eligibility (Oct '92)
- (13) Report of Hire Study (Oct '93)
- (14) Actively Seeking Work Study (Oct '93)
- (15) Short Duration Work and Separation Study (Oct '93)

- PR (1) First Payment Improvement Study (Aug '90)

- RI (1) Employers' Charges for April 6, 1991 through
August 31, 1991 (Dec '91)

- SC (1) Separation Adjudications (Aug '92)

- SD (1) Quality of Service to Claimants - New Claims Survey (Aug '89)
- (2) Quality of Service to Claimants - Eligibility Survey (Sept '89)
- (3) Fact Finding Evaluation (Interim) (Sept '91)
- (4) Return to Work (Sept '91) (Pt. I.)
- (5) Return to work (Nov '92) (Pt. II.)
- (6) Fact Finding Training (Dec '92)

- UT (1) Analysis of Vacation/Severance/Holiday Payment Errors of UI
Claims (Nov '89)
- (2) ES/UI Link Study (Jun '90)

- (3) Review and Analysis of the UI Deferral Program in Utah (Oct '90)

- (4) Effects of Differing Work-Search Requirements on UI Claims (May '91)
- (5) The Effect of Early Intervention on Claimants Who Report Benefit Year Earnings (Mar '93)

WA

- (1) Office of Administrative Hearings Reversal (Oct '88)
- (2) Payments Paid During Periods of Disqualification (Mar '89)
- (3) Waived Overpayments (Apr '89)
- (4) Manually Processed Conditional Payment for Late Reports (Apr '89)
- (5) Availability Issue (Apr '89)
- (6) Late Reports - Identification and Documentation (Nov '89)
- (7) Claimant Profile Form Effectiveness in Eligibility Issue Detection (Apr '90)
- (8) Temporary Total Disability (TTD) Claims (May '90)
- (9) Pension Claims (May '90)
- (10) Error-Prone Profiles: Calendar Years 1988 - 1989 (July '90)
- (11) Exception Report Impact (Jan '91)
- (12) Tacoma JSC Exception Report (Jan '91)
- (13) Dictionary of Occupational Titles and Work Registration (Mar '91)
- (14) Office of Administrative Hearings Reversals Follow-up (Jan '91)
- (15) Quarterly Aged Pay/Pend Report (Mar '91)
- (16) Model Crossmatch (Summary) (Aug '91)
- (17) Notice to Employer (Summary) (Sept '91)
- (18) Increasing the Efficiency of Prevention, Detection, and Collection of Overpayments in Unemployment Insurance (Oct '91)

WI

- (1) Computer Identification of Social Security Number Errors in the Wisconsin Wage Record File (Sept'91)

WY

- (1) Unreported/Unadjudicated UI Issues Arising in the Job Service (Apr '90)
- (2) Prevention of Unreported/Misreported Earnings During the Claim Series (Nov '90)
- (3) Comparison of the Effects of QC and QPI Program Procedures on the Disposition of Separation Issues (Nov '90)
- (4) Last Actual Employment (June '92)

APPENDIX B

PI Grants

The following provides a brief synopsis of Program Improvement Grant projects approved during the past four (4) fiscal years.

FY '90

1. Montana. Produced a Local Office Training Manual for Claims Taking and Factfinding. This was necessary to provide procedural uniformity among SESA LOs. In addition the Grant was used to produce a Benefits Rights Interview (BRI) Video to be shown Statewide.
2. Idaho. Implemented an "Earnings to None Program". This project detects overpayments in a bi-weekly reporting system when a claimant indicates earnings for one week and none in the other week claimed.
3. Oregon. Implemented revisions to the Crossmatch system and Continued Claims Certifications.

FY '91

1. Alabama. Implementation of an automated call-in system for its Eligibility Review Interviews (ERI), in addition to producing an ERI Training Video for Local Offices.
2. Tennessee. Implementation of an automated factfinding program with Expert Systems capabilities.
3. California. Implementation of changes to their UI operations to improve the quality of nonmonetary determinations. This includes conversion of automated decisions to other languages.
4. Hawaii. Developed and produced Video tape BRI.
5. Oregon. Implementation of a Nonmonetary Determination quality review system. This system consists of selecting a random sample of nonmonetary determinations

from the field offices and applying the QPI process to each case, with further review by the UI Technical Unit and feedback to the local offices.

FY '92

1. **Iowa.** Developed and distributed factfinding videos for training in State specific Nonmonetary Determination policy and procedures.
2. **Utah.** Implemented an on-going work search verification program in the Local Offices. This program included the handling of "routine" issues identified on the bi-weekly certifications.

FY '93

1. **Alabama.**
 - a. Development of a computer data base for the storage, retrieval, and analysis of in-house program review data; and
 - b. Design and development of a new hire program, directed at early identification of employment and hidden income.

The personal computer data base is to be utilized as the primary tool for the newly established Program Review Unit in the Technical Services Division. This unit's chief function is the review of benefit operations, from the initial claim through the lower authority appeals process. The personal computer data base will allow for retrieval of information useful in pinpointing problem areas, determining areas in need of corrective measures in order to improve the process and reduce mispayments, as well as serving as a guide for development of methodology for addressing particular deficiencies.

2. **Florida.** Enhancement of the ERP Program in order that this process might assist with the detection and determent of improper payments. Through this on-going project, the agency hopes to fully address the claimant and agency error rate by implementing a standardized, expanded ERP program and developing programmed system improvements that will assist with the detection of earnings and job separations and deter improper payments through claimant and employer education.

3. Iowa. Implementation of UI tax field audit automation project. The need for this project was identified through a Revenue Quality Control pilot review. This on-going automated system will allow the SESA to format work sheets to guide auditors to proper audit documentation, especially the search for hidden or misclassified wages. It will also assist in the automated selection of employers for audit, and produce a profile of employers for increased audit yield to improve audit program performance.

4. Montana. Redesign and revision of the wage reporting program through the implementation of a diskette wage reporting program for employers who report wages to the Montana UI Division. This redesigned system will allow the SESA to modify the format of its magnetic tape reporting system to match national standards. In addition, this revision will allow the SESA to modify the way they access and update data on the wage master file.

5. Utah. Development and implementation of new BPC procedures to intervene early-on for unreported earnings. The early-intervention procedure is expected to (1) detect overpayments early; (2) establish overpayments before they become large, and when they are normally most collectible; and (3) tend to have a deterrent effect on future misreporting.

FY '94

1. Rhode Island. Established and installed a new automated system in all Local Offices for the purposes of early detection, determent, and recovery of improper payments.

2. Illinois. Upgraded the Tax Units' document retrieval process to enhance Revenue Quality Control.

3. Montana. Designed and implemented an Automated Wage Reporting program.

4. California. (A) Implemented an Automated SSN verification process; (B) Automated the UCX/UCFE claims filing system; and (C) Improved Benefit Crossmatch Program/Employer Compliance system.

5. Alaska. Enhanced the Crossmatch reporting system while reducing wage reporting burden on the States' employers.

SECTION A BENEFITS QUALITY CONTROL EVALUATION SURVEY

SURVEY FOR SESA ADMINISTRATORS

We are conducting a survey in each state to determine if the Benefits Quality Control (BQC) program is meeting the goals and objectives for which it was created.

It is important that you personally complete this survey, as different levels of administration in your state will be receiving a similar, but slightly different survey.

You do not have to sign this form and, to ensure further anonymity, a metered envelope is provided. Please return the completed form directly to the U.S. Department of Labor, 200 Constitution Avenue NW, Room S-4220, Washington, D.C. 20210; Attn: TEUQI.

Please read the following statements and, using a range of 1 to 9, indicate your level of agreement/disagreement.

Strongly Disagree										Strongly Agree	No Opinion
1	2	3	4	5	6	7	8	9		0	

- 1. The Benefits Quality Control (BQC) provides data that we use to identify the causes(s) of payment errors. _____
- 2. The BQC program provides statistically valid data. _____
- 3. BQC has enabled us to effectively assess the impact of State and Federal laws and requirements on the accuracy of our UI system. _____
- 4. BQC has helped our agency improve program accuracy. _____
- 5. BQC is an effective measurement system. _____

**STRONGLY
DISAGREE**

**STRONGLY
AGREE**

**NO
OPINION**

1 2 3 4 5 6 7 8 9 0

6. BQC is an efficient management tool that has enabled us to carry out corrective actions. _____
7. We use the BQC program to find out if our procedures are being followed. _____
8. Information from the BQC program has led to improvement of our UI operating procedures. _____
9. The BQC program has provided information that has enabled us to better utilize resources. _____
10. Under the current Federal oversight, we believe claimant confidentiality is being maintained. _____
11. The BQC program has been used to reduce our UI reporting burden. _____
12. The BQC has had an impact on our Agency's relationship with:
(1 = very negative; 9 = very positive)
- Claimants _____
- Employers _____
- Others (Identify) _____
13. The BQC program has been effective in the following program areas:
- Intrastate _____
- UCX _____
- UCFE _____
- CWC _____

**STRONGLY
DISAGREE**

1

2

3

4

5

6

7

8

**STRONGLY
AGREE**

9

**NO
OPINION**

0

14. The BQC program should be expanded to include:

Interstate _____

Denied Claims _____

EB _____

15. The BQC program has been beneficial in the administration of the UI program. _____

16. Publicity of BQC information has been constructive. _____

17. Please rate the usefulness of the BQC program by circling a number on the following scale:

Not Useful

Very Useful

No Opinion

1

2

3

4

5

6

7

8

9

0

Please explain:

18. If our state could make any changes to the BQC program we would:

SECTION A

BENEFITS QUALITY CONTROL EVALUATION SURVEY

SESA UI DIRECTOR/MANAGER

We are conducting a survey in each state to determine if the Benefits Quality Control (BQC) program is meeting the goals and objectives for which it was created.

It is important that you personally complete this survey, as different levels of administration in your state will be receiving a similar, but slightly different survey.

You do not have to sign this form and, to ensure further anonymity, a metered envelope is provided. Please return the completed form directly to the U.S. Department of Labor, 200 Constitution Avenue NW, Room S-4220, Washington, D.C. 20210; Attn: TEUQI.

Please read the following statements and, using a range of 1 to 9, indicate your level of agreement/disagreement.

Strongly Disagree

1

2

3

4

5

6

7

8

Strongly Agree

9

No Opinion

0

- 1. The Benefits Quality Control Program (BQC) provides data that we use to identify the causes(s) of payment errors. _____
- 2. The BQC program provides statistically valid data. _____
- 3. BQC helps our agency improve program accuracy. _____
- 4. We regard BQC as an effective measurement system. _____
- 5. We use the BQC program to find out if our procedures are being followed. _____
- 6. Information from the BQC program leads to improvement of our UI operating procedures. _____
- 7. The BQC program provides information that has enabled us to better utilize resources. _____

**STRONGLY
DISAGREE**

**STRONGLY
AGREE**

**NO
OPINION**

1 2 3 4 5 6 7 8 9 0

8. Claimant confidentiality is being maintained under the current Federal role. _____
9. The BQC program helps to reduce our UI reporting burden. _____
10. BQC has had an impact on our Agency's relationship with:
(1 = very negative; 9 = very positive; 0 = no opinion)
- Claimants _____
- Employers _____
- Others (Identify) _____
11. The BQC program has improved performance in the following program areas:
- Intrastate _____
- UCX _____
- UCFE _____
- CWC _____
12. The BQC program should be expanded to include:
- Interstate _____
- Denied Claims _____
- EB _____
- Other (Identify) _____
13. Publicity of BQC information is constructive. _____
14. The current requirements for publishing BQC data are reasonable. _____

**STRONGLY
DISAGREE**

**STRONGLY
AGREE**

**NO
OPINION**

1 2 3 4 5 6 7 8 9 0

15. The error rate should be re-defined to exclude certain types of errors.
Identify _____
16. We have adequate flexibility in the operation of our BQC program.
17. We use the BQC program to facilitate corrective actions.
18. The BQC program should be modified to provide for:
- Further reduction in sampling
 - Option for reducing coding elements
 - Additional hardware/software
 - Additional training opportunities
 - Other (Identify) _____
19. Federal staff provide beneficial technical assistance on analysis of QC data when requested to do so by our state.
20. BQC program improvements or recommendations have been implemented with:
- Federal resources only
 - Combined federal/state resources
 - State resources only
21. Our state performs its own analysis of BQC findings.
22. BQC helps us to assess the impact of legal requirements on our UI system.
23. BQC is an effective program in assessing the accuracy of our UI system.
24. BQC is an efficient management tool that can be used to carry out and track corrective actions.

25. Please rate the usefulness of the BQC program by circling a number on the following scale:

Not Useful

Very Useful No Opinion

1 2 3 4 5 6 7 8 9 0

Please explain: _____

26. Changes to the BQC program we would like to see are:

BENEFITS QUALITY CONTROL EVALUATION SURVEY

SURVEY FOR SESA QC SUPERVISOR

We are conducting a survey in each state to determine if the Benefits Quality Control (BQC) program is meeting the goals and objectives for which it was created.

It is important that you personally complete this survey, as different levels of administration in your state will be receiving a similar, but slightly different survey.

You do not have to sign this form and, to ensure further anonymity, a metered envelope is provided. Please return the completed form directly to the U.S. Department of Labor, 200 Constitution Avenue NW, Room S-4220, Washington, D.C. 20210; Attn: TEUQI.

Please read the following statements and, using a range of 1 to 9, indicate your level of agreement/disagreement.

**Strongly
Disagree**

1

2

3

4

5

6

7

8

**Strongly
Agree**

9

**No
Opinion**

0

1. The Benefits Quality Control Program (BQC) provides data that we use to identify the causes(s) of payment errors. _____
2. The BQC program provides statistically valid data. _____
3. BQC helps our agency improve program accuracy. _____
4. We regard BQC as an effective measurement system. _____
5. We use the BQC program to find out if our procedures are being followed. _____
- 6.. Information from the BQC program leads to improvement of our UI operating procedures. _____

**STRONGLY
DISAGREE**

**STRONGLY
AGREE**

**NO
OPINION**

1

2

3

4

5

6

7

8

9

0

7. The BQC program provides information that has enabled us to better utilize resources. _____
8. Claimant confidentiality is being maintained under the current Federal role. _____
9. The BQC program helps to reduce our UI reporting burden. _____
10. BQC has had an impact on our Agency's relationship with:
(1 = very negative; 9 = very positive; 0 = no opinion)
- Claimants _____
- Employers _____
- Others (Identify) _____
11. The BQC program has improved performance in the following program areas:
- Intrastate _____
- UCX _____
- UCFE _____
- CWC _____
12. The BQC program should be expanded to include:
- Interstate _____
- Denied Claims _____
- EB _____
13. Publicity of BQC information is constructive. _____
14. The current requirements for publishing BQC data are reasonable. _____

**STRONGLY
DISAGREE**

**STRONGLY
AGREE**

**NO
OPINION**

1 2 3 4 5 6 7 8 9 0

15. The error rate should be re-defined to exclude certain types of errors.
Identify _____
16. We have adequate flexibility in the operation of our BQC program. _____
17. We use the BQC program to facilitate corrective actions. _____
18. Our state performs its own analysis of BQC findings. _____
19. Our BQC unit has access to all areas of information necessary for the performance of the BQC mission. _____
20. The BQC program should be modified to provide for:
- Further reduction in sampling _____
 - Option for reducing coding elements _____
 - Additional hardware/software _____
 - Additional training opportunities _____
 - Other (Identify) _____
21. A decline in error rates in our state can be attributed to:
- PI studies _____
 - PI grants _____
 - Other (Identify) _____
22. Federal oversight of BQC should be modified to include:
- Decreased case monitoring _____
 - Increased technical assistance _____
 - Increased training _____
 - Serve as liaison between BQC and other levels of Mgmt within our Agency _____

**STRONGLY
DISAGREE**

**STRONGLY
AGREE**

**NO
OPINION**

1 2 3 4 5 6 7 8 9 0

23. In case investigation, the BQC methodology should be modified to provide for more flexibility in:

Completing verifications _____

What is required to be verified _____

24. Analysis of BQC data has been made easier and more feasible by:

Hardware provided _____

Software provided _____

Data analysis training provided _____

Other (Identify) _____

25. BQC information has been used for things other than detection of errors (i.e. demographics, employer/claimant statistical information, JS registration) _____

26. BQC data provides information on the reasons for improper payments. _____

27. Please rate the usefulness of the BQC program by circling a number on the following scale:

Not Useful

Very Useful No Opinion

1 2 3 4 5 6 7 8 9 0

Please explain: _____

28. Changes to the BQC program we would like to see are:

BENEFITS QUALITY CONTROL EVALUATION SURVEY

SURVEY FOR SESA QC STAFF

We are conducting a survey in each state to determine if the Benefits Quality Control (BQC) program is meeting the goals and objectives for which it was created.

It is important that you personally complete this survey, as different levels of administration in your state will be receiving a similar, but slightly different survey.

You do not have to sign this form and, to ensure further anonymity, a metered envelope is provided. Please return the completed form directly to the U.S. Department of Labor, 200 Constitution Avenue NW, Room S-4220, Washington, D.C. 20210; Attn: TEUQI.

Please read the following statements and, using a range of 1 to 9, indicate your level of agreement/disagreement.

Strongly Disagree										Strongly Agree	No Opinion
1	2	3	4	5	6	7	8	9			0

1. The Benefits Quality Control Program (BQC) provides data that we use to identify the causes(s) of payment errors. _____
2. The BQC program provides statistically valid data. _____
3. BQC helps our agency improve program accuracy. _____
4. We regard BQC as an effective measurement system. _____
5. We use the BQC program to find out if our procedures are being followed. _____
- 6.. Information from the BQC program leads to improvement of our UI operating procedures. _____

**STRONGLY
DISAGREE**

**STRONGLY
AGREE**

**NO
OPINION**

1 2 3 4 5 6 7 8 9 0

7. The BQC program provides information that has enabled us to better utilize resources. _____
8. Claimant confidentiality is being maintained under the current Federal role. _____
9. The BQC program helps to reduce our UI reporting burden. _____
10. BQC has had an impact on our Agency's relationship with:
(1 = very negative; 9 = very positive; 0 = no opinion)
- Claimants _____
- Employers _____
- Others (Identify) _____
11. The BQC program has improved performance in the following program areas:
- Intrastate _____
- UCX _____
- UCFE _____
- CWC _____
12. The BQC program should be expanded to include:
- Interstate _____
- Denied Claims _____
- EB _____
13. Publicity of BQC information is constructive. _____
14. The current requirements for publishing BQC data are reasonable. _____

**STRONGLY
DISAGREE**

1

2

3

4

5

6

7

8

9

**STRONGLY
AGREE**

**NO
OPINION**

0

15. The error rate should be re-defined to exclude certain types of errors.
Identify _____
16. We have adequate flexibility in the operation of our BQC program. _____
17. We use the BQC program to facilitate corrective actions. _____
18. Our state performs its own analysis of BQC findings. _____
19. Our BQC unit has access to all areas of information necessary for the performance of the BQC mission. _____
20. The BQC program should be modified to provide for:
- Further reduction in sampling _____
 - Option for reducing coding elements _____
 - Additional hardware/software _____
 - Additional training opportunities _____
 - Other (Identify) _____
21. A decline in error rates in our state can be attributed to:
- PI studies _____
 - PI grants _____
 - Other (Identify) _____
22. Federal oversight of BQC should be modified to include:
- Decreased case monitoring _____
 - Increased technical assistance _____
 - Increased training _____
 - Serve as liaison between BQC and other levels of Mgmt within our Agency _____

**STRONGLY
DISAGREE**

**STRONGLY
AGREE**

**NO
OPINION**

1 2 3 4 5 6 7 8 9 0

23. In case investigation, the BQC methodology should be modified to provide for more flexibility in:
Completing verifications _____

What is required to be verified _____

24. Analysis of BQC data has been made easier and more feasible by:

Hardware provided _____

Software provided _____

Data analysis training provided _____

Other (Identify) _____

25. BQC information has been used for things other than detection of errors (i.e. demographics, employer/claimant statistical information, JS registration) _____

26. BQC data provides information on the reasons for improper payments. _____

27. Please rate the usefulness of the BQC program by circling a number on the following scale:

Not Useful

Very Useful No Opinion

1 2 3 4 5 6 7 8 9 0

Please explain: _____

28. Changes to the BQC program we would like to see are:

SECTION A

BENEFITS QUALITY CONTROL EVALUATION SURVEY

SURVEY FOR REGIONAL ADMINISTRATOR

We are conducting a survey in order to determine if the Benefits Quality Control program is meeting the goals and objectives for which it was created. We would like to have your input on how you think the program is currently operating.

Your participation in this survey is voluntary. However, if you choose to participate, it is important that you personally complete the survey, as other staff at different levels of responsibility will be completing a similar, but slightly different survey.

You do not have to sign this form and, to ensure further anonymity, a metered envelope is provided. Please return the completed form directly to the U.S. Department of Labor, 200 Constitution Avenue NW, Room S-4220, Washington, D.C. 20210; Attn: TEUQI.

Please read the following statements and, using a range of 1 to 9, indicate your level of agreement/disagreement.

Strongly Disagree									Strongly Agree		No Opinion
1	2	3	4	5	6	7	8	9		0	

1. I think the Benefits Quality Control (BQC) program provides a valid picture of benefit payment accuracy. _____

2. BQC provides me with an accurate measurement of the degree of state compliance with their written law and policy. _____

3. I feel BQC provides information which is useful in the Federal oversight role of the UI program. _____

4. I think BQC encourages proper administration of the UI program. _____

5. I think BQC encourages efficient administration of the UI program. _____

**STRONGLY
DISAGREE**

**STRONGLY
AGREE**

**NO
OPINION**

1 2 3 4 5 6 7 8 9 0

- 6. I think BQC identifies weaknesses in the UI program. _____

- 7. I think the BQC program successfully combats fraud and abuse in the UI program. _____

- 8. The BQC program supports the Secretary's initiatives. _____

- 9. The BQC program provides a data source for research. _____

- 10. BQC leads to the correction of problems in the UI program. _____

*****COMMENTS:**

SECTION A

BENEFITS QUALITY CONTROL EVALUATION SURVEY

SURVEY FOR REGIONAL UI DIRECTOR

We are conducting a survey in order to determine if the Benefits Quality Control program is meeting the goals and objectives for which it was created. We would like to have your input on how you think the program is currently operating.

Your participation in this survey is voluntary. However, if you choose to participate, it is important that you personally complete the survey, as other staff at different levels of responsibility will be completing a similar, but slightly different survey.

You do not have to sign this form and, to ensure further anonymity, a metered envelope is provided. Please return the completed form directly to the U.S. Department of Labor, 200 Constitution Avenue NW, Room S-4220, Washington, D.C. 20210; Attn: TEUQL.

Please read the following statements and, using a range of 1 to 9, indicate your level of agreement/disagreement.

**Strongly
Disagree**

1

2

3

4

5

6

7

8

**Strongly
Agree**

9

**No
Opinion**

0

1. I think the Benefits Quality Control (BQC) program provides a valid picture of the accuracy of the UI program. _____
2. BQC provides me with an accurate measurement of state compliance with their written law and policy. _____
3. I feel BQC provides information which is useful in the Federal oversight role of the UI program. _____
4. I think BQC encourages proper administration of the UI program. _____
5. I think BQC encourages efficient administration of the UI program. _____
6. BQC identifies weak areas in the UI program. _____
7. I feel BQC data can be used to support other UI reviews (i.e. Quality Appraisal). _____

**STRONGLY
DISAGREE**

1

2

3

4

5

6

7

8

**STRONGLY
AGREE**

9

**NO
OPINION**

0

- 8. BQC provides data which can be used for Budget purposes. _____
- 9. BQC provides data which can be used for Legislative purposes. _____
- 10. I think the BQC program successfully combats fraud and abuse in the UI program. _____
- 11. The BQC program provides a data source for research. _____
- 12. BQC provides a data base we use for Federal analysis. _____
- 13. BQC helps to improve the accuracy of benefit payments. _____
- 14. BQC serves as a management tool in making decisions. _____
- 15. The BQC program leads to the initiation of program improvements. _____
- 16. BQC creates incentives to take program improvement actions. _____
- 17. BQC reduces the UI reporting burden. _____
- 18. BQC should be expanded to include:
 - Denied Claims _____
 - Interstate _____
 - Other (Identify) _____

****COMMENTS****

SURVEY FOR REGIONAL QC TEAMLEADER

We are conducting a survey in order to determine if the Benefits Quality Control program is meeting the goals and objectives for which it was created. We would like to have your input on how you think the program is currently operating.

Your participation in this survey is voluntary. However, if you choose to participate, it is important that you personally complete the survey, as other staff at different levels of responsibility will be completing a similar, but slightly different survey.

You do not have to sign this form and, to ensure further anonymity, a metered envelope is provided. Please return the completed form directly to the U.S. Department of Labor, 200 Constitution Avenue NW, Room S-4220, Washington, D.C. 20210; Attn: TEUQL.

Please read the following statements and, using a range of 1 to 9, indicate your level of agreement/disagreement.

**Strongly
Disagree**

1

2

3

4

5

6

7

8

**Strongly
Agree**

9

**No
Opinion**

0

1. I think the Benefits Quality Control (BQC) program provides a valid picture of benefit payment accuracy. _____
2. BQC provides me with an accurate measurement of state compliance with their written law and policy. _____
3. I feel BQC provides information which is useful in the Federal oversight role of the UI program. _____
4. I think BQC encourages proper administration of the UI program. _____
5. I think BQC encourages efficient administration of the UI program. _____
6. I think BQC identifies weaknesses in the UI program. _____

**STRONGLY
DISAGREE**

**STRONGLY
AGREE**

**NO
OPINION**

1 2 3 4 5 6 7 8 9 0

- 7. I feel BQC data can be used to reinforce the results of other UI reviews (i.e. Quality Appraisal). _____
- 8. The BQC program provides a data source for research. _____
- 9. BQC provides a data base we use for Federal analysis. _____
- 10. BQC helps to improve the accuracy of benefit payments. _____
- 11. BQC serves as a management tool in making decisions. _____
- 12. The BQC program leads to the initiation of program improvement. _____
- 13. BQC creates incentives to take program improvement actions. _____
- 14. BQC helps reduce the UI reporting burden. _____
- 15. BQC should be expanded to include:
 - Denied Claims _____
 - Interstate _____
 - Other (Identify) _____

***** COMMENTS:**

BENEFITS QUALITY CONTROL EVALUATION

SURVEY FOR NATIONAL OFFICE STAFF

The Office of Quality Control (OQC) is conducting a complete evaluation of all aspects of the Benefits Quality Control (BQC) program.

We would like to have your input which will be used for later analyses. Please complete this survey form and deposit it in the box marked "BQC Surveys" which is located immediately inside the door of Room S-4220.

If you wish to remain anonymous, you do not have to sign this form.

Please read the following statements and, using a range of 1 to 9, indicate your level of agreement/disagreement.

**Strongly
Disagree**

1

2

3

4

5

6

7

8

**Strongly
Agree**

9

**No
Opinion**

0

1. I think the Benefits Quality Control (BQC) program provides a valid picture of benefit payment accuracy. _____
2. BQC provides an accurate measurement of state compliance with their written law and policy. _____
3. BQC provides information which is useful in the Federal oversight role of the UI program. _____
4. BQC encourages proper administration of the UI program. _____
5. BQC encourages efficient administration of the UI program. _____
6. BQC identifies weaknesses in the UI program. _____

- 7. BQC data can be used to reinforce other UI reviews. _____
- 8. The BQC program provides a data source for research. _____
- 9. BQC provides a data base we use for Federal analysis. _____
- 10. BQC helps to improve the accuracy of benefit payments. _____
- 11. BQC provides data which can be used for Budget purposes. _____
- 12. BQC creates incentives to take program improvement actions. _____
- 13. BQC reduces the UI reporting burden. _____
- 14. The BQC program leads to the initiation of improvement in the UI program. _____
- 15. BQC should be expanded to include:
 - Denied Claims _____
 - Interstate _____
 - Other (Identify) _____

*****COMMENTS*****

SIGNATURE _____ (OPTIONAL)

BENEFITS QUALITY CONTROL CUSTOMER SURVEY - E

The Unemployment Insurance Service (UIS), Office of Quality Control (OQC), is conducting an evaluation to determine if the Benefits Quality Control program is meeting the goals and objectives for which it was created. We would like to have your input in this effort. Please complete the attached survey form and return it directly to the U.S. Department of Labor in the pre-addressed, postage paid envelope provided for your convenience.

Please read the statements and use the scale to indicate your level of agreement/disagreement.

If you wish to remain anonymous, you do not have to sign this form.

Please read the following statements and, using a range of 1 to 9, indicate your level of agreement/disagreement.

Strongly Disagree									Strongly Agree	No Opinion
1	2	3	4	5	6	7	8	9		0

1. The Benefits Quality Control (BQC) program provides a valid picture of benefit payment accuracy. _____
2. Our group members are treated fairly by the BQC reviews. _____
3. BQC provides data relevant to the concerns of my organization. _____
4. BQC improves UI program integrity. _____
5. BQC provides our organization with readily translatable data. _____
6. BQC should be expanded to include:
 - Denied Claims _____
 - Interstate _____
 - Other (Identify) _____ _____

(CONTINUED ON REVERSE SIDE)

COMMENTS

SIGNATURE _____ (OPTIONAL)

BENEFITS QUALITY CONTROL CUSTOMER SURVEY - C

The Unemployment Insurance Service (UIS), Office of Quality Control (OQC), is conducting an evaluation to determine if the Benefits Quality Control program is meeting the goals and objectives for which it was created. We would like to have your input in this effort. Please complete the attached survey form and return it directly to the U.S. Department of Labor in the pre-addressed, postage paid envelope provided for your convenience.

Please read the statements and use the scale to indicate your level of agreement/disagreement.

If you wish to remain anonymous, you do not have to sign this form.

Please read the following statements and, using a range of 1 to 9, indicate your level of agreement/disagreement.

Strongly Disagree								Strongly Agree	No Opinion
1	2	3	4	5	6	7	8	9	0

1. The Benefits Quality Control (BQC) program provides a valid picture of benefit payment accuracy. _____
2. Our group members are treated fairly by the BQC reviews. _____
3. BQC provides data relevant to the concerns of my organization. _____
4. BQC improves UI program integrity. _____
5. BQC provides our organization with readily translatable data. _____
6. BQC should be expanded to include:
 - Denied Claims _____
 - Interstate _____
 - Other (Identify) _____ _____

(CONTINUED ON REVERSE SIDE)

*****COMMENTS*****

SIGNATURE _____ (OPTIONAL)

BENEFITS QUALITY CONTROL CUSTOMER SURVEY - R

The Unemployment Insurance Service (UIS), Office of Quality Control (OQC), is conducting an evaluation to determine if the Benefits Quality Control program is meeting the goals and objectives for which it was created. We would like to have your input in this effort. Please complete the attached survey form and return it directly to the U.S. Department of Labor in the pre-addressed, postage paid envelope provided for your convenience.

Please read the statements and use the scale to indicate your level of agreement/disagreement.

If you wish to remain anonymous, you do not have to sign this form.

Please read the following statements and, using a range of 1 to 9, indicate your level of agreement/disagreement.

Strongly Disagree									Strongly Agree	No Opinion
1	2	3	4	5	6	7	8	9		0

1. The Benefits Quality Control (BQC) program provides a valid picture of benefit payment accuracy. _____
2. Our group members are treated fairly by the BQC reviews. _____
3. BQC provides data relevant to the concerns of my organization. _____
4. BQC improves UI program integrity. _____
5. BQC provides our organization with readily translatable data. _____
6. BQC should be expanded to include:
 - Denied Claims _____
 - Interstate _____
 - Other (Identify) _____ _____

(CONTINUED ON REVERSE SIDE)

*****COMMENTS*****

SIGNATURE _____ **(OPTIONAL)**

SURVEY RESULTS

Surveys were mailed to four (4) groups - State Employment Security Agency staff, Regional Office Federal staff, National Office Federal staff, and special interest groups which represent claimants, employers, and researchers. Results were kept separate not only by group, but also by staff levels in each group. The response level from the special interests groups was so small (7 total) that the results could not be found to be conclusive and were not included in the attached chart.

The information requested on the surveys was individually tailored to each group as the levels of responsibility and knowledge of the program varied from group to group. Respondents were asked to rate the survey statements using a scale of 1 (strongly disagree) to 9 (strongly agree) with a response of 0 equaling no opinion. The results were then divided into sub-groupings by adding together the number of people in each staff level who gave a 1, 2, or 3 (disagree) rating to a statement, those who gave a 4, 5, or 6 (middle) rating, and those who gave a 7, 8, or 9 (agree). The "no opinions" (0's) were grouped alone. Based on these totals, percentages were determined for each of the 4 groupings.

GOAL #1. Assess the impact of State and Federal laws and regulations on the system's accuracy and integrity.	SESA ADMIN.		SESA UI DIRECTOR/ MANAGER		SESA QC SUPVR.		SESA QC INVEST.	
		%		%		%		%
The BQC program provides data that we use to identify the causes of payment errors.	2	10.5	6	13.0	2	4.3	6	2.2
	4	21.1	16	34.8	3	6.5	18	6.5
	13	68.4	24	52.2	41	89.2	246	89.1
	0	-	0	-	0	-	6	2.2
The BQC program provides statistically valid data.	3	15.8	6	13.0	2	4.3	7	2.5
	5	26.3	13	28.3	0	-	30	10.9
	11	57.9	26	56.5	43	93.5	234	84.8
	0	-	1	2.2	1	2.2	5	1.8
BQC is an effective measurement system.	5	26.3	11	23.4	4	8.7	17	6.2
	7	36.85	18	38.3	8	17.4	36	13.0
	7	36.85	17	36.2	33	71.7	219	79.3
	0	-	1	2.1	1	2.2	4	1.5
We use BQC to find out if our procedures are being followed.	3	15.8	13	28.3	7	15.2	30	10.9
	4	21.1	15	32.6	10	21.7	38	13.7
	12	63.1	18	39.1	28	60.9	200	72.5
	0	-	0	-	1	2.2	8	2.9
BQC has enabled us to effectively assess the impact of State & Federal laws & regulations on the accuracy of our UI system.	5	26.3						
	7	36.85						
	7	36.85						
	0	-						
BQC helps us to assess the impact of legal requirements on our UI system.			16	34.75				
			16	34.75				
			12	26.1				
			2	4.3				

GOAL #1 (cont.)	SESA ADMIN. %		SESA UI DIRECTOR/ MGR %		SESA QC SUPV. %		SESA QC INVEST. %	
BQC is an effective program in assessing the accuracy of our UI system.			15	32.6				
			14	30.4				
			16	34.8				
			1	2.2				
BQC data provides information on the reasons for improper payments.					3	6.5	6	2.2
					5	10.9	25	9.1
					33	71.7	235	85.1
					5	10.9	10	3.6

GOAL #2. <u>Achieve improvements in program accuracy & integrity. Improve program quality & solvency thru error reduction.</u>	SESA ADMIN		SESA UI DIRECTOR/ MGR.		SESA QC SUPV.		SESA QC INVEST.	
		%		%		%		%
BQC has helped our agency improve program accuracy.	3	15.8						
	8	42.1						
	8	42.1						
	0	-						
BQC helps our agency improve program accuracy.			14	30.4	5	10.9	38	13.8
			15	32.6	17	36.9	55	19.9
			17	37.0	23	50.0	176	63.8
			0	-	1	2.2	7	2.5
BQC is an efficient mgmt. tool that has enabled us to carry out and track corrective actions.			15	32.6				
			13	28.3				
			18	39.1				
			0	-				
We use the BQC program to facilitate corrective actions.			14	30.45	10	21.75	57	20.7
			18	39.1	10	21.75	68	24.6
			14	30.45	26	56.5	140	50.7
			0	-	0	-	11	4.0
Information from the BQC program has led to improvement of our UI operating procedures.	3	15.8						
	4	21.1						
	12	63.1						
	0	-						
Information from the BQC program leads to improvement of our UI operating procedures.			14	30.45	9	19.6	49	17.8
			18	39.1	13	28.3	56	20.3
			14	30.45	22	47.8	164	59.4
			0	-	2	4.3	7	2.5

GOAL #2 (cont.)	SESA ADMIN. %		SESA UI DIRECTOR/ MGR. %		SESA QC SUPV. %		SESA QC INVEST. %	
A decline in error rates can be attributed to PI studies.					14	30.4	28	10.2
					3	6.5	22	8.0
					10	21.8	43	15.7
					19	41.3	181	66.1
A decline in error rates can be attributed to PI grants.					12	26.1	26	9.4
					5	10.9	17	6.2
					4	8.7	28	10.2
					25	54.3	204	74.2

<u>MISCELLANEOUS</u>	SESA ADMIN.		SESA UI DIRECTOR MGR.		SESA QC SUPVR.		SESA QC INVEST.	
		%		%		%		%
Under the current Federal oversight, we believe claimant confidentiality is being maintained.	0	-						
	2	10.5						
	15	79.0						
	2	10.5						
Claimant confidentiality is being maintained under the current Federal role.			1	2.2	2	4.35	3	1.1
			7	15.2	2	4.35	18	6.5
			32	69.6	37	80.4	233	84.4
			6	13.0	5	10.9	22	8.0
Publicity of BQC information has been constructive.	11	57.9						
	3	15.8						
	2	10.5						
	3	15.8						
Publicity of BQC information is constructive.			25	54.3	12	26.1	34	12.3
			11	23.9	10	21.7	43	15.6
			8	17.4	21	45.7	170	61.6
			2	4.4	3	6.5	29	10.5
The current requirements for publishing BQC data are reasonable.			20	43.5	12	26.1	36	13.1
			12	26.1	7	15.2	52	18.8
			14	30.4	25	54.3	122	44.2
			0	-	2	4.4	66	23.9
The BQC program has improved performance in the INTRASTATE program.	5	26.3	17	36.9	8	17.4	34	12.3
	3	15.8	13	28.3	13	28.3	45	16.3
	7	36.8	12	26.1	15	32.6	122	44.2
	4	21.1	4	8.7	10	21.7	75	27.2

MISC. (cont.)	SESA ADMIN. %		SESA UI DIRECTOR/ MGR. %		SESA QC SUPVR. %		SESA QC INVEST. %	
The BQC program has improved performance in the UCX program.	6	31.6	23	50.0	13	28.25	48	17.4
	7	36.8	13	28.3	12	26.1	62	22.5
	2	10.5	2	4.3	8	17.4	57	20.7
	4	21.1	8	17.4	13	28.25	109	39.4
The BQC program has improved performance in the UCFE program.	6	31.6	22	48.9	14	30.4	49	17.7
	7	36.8	13	28.9	12	26.1	62	22.5
	2	10.5	2	4.4	8	17.4	58	21.0
	4	21.1	8	17.8	12	26.1	107	38.8
The BQC program has improved performance in the CWC program.	6	31.6	21	45.7	9	19.6	41	14.9
	5	26.3	9	19.6	4	8.7	62	22.5
	3	15.8	8	17.35	29	63.0	73	26.4
	5	26.3	8	17.35	4	8.7	100	36.2
The BQC program should be expanded to include Interstate.	11	57.9	21	45.7	14	30.4	94	34.1
	3	15.8	9	19.6	6	13.1	43	15.6
	4	21.1	8	17.35	19	41.3	97	35.1
	1	5.2	8	17.35	7	15.2	42	15.2
The BQC program should be expanded to include Denied Claims.	10	52.7	21	45.7	9	19.6	73	26.4
	2	10.5	4	8.7	4	8.7	29	10.5
	7	36.8	14	30.4	29	63.0	133	48.2
	0	-	7	15.2	4	8.7	41	14.9
The BQC program should be expanded to include EB.	11	57.9	25	54.3	25	54.3	96	34.8
	3	15.8	8	17.4	3	6.5	30	10.9
	3	15.8	5	10.9	9	19.6	89	32.2
	2	10.5	8	17.4	9	19.6	61	22.1

MISC. (cont.)	SESA ADMIN.		SESA UI DIRECTOR MGR.		SESA QC SUPVR.		SESA QC INVEST.	
		%		%		%		%
The error rate should be redefined to exclude certain types of errors.			7	15.2	17	37.0	85	30.8
			1	2.2	4	8.7	13	4.7
			14	30.4	15	32.6	48	17.4
			24	52.2	10	21.7	130	47.1
We have adequate flexibility in the operation of our BQC program.			22	47.8	16	34.8	48	17.4
			13	28.3	9	19.6	80	29.0
			10	21.7	21	45.6	132	47.8
			1	2.2	0	-	16	5.8
Our State performs its own analysis of BQC findings.			8	17.4	8	17.4	37	13.4
			8	17.4	5	10.9	31	11.2
			27	58.7	31	67.4	138	50.0
			3	6.5	2	4.3	70	25.4
The BQC program should be modified to provide for further reduction in sample.			16	34.7	23	50.0	132	47.8
			5	10.9	8	17.4	39	14.1
			18	39.1	13	28.3	64	23.2
			7	16.2	2	4.3	41	14.9
The BQC program should be modified to provide for an option for reducing coding elements.			6	13.0	13	27.1	65	23.6
			6	13.0	4	8.3	52	18.8
			26	56.6	28	58.3	119	43.1
			8	17.4	3	6.3	40	14.5
The BQC program should be modified to provide for additional hard/software.			15	32.6	8	17.4	27	9.8
			11	23.9	11	23.9	45	16.3
			7	15.2	23	50.0	151	54.7
			13	28.3	4	8.7	53	19.2

<u>MISCELLANEOUS</u>	REGIONAL ADMIN.		REGIONAL UI DIRECTOR		QC TEAM LEADER		REGIONAL UI STAFF	
		%		%		%		%
The BQC program supports the Secretary's initiatives.	4	80.0						
	0	-						
	1	20.0						
	0	-						
The BQC program provides a data source for research.	0	-	0	-	1	12.5	6	12.2
	2	40.0	4	44.5	2	25.0	16	32.7
	3	60.0	3	33.3	4	50.0	27	55.1
	0	-	2	22.2	1	12.5	0	-
BQC provides a data base we can use for Federal analysis.			1	11.1	3	37.5	18	36.8
			5	55.6	4	50.0	13	26.5
			2	22.2	1	12.5	17	34.7
			1	11.1	0	-	1	2.0
BQC provides data which can be used for budget purposes.			4	44.45				
			4	44.45				
			0	-				
			1	11.1				
BQC provides data which can be used for legislative purposes.			1	11.1				
			7	77.8				
			0	-				
			1	11.1				
BQC reduces the UI reporting burden.			6	66.7	6	75.0	31	63.3
			2	22.2	0	-	12	24.5
			0	-	0	-	5	10.2
			1	11.1	2	25.0	1	2.0

GOAL #1. <u>Assess the impact of State and Federal laws & requirements on the system's accuracy and integrity.</u>	NATIONAL OFFICE UI STAFF %							
I think the BQC program provides a valid picture of benefit payment history.	1	6.7						
	5	33.3						
	9	60.0						
	0	-						
BQC provides an accurate measurement of State compliance with their written law and policy.	1	6.7						
	4	26.65						
	7	46.65						
	3	20.0						
BQC provides information which is useful in the Federal oversight role of the UI program.	2	13.35						
	6	40.0						
	7	46.65						
	0	-						
BQC identifies weaknesses in the UI program.	3	20.0						
	4	26.7						
	8	53.3						
	0							
BQC data can be used to reinforce other UI reviews (i.e. Quality Appraisal).	2	13.3						
	0	-						
	11	73.4						
	2	13.3						

GOAL #2. Achieve improvements in program accuracy & integrity. Improve program quality & solvency thru error reduction.	NATIONAL OFFICE UI STAFF %							
BQC helps to improve the accuracy of benefits payments.	4	26.7						
	2	13.3						
	8	53.3						
	1	6.7						
BQC creates incentives to take program improvement actions.	5	33.3						
	4	26.7						
	5	33.3						
	1	6.7						

GOAL #3. <u>Encourage more efficient administration.</u>	NATIONAL OFFICE UI STAFF %							
BQC encourages proper administration of the UI program.	3	20.0						
	4	26.7						
	8	53.3						
	0	-						
BQC encourages efficient administration of the UI program.	6	40.0						
	1	6.7						
	7	46.6						
	1	6.7						
BQC provides data which can be used for budget purposes.	5	33.3						
	2	13.35						
	2	13.35						
	6	40.0						

<u>MISCELLANEOUS</u>	NATIONAL OFFICE UI STAFF %							
The BQC program provides a data source for research	0	-						
	4	26.7						
	7	46.7						
	4	26.7						
BQC provides a data base we use for Federal analysis	0	-						
	4	26.7						
	7	46.7						
	4	26.7						

APPENDIX D

COMMENTS FROM ASSESSMENT RELATED TO BQC GOALS

1. Assess the impact of State and Federal laws and requirements on the systems accuracy and integrity.

1a - Meets goal 1.

1b - Does not meet goal 1.

1c - State action affects meeting goal 1.

2. Achieve improvements in program accuracy and integrity. Improve program quality and solvency through error reduction.

2a - Meets goal 2.

2b - Does not meet goal 2.

2c - Management not using.

3. Encourage more efficient administration.

3a - Meets goal 3.

3b - Does not meet goal 3.

4. Miscellaneous

4a - Favorable comment not elsewhere classifiable.

4b - Unfavorable comment not elsewhere classifiable.

5. Not Applicable

5 - Comment not applicable/understandable.

6. Comment for Change.

6 - Comment pertains to desired change in program; added to that section.

7. Monitoring Comment.

M - Comment pertains to monitoring of program; referred to Monitoring Workgroup.

*****NUMBERING SYSTEM "KEY"**

Summary of Comments from Assessment Related to BQC Goals

	RAs	RDs	TLs	RO	SADMs	SUIDs	QCS	STAFF
1a		1	2	2	3	5	14	76
1b	1			2				2
1c						1		3
2a					6	8	6	38
2b	2		1	3	2	5	3	2
2c		1	3	4		1	10	60
3a					1	1	1	8
3b	1			5	1	1		
3c								
4a						1		5
4b	1	1	1	9	4	13	3	3

*****NUMBERING SYSTEM**

**COMMENTS INCLUDED
ON
BQC ASSESSMENT SURVEYS
REGIONAL ADMINISTRATORS**

- 1b b. Is too statistical in orientation and not focused enough on operations. Was designed by a statistician and not by UI managers. This is perhaps its biggest fault.

- 2b 2. Extremely resource intensive with limited benefit. An objective cost/benefit analysis would probably lead to a complete overhaul.

- 2b c. Is far too costly system wide for the benefit derived from it.

- 3b b. Too much time (man hours) spent in looking at numbers that someone else has already looked at; time could and should be spent at the front end on the system.

- 4b 1. a. Does not get to real question of how we are serving our customers.

- 6 3. a. Does not measure errors of "nonpayment" and is therefore not balanced.

**COMMENTS INCLUDED
ON
BQC ASSESSMENT SURVEYS**

REGIONAL UI DIRECTORS

- 1a 3. Data is there for research and Federal analysis, but not
2c used.
- 4b 2. These questions are too slanted and appear geared to soliciting positive response. For example, BQC does identify weaknesses - but does it change the program, does it identify why or how to correct it or does it act as a management tool? No it doesn't, if we're honest, yet the way the question is worded it warrants a high "agrees". Secondly the questions are so general that to say you disagree, suggests the RD must not be doing a competent and thorough oversight job. The fact is, after doing this workload for too many years in a redundant manner
- 5 without any honest willingness to have the States truly focused on resolving key issues, it's tough to be objective about what benefits BQC can be to ensuring a quality, error free UI benefit system. What we focus on in our reviews and how we work to truly fix the problem needs to be the emphasis in any changes we engender in a future BQC program.
- 6 1. Denied claims and interstate claims should not become part of QC sample; but (addressed thru) periodic identification or special study.

**COMMENTS INCLUDED
ON
BQC ASSESSMENT SURVEYS**

REGIONAL BQC TEAMLEADERS

- 1a c. Administrators do not listen to or request BQC
2c information.
- d. BQC information could be used to the good of the agencies but the administrators do not use the information.
- e. RO works closely with all of the BQC units and pushes for PI but the BQC information seems to fall on deaf ears.
- f. More clout is needed from the NO addressing the SESA Administrators on how and why they should be dealing with BQC information.
- 1a 7. BQC can be used to target strengths and weaknesses of the
2c program, but it also can not be used. How do we motivate managers to use it?
- 2b b. Investigative resources would be better placed if devoted to program improvement.
- 2c We need "to bridge the chasm" between simply gathering data and using it to promote program improvement in UI.
- 4b 3. a. Repetitive nature of processes are not productive.
- 6 1. Include interstate claims (5 rating). Do not expand QC program but at certain times of the year include interstate claims, maybe for 1 or 2 weeks a quarter or as a special study.
- 6 4. a. States should be encouraged to determine what they need from BQC and what they want measured, not what the federal government wants.
- 6 b. Every effort should be made to integrate BQC into mainline UI.
- 6 5. Recommend a strongly proactive "selling" role be played by NO staff with State UI directors.
- 6 6. May be wise to move from a "gotcha" process to a process oriented measurement system. How about a "blend" of RQC/QPI/QA assessment tool?
- M 2. The UI BQC automated regional monitoring system would be many times more useful if the software worked reliably.

COMMENTS ON BQC ASSESSMENT SURVEYS

REGIONAL UI STAFF

- 1a 9. Is a valuable source of UI program data. The extent of its use to make PI varies considerably depending on program acceptance, ability of QC staff to work with UI administrators, and the degree of support by the RO.
- 1a 15. BQC data is very valuable if management can be convinced
- 1b d. Not adequate review of ES role in claimants receipt of benefits.
e. QC is not keeping up with new developments in States; telephone, paperless offices.
- 1b b. QC needs more process based codes for identifying mispayments.
- 2b 8. Funds are excessive for benefits derived. Does not give info useful in improving UI.
- 2b 13. Needs to be geared to PI. We've reviewed enough cases to determine shortfalls; let's get on with PI.
- 2b 19. BQC does not make a difference.
- 2c 1. NO should reinvent approach/philosophy about PI. Data publication has been a failure. States have not bought into external pressure for PI. The whole notion of internal action by States to use PI needs to be reinvented.
- 2c 4. Administrators fail to make adequate use of data.
- 2c b. QC does not take its findings and conduct training of staff to correct deficiencies.
- 2c that it is a good management tool to evaluate the program.
- 3b 10. a. Labor intensive enforcement after the fact.
- 3b c. It seems that changes are made to pass a QC review not to improve service.

- 3b 14. Many times policy/procedures are changed merely to keep an error condition from happening and not because the change is beneficial to the UI program.
- 3b 17. a. BQC is a rigid program which drives states to make policy decisions which are not necessarily good for the UI program.
- 3b 21. a. The program allows States to make changes in policies procedures which are solely designed to lower the error rate, i.e. changing work search or job service registration requirements.
- 4b 2. BQC is a complete waste of time and resources. It is no better than a good administrative/program review.
- 4b 6. Waste of time money and staff.
- 4b 7. BQC is an outlived program and in its present form should be put to "rest".
- 4b f. Not enough leadership, direction, training from NO.
g. People doing the work do not have the resources. Need to be able to attend multi-regional meetings, need refresher training.
- 4b 11. Should be reduced or eliminated.
- 4b 12. Has outlived its usefulness.
- 4b b. It is too statistically oriented and very costly.
- 4b 18. a. Too expensive, staff intensive and detail oriented for a program that repeatedly points out the same errors, while funding to operate the UI program is being reduced.
- 4b 20. a. BQC has been out of control for too long. It started on wrong path by excluding states from meaningful participation in its design.
b. It expends funds to prove already known facts.
- 6 3. Study of benefit charging should be in BQC.
- 6 16. Focus needs to be changed. It should not be used solely for statistics. We should have more flexibility to concentrate on problem areas.
- 6 c. We should spend our resources providing leadership and guidance up-front instead of playing "gotcha" on the back end.

- 6 b. Use BQC resources to initiate/require PI and customer service.
- M Monitoring role needs change to the point that monitors see themselves as movers and shakers.
- M 5. RO reviews should include operational reviews of QC in addition to case review. Too little emphasis on UI program area. QC reviews should be expanded to determine QC's relationship to all UI functions.
- M c. RO monitoring role is so boring that most staff try to avoid anything to do with BQC.

BQC ASSESSMENT SURVEYS

STATE ADMINISTRATORS

USEFULNESS #17

- 1a 3. BQC is an effective program to measure UI benefits paid.
- 1a 9. BQC is a valuable tool in evaluating the effectiveness of our systems and their internal controls and pointing out weaknesses.
- 1a 13. Useful in providing info on policies and procedures.
- 2a 2. a. Data has been used for special studies to improve UI operations.
- 2a Results of case investigation are used for program improvements.
- 2a Improvements that could be made under existing state law have for the most part been implemented.
- 2a 7. BQC has helped to reduce improper and overpaid claims.
- 2a It is also very useful in identifying all factors related to improper payments so corrective actions can be directed primarily to areas which it will most benefit.
- 2a 10. BQC has been the principal force behind several procedural/forms changes. The recurrence of errors over the years is causing us to re-examine our UI law using BQC and other data to recommend changes.
- 2b 1. Rated 4, seems like most of the errors are somewhat beyond the agency to correct on the front end.
- 2b 8. Historical data and a review of past practices and policies indicate that the BQC program has been of little or any benefit in improving the quality of the UI program.
- 3a b. Because of the BQC program SESA relationships with both claimants and employers have improved.
- 3b 12. I feel that rather than QC at the end, there needs to be more at front end.
- 4b 4. Continues to tell the very same results which it told from the outset.

- 4b 5. Same results are generated over and over. Many of the errors are outside the agency's control. Resources are not sufficient to address the employer and claimant caused errors.
- 4b 6. Initial benefit was good, but continuation of the program now provides redundant information.
- 4b 11. Rated a 1- Continuously measuring same information - does not indicate significant change.

BQC ASSESSMENT SURVEYS

STATE UI DIRECTORS/MANAGERS

USEFULNESS #25

- 1a 4. a. QC helps quantify problems known to management, but
- 1a 10. Provides information detailing patterns of error, frequency and responsibility.
- 1a 13. QC does a good job in measuring the payment accuracy and
- 1a 27. BQC findings when analyzed with QA and data validation findings provides a comprehensive depiction of the strengths and weaknesses in the UI operation.
- 1a 30. Measures the rate of errors and the fault for errors. Feedback is immediate.
- 1c 11. Our UI program does not use BQC findings to discover better ways to administer their program. Rather they focus on efforts to refute findings.
- 2a 5. BQC data is used. Provides opportunities for further exploration.
- 2a 8. Provide management data - allows for tracking of effects of corrective action taken.
- 2a 9. a. We have been able to do some changes that have impacted correct payments.
- 2a b. We have written more policies which are to our benefit.
- 2a provides program improvement recommendations.
- 2a 14. The program presents great potential. Unfortunately,
- 2a 17. a. BQC generates valuable information and data for managers to use in running the UI program. UI areas which are in need of improvement can be targeted by utilizing the BQC data collected, however, an inordinate amount of time is spent in coding minor detail which are not utilized.

- 2a 24. It assists in spotting trends in errors and helps to develop corrective action. Tracks the UI system consistently throughout the State. Allow state to ensure employers that it is regularly assessing the accuracy of benefit payments.
- 2b b. Some areas such as work search policy are influenced by the political environment and are not likely to be changed because of QC.
- 2b 15. Corrective action has little impact on certain areas like claimant and employer wage reporting where there will always be some error no matter how much instruction is provided.
- 2b 18. The data provided by QC is virtually useless. Even the most inexperienced UI employee knows that not every claimant efficiently seeks work and not every employer accurately reports wages. To continuously accumulate this data is a horrendous waste of resources.
- 2b There is no mechanism for program improvements which require resources to accomplish.
- 2b 21. This trivial data and a review of past practices and policies indicate that the BQC program has been of little or no benefit in improving the quality of the UI program.
- 2c State management chooses not to use it.
- 3a 16. Provides an audit presence to claimants and employers. Good PR.
- 3b Quantified problems by taking a disproportionate share of operational resources.
- 4a 28. Program has the potential to provide significantly more info that could be useful at the State level. Rated 6.
- 4b 1. Usefulness has already realized diminishing returns. Also BQC is being used as a means to compare effectiveness and efficiency of State UI programs although such comparisons were not the intent of the program.
- 4b 2. Initially BQC was useful in determining program weaknesses. The findings have become repetitive and are no longer constructive.

- 4b 3. Too repetitive, too labor intensive (in-person contact and travel time). Same results, over and over.
- 4b 6. Most program adjustments that could be made have occurred. Very useful for first few years.
- 4b 7. Finding the same problems/errors year after year - usually because of technicalities in the law.
- 4b c. Concentrate on improving the UI program and minimize the stressing of the improper payment rate.
- 4b 19. Essentially the same results have been generated since the inception of the program. We are spending a lot of money to discuss the same thing over and over.
- 4b 20. BQC continues to plow the same ground.
- 4b 22. Continued sample load and findings haven't changed in last six years.
- 4b 23. Not very useful in its present form. Same information produced for last eight years.
- 4b 25. Too many resources devoted to finding errors. Need resources to fix. Need to concentrate on doing it right the first time.
- 4b 26. Conclusions are redundant at this point.
- 4b 29. Tells over and over that work search and unreported earnings are primary cause of error. Do not need to spend this amount of resources to tell us what we already know.
- 6 12. Elimination of special studies. QIP has reduced the usefulness of the BQC program.
- 6 b. BQC emphasis is needed on taking corrective action on UI program improvement whether based on collected data or not.

**COMMENTS INCLUDED
ON
BQC ASSESSMENT SURVEYS**

STATE QC SUPERVISORS

USEFULNESS OF THE BQC PROGRAM #27

- 1a 7. Rated a 9 because "an agency can definitely see who and where errors are occurring".
- 1a 8. QC has the performance numbers/level to measure impact of changes taking place due to increased automation.
- 1a 12. a. It is important to ensure the UI program is properly run and QC gives a good indication of that.
- 1a 14. It is the only ongoing means to assess local office operations.
- 1a 15. It's still the best program to measure total payment accuracy.
- 1a 19. The program has been useful in providing information,
- 1a 26. Identifies more clearly the procedures being followed and obtains feedback from customers that may never be obtained via regular UI procedures.
- 1a 28. Data is useful but incentive needs to be provided for
2b data to be fully utilized.
- 1a 2. Data is accurate and reasonably meaningful. Internal
2c administrative bureaucracy makes any change in law, procedures, regulation exceedingly difficult.
- 1a 10. Data is available but not necessarily developed or
2c requested for analysis.
- 1a 16. Rated a 2. The State could use BQC to improve the
2c system, if we were allowed to design our own program.
- 1a 23. Provides valid data that could be used if management
2c chose to.

- 1a 24. Provides management with solid information on problem areas. The
2c problem is many administrators do not see
improvement of the quality of benefit payments as a goal
- 1a 25. Potentially useful. Management (line) still feel it is a
2c federal oversight; still some resistance.
- 2a 3. QC makes the agency aware there is a watchdog present. The present
(State) administration wants to use the data to make our UI program more
effective.
- 2a 6. Useful as management and integrity program.
- 2a 13. Data used by a process improvement system which includes providing
case results to field offices which complete corrective action plans.
- 2a 20. Analysis of data has led to program changes. Law and regulation changes
can also be partly attributed to QC.
- 2a 22. Has made LOs more aware of errors and enabled them to correct errors.
- 2a 24. QC staff give immediate feedback to management and field offices on
errors detected.
- 2b 5. Rated a 3 because "no DLA for error rates, no incentive for a SESA to lower
error rate".
- 2c 1. Would be very useful if changed to an oversight program that would allow
for follow-up on corrective action suggestions. The problem is we report the
error and suggest remedies only to be ignored or put off.
- 2c administrative bureaucracy makes any change in law, procedures, regulation
exceedingly difficult.
- 2c 4. (Rated not useful because) agency ignores results.
- 2c 11. If data is used by SESA it could result in reduction of errors.
- 2c 27. Management does not utilize data to any noticeable degree.
- 3a 21. The agency has been slow to make changes in UI. BQC serves as a
reminder that program improvements mean efficiency as well as payments
made on time.

- 4b 9. Program was useful in the first few years as far as identifying possible areas needing improvement. Now we are not learning anything new.
- 4b b. Year round sampling seems excessive.
- 4b 18. Over time the results have become very predictable with very little new useful data. Process now seems to take precedence over results.
- 5 17. BQC does not provide information necessary to determine effectiveness of quality improvement efforts.
- 6 5. Rated a 3 because "no DLA for error rates, no incentive to lower error rate.
- 6 Reduce size and redirect resources for corrective action even though some precision in data might be lost.
- 6 b. Year round sampling seems excessive.
- 6 States should be allowed to couple quality improvement efforts with error measurements.

**COMMENTS INCLUDED
ON
BQC ASSESSMENT SURVEYS**

STATE QC STAFF

USEFULNESS #27

- 1a 1. An excellent program to review UI payments and procedures. Should be retained.
- 1a 12. The data appears to be accurate and reflects areas where the agency needs to implement changes/improvements and follow regulations and policy.
- 1a 31. Rated a 6 because State is not required to use data.
- 1a 41. BQC data introduces findings to the SESA so they may improve compliance.
- 1a 47. The QC staff evaluates a claim from beginning to end and provides an analysis of the entire Job Center process.
- 1a 54. Gives State a real basis for making decisions and changing the law. Gives support for politically unpopular decisions/ recommendations.
- 1a 56. Provides the only real oversight to claimant payments that involve field investigation.
- 1a 57. Results allow LO managers to see where errors occur and when staff is producing quality work.
- 1a 58. Information can be defined by localities.
- 1a 62. Gives Fed and state managers info on areas that need improvement.
- 1a 66. Identifies errors which benefits claimant, employer and SESA.
- 1a 68. QC is effective in detecting need for change and also as good public relations.
- 1a 69. Shows areas that need corrective measures.

- 1a 70. Provides a monitoring tool to make LO aware of errors and employers that the program is being checked.
- 1a 71. On going review by QC helps to maintain procedural consistency.
- 1a 72. Provides statistically valid data upon which to base administrative decisions.
- 1a 73. Obtains State specific info re: agency and employer errors.
- 1a 74. The only unit which reviews all aspects of claim.
- 1a 75. QC fills the need to measure accuracy of payment system.
- 1a 77.
 - a. useful for early detection of OP's
 - b. claimant fraud
 - c. discovery of non-tax paying units.
- 1a 80. Critical function in identifying deficiencies.
- 1a 83. Able to sometimes detect huge OP's or fraud which normally would not be detectable.
- 1a 86. Essential as an audit program.
- 1a 90. Good way to measure errors.
- 1a 96. It is the only comprehensive assessment of a multi-billion dollar program.
- 1a 97. This is the only oversight program that checks employers, claimants and the department, and it will become more critical as we go into more automation and less contact with claimants and employers.
- 1a 99. Detection of fraud.
- 1a 101. Could be more useful if QIP studies were easier to authorize.
- 1a 102. Detects problems not detectable by normal UI procedures.
- 1a 104. A tool which allows agency to determine where mispayments are occurring that probably would not otherwise be detected.
- 1a 107. Only program available to evaluate the effectiveness of the UI system.

- 1a 116. Identifies problems before they reach crisis level.
- 1a 128. Trends are identified which can allow for corrective focusing in these areas.
- 1a 129. It's a high quality database on the State level.
- 1a 135. Serves as a useful tool to bring problems, concerns and detection of fraud to the attention of LOs and the Division.
- 1a 136. a. An oversight presence.
b. The only in-person contact for the UI program; will become more significant when filing of claims by phone is implemented.
- 1a 142. In difficult economic times, any program designed to monitor claim errors and improve procedures becomes even more valuable.
- 1a 144. BQC is the only means of oversight for the UI program, since clm't does not report to LO after filing initial claim.
- 1a 145. Could be more useful if agency used findings for
- 1a 154. Points out probability of LO lapses, fraud and other error.
- 1a 159. a. A good "watchdog" effect.
- 1a 161. it is useful for benefits personnel to know that QC is looking over their shoulder, since line supervisors are not prone to closely supervise.
- 1a 19. Potentially BQC is very useful. The level of impact is
2c solely determined by acceptance of information by the SESA.
- 1a 20. Information would be useful if the State used it.
2c
- 1a 21. Raw data is available for use. Little, if any, action
2c has been taken to analyze data for use in day-to-day operations.
- 1a 23. My State has not utilized the BQC data to its fullest.
2c It does not realize what a benefit QC could be.
- 1a 25. The data provided are very useful in doing analysis. But
2c agency is not fully or properly utilizing BQC efforts in improving operations.

- 1a 26. Errors can be pinpointed as to cause and effect. If
2c properly interpreted and corrective action taken in a timely manner, error rates
could be lowered.
- 1a 34. Provides good management info if provided regularly and
2c consistently looked at.
- 1a 35. Could be useful; needs support of upper management.
2c
- 1a 40. It could be useful for accuracy and consistency among
2c local offices.
- 1a 65. QC info is very useful but is not being used as it
2c should.
- 1a 76. Potentially useful but SESA isn't taking full advantage.
2c
- 1a 82. Could be very useful if utilized by management for
2c improvement or training.
- 1a 87. BQC is critical, but UI management has failed to act on
2c most corrective actions.
- 1a 91. Rated a 6. Potential usefulness is far greater than how
2c it is being used.
- 1a 93. Agency uses info but could do a better job by giving
2c more attention to findings.
- 1a 94. Assume its useful, but all I hear is negative comments
2c from managers about interfering.
- 1a 103. Very useful if used by SESA to improve program quality.
2c
- 1a 105. Errors are identified but no corrective action is
2c implemented.
- 1a 109. Believe it could be valuable, but it does not appear
2c to be utilized.
- 1a 112. Information could be used much more for PI;

- 2c unfortunately our agency does not use the information we discover the way it should.
- 1a 120. Data is very useful, if only the agency would choose to
2c use it. With low UI benefit rates and sufficient trust fund dollars, there is little interest in making changes to the system.
- 1a 121. It won't be very useful until it is more fully utilized
2c and understood.
- 1a 122. A lot of problems or potential problems are identified
2c which reflect a general pattern/problem in LOs if LOs would cooperate more.
- 1a 124. Can be valuable if it was used effectively.
2c
- 1a 125. a. When used by management to make changes it can
2c improve the system.
b. Some local office managers see it as a threat instead of a help.
- 1a 130. I think the program is very useful if the State would
2c use the data.
- 1a 132. If used, the information gathered is very useful.
2c
- 1a 133. Not useful if only gather data that is not used
2c properly for program improvement. By not using properly, the same data continues to be gathered over and over.
- 1a 140. Rated a 9, "if agency UI higher-ups would use and ask
2c the BQC investigators for input on a JSC basis.
- 1a 145. Could be more useful if agency used findings for
2c training/staff consistency; Instead regulations are changed to reduce the error rate.
- 1a 146. If information obtained is used properly, the result
2c should be a reduction in errors.
- 1a 153. Program is excellent but data is not being used by the
2c States to make the changes indicated by data.
- 1a 155. Could be very useful. Supervisor has no interest in

- 2c program or unit. State circumvents everything we try to do.
- 1a 156. It has shown where and what the problems are.
- 1a 158. a. It is the only oversight program for the UI program.
2c b. It advises management of problem areas, whether they want to acknowledge them or not.
- 1b Data is too limited for usefulness; must be specific to problems that need to be fixed.
- 1b 134. By limiting coding to KW errors, we are minimizing problem identification.
- 1c 48. State is manipulating data.
- 1c 88. Management above QC is manipulating the data to make the error rate seem lower.
- 1c 148. The Director has compromised the program by establishing a Review Board which reviews QC work.
- 2a 5. When error rate increases, BQC is useful in determining why, and getting the program back on track thru corrective action.
- 2a 6. Useful in pinpointing procedural problems at the LO level.
- 2a 7. Recurring problems in QC samples have been addressed by QC and administration with changes in processes, forms, computer reports, etc. being the result.
- 2a 9. The program must have checks and balances. BQC allows the program to continually improve by correcting error areas that arise frequently.
- 2a 10. Local offices make changes to avoid errors.
- 2a 13. Provided better understanding of our law and more consistent application - in some cases correction of procedures.
- 2a 24. Usefulness will increase as we switch over to all phone claims.
- 2a 28. QC, DOL And other DET departments use QC information.
- 2a 29. Rated an 8 because"State administrators are forced to take action to implement policies and procedures for Correct. Action.

- 2a 30. PI studies have led to more changes and improvements than the publication of data has.
- 2a 32. State has provided better service and more accurate decisions due to QC info.
- 2a 37. Our State is using data to make changes.
- 2a 42. Useful to determine agency errors and initiate corrective action.
- 2a 43. Detecting errors and writing corrective action to reduce future errors.
- 2a 49. Many beneficial changes have been made as a result of QC. State has used QC as a tool to help with problems.
- 2a 50. Agency does corrective action.
- 2a 51. Provides for independent monitoring, breakdowns are discovered. Findings are reported and corrective action is required for agency errors.
- 2a 52. Via a good working relationship with UI chief and director, have been able to use BQC for help in improving UI program.
- 2a 53. Provides valuable data, helps in training and helps detect potential fraud.
- 2a 59. Data has been used to modify the procedures to process and pay UI benefits.
- 2a 61. Could be improved with better communication between UI administration and QC management.
- 2a 64. Program is helping field section to locate errors and show preventive measures to LO staff.
- 2a 78. Increase in agency effectiveness and reduction of claimant fraud.
- 2a 81. Very important in error reduction and corrective action.
- 2a 84. Information gathered is used in every aspect of UI program. Used to provide training to prevent errors.
- 2a 89. Detects a pattern of error which allows management to take corrective action..

- 2a 98. Agency has the wisdom to take advantage of the QC database, which is used regularly by various departments within the agency to assist in formulation of policy, direction, corrective action.
- 2a 100. Useful.
- 2a 108. Local offices are using QC case reviews to instruct employees on correcting errors that have been made.
- 2a 118. There have been several instances where BQC data has led to improved claims methodology and UI/ES looking at things from a different viewpoint.
- 2a 119. Fraud would be more likely and abundant without BQC
- 2a 123. A primary diagnostic tool that can be used to improve the system.
- 2a 131. BQC has been very useful in detection, correction of UI error.
- 2a 137. BQC is useful to the people in the agency that know about it. Too few people understand what BQC could do for them. When they finally understand, they are really excited.
- 2a 143. QCA's take immediate corrective action if an employer or field office error is detected. QCA's have immediate knowledge of employer trends and report these trends to upper management for action.
- 2a 147. BQC identifies problems in the field that is helpful to Field Operations.
- 2a 157. Finds and leads to correction of errors.
- 2a b. Useful in error analysis.
- 2b 38. Rated a 3 because "Data shows that people make errors and statistics are gathered that have no bearing on errors".
- 2b 85. Rated a 2 because, focus is on correcting individual cases rather than using data to correct the overall system.
- 2c 2. Rated a 3, because state does not utilize the information available from the program to make improvements.
- 2c 11. Since nothing of a program improvement nature is instigated from BQC, the program provides no discernable value to the agency.
- 2c Administration not willing to discuss data.

- 2c 15. Rated an 8 based on possible usefulness, not whether it is being used to its best or fullest potential.
- 2c 22. No feedback, therefore not useful to the field.
- 2c 27. It seems like our statistical information never goes anywhere.
- 2c 33. Have not yet seen agency use QC info to improve program.
- 2c 36. Need to make corrective actions based on data.
- 2c 39. State does not use data to make changes.
- 2c 44. Data is underutilized. Analysis should lead to training for LO staff.
- 2c 45. Knowledge gained needs to be translated t practical use.
- 2c 46. Management does not utilize the data QC provides.
- 2c 55. Results are not carried thru by benefits management to aid program improvement.
- 2c 60. Data needs to be utilized.
- 2c 63. Data is rarely used by administrator.
- 2c b. Political agendas overpower QC's findings.
- 2c 92. Rated a 2 because findings are totally ignored by management and deemed to be case specific with no bearing on the system.
- 2c 106. Not being used effectively.
- 2c 110. State doesn't utilize BQC to full potential.
- 2c 111. Information is not used by the agency. I think it is viewed as a Federal "have to" program that is a basis for funding but not a tool for operation.
- 2c 113. since our State does not use the data, the data is useless no matter how accurate.
- 2c 114. No one that I know of has really exhausted the potential of this program. SESAs don't want to do much but collect the money for the program; regional seems content with that attitude.

- 2c 115. No action to correct problems. Unit has become more concerned about production for production's sake.
- 2c 127. Management doesn't make good use of the information available.
- 2c 138. I don't think the data is used to help the staff do a better job.
- 2c 160. Agency politics handicaps BQC from making a contribution to operations.
- 3a 3. rated a 9, because detection of fraud and recovery of improperly paid benefits are extremely beneficial to employers.
- 3a 4. It helps to recover a lot of dollars in OPs.
- 3a 16. Assures consistency in the way we treat our customers.
- 3a Employers have also become more informed about UI via QC.
- 3a 79. Random review makes staff more careful in how they handle claims.
- 3a 117. Keeps everyone involved in benefit payments alert.
- 3a 152. A necessary tool to insure the integrity of the administration of UI.
- 3a Gives employers and claimants quality time with an investigator to talk and understand concerns, problems about the UI program.
- 4a 17. The system must have a checks and balance program or misuse would be greater.
Claimants/employers should be told/informed about QC and its effect on them.
- 4a 139. When properly designed and administered, QC is a very important tool in our departments goal of TQM.
- 4a 149. Randomness helps everyone be made aware of the fact that claim could be reviewed. The claim should therefore be handled properly from the start.
- 4a 150. All government entities should be required to have an objective monitoring process.
- 4a 151. QC is an important part of all types of industry and government.
- 4b 14. Data is repetitious of previous year.

- 4b 18. The program does not seem to benefit the State.
- 4b 67. a. Publication requirements are too easy. Customer doesn't see. No political pressure to use QC data.
- 5 8. Do not know to what use the data compiled is put.
- 5 95. In many cases people don't understand QC and won't learn.
- 5 126. QC needs to be allowed to make changes when incorrect decisions are found instead of letting it go and coding as an incorrect payment. The program is useless if we just code and no action to correct or change.
- 5 141. Rated a 5, "we have several oversight programs, e.g., QA, BQC , etc. There should be one program only.
- 6 BQC could provide the same services in conjunction with the local office with cross training of personnel.
- 6 Require State to use data.
- 6 Data needs to be collected on non-key week errors.
- 6 Make QIP studies easier to authorize.
- 6 Expand coding to non-key week errors.

APPENDIX E

CATEGORIES IN WHICH CHANGE IS DESIRED BASED ON COMMENTS RECEIVED

1. Change use of staff.
 - 1a. More staff.
2. Stop or curtail travel.
3. Program Improvement Studies/Grants.
4. Lower sampling level.
 - 4a. Other changes in sampling.
5. Work search verification by phone.
6. Stop work search verification.
7. Base period work search verification in person.
8. Other changes in QC methodology or requirements.
9. Less oversight.
 - 9a. More oversight.
11. Change the function of the BQC program.
12. Stop publication of QC data.
 - 12a. More/better publication of QC data.
13. Change computation of error rate.
14. Organizational location of QC unit.
15. More flexibility in use of resources/program operation.
17. Add denied/interstate claims, appeals, bigger sample, etc.
19. DCI changes.
20. Eliminate BQC.
21. Hardware/Software/Hotline.
22. More Technical Assistance.
23. QC unit role.
24. Desired change is a State issue.
25. Maintain the program as it is.
- M. Refer to Monitoring Workgroup.
- NU. Comment not understood.

**SUMMARY OF DESIRED CHANGES.
BY
CATEGORY AND COMMENTOR**

	RA	UIRD	QCTL	RO	SADMs	SUIDs	QCS	STAFF
1.					2			
1A.								1
2.					1			
3.					2	5	2	5
4.					1	3	4	5
4A.					1	2	3	3
5.								15
6.								1
7.							1	9
8.					1	3	9	37
9.					1	3		1
9A.			1			1	3	12
11.			1	3	2	7	3	5
12.						3	3	1
12A.								2
13.					1	1	2	3
14.			1			1	1	3
15.			1		1	9	5	9
17.	1	1	1	1		2	4	17
19.						1	3	3
20.						5		2
21.						2	4	6
22.					1	2	1	9
23.							1	
24.							1	52
25.								1
M.								2
NU.						1	2	5
Total	1	1	5	4	14	51	52	208

BQC ASSESSMENT SURVEY

STATE ADMINISTRATORS

DESIRED CHANGES BY CATEGORY

- 1 1. Shift staff into direct service positions in the UI program.
- 1 6. Would direct staff to BPC activities.
- 2 3. Stop or curtail the wasteful travel expenditures which have prevailed from the beginning of the program.
- 3 2. Encourage more program improvement studies.
- 3 d. Eliminate all paperwork currently required by DOL to request use of BQC resources for UIS program improvements.
- 4 4. Reduce caseload.
- 4a 5. Pull a sample only periodically and utilize resources for claims processing and/or processing improved initiatives.
- 8 8. a. Decrease the level of detail required by current BQC methodology.
- 9 b. Decrease the level of oversight if the State's BQC program demonstrates proper methodology and timely completion of cases.
- 11 7. Replace BQC with a time measurement/management tool that will result in some program improvements. The current BQC program appears to have a single objective: To publish benefit payment error rates on a national basis.
- 11 10. Use to assess quality of program - measure continuous improvement.
(rated 1 for usefulness - "continuously measuring same information - does not indicate significant change.")
- 13 9. Somehow incorporate BPC data with BQC to produce a true error rate.
- 15 c. Allow States more flexibility in the number of case audits so we can focus on areas creating improper payments.

22 11. More training and technical assistance from the RO and NO.

* from RA comments:

17 Errors of "nonpayment" needed to be included so the program has balance.

BQC ASSESSMENT SURVEYS

STATE UI DIRECTORS/MANAGERS

DESIRED CHANGES BY CATEGORY CODE

- 3 b. Less bureaucratic requirements/restrictions on performing special studies.
- 3 15. Procedures are too formal and time consuming for PI studies. Let RO approve short term studies.
- 3 19. Additional flexibility in conducting UI program improvement studies; this could be in the form of mini studies that don't have to go through the formal approval process.
- 3 20. Allow program improvement studies/activity based on UI data that is other than QC collected data.
- 3 38* Elimination of special studies. QIP has reduced the usefulness of BQC program.
- 4 2. Reduce sample size on a permanent basis or conduct sample analysis once each year for randomly selected payments.
- 4 b. Reduce sampling
- 4 8. a. Reduce sampling levels.
- 4a 24. Allow a hiatus in regular BQC so the QC staff can be used to develop program improvement and assist in implementation. Then return to full BQC. Allow that in alternating cycles.
- 4a 27. Periodic temporary discontinuation of sample so that resources can be applied to corrective action plans.
- 8 Allow more non-inperson contacts.
- 8 35. Change some current procedures which are not cost effective; eliminate inperson interview requirements on some procedures.
- 8 37. Flexibility to limit sample to early stages of claimant duration.

- 9 c. Reduce federal review.
- 9 18. Less Regional monitoring or at least consistent monitoring between Regions.
- 9 29. Less monitoring
- 9a 13. Greater Federal mandate for use of QC data for PI and monitoring to ensure it's done.
- 11 1. Phase out current BQC process since no new information is being identified and have BQC assume workload validation and quality appraisal function.
- 11 3. Should be limited in spending resources for detection and more positive use of resources in prevention.
- 11 b. De-emphasize problem identification and continue to move toward problem resolution.
- 11 7. Just give us the dollars to strengthen BPC. We know what the problems are.
- 11 14. Inclusion of more validation/QA elements and measures.
- 11 17. Reduce emphasis on error rates and give States flexibility to work on correcting problem areas that can be affected.
- 11 30. a. Use RQC model which is less staff intensive.
b. Use resources to fix process problems.
c. Integrate program with claims function rather than separate.
- 12 4. a. Eliminate publication of data. QC is for internal improvements not external consumption.
- 12 6. a. Elimination of public reporting.
- 12 12. a. Data publication has little program improvement impact.
b. Publication leads to comparison, which leads to establishment of policies which reduce the error rate for publication purposes only.
- 13 c. Exclude, eliminate or separate completely uncontrollable on(sic) non-SESA error rates from SESA error rates.
- 14 5. a. Insist it be part of the State UI management structure; not require it to be separate.

- 15 c. Give States more flexibility with QC resources.
- 15 c. Unreasonable adherence to case load/time frames when encountering personnel problems.
- 15 9. More flexibility.
- 15 23. More flexibility for States to make changes.
- 15 26. It would be more beneficial to reduce the sample load and utilize BQC staff in other ways such as LO reviews; in depth studies.
- 15 28. Allow for reduced evaluation of cases if proper payment rate is above 90%. Use part of staff to measure only administrative problem and develop strategies to improve performance where errors are caused by controllable factors.
- 15 31. More flexibility in the use of the funds.
- 15 34. Continue with core federal BQC requirements and studies and also provide states with resources to study state specific issues, i.e. enhance with a process that has more flexibility- thus usefulness- than the QIP. Frequently states would like to study issues that are not always approveable for a QIP.
- 15 36. Flexibility to use resources at the discretion of the administrator. Don't need 11 FTE's for this area. Cut the program (sample?) in half and allow states to move resources to overpayment problems/education activities.
- 17 11. Sampling into new areas such as interstate and denied claims; possibly alternating specific fields of sampling so that each area of study is visited every two to three years.
- 17 16. Addition of interstate and denials.
- 19 d. Reduce coding of minutia.
- 20 10. Cancel the program.
- 20 21. Either drop BQC or totally revamp to something similar to Revenue QC.
- 20 22. It may be too late to change BQC to make it palliatible.(sic)
- 20 25. The BQC program cannot be improved in its present format. It must be completely abolished.

- 20 32. Elimination.
- 21 c. Additional equipment for QC is questioned. Want to use equipment resources for other purposes in the State.
- 21 d. BQC staff has to support QC's PC rather than DP, due to incompatibility with main frame.
- 22 More technical assistance from RO.
- 22 33. More focus and technical assistance on the application of BQC findings, including the incorporation of the application of BQC findings into a performance standard.
- NU b. More studies as they currently exist and some similar to RQC audits.

* Added from comments on usefulness.

- * UIRD comments:
- 17 Denied claims and interstate claims should be addressed thru periodic identification or special study. They should not become part of the QC sample.

BQC ASSESSMENT SURVEYS

STATE QC SUPERVISORS

DESIRED CHANGES TO BQC PROGRAM BY CATEGORY CODE

- 3 3. More latitude in how we conduct PI studies, even if they touch on parts of the UI program not visited by QC.
- 3 19. Make it easier to do program improvement studies.
- 4 9. Reduce sample size and redirect resources for corrective action.
- 4 24. Less case sampling so it frees resources to explore problem areas. More computer training.
- 4 27. a. Allow state to not sample during two weeks per year.
- 4 34* Reduce sample size and redirect resources for corrective action even tho some precision in data might be lost.
- 4a b. temporary suspension of audits to allow work on special projects.
- 4a 22. Regimented BQC procedures, so valid comparative data can be collected, be in place only one year out of every three. Remaining two years the program be operated at State discretion. this would continue to provide a base line reference point and provide better utilization of resources. In the two years the State could use staff for program improvement—customer surveys, concentrate on high error categories, etc.
- 4a 32* Year round sampling seems excessive.
- 7 17. Base period verification in-person again.
- 8 8. a. Establish BQC accuracy level; NO/RO concerned about timeliness but not accuracy.
- 8 11. Expand in-person audits in anticipation of the greater impact of automated and less in-person processing.

- 8 13. a. non-inperson methodology on claimant interviews and work search.
- 8 b. Case completion is when the QC findings are complete; not after the adjudication of a found issue.
- 8 c. Since QC is a statistical data gathering instrument, OP's should not be set up, unless fraud is involved, as this results in discrimination.
- 8 20. a. Take the next step in alternative methodology and allow completion of the QC investigation by telephone - less paperwork.
- 8 b. Eliminate KW error summary worksheet. (who uses it, what for)
- 8 23. Scale back the use of alternative methodology in order to maintain credibility of findings. QC needs to enhance its reputation for tough audits, not diminish it.
- 8 d. Allow more flexibility in work search verification.
- 9a 4. (Wants BQC changed to have) teeth.
- 9a c. A stronger partnership between SESA QCs and USDOL.
- 9a c. More frequent communication among all participants; States, Feds, etc.
- 11 c. More integration of QC program into other areas of UI system.
- 11 29. Change focus from a number tracking database to quality tracking (countable ERP, Nonmon meets QPI, Employer responded to Dept. inquiries, ES info on jobs, etc.).
- 11 33* states should be allowed to couple quality improvement efforts with error measurement.
- 12 b. Stop publishing BQC data.
- 12 10. a. Change the publicity campaign.
- 12 35. Avoid comparing States which is done in the annual report.
- 13 b. Change the error coding structure. Finality payments are not errors; sub-category of proper payments.
- 13 31* a DLA for error rate as an incentive to lower the rate.

- 14 6. a. Move BQC out from under jurisdiction of UC management to reduce political influencing.
- 15 b. Build in more flexibility in order to overcome personnel problems.
- 15 12. Flexibility to utilize resources for other purposes related to improving the operation of the benefits program.
- 15 15. States with very low error rates should have flexibility in how often cases are sampled for investigation in order to save resources spent on QC.
- 15 18. Total flexibility in investigative methodology.
- 15 30. a. Allow QC management more prerogative in deciding the most effective investigative methodology for the specific situation/area.
- 17 7. a. Continue to expand into other areas, i.e. appeals, denied claims.
- 17 16. a. Nonmonetary denial reviews.
b. Monetary ineligible claim reviews.
- 17 28. Add denials.
- 17 b. Include denied claims.
- 19 b. Eliminate elements of no value; allow staff to incorporate elements of benefit to SESA.
- 19 14. a. Reduce coding elements that do not pertain to the payment.
- 19 21. Let each State decide on the data elements needed and design their own BQC system to suit their needs.
- 21 2. Hardware/software releases are terrible. We should not be the testers. There are an excessive number of bugs when states receive it. This should not be the case.
- 21 c. Hardware people need to get their act together, i.e. SPARC installation. "Get it right the first time".
- 21 b. Test software thoroughly before sending out.
- 21 c. Correct problems on the hotline (slow, in the dark).

- 22 26. More regional/national training for investigators.
- 23 1. A more significant role in the implementation of corrective actions with the authority to follow up on these measures. Also the wherewithal to train and give training to personnel so they have the tools necessary to perform their jobs with confidence and satisfaction.
- 24 5. Should be code for SESAs unwilling to follow State written law and policy. Should be mandates to States to issue appropriate decisions when uncovered by QC.
- NU c. Tracking nonmonetary decisions and the recoupment of overpayments.
- NU 25. Modification of the sampling and expansion of automation to include UI procedures and policies as UI automation takes place.

* Added from comments on usefulness.

Comments of Regional teamleaders:

- 9a 5. Recommend a strongly proactive "selling" role be played by NO staff with State UI directors.
- 11 4. Move from a gotcha process to a process oriented system. How about a blend of RQC/QPI/QA assessment tool?
- 14 3. Effort should be made to integrate BQC into mainline UI.
- 15 2. State should determine what they need from BQC rather than the FEDs determining.
- 17 1. Include interstate claims. Do not expand QC program but at certain times of the year include interstate claims, maybe for 1 or 2 weeks or as a special study.

BQC ASSESSMENT SURVEYS

STATE QC STAFF

DESIRED CHANGES BY CATEGORY

- 1a 109. Additional investigators.
- 3 Allow some leeway on special studies instead of all the hoop jumping.
- 3 b. Once again allow QIP studies to better the program.
- 3 80. a. More follow up on PI recommendation until they are implemented or explained.
- 3 128. Possible special studies as we identify characteristics and trends of improper payments.
- 3 150* Provide easier authorization for QIP studies.
- 4 15. Either increase the number of auditors or decrease the caseload. Level of stress is extremely high.
- 4 87. a. Case sample reduction.
- 4 103. Reduced caseload.
- 4 113. a. Decreased number of cases.
- 4 138. a. reduction in sample size.
- 4a 29. Do reviews in conjunction with other types of review such as Quality Appraisal. QC should be on-going but not a weekly sample.
- 4a 132. To maybe select cases in areas or other designations other than weekly random selection.

- 4a 137. a. Concentrate sampling to areas of high incidence of error.
- 5 26. More flexibility in verification of work search.
- 5 44. Telephone verification of work search.
- 5 61. Verify Work search as the contact was made VS. investigative discretion.
- 5 72. a. telephone verification of work search.
- 5 94. Allow telephone verification of work search. In-person is often creating very bad PR with employers.
- 5 97. Do all WS verification by phone.
- 5 104. Work search verification by phone.
- 5 116. a. All work search verification by phone/mail.
- 5 127. No in person work search verification required.
- 5 129. Work search verification of NO and Maybe responses should be verified by telephone.
- 5 133. Eliminate requirement to verify most work search contacts in person.
- 5 134. The requirement to travel and verify inperson job contacts is ludicrous bureaucratic nonsense and a waste of tax money. If an employer says by phone that a claimant did not make the contact, that should end it.
- 5 136. Work search verification should be done by phone.
- 5 c. verify ESW's (WS?) by phone when possible.
- 5 146. Work search verifications that are unverifiable should be allowed to be done by telephone rather than inperson.
- 6 59. Drop the requirement for work search verification.
- 7 1. Return to completing wage review in person.
- 7 Wage verification should be done in person; errors are sometimes missed when doing by phone.

- 7 18. Return to inperson employer audits to improve accuracy of BP wages used.
- 7 b. We should not have given up the inperson contact with employers for BP wages as this also could be used for employer relations and assessing training needs.
- 7 b. In-person (wage) audits the norm with exceptions.
- 7 78. Require base period wage audits in-person.
- 7 b. In-person wage audit for better integrity.
- 7 120. Wage verification completed in person with signature from employer.
- 7 would prefer to verify BP wages in person rather than WS.
- 8 2. More flexibility on questions on the claimant questionnaire.
- 8 4. More flexibility on claimant questionnaire and coding.
- 8 6. More automation, lap-top computers, direct contact with employers thru computer resources, etc.
- 8 7. Dispense with wage verification for employers who have history of correct reporting. Verify totals only.
- 8 27. More options in methodology and flexibility for method of verification.
- 8 30. Eliminate case summary and replace with a report to agency office including error cause and recommendation for corrective action.
- 8 43. Less emphasis on time lapse.
- 8 47. a. All Verification by most expedient and logical method.
- 8 48. Make claimant participation mandatory and allow use of phone/mail/fax to complete questionnaire.
- 8 52. Ability to select specific cases (with fraud or error probability?)
- 8 66. Revert to inperson verification and reduce case load accordingly for more reliable information.
- 8 67. Go back to in-person audits. Info is much more reliable.

- 8 c. More realistic Federal standards.
- 8 79. a. "selective" audits
- 8 82. a. Expand deadline on cases from 60 to 90 days.
- 8 b. allow more phone/mail verification.
- 8 85. a. Conduct out-of-State PI's (personal interviews?) via mail or telephone.
- 8 b. Limit case investigation to present claim year; exclude prior year claims.
- 8 89. Eliminate work search verification when claimant has verified KW earnings. Effort is redundant.
- 8 98. a. stratified sampling.
- 8 101. Elimination of requirement that claimant complete questionnaire. Better and/or more complete information is obtained when investigator conducts interview in majority of cases.
- 8 102. a. Allow all areas of investigation to be done by telephone, mail or fax in order to eliminate the expense and danger of travel.
- 8 110 a. Error rate standards might encourage corrective action.
- 8 b. Funding allocations based on performance.
- 8 b. Elimination of unnecessary work, i.e. worksearch verification, JS registration policy, INS SAVe, investigative summaries.
- 8 125. a. Make alternative methodology an option to be used only after in-person attempts have failed. Using alternative methodology as a primary methodology creates errors and extends the completion time for a case.
- 8 130. a. Start valuing correctness as highly as timeliness.
- 8 b. What is the value of interviewing claimants in person? Claims are not set up that way in this state. Inperson claimant interviews are impractical in a state this large.
- 8 131. A method to better conduct the wage audit yet the information is correct.
- 8 135. a. Less extraneous info on claimant questionnaire.

- 8 b. more flexibility in verifications.
- 8 142. Collection of information about procedural errors or deficiencies which do not result in a payment error but still should be addressed.
- 8 145. More flexibility concerning all types of verifications.
- 8 147. a. Establish a minimum acceptable error rate. Make the States show corrective action when the error rate goes above the minimum.
- 8 149* Collect data on non-key week errors.
- 8 151* Expand coding to non-key week errors.
- 8 155. Modify claimant questionnaire to reduce to about 10 questions or do away with altogether.
- 9 106. Federal monitoring not as intense and detailed.
- 9a 20. Better management support and oversight of SESA disbursement of QC funding.
- 9a 22. A stronger mandate requiring State UI agency to utilize BQC findings and report those findings.
- 9a 32. Spend time with regional staff to discuss findings and meaning of our data.
- 9a 39. Mandate for SESA administrators to use the program data in their policy making.
- 9a 112. More Federal guidance and tighter controls.
- 9a 119. Require management to make better use of information discovered by BQC.
- 9a b. Feds get tough on use of data.
- 9a 115. a. A requirement that SESAs show steps taken to address problems found by QC.
- 9a 139. QC managers need some federal support.
- 9a 144. More follow up by State agency and feds to insure areas of improper payments and procedures are corrected.

- 9a 148* Require States to use data
- 9a 154. Ask States for changes made to reduce error and publicly identify changes made that improved operations. Get DOL to recognize and hype the State for its program improvement actions.
- 11 10. Elimination of sample. Use of QC investigator expertise in reviewing/monitoring other agency procedures / WLW, QPI, PMR. etc.
- 11 51. More procedural/systems investigations.
- 11 91. De-emphasize BP wage verification and shift resources to longitudinal and experimental studies dealing with significant error rates associated with earnings, work search and claimant reporting responsibilities.
- 11 114. a. With the switch in emphasis to reemployment, QC should be used to show the effectiveness of placement efforts and where the ES system might be improved.
- 11 b. I think BQC should be more like RQC where you check to make sure that internal controls are in place. BQC could be broken into several different functions of claims activity.
- 12 122. a. Publishing the data does not accomplish anything and leads to comparisons between states.
- 12a 63. a. Publication of Annual Report (p.1&2) on the front page of largest circulated newspaper in each State with details of cost of errors to customer.
- 12a b. Annual report in at least one statewide newspaper when media fails to utilize press release.
- 13 b. Make the Annual Report clear that the error rate is an estimate based on sample and not an exact error rate.
- 13 b. Inclusion of non-keyweek errors in statistics.
- 13 b. Elimination of formal warning exclusion which facilitates wholesale closeting of QC and creates inequities in State outcomes.
- 14 84. Have QC staff report to agency director and not UI chief.
- 14 118. a. More autonomy from fraud BPC unit.

- 14 126. Do not keep BQC under UI management. Valid changes cannot be made if management disagrees.
- 15 5. More flexibility by States in tailoring BQC program to program improvement actions as needed.
- 15 Also need "burn-out" prevention as there is no break from case assignments when on vacation.
- 15 37. More flexibility, a larger sample,
- 15 64. a. More flexibility in the program(?)
- 15 74. More flexibility in QC methodology.
- 15 83. More State flexibility.
- 15 88. More flexibility in case investigations.(methodology?)
- 15 b. More latitude for BQC field people in conducting audits.
- 16 21. Have the ability to drop cases that are very difficult and would take double the normal hours to complete. Many cases take 30+ hours to complete. Very few cases take 15 or less hours to complete.
- 17 19. Inclusion of interstate claims in population.
- 17 Investigation of ineligible claims. Claimants filing weekly certifications while awaiting appeals.
- 17 25. Identify problems in Federal programs, TRA, FSC, etc.
- 17 41. The addition of denied claims.
- 17 42. To examine denied claims.
- 17 48. Include denials.
- 17 53. a. expand program so that each LO/major LO would have a resident QC analyst.
- 17 55. a. Expansion of audited areas.
- 17 60. Review denied claims.

- 17 68. A bigger sample.
- 17 b. Examine denied claims.
- 17 b. Add denials and RQC.
- 17 90. Add LO program reviews, appeals, denials.
- 17 108. Inclusion of denied claims.
- 17 121. Expansion of QC into other SESA departments, in addition to benefits and revenue.
- 17 b. Add denied claims.
- 17 153. Addition of denials.
- 19 Reduce coding items.
- 19 69. Expanded coding to include reasons for no-KW errors.
- 19 92. More flexibility in coding
- 20 36. Probably eliminate it.
- 20 111. Unless this survey detects some use for the data, BQC should be eliminated.
- 21 8. More user friendly software packages for statistics work.
More advanced technology in field equipment - laptops with fax/modem capabilities.
- 21 More computers, PC's, lap tops with software to improve productivity of QC staff.
- 21 12. Better integration between PC's and federal computer.
- 21 54. Updated computer and wordperfect equipment.
- 21 71. Improve capability of computer system.
- 21 96. More up to date computer equipment and software.

- 22 9. More training for investigators - interaction with other States. It's a good program.
- 22 62. Increase training and staff.
- 22 More involvement of DOL/ETA working with administrators to stress importance of working toward program improvement.
- 22 c. More ETA training.
- 22 107. More training provided by DOL.
- 22 138. More training, to increase consistency.
- 22 140. Yearly meeting to express opinions and ideas with other States.
- 22 141. Require regional training on a timely basis for investigators.
- 22 143. a. More training.

- 24 Authority to request implementation of corrective action to improve quality of product.
- 24 Improved support staff, clerical available.
- 24 Special studies which our BQC has not addressed to date.
- 24 13. We need to get rid of two or three layers of supervision. It would be more effective in our State if we answered directly to DOL director or directly to the Feds.
- 24 14. Give control of QC monies back to QC. Our administrator restricts its use.
- 24 16. We need a fax machine, cellular telephones because of extensive travel.
- 24 Desperately need on-going training and update on State policy and local office procedures.
- 24 17. More tools for dealing with employers.
- 24 23. More input into budget and expenditure of State QC funds.

- 24 24. Need to use QC to use data as a teaching guide so that errors are corrected where they occur and staff learns correct procedures.
- 24 28. Change from Random audit to Quality control. Need a commitment from management to producing a better product.
- 24 31. Better use of info by SESA.
- 24 33. Better support from system administration staff when new computer systems are introduced.
- 24 34. Upper management needs to show some interest and utilize the program in a positive manner.
- 24 35. More training.
- 24 Implementation of findings to improve service and accuracy.
- 24 38. Use of data to compare performance between local offices.
- 24 40. More QC involvement in the training of UI staff and the improvement of UI and ES operations.
- 24 45. Constructive utilization of data by management.
- 24 46. Utilization of QC staff for training of LO.
- 24 49. Telecommuting for QC staff.
- 24 50. More time to complete work or more people to help when staff is on leave or there is turnover.
- 24 b. Laptop computers for each analyst.
- 24 b. More hands on involvement (of QC) in procedural changes.
- 24 56. a. Increased utilization of QC info gathered.
- 24 c. Corrective actions taken to consistent problems found in the field.
- 24 57. Annual reports in this state tell administrators what they want to hear rather than the actual (picture).
- 24 58. QC control of funding and personnel.

- 24 b. Better use of results by our agency.
- 24 65. a. Use QC to find out what the employer community see as their future needs from ES and UI.
- 24 70. Change work search policy (at State level) to require a more systematic search or do away with it.
- 24 73. a. Increased awareness of and utilization of valid QC findings.
- 24 75. a. Increased liaison with UI benefits
- 24 b. Cooperation with chief of Benefits.
- 24 76. a. check on LO procedures/compliance.
- 24 77. a. Utilize BQC as a training indicator.
- 24 81. a. Data should be used for training.
- 24 b. Possible error tracking for field personnel.
- 24 93. More support for correction of problem areas, not just redoing policy.
- 24 95. Use of info for corrective action.
- 24 More support with solving UI program issue; need new solutions and monies to implement. Emphasis should be placed on ways to increase accuracy and timeliness of benefit payment system.
- 24 b. penalties or recourse for employers/claimants who refuse to participate.
- 24 99. SESA should improve pursuit of corrective action.
- 24 100. Would like to see BQC findings used in establishing corrective action.
- 24 105. QC findings should be presented directly to local offices with solutions.
- 24 c. Better coordination with programs that review LO performance and non-monetary determinations.
- 24 b. More cooperation from Admin. Depts. to correct problems found.
- 24 117. a. More impact on LO claims procedures and policies.

- 24 b. Closer involvement with training as the two should be used together to improve the system.
- 24 b. More personal direction from the UI director, or agency directors and philosophy.
- 24 124. More training for staff, flextime for investigators, so time management will be efficient.
- 24 b. Support from supervisor.
- 24 b. Don't allow States to rotate QC personnel, or use QC as a training program.
- 25 123. Keep program as is.
- M b. Regional monitors need to be consistent and familiar with UI law.
- M b. More consistency in RO monitoring and better knowledge about the investigators field work.
- NU 11. Add areas where federal funding is used but not currently reviewed.
- NU b. More PI's on national level.(?)
- NU 86. Customer satisfaction surveys.
- NU b. Claimant follow-up, - pass/fail - so that results are tangible.
- NU 152* BQC could provide the same service in conjunction with the local office (via LO staff?) with cross training of personnel.

* added from comments on usefulness.

** Added from Regional UI staff comments:

- 11 2. Change focus from statistics to provide the flexibility to concentrate on problem areas
- 11 3. Spend our resources providing leadership and guidance up-front instead of playing gotcha.
- 11 4. Use BQC resources to initiate/require program improvement and customer service.
- 17 1. Add benefit charging to BQC.

