

Unemployment Insurance (UI) Benefit Operations Self-Assessment Tool: *Overarching Operational Matters*

This self-assessment review of the state's Overarching Operational Matters will examine overall UI program processes that may impact the UI program across the various functions reviewed in other parts of the self-assessment tool. Overarching Operational Matters include key overarching policies, procedures and functional areas that can impact overall program integrity, performance and service delivery. The reviewer will consult with appropriate staff regarding each operational element to ensure accurate and complete information is captured and reported. This will include consulting with Unemployment Insurance (UI) administrators, Information Technology (IT) managers, performance management staff, and fiscal officers.

UI Benefits operations are multi-faceted and multilayered often involving more than one office or department. There are functional areas that are cross-cutting and the reviewer will need to identify individuals who need to be involved in responding to the questions. Any recommendations that result from the self-assessment should be provided to the policy leaders/managers for consideration. Upon completion of this review, the results should be shared with UI administrators, appropriate program manager(s), and supervisors. The self-assessment findings can provide a very good analysis of the state's overall UI operations and can be used to drive process and program-improvement initiatives.

A comments section is provided for each operational element, which the reviewer should use to document any observations regarding issues identified relating to that specific operational element. This space may also be used to provide any additional information relating to a specific question in the separate sections of the self-assessment instrument. In doing so, the reviewer should reference the specific question by number and insert the additional information related to that question.

In addition, a concluding comments section is provided at the end of the self-assessment instrument. It can be used to capture any strength(s) identified by the reviewer concerning the overarching operational matters which could constitute a successful practice(s) that can be shared with other states; any issues identified by the reviewer that adversely impacts the state's performance and to identify any possible corrective actions to address the issue. It may also be used to document overall general comments. The reviewer can provide information here that state UI administrators and managers can use to evaluate program operations and the state's effectiveness in providing quality services. Federal reviewers may also be able to use the information is providing technical assistance to the state.

Save your entries regularly as you complete the review and when you close the self-assessment to ensure your answers are saved.

SECTION 1: Policies, Procedures, and Confidentiality

The purpose of this section is to review the policies and procedures provided by the agency for staff to use in the general overarching operational matters of the UI program. These are the written (e.g., in hard-copy, electronically or both formats) standards, instructions, and guidelines that staff regularly use in the operation of the program. The reviewer may utilize resources that include manuals, handbooks, desk aids, computer help screens, training guides, organized collections of procedures or policies, or other readily accessible instructions which can help staff do their work correctly. Instructions will normally include general information such as compilations of relevant laws and regulations, as well as detailed instructions for carrying out individual jobs in the agency. The reviewer may need to examine all relevant instructions and consult with UI administrators, appropriate managers, supervisors, and staff.

The self-assessment is designed to help states ensure proper administration of the UI program. It can also help ensure that program operations encompass strategies and practices that accomplish the basic goal of delivering quality services in the most cost-effective and timely manner to achieve operational efficiencies. The reviewer will document whether the state has policies and procedures sufficient to provide guidance and instruction to staff to properly carry out their duties. Existing policies and procedures should be examined to determine whether they are up-to-date and address all law changes, organizational changes and technology changes that occurred during the review period.

Helpful Info.

Question 2b: The reviewer will document any changes that were made to the state's Administrative Regulations during the review period.

Question 3: The reviewer should review [29 CFR 97.42](#) to ensure the state's policies and procedures regarding the retention of UI records are consistent with Federal regulations (e.g., maintaining records for three years, etc.).

Question 4: The reviewer should review [20 CFR § 603](#) and assess the state's policies and procedures regarding confidentiality of UI records to determine if they are consistent with Federal regulations.

Helpful Info. (continued)

Question 6a: The reviewer will document the state's procedures for handling incidents where confidential information is provided to or obtained by an unauthorized party. (If space is not adequate to fully respond to this question, the reviewer may use space in the Comments area at the end of this section.)

Question 6b: If the state's procedures for handling incidents where confidential information is provided to or obtained by an unauthorized party vary depending on the type and magnitude of the breach, the reviewer will document the types or levels of breaches for which the state has developed procedures and the processes to be followed under each scenario.

SECTION 2: Training

Managers/employees should possess and maintain a level of expertise which enables them to accomplish their assigned duties. Training systems should be sufficient to ensure that personnel understand and perform their duties properly. When reviewing training systems, the reviewer should consult with the state's training unit/staff and examine formal training procedures (e.g., the training is conducted using an established schedule and using set guidelines to make judgments about the quality of work being produced). The state should have procedures for identifying general and specific training needs, for developing a training curriculum and training materials, and for delivering training as needs are identified.

Helpful Info.

Question 4: The reviewer will document how UI agency employees (including state employees and/or contractors) are trained in the proper handling and safeguarding of confidential UI claim information and the penalties for unauthorized use of confidential claim information.

SECTION 3: Workload Analysis/Management Controls

The reviewer will examine the state's plans, if any, for managing workloads, particularly through periods of unforeseen spikes in workload. The reviewer will document the methods used to identify process-improvement initiatives. The reviewer will interview the UI administrator and program managers to thoroughly document the state's practices for managing its workloads.

Helpful Info.

Question 1a: If the state has a systematic plan to manage workload increases, the reviewer will document the key elements and methods reflected in the plan. *(If space is not adequate to fully respond to this question, the reviewer may use space in the Comments area at the end of this section.)*

Question 2: Describe the methods the state uses to identify business process improvements or business process analysis initiatives. *(If space is not adequate to fully respond to this question, the reviewer may use space in the Comments area at the end of this section.)*

SECTION 4: Performance Management

The reviewer will examine the state's practices for monitoring program performance and compliance with Federal and state laws and regulations. The reviewer will examine the use of Benefit Accuracy Measurement (BAM) data and results and any organizational changes impacting BAM operations. If the state has a performance management unit, the reviewer should consult with performance management staff in addition to UI administrators and program managers when completing this section.

Helpful Info.

Question 2: The reviewer is to identify the responsible unit or office. This may be a performance management office within the UI operations, the UI Director's office, an agency-wide/department-wide office, or some other entity.

Helpful Info. (continued)

Question 4: This question seeks to identify the organizational placement of the reviewer(s) who conducts and completes this self-assessment instrument and review. The response should indicate if the reviewer(s) is part of the UI operations; independent and separate from the UI operations, or is organized in some other structure. If the appropriate response is “Other Organizational Structure,” the response should be explained in the space provided.

Question 5a: The reviewer will document any organizational changes implemented during the review period that affected BAM operations.

SECTION 5: Information Technology

The state’s IT operations related to projects completed during the review period and planned for the future are examined. The reviewer will assess the IT department’s delivery of programming and technical support to the UI programs. Having a disaster recovery plan as well as contingency planning to implement emergency procedures with a short lead time is vital to continued operations under extreme conditions.

Helpful Info.

Question 2a: If the state is involved in any UI-IT modernization efforts, the reviewer will document the status for each of the designated programs applicable to the state’s project(s).

Question 5a: If the state has future plans for any IT projects for the UI Benefits, Appeals, or Tax systems, the reviewer will describe the projects expected start dates and duration.

Question 6: If the answer is “no” to any category of technology noted in the question, the reviewer should use the Comments area at the end of the IT Section to provide details on any area not having adequate staff support.

Question 8: If the state UI agency’s IT operations is supported with an available disaster recovery site, the reviewer should indicate the nature of the site. If one is not available, the reviewer should select “N/A”.

Question 9b: If the state has a contingency plan, the reviewer will document the date and results of the last test of the plan.

Helpful Info. (continued)

Question 12a: If the state conducted a threat assessment technical review of its Internet-based applications during the review period, the reviewer will document the date and results of the test.

Question 15: If the state was required to submit a Corrective Action Plan (CAP) the reviewer will indicate the reason for the CAP and the explain the actions that the state is taking to meet these requirements in the Comments area at the end of the IT Section (see [Handbook No. 336](#), Chapter I, Section VIII – Assurances, items H and J).

SECTION 6: Access and Communications

The reviewer will examine the state’s methods related to program access and communications with claimants, employers and others in conducting its UI program operations during the review period. Methods used must comply with requirements set forth in Federal law and must meet Federal regulations and guidance regarding accessibility. The reviewer will capture basic information regarding system functionality. The reviewer will consult with UI administrators and program managers when completing this section of the self-assessment instrument.

Helpful Info.

Question 1: The reviewer will document whether each of the listed communication systems used to deliver services meet accessibility standards in accordance with Section 508 of the Rehabilitation Act ([29 U.S.C. 794d](#)), [UIPL No. 30-11](#), [UIPL No. 02-16](#) and the state’s accessibility guidance or standards, if different. The reviewer will need to review the accessibility standards and guidance and apply the requirement to evaluate each communication method.

Question 6: The reviewer will indicate all of the state’s primary access points (checking all that apply).

Helpful Info. (continued)

Question 7: The reviewer will document all alternative access points/communication methods the state provides for individuals with access barriers. The response should note the alternatives available based on the type of access barrier, including, but not limited to individuals with disabilities, individuals with limited English proficiency (LEP), individuals who are not computer literate or may not have access to computers, and individuals who are illiterate in their primary language.

Question 8: The reviewer will document all methods the state uses to publicize the alternative access points to the public.

Question 12: The reviewer should review Section 188 of the Workforce Innovation and Opportunity Act (WIOA) ([P.L. 113-128](#)) and relevant regulations implementing WIOA related to Section 188 to determine whether the state is in compliance with these provisions.

SECTION 7: Operational Efficiency/Resource Allocation

Through interviews with UI administrators and program managers the reviewer will identify efficiencies and automation the state has taken advantage of to improve performance and provide better service to the public.

Helpful Info.

Question 1a: The reviewer will document any initiatives the state conducted during the review period concerning its facilities to improve program efficiency.

Question 2a: The reviewer will document any initiatives the state conducted during the review period concerning its service delivery methods to improve program efficiency.

Question 4a: The reviewer will note if the state agency uses bar codes on documents or forms provided to and received from claimants, employers or other parties. The reviewer can use the Comments area at the end of this section to provide any relevant information on the use of bar codes on its operations.

SECTION 8: Staffing / Merit Staffing

The reviewer will examine staffing levels during the review period. The reviewer should consult with UI administrator, program managers, and the state agency’s human resource manager(s) when completing this section of the self-assessment. The use of merit and non-merit staff will be reviewed in this section. The reviewer should understand the merit staffing requirements and review [UIPL No. 12 – 01](#)).

Helpful Info.

Question 1: The reviewer will document the percentage of UI staff in each category described, during the review period.

Question 2: The reviewer will report whether the state employs any non-merit staff in each of the noted UI functional or program areas. If so, the reviewer should note the positions the non-merit staff hold and their duties and responsibilities in the specified program area.

Question 11a: The reviewer will document the methods used by the state to formulate, for planning purposes, a layoff plan for UI employees.

Question 12: For each of the functional or program areas indicated, check the “Plan developed” box if a succession plan has been developed for that area. If a plan has been developed, indicate the date it was last updated in the space provided. If the state has no succession plan in a particular area, leave the response blank.

SECTION 9: Fiscal Management

The reviewer should consult with UI administrators, program managers, and the state agency’s fiscal officer to determine whether the state’s practices for managing its UI grants are in compliance with Federal and state laws and regulations and to determine the degree to which budget and staffing information is shared with management staff to aid in managing workloads and staffing levels.

Helpful Info.

Question 1: The reviewer will document the methods used by the state to ensure that a grant was not charged unallowable costs based on applicable cost principles and the provisions of the grant agreement, such as time and cost accounting systems, etc.

Helpful Info. (continued)

Question 7a: The reviewer will document any issues the state experienced during the review period in the obligation and expenditure of the state's grant funds.

Question 8: The reviewer will determine whether the state's UI program has adequate controls in place to ensure individual employees do not have access to complete transactions from start to finish without adequate internal controls for separation of duties (e.g., another employee's involvement). Activities/transactions to review include fiscal activity such as cancellation of benefit payments, issuance of large benefit payments, handling of trust fund transfers/disbursements, etc.

Question 16: The reviewer will document the methods the state uses to ensure administrative grant funds are deposited and transferred in accordance with state and Federal regulations.

SECTION 10: Concluding Summary Comments

The reviewer will use the Concluding Summary Comments section to highlight the state's strengths and weaknesses that impact overarching UI functional areas and identify issues that have not been addressed in any other section of the self-assessment instrument. These comments are intended to provide Federal reviewers and the state's UI administrators with additional insight into these program areas, focusing on methods that have proven to be successful and can be capitalized upon or areas where corrective measures may be needed.

The first comment area provides the reviewer an opportunity to share any examples of good and/or exemplary operations in the overarching operational matters after reviewing each operational element. The reviewer can use this space to identify any policy, procedure or operation that would constitute a successful practice that can be shared with other states.

The second comment area provides the reviewer an opportunity to document issues detected during the review that are having an adverse impact on any of the overarching operational matters affecting the state's performance, ability to meet performance standards, or customer service. It is also a place to recommend corrective actions for the agency's leadership to consider implementing.

The final comment area in this section provides the reviewer space to share any additional comments, concerns or observations regarding the state's operations related to the overarching operational matters self-assessment.