UNEMPLOYMENT INSURANCE

BENEFIT ACCURACY MEASUREMENT

MONITORING HANDBOOK

ET Handbook No. 396, 4th Edition

U.S. Department of Labor

Employment and Training Administration

Prepared by

Office of Unemployment Insurance

Division of Performance Management

November 2009

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CHAPTER I

INTRODUCTION

1. Purpose and Structure of the Handbook. The Secretary of Labor interprets sections 303(a)(1) and 303(a)(6) of the Social Security Act (SSA), to authorize the Department of Labor to prescribe standard definitions, methods and procedures, and reporting requirements for a Quality Control (QC) program for Unemployment Insurance (UI) and to ensure accuracy and verification of QC findings. Therefore, the Code of Federal Regulations § 602.31 states: "The Department shall review QC operational procedures and samples, and validate QC methodology to ensure uniformity in the administration of the QC program and to ensure compliance with the requirements of this part. The Department shall, for purposes of determining eligibility for grants described in §602.40, annually review the adequacy of the administration of a State's QC program." This Benefit Accuracy Measurement (BAM) monitoring handbook, formally known as Benefits QC, provides a systematic approach for the Regional Offices in reviewing and supporting state administration of the BAM program for both paid and denied claims. Regional Offices have primary responsibility for monitoring and reviewing BAM operations in the State Workforce Agencies (SWAs). Regional monitoring ensures that each UI BAM program operates in accordance with BAM requirements as set forth in Federal regulation and in ET Handbook No. 395, Benefit Accuracy Measurement State Operations Handbook.

Systematic reviews enable Regional Office staff to compile a comprehensive body of knowledge concerning the BAM program in each State Workforce Agency (SWA). This handbook offers a standardized method of conducting reviews and gathering, analyzing, and presenting findings of a variety of program operational evaluations. Additionally, it offers examples of appropriate leadership efforts that the Regional Office monitors may undertake to foster effective BAM programs in the states, and for the provision of technical assistance and support to the state agencies when necessary and feasible.

This chapter examines the three distinct responsibilities of the regions in the state BAM programs.

a. to provide program leadership, working actively with state agency management and staff to implement a sound UI BAM program and to promote long-term UI program improvements based upon analysis of BAM and other data and the interpretation of BAM findings;

b. to provide technical support in the development and maintenance of the BAM program in each state; and

c. to monitor (oversee and assess) state BAM program operations and staff performance by way of periodic and risk-based reviews in order to foster and maintain an effective BAM program in each state agency.

In addition, this chapter identifies the types of BAM reviews required during the program year, explains briefly the scope of the general monitoring process, and identifies the relationship of Regional and National Office staff in the conduct of their respective functions in this important program.

Finally, this chapter describes briefly the content of the other seven chapters in the Monitoring Handbook.

2. Regional Office Responsibilities in BAM. To achieve BAM program objectives, the role of the Regional Office monitor is necessarily broad. The major objectives of the BAM program are to:

- assess the accuracy of Unemployment Insurance (UI) payments and denials of benefits;
- assess improvements in program accuracy and integrity; and;
- encourage more efficient administration of the UI program.

The BAM system is designed to be comprehensive by including all areas of the claims process where errors could occur. Therefore, in their relationships with SWA administration and staff, Regional Office monitors must alternately play the roles of leader, technician, advisor, and evaluator.

BAM administration, in a program as complex as UI, requires active leadership, strong technical support, and thorough monitoring of the BAM activities within each SWA. These program responsibilities are discussed below.

a. BAM Program Leadership. A major responsibility of the Regional Office is to provide active program leadership to the state agencies to foster an effective BAM operation. The ultimate goal, of course, is to foster long-term UI program improvements based upon BAM findings. Regional Office leadership can involve such specific efforts and actions as:

   - Reviewing BAM data and other UI operational information to identify factors that adversely affect proper payments. The region can also assist state BAM staff in data analysis and in the interpretation and presentation of their findings to SWA administration.

   - Working with state agency principals in formulating and testing program improvement measures.

   - Setting up conferences or seminars for state agency and regional staff on the utilization of BAM data findings for the improvement of UI payment operations.

   - Identifying and documenting agency BAM developments and facilitating the exchange of information among the states regarding UI program improvements.

   Program improvement is used here to cover a wide range of operational, policy, and program changes that may be undertaken by SWA administration to ensure proper operation and advance the integrity of the UI system.

b. Implementation of UI/BAM Support. Varying from state to state, there are a number of ways that the state agencies can benefit from Regional Office technical support in refining their BAM operations. A few examples of such regional staff support are:

   - Collaboration with National Office UI/BAM staff in developing training in BAM case investigation methodology and data analysis.

   - Encouraging and assisting state agencies to plan program improvement activities based on BAM and other UI Performs measurements.

   - Identifying the need for other training for agency BAM staff (for example: nonmonetary determination training) and offering assistance, if appropriate, to the state agencies in developing and providing training.

- Working with states in planning and later monitoring pilot BAM projects and special studies carried out by the state agencies to reduce payment or improper denial errors.

- Encouraging and reviewing state agency participation in studies and program evaluations independently funded by the National Office.

- Reporting results and findings as necessary to the National Office.

c. Monitoring state agency BAM Operations and Staff Performance. Regional Office oversight of state BAM operations and investigative performance is generally realized through field reviews or monitoring trips to the state agencies, and peer quality assurance reviews. Regional Offices may alternate the case review of BAM Denied Claims Accuracy (DCA) with BAM Paid Claims Accuracy (PCA) every other year for each state, except those with DCA or PCA programs determined to be at-risk because of anomalous data. The table below demonstrates this alternating schedule.

State	Year	DCA	PCA
Columbiana	2008	20 cases	None
Columbiana	2009	None	20 cases; additional cases for anomaly review
New River	2008	20 cases	Anomaly review
New River	2009	None	20 cases

In order to obtain representative sampling throughout the year in each state, monitors are required to sample at least 10 cases in each of two non-consecutive quarters or five in each quarter. Case monitoring may be accomplished as desk review, on-site review, and peer review.

Regional Office monitors should conduct at least one on-site BAM Method and Procedures (M&P) in each state in alternating years. Regional Office monitors will:

- conduct M & P reviews of each state agency biennially, and monitor M & P elements on an on-going basis to determine if the state agency adheres to BAM organizational and procedural methodology;

- periodically review state agency sample selection and assignment practices, timeliness of state BAM case completion, and case reopening practices;

- investigate, on occasion, specific sampling exceptions that may occur among state agencies and that may reflect aberrations in the sampling process which need to be corrected by the respective state agencies;

- recommend appropriate administrative and procedural BAM corrective actions and negotiate with state staff for acceptance of such recommendations; and

- carry out an end-of-year assessment of the status of each state agency's BAM program. The basis for this assessment, resulting in the Annual BAM Administrative Determination, is the ongoing monitoring, conducted throughout the year, which assesses the relative strengths and weaknesses of each state BAM program. It serves as a vehicle by which regional administrators annually inform each state agency regarding its compliance with basic BAM regulations. This assessment of the adequacy of the administration of a State's BAM program is required by regulation (20 CFR § 602.31, Oversight) and results in an annual determination letter on behalf of the Secretary of Labor.

3. Types of Reviews, the Process, and the Participants.

a. Types of BAM Reviews. Regional Office monitoring involves an Annual BAM Administrative Determination, Methods and Procedures Reviews, and Program Reviews as follows:

Annual BAM Administrative Determination. This is a once-a-year determination of a state agency's compliance with established BAM requirements. This determination is based upon the findings of the M & P review of each state agency biennially, or on-going monitoring of M & P elements in non-review years, and the progress reviews in other major BAM program operations.

Methods and Procedures (M & P) Review. A formal M&P review of each state's BAM operations is required every two years. A region should plan to conduct M & P reviews in half of the SWAs in their region each year. Because changes in Organization and Authority may occur at any time, regions should review these two areas as changes occur, in addition to the biennial reviews. The formal M&P review is the foundation of the annual administrative determination. Therefore, if it is administratively feasible, monitors should conduct this review on site.

Program Reviews. The following BAM program aspects are monitored by regional staff periodically and at the close of the program year:

- Timeliness of case completion;
- Sample selection, assignment, sampling exceptions, and compliance with the National Directory of New Hire matching requirements;
- Case investigation/verification – a review of a random sample of completed BAM cases to assess the adequacy of investigations and the accuracy of data collection coding (case reviews encompass the BAM methodology defined in Federal regulation and contained in ET Handbook No. 395, Benefit Accuracy Measurement State Operations Handbook); and
- Case reopening activity.

b. The Monitoring Process. Monitoring a state agency's BAM program by Regional Office staff may involve some or all of the following processes:

- Reviewing subject areas for compliance with BAM methodology as prescribed by Federal regulation and ET Handbook No. 395, Benefit Accuracy Measurement State Operations Handbook;
- Obtaining BAM program corrective actions by state agencies to resolve BAM operational deficiencies;
- Resolving disputes when a state agency disagrees that a BAM program corrective action is necessary;
- Analyzing a state agency's BAM data to investigate factors that might contribute to anomalies;

- Maintaining records and making reports; and

- Preparing the Annual BAM Administrative Determination concerning each state agency's compliance with BAM requirements.

c. Participants. Regional Offices have primary responsibility for monitoring BAM operations in the state agencies. National Office staff will participate on a limited basis, as follows:

- Assist in staff training and provide other technical assistance, when requested by Regional Offices, and when feasible.

- Conduct analysis to investigate the causes of anomalous data and review cases in selected states to increase uniformity of case review among regions.

- Review reports submitted by Regional Offices (Chapter VIII, sec. 5) and review the findings and conclusions of the Regional Offices' biennial Methods and Procedures reviews in an effort to ensure the integrity of the state BAM program.

- Review Annual BAM Administrative Determinations following regional issuance to the state agencies.

- Provide initial information regarding states with potential problems with anomalous data.

4. **Review Calendar**. Monitoring activities must be scheduled in order to accomplish the following reviews in a timely manner:

Schedule	Program Component
a. As needed or Biennially	Organization and Authority areas of the M&P process
b. Quarterly	Case completion and timeliness reports State agency sample, selection, and assignment Population comparison reports Case reopening history report Pending exceptions report Population exceptions reports (PCA only)
c. Semi-annually	Case review and exceptions recording Case reopening history report
d. As necessary	Report on status of state BAM program (technical assistance provided or required, M&P changes in Authority and Organization, case completion, sampling, problems/ issues resolved or pending, NDNH matching compliance, etc.)
e. Annually	BAM Administrative Determination
f. Biennially	Methods and Procedures formal review

5. Chapters II – VII and Appendices Descriptions.
The ensuing sections and content of the Handbook are summarized below:

a. Methods and Procedures Reviews. Chapter II describes the review of the organizational location of the state agency BAM unit, its operating authority, the adequacy of written BAM procedures, and BAM forms. The formal biennial review and ongoing monitoring will determine if the state agency's BAM operations are being administered in compliance with BAM organizational and methodological requirements.

b. Sampling Review. Chapter III describes the review of the state agency's selection of paid and denied cases to ensure adherence to established standards of random selection and assignment. It also identifies a number of sampling exceptions that occur occasionally in states' sampling data and which require regional investigation and resolution. Finally, Chapter III establishes verification procedures for state compliance with the BAM NDNH matching requirements.

c. Timeliness Review. Chapter IV sets forth the requirements for timely completion of state BAM case investigations and describes the process of Regional Office review of case completion timeliness.

d. Case Review. Chapter V describes the process of reviewing BAM cases to assess the adequacy of the investigation and the accuracy of the coding of case data.

e. Support for Case Review. Chapter VI contains a description of the case review reporting system developed for use by Regional Office monitors. It describes the types of reports that are generated and provides an explanation of their usage and their relationships to the required reviews described in other chapters.

f. Review Completion, Corrective Action, Dispute Resolution, and Annual BAM Administrative Determination. Chapter VII describes actions necessary by regional staff during and subsequent to a monitoring trip to bring about required BAM corrective action, dispute resolution, or review closure whenever state agency BAM operations do not meet BAM requirements. Guidance is provided for Regional Office technical assistance in the planning of state agency BAM operational changes and for working to achieve an acceptable resolution of disputed issues.

g. Review Documentation and Regional Office Reporting. Chapter VIII provides guidelines for achieving adequate documentation of review findings necessary for assessment of state BAM program progress and for preparation of subsequent issue notifications to the National Office, as well as for communicating findings to the state agencies.

h. Appendices. Appendices consist of case review tools and copies of all worksheets used for monitoring and reporting on the BAM program.

CHAPTER II

METHODS AND PROCEDURES REVIEW

1. Introduction. The Department of Labor is responsible for reviewing each state BAM unit's organization, authority, and operational procedures as a mechanism for ensuring program integrity. Regional Office staff will conduct Methods and Procedures (M&P) reviews as a means of assessing a state's adherence to the required BAM methodology for both paid claims accuracy and denied claims accuracy. Each state agency must be reviewed biennially. Regional Offices should conduct reviews in half of their states each year. During years in which a state agency is not reviewed, Regional Office staff will base their annual assessment on findings of ongoing monitoring and discussion with state staff.

A formal M&P review covers Organization, Authority, Written Procedures, and BAM Forms. However, monitors should note any changes, particularly in Organization and Authority, on a continuing basis, whether in the optional semi-annual or special BAM reports to the National Office or the biennial M&P report. Anytime that a change in Organization and Authority is noted, the monitor will test the new structure using the procedures described in sections 3 and 4 of this chapter to assure that it meets requirements.

A section of this chapter is devoted to each of the M&P areas: Organization, Authority, Written Procedures, and BAM Forms. Each of the four areas has four subsections. These subsections present BAM requirements, process, worksheet instructions, and a worksheet facsimile. BAM Requirements cites the applicable section of ET Handbook No. 395, which is being reviewed. Process describes in general terms the purpose of reviewing the area and the steps performed in conducting the review. Worksheet Instructions, which explain how to answer the questions on the worksheets, lead the monitor to draw a conclusion as to whether the state agency adheres to the BAM requirements, and provide guidance to the monitor on explaining their findings. This is followed by a facsimile of the Worksheet to be completed during the review.

The assessment of each M&P area will result in one of the following conclusions by the region:

- The state agency adheres to BAM requirements.
- The state agency does not adhere to BAM requirements and agrees to correct the deficiency.
- The state agency does not adhere to BAM requirements and does not agree to correct the deficiency.

Whenever review findings show that the state agency adheres to BAM requirements in each M&P area, the review is complete for a given review period. No further review will be needed unless a program or policy change occurs that affects the facts supporting the earlier finding of adherence, e.g., state agency reorganization.

Whenever the M&P review shows non-adherence in any one or more of the four areas, further attention of the region is required. Depending upon the response (e.g., agrees to take corrective action or disagrees with the review findings), the monitors will work with the state to achieve BAM corrective action or dispute resolution, as prescribed in Chapter VII.

Whenever corrective action has been completed, the monitor must again review each program area that was deficient to determine whether the state agency has corrected its deficiencies and adheres to the M&P requirements.

If subsequent review of areas of non-adherence reveals that a state agency still has not taken corrective action earlier agreed to, the Regional Office will necessarily find the state agency in noncompliance on these requirements.

2. Review Schedule and Reporting. Methods and Procedures reviews are conducted biennially for each State agency during the six-month period between October 1 and March 31. Regions should schedule half of their states each year. Four worksheets comprise the M&P review:

- BAM-1 Organization
- BAM-2 Authority
- BAM-3 Written Procedures
- BAM-4 Forms

Regional monitors report findings, conclusions, and explanations to the National Office following each review, using the four worksheets presented in this chapter. The biennial M&P reports are due in the National Office on or before the sixth working day of April. Appropriate documentation supportive of the review findings should accompany each worksheet. (Copies of the M&P worksheets are included in Appendix A.)

Specific BAM program documents generated by state agencies must be submitted to the National Office, on a one-time basis, whenever they are completed by the state agency and approved by the Regional Office. These documents, described later in this, chapter, are:

- the state agency BAM Operations Manual;
- the BAM Claimant Questionnaires; and
- required standard BAM forms used in state BAM case investigations.

It is sufficient for the Regional Offices to submit the required documents for each state agency once, rather than biennially, to the National Office provided that:

a. each document has been reviewed and approved by the region during the M&P review;
b. each document has been approved by the National Office; and
c. the Regional Office sends to the National Office the required M&P review worksheets affirming that the previously approved documents remain substantially unchanged.

Regardless of whether or not substantive changes have been made by a state agency, review worksheets must be completed to substantiate the review for the National Office.

Whenever substantive changes are made, they must be reviewed by the Regional Office. If approved, appropriate sections or pages affected by changes must then be submitted to the National Office for review. The submission should include concerns and a recommendation.

The findings of the biennial M&P review of each state agency will be incorporated in the annual determination letter as detailed in Chapter VII. During non-review years, regions, through their on-going monitoring, should gather enough information to be able to certify in the annual determination that a state agency does or does not adhere to the M&P requirements.

3. Organization - Regional monitors conduct on going assessment to assure that each BAM unit is situated so that it is able to fulfill its audit responsibilities.

a. BAM Requirements. Each BAM unit is to be organizationally independent of, and not accountable to, any unit performing functions subject to evaluation by the BAM unit. The organizational location of the BAM unit must be such as to maximize its objectivity, to facilitate its access to information necessary to carry out its responsibilities, and to minimize organizational conflict of interest. (20 CFR Part 602.20 Organization).

b. Process. The purpose of reviewing organizational independence is to establish that the BAM unit has adequate access to information to conduct a complete and timely investigation and is able to report and take actions on its findings without fear of censure. The steps in the Organizational review process include:

(1) examining documents and discussing the organizational position with state agency staff;
(2) determining whether the BAM supervisor's position in the chain of command raises a potential conflict of interest;
(3) determining whether the BAM unit has access to the information necessary to conduct case investigation;
(4) determining the person(s) to whom BAM reports its findings;
(5) determining whether adequate methods exist for conflict resolution;
(6) determining whether the BAM staff is subject to the State Merit System; and
(7) determining whether the BAM unit organization is consistent with federal requirements.

c. Organization Worksheet Instructions Form BAM-1. (worksheet facsimile follows)

Section I Organization Findings - The following are instructions for obtaining the information requested in each question on Section I of the BAM -1 worksheet:

(1) Information on the person(s) to whom the BAM supervisor reports should be obtained from discussions with agency staff in conjunction with documentation from the following sources:

- State agency organizational chart;
- position description for the BAM supervisor;
- function statement of the UI office or unit to whom the BAM supervisor reports;
- if BAM reports to a UI office that includes UI benefit operations as a one of its operations, the monitor must obtain an office function statement that clearly shows other operations and demonstrates that BAM's chain of command does not pass through benefit operations.

(2) Information on BAM's strategic vision and mission should be obtained from:

- mission and function statement of the BAM unit;
- mission statement of the UI office or unit to whom the BAM supervisor reports;
- copies of agency directives and policy issuances pertaining to the establishment, duties, and responsibilities of the BAM unit; and
- copies of the agency's written procedures that guide the operation of the BAM unit.

(3) Hold a discussion with the BAM supervisor to determine the accessibility of data necessary for BAM operations. Include at least the following items in the discussion:

- claim files
- determinations (monetary and nonmonetary)
- wage records (and access to employer records)
- crossmatch results (New hire, wage record benefit, etc)
- overpayment records
- appeals records
- response/support from UI Data Processing Unit
- tax records
- policy statements

(4) Determine how higher authority resolves disagreements on the outcome of case investigations between the BAM unit and other units in the UI system; this includes reporting of and actions taken based on BAM findings.

- Collect and review dispute resolution procedures
- Review established reporting methodology and agency response procedures
- Interview supervisor about the reasons that cases were reopened.

(5) Question the BAM supervisor or higher authority to ascertain whether BAM staff fall within the State Merit System. It is anticipated that all BAM staff will fall within the State Merit System. Section 303(a)(1) of the Social Security Act requires the establishment and maintenance of personnel standards based on merit for certification of administrative grants to States. (The merit staffing responsibilities under Sec. 303(a)(1) were transferred to the Civil Service Commission, now the Office of Personnel Management, effective March 6,1971 by P.L. 91-648, Sec. 208(a)(2)(B) and are still in effect.) If it appears that the BAM staff are outside the State Merit System, obtain documentation from the state agency to verify the staff's status and to use in pursuit of a solution.

Section II Conclusion. Monitors check the box that indicates the most appropriate conclusion as to whether the agency's organization is consistent with BAM requirements:

(a) If answers to all five questions are "yes", then BAM Organizational requirements have been met. Check the "Adheres to BAM Requirements" box, provide the explanation as required in Section (3) below, and proceed to the Completion Process, Chapter VII.

(b) If the answers result in a finding that not all the requirements have been adhered to, however the state agency agrees to make corrections, check the appropriate box, provide the explanation required in Section (3) below, and offer technical assistance as described in Chapter VII.

(c) If all the requirements have not been adhered to, and the state agency does not agree to make corrections, check the appropriate box, provide the explanation required in Section (3) below, and work with the agency to resolve any dispute or to encourage adherence as described in Chapter VII.

Section III Explanation. The conclusion reached in Section II needs to be supported by an explanation and documentation.

- If the state agency adheres to BAM requirements, then explain and attach the verifying documentation.
- If the state agency does not adhere to BAM requirements, explain the deficiency and indicate how the agency will correct it or what attempts were made to negotiate a correction before an impasse was reached.
- If the deficiency persists, the region must document the reason the agency has not agreed to correct it and continue its efforts to resolve the dispute as described in Chapter VII.

When corrective action is completed, the regional monitor must conduct another review to determine and document whether or not adherence is achieved.

d. Worksheet. Facsimile of worksheet for Organization review.

ORGANIZATION WORKSHEET BAM-1

State_____ Date_____ Reviewer_____

Section I. Organization Findings

1. Circle one of these chain of command structures which represents who the BAM supervisor reports to:

a. A person who has no line responsibility (up or down) for any function audited by BAM

b. The head or deputy head of the state agency

c. The head or deputy head of UI, or equivalent, who has staff or line management responsibility for other functions and activities in addition to UI benefits and the BAM chain of command does not pass through UI benefit operations and does not pass through BPC.

d. The BAM chain of command passes directly through a supervisor or manager who oversees a function that BAM audits (e.g. the chain of command passes through a unit that BAM audits).

If "a" or "b" or "c "is circled, then mark "yes" ____ Yes
If "d" is circled, then mark , then mark "no ____ No

Name, of BAM supervisor's superior:_____
Title of BAM supervisor's superior:_____
Superior's Department name:_____

2. Does the BAM vision or mission statement reflect independent audit operations and the major objectives of the BAM system which include: ____ Yes ____ No
   - assessing improvements in program accuracy and integrity; and,
   - encouraging more efficient administration of the UI program?

If BAM does not have an agency approved mission or vision statement which reflects independent operations and BAM objectives, then mark "no"

3. Does the BAM unit have access (by policies and procedures) to all records and databases necessary to carry out its functions? ____ Yes ____ No

4. Are there written procedures and processes in place to resolve conflicts between BAM and other units including the reporting of BAM findings? (Mandatory if BAM refers finding to another department for determination.) ____ Yes ____ No

5. Are the BAM supervisor and investigators covered by the State Merit System? ____ Yes ____ No

II. Conclusion

____ State agency adheres to BAM requirements.

____ State agency does not adhere to BAM requirements - agrees to correct.

____ State agency does not adhere to BAM requirements - does not agree to correct.

III. Explanation (if necessary add additional pages) _____

_____

_____

4. Authority - Regional monitors conduct an assessment to assure that each BAM unit has the authority to fulfill its audit responsibilities.

a. BAM Requirements. All conclusions drawn from the BAM investigative process must be formalized in official agency actions if errors are found, except where prohibited by state law or regulation provisions such as finality. Any determinations or redeterminations resulting from the BAM process must be in accord with the appeal and fair hearing requirements of Federal and state law.

Determinations and redeterminations resulting from the BAM investigation must be made to preclude any conflict of interest with another agency unit whose work has been evaluated by BAM. If a conflict of interest arises, then a mechanism must be in place for resolution of the issue by a higher authority. (ET 395, p. II-1)

b. Process. The scope of the review of the BAM unit's authority is limited to ensuring that there is no conflict of interest inherent in issuing official agency action flowing from BAM findings. Although BAM is a diagnostic tool for Federal and State Workforce Agency (SWA) staff to identify systemic errors and their causes and in correcting and tracking solutions to these problems, review of authority is limited to BAM's ability to identify and issue determinations as it relates to this program goal.

The steps in the authority review process include:

(1) Examining BAM and SWA policy, documents, and discussing the issuing of determinations with the BAM supervisor to establish where decision-making authority lies.
(2) Determining the location of decision-making authority for determinations to ensure that the interests of a unit evaluated in the BAM process do not compromise BAM findings. This will be determined through questions that pose potential ways to be consistent with BAM requirements, as identified in the worksheet instructions.
(3) Determining the higher authority, mechanism, and procedures established for conflict resolution between BAM and other units and assessing whether these are adequate to insure BAM program integrity.

c. Authority Worksheet Instructions - BAM-2. (worksheet facsimile follows)

Section I Decision Authority Findings - The monitor must ascertain where the execution authority resides when official agency action is required. This is a two-step process, which depends on the type of issue or error identified:

- monetary redeterminations
- findings of fraud
- nonmonetary determinations/redeterminations
- formal warnings for failure to conduct a work search, and
- other actions not included above which could be prompted by BAM investigations;

First, the monitor determines where official agency action occurs. Second, the monitor must ensure there is no conflict of interest inherent in issuing official agency action flowing from BAM findings.

The monitor should obtain the information by discussion with agency staff in conjunction with examination of documentation from some or all of the following sources:

- copies of agency directives and policy issuances pertaining to the establishment, duties, and responsibilities of the BAM unit;
- copy of the agency written procedures that guide the operation of the BAM unit; and

- samples of determinations written by the BAM unit.

If the monitor finds that the necessary authority to resolve errors does not reside in the BAM unit, then the monitor must ensure determinations and redeterminations resulting from the BAM investigation made by another unit are consistent with BAM findings. In other words, if BAM refers issues to another unit, the monitor must find that procedures are in place to preclude any conflict of interest. This is required because such a referral usually involves an agency unit whose work has been evaluated by BAM. If a conflict of interest arises, then a mechanism and written procedures must be in place for resolution of the issue by a higher authority. The higher authority resolution process must ensure that BAM procedures are followed.

The monitor should obtain the information by discussion with agency staff in conjunction with examination of documentation from the following sources:

- copy of the agency written procedures that guide the referral of errors identified by BAM unit.
- copy of the agency written procedures that guide conflict resolution between BAM and a unit to whom referrals are made and that BAM audits.

The monitor must assess whether the higher authority delegate meets the objective criteria established in the organization review section. An example of appropriate delegate might be higher authority appeals staff.

From the “Options” section, select the state agency practice that applies to each of the items listed under “Decision Authority Findings” and enter the appropriate number next to the item. If neither option "1" nor "2" is applicable, enter "3", and explain the agency practice. If the monitor finds that the authority guidelines do not meet BAM requirements, then “4” is entered.

Section II Conclusion. - Check one box to indicate the appropriate response:

- If all entries in the "Action" section are "1" or "2", check the block that indicates, "State agency adheres to BAM methodology".
- If there is a "3" entry for one or more items, ascertain whether the State agency practice meets the BAM requirements, and make the appropriate entry. If the agency adheres to the requirements, check the appropriate box, provide the explanation required in Section III below, and proceed to the Completion Process, Chapter VII.
- If the agency does not adhere to the requirements (“4” is entered for one or more elements), but agrees to make corrections, check the appropriate box, provide the explanation required in Section III below, and offer technical assistance as described in Chapter VII.
- If the agency does not adhere to the requirements (“4” is entered for one or more elements), and does not agree to make corrections, check the appropriate box, provide the explanation required in Section III below, and work with the state agency to encourage adherence as described in Chapter VII.

Section III Explanation. - Each "3" or “4” entry in section I of the worksheet requires an explanation as to why the state agency adheres/does not adhere to the requirements. Regardless of the conclusion reached for section II, cite the appropriate sections of the state agency BAM Operations Manual to support the conclusion. If not addressed in that manual, identify the source of the information.

If the state agency does not adhere to BAM requirements, explain how it will correct the deficiency or what attempts were negotiated to correct the deficiency before an impasse was

reached. If the State agency is not adhering to BAM requirements, continue to work on adherence as described in Chapter VII.

d. Worksheet. Facsimile of worksheet for Authority review.

AUTHORITY WORKSHEET BAM-2

State _____ **Date** _____ **Reviewer** _____

I. Decision Authority Findings - Enter the number from the "Options" section below which explains how each of the following are issued, when BAM identifies an error:

.

__ Monetary redeterminations
__ Findings of fraud
__ Nonmonetary determinations/redeterminations
__ Formal warning for work search
__ Employment Service (labor exchange) registration
__ Other actions not included above (OP's, UP's, voided offsets, etc.)

Options

1. The state agency's written policies and procedures give the BAM unit the authority to issue a determination/redetermination when an error is found in a case.

2. The BAM unit refers findings to other units to issue determinations/redeterminations, and in the event of disputes with those units, the BAM unit has access to a higher authority to obtain resolution and the mechanism assures program integrity. The higher authority must be identified along with the resolution process and standards employed.

3. Other (explain). Procedure meets requirement in that_____
_____
_____

4. Does not meet BAM requirements for authority

II. Conclusion.

__ State agency adheres to BAM requirements.
__ State agency does not adhere to BAM requirements - agrees to correct.
__ State agency does not adhere to BAM requirements - does not agree to correct.

III. Explanation. (if necessary add additional pages)

_____
_____
_____
_____

5. Written Procedures - Regional monitors conduct an assessment to ensure that each BAM unit has written procedures, which guide the state in fulfilling its audit responsibilities.

a. BAM Requirements. Each state agency must develop written procedures for the operation of the BAM program, which is part of the UI system. Therefore, the findings of BAM must be consistent with the laws, official policies, and written procedures of the SWA. The BAM Operations Manual must cover all investigative and administrative functions of the BAM unit. Though procedures will be adapted to the particular circumstances of the State, they must be consistent with ET Handbook No. 395 to properly administer the BAM program. The state agency must provide a copy of its BAM procedures manual, and updates as they occur, to the Regional Office for review and approval. (See ET Handbook 395, p. II-1.)

b. Process. Monitors review the state agency BAM Operations Manual in conjunction with the state's written law and policy. This review is done to ensure that it conforms to the BAM requirements set forth in ET Handbook No. 395 and reflects state-specific law, policy, and internal UI processes. These requirements include:

- Investigative procedures specifically adapted to state specific requirements. This includes applying state reporting compliance procedures to assure completion of questionnaires (claimant or employer);
- Investigative methodology adapted to state specific requirements and includes new and original [fact finding or verification of facts;
- Interview and verification procedures which meet the Department ‘s requirement but may be adapted to state specific requirements;
- New Hire crossmatch procedures and requirements that comply with those detailed in Unemployment Insurance Program Letter No. 03-07, Change 1, and include a thirty-seven day wait period after the key week end date to include response results;
- methods and procedures for reporting BAM findings; and
- methods for conflict resolution when there is a disagreement about the outcome of case investigations between the BAM unit and other units in the UI system.

In addition, monitors must ensure that the state agency BAM Operations Manual does not establish requirements that may restrict the scope of the BAM investigation or limit findings. It is important to note that the audit process differs substantially from other UI operations in terms of cost, time, and effort. BAM exhausts all avenues in obtaining information, while UI operations make reasonable attempts. BAM procedures must be consistent with this higher standard. For example, if a state established case time-lapse completion standards that are significantly stricter than federal requirements, such standards may unduly limit response time, curtail rebuttal opportunities, or undermine new hire crossmatch requirements. In this instance, the state operation manual would conflict with federal requirements.

c. Written Procedure Worksheet Instructions - BAM-3 (worksheet facsimile follows)

Section I Written Procedure Findings. Compare the BAM procedures developed by the state agency with the procedures in ET Handbook No. 395 to ascertain whether the procedures are consistent with BAM requirements. The items listed after questions 1and 2 should be considered before answering these questions. However, these lists are not meant to be all-inclusive; other items should be considered, as applicable under State law/procedures and BAM application of those procedures (e.g. work search and Employment Service (ES) Registration requirements).

Section II Conclusion. Using the answers to the questions or findings in Section I, monitors make a decision as to whether the BAM requirements have been adhered to, and check one box to indicate the appropriate response:

- If answers to all findings are "yes", then the agency adheres to BAM requirements. Check the "Adheres to BAM Requirements" box, and proceed to the Completion Process, Chapter VII.

- If the agency does not adhere to all of the requirements (one or more of the questions are answered "no"), but SWA agrees to make corrections, check the appropriate box, provide the explanation required in Section (3), and offer technical assistance as described in Chapter VII.

- If the agency does not adhere to the requirements (one or more of the questions are answered "no") and does not agree to make corrections, check the appropriate box, provide the explanation required in Section (3), and work with the agency to resolve any dispute or to encourage adherence as described in Chapter VII.

Section III Explanation. If the state agency does not adhere to BAM requirements, regional monitors must explain and document the issue. Monitors will provide a narrative describing how the state BAM unit does not adhere to the requirements and what will be done to correct this situation, or why it will not be corrected.

Regardless of the conclusion reached, monitors should submit a copy of the state agency BAM Operations Manual as an attachment to the worksheet. This will need to be done at least once for each State, whenever the review of the Operations Manual is completed. In the event of substantive changes between biennial reviews, monitors should review the document and resubmit the manual to the National Office.

d. Worksheet. Facsimile of worksheet for Written Procedures.

WRITTEN PROCEDURES WORKSHEET BAM-3
(Page 1 of 3)

State _____ **Date** _____ **Reviewer** _____

I. Written Procedures Findings.

1. Does the state agency BAM Operations Manual cover all investigative and administrative functions of the BAM unit? Consider the following: __ Yes No

- Responsibilities of BAM staff – including training and staff development
- Information Technology Support - data processing and Sun System administration
- Maintaining data files
- Sampling and sample population validation
- Assignment of cases
- Questionnaire completion standards and minimum procedure requirements
- Investigations including new and original fact finding
- Standards for exploration of issues outside of the key week or denial, which might affect the accuracy of the payment or denial decisions.
- Interstate procedures for assisting other States and for requesting assistance
- Coding/error classification
- Records – case review procedures, data input & review, documentation, retention
- Relationships with other agency units - BPC, Benefits, Tax, Appeals, Job Service
- Process for making determinations resulting from BAM investigations
- Source references for law, rules, appeal precedents, and SWA procedures
- Case file and required documentation organization

WRITTEN PROCEDURES WORKSHEET BAM-3

(Page 2 of 3)

State _____ Date _____ Reviewer _____

I. Written Procedures Findings continued.

2. Have the procedures been adapted to particular circumstances of the State in addition, do these procedures accurately reflect law and policy? __ Yes __ No
Consider the following:
- Work search requirements
- ES registration (labor exchange) requirements
- Procedures for obtaining necessary dependency information, if applicable
- Alternate or extended base period wage determinations
- Fraud determinations
- Procedures for contacts with non-English speaking claimants
- Method or process for reporting findings, such as systemic issues
- Procedure for conflict resolution between BAM and other UI departments

3. Ascertain whether or not the requirements of ET Handbook No. 395, including Appendix C – Investigative Guide, are properly incorporated into its BAM procedures manual. Consider:

a. Are the procedures consistent with ET Handbook No. 395? __ Yes __ No
Consider:
- Data collection
- Crossmatch of PCA cases with NDNH
- Investigations
- Documentation
- Retention of records
- Reporting (claimant questionnaire completion)

b. Are the investigative procedures designed to accord with standard agency fact-finding practices? __ Yes __ No

c. Do the case completion timeliness objectives facilitate investigative procedures? __ Yes __ No

d. Do agency procedures require the BAM investigator responsible for an official action that was appealed to attend the appeals hearing? __ Yes __ No

e. Do instructions for completing the required forms specify that the investigator must explain the reason if any information was not obtained? __ Yes __ No
(This may be satisfied by space on the forms designated for this information.)

4. Does the state agency BAM Operations Manual document the NDNH paid claims matching requirements and the procedures for follow-up investigations? __ Yes __ No
Do these procedures include an adequate wait time (e.g. a minimum of 5 business days after the record submission) to allow for the crossmatch results to be returned to the SWA?

WRITTEN PROCEDURES WORKSHEET BAM-3
(Page 3 of 3)

State _____ **Date** _____ **Reviewer** _____

I. Written Procedures Findings continued.

5. Does the NDNH matching process meet the requirements in UIPL 03-07, Change 1? __ Yes ___No

   a. The BAM records are submitted directly to NDNH and not an internal database of NDNH "hits"
   b. The crossmatch date parameters include the period from the benefit year begin date to 30 days after the key week end date;
   c. Submission of the case SSN is not subjected to other SWA NDNH crossmatch process filters (e.g. weeks claimed, weeks compensated, partial payments, current investigation - same employer with different dates, employer type, etc.);
   d. BAM NDNH Crossmatch includes request for name-SSN verification; and
   e. BAM has access to all NDNH "hits" returned without SWA filtering.

II. Conclusion.

__ State agency adheres to BAM requirements.

__ State agency does not adhere to BAM requirements – agrees to correct.

__ State agency does not adhere to BAM requirements - does not agree to correct.

III. Explanation. (if necessary add additional pages) _____

_____

_____

_____

_____

_____

6. Forms - Regional monitors conduct an assessment to ensure that each BAM unit has developed the forms necessary to assist the state in fulfilling their audit responsibilities

a. BAM Requirements -. Each SWA must modify the claimant questionnaire to state specific requirements. BAM must develop or use SWA standard forms in investigations for:

- Claimant Questionnaire – adapted to state law
- Work Search Verification - Employer
- Work Search Verification - Labor Organization
- Base Period Wage/ Base Period Employment Attachment Verification
- Separation /Recall Status Verification
- Benefit Year Earnings /Current Employment Status Verification/ New Hire Reporting Compliance
- Disqualifying/Deductible Income Verification
- Authorization to Release Information (where required)
- Fact-finding Statement
- Dependency Eligibility Verification (if applicable)

- Interstate Request
- Summary of Investigation

The questions on all forms that address eligibility must be adequate to obtain information that the SWA requires to determine adherence to provisions of law and written policy. All forms used for interviews must provide space for the name/signature of the person interviewed, the SWA investigator's signature, the method used to obtain the information, and the date of the interview. State agencies may add additional questions to any of the investigative forms but cannot remove any of the required questions without permission from the National Office (ET Handbook 395, pp. VI-1, A-2, and C-1- C-9).

(1) BAM Claimant Questionnaire. The BAM claimant questionnaire is a required, standard information form to be completed by each UI claimant whose claim is investigated by state agency BAM staff. The regional office must review the claimant questionnaire (based upon ET Handbook No. 395 model) to ensure that the state agency has added items that are needed to determine benefit eligibility in accordance with state law, regulations, and policy. State agencies must submit any amended claimant questionnaires to their respective Regional Offices for review and approval. Regional monitors must investigate whether claimant questionnaires have been translated into other languages and submit any translations to the National Office for review. This review must occur with the initial translation. Any subsequent changes must also be submitted for review (ET Handbook 395, p. A-2). BAM units may add questions to gather additional information required to meet state law and rules; however, they may not remove questions.

(2) Standard Forms. The questions on all forms that address eligibility must be adequate to obtain information needed to determine adherence to the state agency's provisions of law and written policy. Additionally, all forms used for interviews must provide space for the name or signature of the person interviewed, the date of the interview, and for the state agency investigator's signature and date of review (ET Handbook 395, pp. VI-1, C-1- C-9).

b. Process. Monitors must assess whether BAM forms conform to BAM requirements set forth in the ET Handbook No. 395. Monitors may consider other source documents, such as the ET Handbook 301 Guide Sheets (chapter VI, pp. VI-1 thru VI-47), when reviewing fact finding forms.

The steps in the form review process are:

- Monitors must review the state agency's BAM forms in conjunction with the State's written law and policy;
- Monitors must ensure that state specific forms and modifications fulfill procedures found in Chapter VI of ET Handbook 395, which include investigative requirements and investigative methodology;
- Monitors should interview the BAM supervisor to determine if the forms meet the state specific needs; and
- Monitors must ensure that the BAM unit's telephone protocols follow the content and organization of the forms used. This requirement can be fulfilled by monitoring (listening to) investigators while they complete the BAM claimant questionnaire and other forms.

c. Forms Worksheet Instructions - BAM-4 (worksheet facsimile follows)

Section I Form Review Findings. Monitors review the BAM unit's forms by completing 11 questions, which are grouped into the two categories. Most questions have more than one

part. Each question is self-explanatory; therefore, no elaboration is necessary in this section.

(a) Claimant Questionnaire (Questions 1-3). Monitors must compare the Claimant Questionnaire developed by the state BAM unit with the Claimant Questionnaire prescribed in ET Handbook No. 395 and with state written law and policy. The questionnaire must be modified in accordance with the state agency's unique eligibility requirements

(b) Standard Forms (Questions 4-11). ET Handbook No. 395 calls for the use of a minimum of six standard forms in all state agencies plus two others (Authorization to Release Information and Dependency Eligibility Verification) in states where applicable. Regular state UI forms may be substituted for two of the six standard formats - Disqualification/Deductible Income Verification and Fact finding Statement. However, the forms must still meet the BAM requirements. All forms should be compared with state written law and policy and with the requirements in ET Handbook No. 395 for adequacy. All forms must also provide space for signatures and indicate the method by which the information is obtained.

Section II Conclusion. Using the answers to the questions in Section I, monitors decide whether the agency adheres to the form requirements and check one box to indicate the appropriate response:

(a) If answers to all questions are "yes" and/or "N/A", the agency adheres to BAM requirements. Check the "Adheres to BAM Requirements" box and proceed to the Completion Process, Chapter VII.

(b) If the agency does not adhere to the requirements (one or more question checked "no"), but agrees to make corrections, check the appropriate box, provide the explanation required in Section III, and offer technical assistance as described in Chapter VII.

(c) If the agency does not adhere to the requirements (one or more question checked "no") and does not agree to make corrections, check the appropriate box, provide the explanation required in Section III, and work with the agency to resolve any dispute or to encourage adherence as described in Chapter VII.

Section III Explanation. If the state agency does not adhere to BAM requirements, regional monitors must describe how the deficiency will be corrected or what attempts have been made to negotiate a correction. Monitors must provide a rationale for any changes made to the Claimant Questionnaire.

Additionally, monitors must ensure that any additional form revisions occurring outside of the Methods and Procedures review meet requirements.

- State agencies must submit copies of all altered forms (highlighted to show any revisions) to their respective Regional Offices for review and comment.
- Regional Offices, in turn, will submit these forms to National Office with their recommendation(s) to approve or disapprove the changes.

However, following approval by the National Office, the review of these documents will not be required in subsequent M&P reporting, unless the state BAM unit makes substantive changes.

d. Worksheet. Facsimile of Forms Worksheet BAM-4.

FORMS WORKSHEET BAM-4
(PAGE 1 OF 3)

State _____ **Date** _____ **Reviewer** _____

I. Section I Form Review Findings

(a) Claimant Questionnaire

1. Has the questionnaire been altered as required to cover specific provisions of state law? __ Yes __ No __N/A

Consider the following:

- Base period separations
- Base period weeks or hours worked or part time employment
- Base period wages to include alternate and extended base periods
- Work search
- Separations (base period, initial, additional, continued claim, lag period or last employing unit, and covered employment requirements) and separations with Compelling Family Reasons
- Work force attachment/recall status and partial employment
- Employment Service registration
- Disqualifying Income during Key Week
- Key week or other week earnings
- Temporary employment
- Dependency allowances

2. Are all changes to the questionnaire adequate to obtain the necessary information or cause further investigation? __ Yes __ No __ N/A

3. Were changes to the questionnaire limited to those necessitated by specific provisions of State law or policy? __ Yes __ No __ N/A

(b) Standard Forms

1. Work Search Verification - Employer

a. Are questions on the form adequate to determine whether claimant's work search contacts were acceptable according to state agency written law and policy? __ Yes __ No

b. Is space provided for signature of the investigator, signature or name of the person interviewed, and the date? __ Yes __ No

2. Work Search Verification - Labor Organization

a. Are questions on the form adequate to determine claimant's union status? __ Yes __ No

b. Are questions on the form adequate to determine, according to state written law and policy, if any issues resulted from job referrals or job refusals? __ Yes __ No

c. Is space provided for signature of the investigator, signature of the person interviewed, and the date? __ Yes __ No

(PAGE 2 OF 3)

State _____ **Date** _____ **Reviewer** _____

I. Section I Form Review Findings

(b) Standard Forms continued

3. Employment / Base Period Wages / Separation / Benefit Year Earnings and New Hire Reporting Verification

a. Are questions on the form(s) adequate to obtain, according to state written law and policy, reason for separation from employment, recall status, base period wages, other income or special payments (pension, vacation, separation pay, wages in lieu of notice, etc.), earnings received during the benefit year and payment frequency, and current employment status? __ Yes __ No

b. Does the form(s) capture whether the employer reported the claimant as a new hire, if the claimant was hired since the beginning of the benefit year? __ Yes __ No

c. Is space provided for signature of the investigator, signature or name of the person interviewed, and the date? __ Yes __ No

4. Disqualifying/Deductible Income Verification

a. Are questions on the form adequate to determine eligibility or reductions to benefits, according to state written law and policy, regarding receipt of or application for pension/income/remuneration? __ Yes __ No

b. Is space provided for signature of the investigator and date? __ Yes __ No

5. Authorization to Release Information

a. If required by the State, is the form used for BAM adequate according to state requirements? __ Yes __ No __ N/A

b. Is space provided for signature of the claimant and date? __ Yes __ No

6. Fact-finding Statement

Does the form provide space for the signature or name of the person providing the information and the date? __ Yes __ No

7. Dependency Eligibility Verification

a. Are questions on the form adequate to obtain, according to state written law and policy, data needed to determine eligibility? __ Yes __ No __ N/A

b. Is space provided for signature of the investigator and date? __ Yes __ No

FORMS WORKSHEET BAM-4

(PAGE 3 OF 3)

State _____ **Date** _____ **Reviewer** _____

I. Section I Form Review Findings
(b) Standard Forms continued

8. Summary of Investigative Narrative

a. Is adequate space provided on the form to enter pertinent facts of the case? __ Yes __ No

b. If a "fill-in-the-blank" summary is used, is it adequate to summarize pertinent facts of cases? __ Yes __ No

c. Is space provided for signature of the investigator and date? __ Yes __ No

II. Conclusion.

__ State agency adheres to BAM requirements.

__ State agency does not adhere to BAM requirements – however it agrees to correct.

__ State agency does not adhere to BAM requirements – and it does not agree to correct.

III. Explanation.

_____

_____

_____

_____

_____

_____

ET HANDBOOK NO. 396, 4TH EDITION

CHAPTER III

BAM SAMPLE SELECTION, CASE ASSIGNMENT, AND NATIONAL DIRECTORY OF NEW HIRE CROSSMATCH SUBMISSION REVIEW

1. Introduction. Each week state BAM units select samples of UI weeks paid and disqualifying eligibility determinations (monetary, separation, and nonseparation) for investigation and verification. The Department establishes annual sample allocations for paid and denied claims and sets weekly and quarterly minimum sample sizes.

Among their other field monitoring responsibilities, Regional Office (RO) staff periodically review their states' BAM sample selection and assignment process for paid and denied claims. This monitoring evaluates the integrity of the states' sampling procedures and ensures that states meet their annual sample targets. ET Handbook No. 395 (HB 395), Chapter III outlines the steps for building the universe of cases for the weekly samples. The review findings are used in the annual determination of a state's administration of BAM, as detailed in Chapter VII.

Furthermore, Regional Office monitors must ensure the integrity of BAM's National Directory of New Hire (NDNH) crossmatch submission process. Monitors verify that states submit for matching the Social Security Numbers (SSN) of claimants whose paid weeks of UI (key weeks) were selected for review, according to the required procedures. This is accomplished by reviewing "SWA INPUT HEADER RECORD" and "SWA INPUT DETAIL RECORD" for BAM cases. Monitors must check four or more consecutive weekly batches, arbitrarily chosen, when they conduct this review. Again, review findings are used in the annual determination of a state's administration of BAM, as detailed in Chapter VII.

It is advisable for the RO monitor to request well in advance of the monitoring visit that the BAM unit assemble the required documents (i.e., "hit files," case assignment reports, sample validation and sample characteristic reports, benefit histories, and the NDNH Input records of each claim to be verified) for the scheduled review. Some state ADP and other support units may need a month or more of lead time, due to heavy work schedules, to meet the monitoring schedule.

2. BAM Sample Selection Review Requirements. BAM methodology ensures the integrity of BAM data and sampling uniformity among the states. Chapter III of HB 395 provides instructions to states on the sampling process. BAM case sampling and case assignment for paid and denied claims must meet the following three requirements:

a. That the automated weekly sample selection has been performed correctly, i.e., that samples are representative of the survey population, are selected randomly, and include no extraneous cases (e.g., Extended Benefits, Disaster Unemployment Assistance, Workshare, EUC, etc.).

b. That all cases selected are assigned for investigation. This means that:

(1) each case in the weekly sample is assigned. An exception is a case selected for the sample that should not have been included in the sampling frame, because it is one of the excluded cases described in 2 (a).

(2) only the cases that are selected will be assigned for investigation (i.e., no substitutions will be made).

c. That adequate sample levels are selected/assigned weekly to satisfy BAM random sampling methodology and to meet the weekly and quarterly minimum sample sizes and

the annual allocations of each state.

d. That PCA cases are submitted to NDNH according to the requirements in UI Program Letter (UIPL) No. 03-07 and UIPL No. 03-07, change 1.

ET Handbook No. 395, Chapter III, provides the instructions for constructing the universes from which paid and denied sample cases are selected. It includes a table of the minimum weekly and quarterly sample sizes for both paid and denied claims. This table is replicated in Section 4.

UIPL No. 03-07 and UIPL No. 03-07 change 1 provide the instructions for constructing the SWA Input Detail record. These procedures have been incorporated into ET Handbook No. 395, Chapter VI. One of the key requirements is assuring coverage for the entire period from the claimant's benefit year beginning date to the 30-day period after the Key Week ending date. This accommodates breaks in claiming, partial payments, disqualifications or ineligibilities, employer new hire reporting time allowances, and data transmission periods.

3. Sample Selection and Assignment Review Process. Regional monitors are responsible for reviewing their states' BAM sample selection and assignment. Ideally, monitors should plan and carry out the review during a required on-site BAM M&P or case review visit. When not done on site, the monitor should request that the BAM unit provide the necessary reports (for example, sample validation and sample characteristic reports, NDNH documentation, etc.) for conducting the review. Worksheet QC-5 (a facsimile is included at the end of this chapter and in Appendix B) should be completed for this review. Instructions for conducting the review and handling each of the four required tasks as follows:

a. Determine that all sample cases pulled weekly are assigned. In this first task, the monitor's goal is to determine that the number of cases assigned matches the number of cases pulled and the cases assigned are the same cases that were pulled. Regional Office monitors are strongly urged to conduct this review annually in order to identify problems that can occur with states' samples and correct these problems immediately. Monitors will request four weekly samples. State BAM units will provide a copy of both the printout of the "hit file" of sample cases selected by the BAM sample selection program and a printout of the case assignment reports for those weeks.

The monitor can verify that the cases that were assigned were those selected by the BAM automated sample selection program by comparing the "hit file" for a given weekly batch and the case assignment report. The hit file (see example below) consists of the records selected for the samples. The records in this file are in the same format and sort sequence as the UI transactions file: UI paid claims records will be written first, followed by monetary, separation, and nonseparation denials. This file does not have delimiters, which indicate breaks between data elements.

JOB [JOB NO.] [STATE] EMPLOYMENT SECURITY COMMISSION
RUN DATE: 01/08/2001 HITFILE OF BAM SAMPLE CASES
99200101111223333122820001231200011107197111104000000013100010820012040000000000
99200101444556666122820000103200111202196811107500000013100010820012075000000000
99200101777889999122120001230200011211196222114500000013100010820012145000000000
99200101111335555122820000102200111108196531102515000013100010820012175000000000

The "hit file" records or lines of data are organized in the sequence shown in the table, "HIT FILE RECORD LAYOUT," which can be found at the end of this chapter (Attachment B). To locate a specific data element, the monitor should count the number of positions to the beginning and ending positions of the element. For example, here is the first record in the hit file above.

99200101111223333122820001231200011107197111104000000013100010820012040000000000

Each record in the hit file consists of 21 data elements. The monitor should use a sharp pencil and a good straight edge to parse the hit file into its data element components. Because all the fields are standard size, one only needs to parse the first record and then draw a clean line down through the other records.

Field Name	State I.D.	Batch #	Social Security #	Claim Date	Transaction Date	Sample Select. Ind.	Transaction Type
Field Size	2	6	9	8	8	1	1
Begin & End Positions	1-2	3-8	9-17	18-25	26-33	34	35
Record #1	99	200101	111223333	12282000	12312000	1	1

Field Name	Gender	Date of Birth	Ethnic	Program Type	UI Duration	Amount Paid	Amount Offset	Amount of Intercept
Field Size	1	6	1	1	1	3	3	3
Begin & End Positions	36	37-42	43	44	45	46-48	49-51	52-54
Record #1	1	071971	1	1	1	040	000	000

Field Name	Claim Type	Filing Status	Work-share Pct.	Run Date	Adjustment Ind.	Total Amount "Paid"	Filler
Field Size	2	1	2	8	1	3	9
Begin & End Positions	55-56	57	58-59	60-67	68	69-71	72-80
Record #1	13	1	00	01082001	2	040	000000000

State BAM units will provide a copy of both the printout of the hit file of sample cases selected by the BAM sample selection program and a printout of the case assignment reports for those weeks. The case assignment reports for denied and paid claims are found within the Supervisor Case management menu in the BAM software application on the State Workforce Agency's (SWA's) Sun system. These reports are not available through the BAM software on the OUI Web site.

Monitors will request four weekly samples and compare the hit files against the case assignment reports generated by the SWA's system. To assist the monitor, examples of the State Menu Selection options, the Case Assignment menu, and Case Assignment Report follow.

Applications Menu

- BAM (Benefit Accuracy Measurement) (OMB No.1205-0245)
  - Investigator Case Management
  - Supervisor Case Management
    - Case Conversion
    - Case Assignment

CASE ASSIGNMENT

- ASSIGN CASES
- REASSIGN CASES
- ASSIGNMENT REPORT

SORT BY: Batch, Sequence, Sample Type

PCA DCA

Submit

BENEFIT ACCURACY MEASUREMENT
PAID CLAIMS ACCURACY
CASE ASSIGNMENT REPORT
State:
Paid Sample

SSN	Key Week	Batch #	Seq #	Sample Type	Assign Date	Local Office	Inv ID
xxx-xx-xxxx	03/22/2008	200813	3	1	03/31/2008	65	1
xxx-xx-xxxx	03/22/2008	200813	7	1	03/31/2008	61	8
xxx-xx-xxxx	03/22/2008	200813	8	1	03/31/2008	61	8
xxx-xx-xxxx	03/08/2008	200813	1	1	03/31/2008	63	12
xxx-xx-xxxx	03/22/2008	200813	2	1	03/31/2008	63	12
xxx-xx-xxxx	03/22/2008	200813	4	1	03/31/2008	60	13
xxx-xx-xxxx	03/22/2008	200813	5	1	03/31/2008	60	13
xxx-xx-xxxx	03/15/2008	200813	6	1	03/31/2008	64	10
xxx-xx-xxxx	03/15/2008	200813	9	1	03/31/2008	60	10

BENEFIT ACCURACY MEASUREMENT
DENIED CLAIMS ACCURACY
CASE ASSIGNMENT REPORT
State:
Denied Sample

SSN	Claim Date	Batch #	Seq #	Sample Type	Assign Date	Local Office	Inv ID
xxx-xx-xxxx	03/25/2008	200813	1	4	03/31/2008	65	1
xxx-xx-xxxx	03/25/2008	200813	3	3	03/31/2008	64	6
xxx-xx-xxxx	03/27/2008	200813	3	4	03/31/2008	61	8
xxx-xx-xxxx	03/12/2008	200813	4	2	03/31/2008	60	6
xxx-xx-xxxx	03/26/2008	200813	4	3	03/31/2008	61	8
xxx-xx-xxxx	03/28/2008	200813	4	4	03/31/2008	65	6

For each paid or denied claim sampled, monitors should compare the following data items in the hit file and case assignment report:

- SSN
- Batch #
- Key week ending date (PCA only)
- Amount paid, offset, or intercepted (PCA only)
- Type of denial (DCA only)

The monitor must report to the National Office any discrepancies between samples selected and cases assigned. Section 5, below, describes the reporting procedures. Because case substitutions are not permitted, the paid or denied claims sample must be selected again. The monitor should probe the reason for the substitution with the BAM supervisor and, if the situation warrants, offer technical assistance to ensure that the BAM unit will subsequently be able to follow proper sample selection and assignment procedures.

b. Every two years, the monitor must determine if any incorrect records in the rec1.dat file are downloaded to the Sun computer. Specifications for the rec1.dat file are documented in chapter III of ET Handbook 395. To make this determination, a monitor must:

(1) request a printout of the hit file generated by the BAM sample selection program and a benefit history (printout) for each claim sampled; and
(2) compare these documents with the rec1.dat file which was downloaded to the Sun system.

The purpose of this review is to ensure that the computer program developed by the state to create the rec1.dat file includes the same claims as those in the hit file, which is produced by the BAM sample selection program.

Monitors must review a minimum of four arbitrarily chosen weekly batches (for both paid and denied claims) for each state. If the state's program that creates the rec1.dat file includes the wrong cases/claims, it is important that this problem be detected early. In addition to the annual review, the monitor must re-verify the accuracy of the rec1.dat file whenever a state makes changes in its automated system that might affect the creation of the rec1.dat file.

As noted above, it is advisable for the RO monitor to request the BAM unit, well in advance of the monitoring visit, to make arrangements for the preparation of the

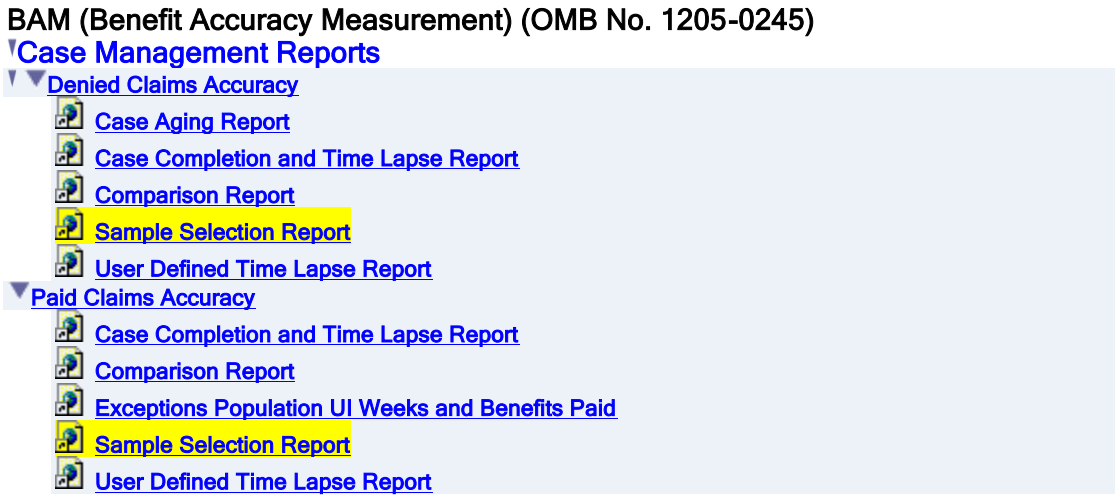
documents that will be needed (i.e., hit files and benefit histories of each claim to be verified) so that these will be available for the scheduled review. Some state ADP and other support units may need at least a month's notice; other units may need considerably more lead time, due to heavy work schedules.

Generally, a printout of the rec1.dat file records of the claims in the batches being reviewed can be provided by the BAM supervisor. If this is not the case, these records (printouts) must be requested from the state ADP unit (also well in advance of the planned review). For each paid or denied claim sampled, monitors should compare the following data items in the hit file and the rec1.dat file:

- SSN
- Batch #
- Key week ending date (PCA only)
- Amount paid, offset, or intercepted (PCA only)
- Type of denial (DCA only)

The monitor must promptly report to the National Office any discrepancies between samples selected and the cases downloaded. Monitors should confer with state BAM staff to learn why these discrepancies occur and arrange for technical assistance, if needed. Because case substitutions are not permitted, the State program that creates the rec1.dat file must be corrected to ensure that it includes the same the paid and denied claims included in the hit file. Until the state can correct its rec1.dat file, the weekly BAM paid and denied claims samples will have to be manually entered through the BAM software Case Conversion application.

4. Adequacy of Sample Levels Review. Monitors should run these automated Sample Selection reports at least quarterly to identify problems. Regional monitors can generate these reports for all states or selected states in their region. The system provides the option to produce summary and/or batch reports for PCA and DCA. Access to these reports is on the OUI Web site under the BAM application as follows:



a) Reviewing Weekly Sample Levels. Monitors should review states' BAM sampling to determine if the state has dropped below its minimum weekly sample. Both the PCA and DCA sample selection report provides a batch detail report option that displays the number of cases pulled for each week.

The Sample Selection Summary Reports provide actual and projected sample size

information. The Sample Selection Batch report shows the number of cases pulled each week during the "current quarter," by state and batch. ("Current quarter" is the latest quarter [partial or complete] selected by the monitor covered in the reports). Used throughout the year, these two Sample Selection reports identify those states that are sampling at an annual rate below their annual targets.

Monitors will determine if a state BAM unit is experiencing sampling problems that calls for special Regional Office attention. In any case, monitors need to point out that below-minimum samples may decrease the precision of estimated error rates. States that pull below-minimum samples may not have a sufficient number of cases to analyze types and causes of errors, or analyze population subgroups. If Regional Office monitors identify sampling problems, they should offer to provide technical assistance to the state and notify the National Office if the state fails to pursue corrective action.

Note: The Sample Selection reports include data through the most recent batch residing in the National Office database. However, data for all states and batches may not be picked up due to technical issues with the National Office's automated pick-up procedures. Whenever the Sample Selection Batch and Summary reports show that data are missing, this does not necessarily mean that a state failed to pull samples for these batches. Before Regional Offices contact states about missing batches, monitors should run the Current Database Status Report, available on the National Office Web site, to determine the last data pickup date.

b) Monitoring Annual Sample Levels. Monitors need to be mindful of average sampling levels over the year to determine whether state BAM units are pulling samples large enough to satisfy their annual sampling goals. For example, a state with an annual allocation of 360 cases needs to maintain a weekly sample average of 7 cases. A 480 annual allocation requires an average weekly selection of 9 cases.

The following table shows the normal and minimum weekly and quarterly sample sizes based on the state's annual sample allocations. During the normal course of operations and because of staffing vacations or other issues, sample size may fluctuate week to week.

SWA size and sample type	Annual Sample Size	Normal Weekly Sample	Minimum Weekly Sample	Normal Quarter Sample	Minimum Quarter Sample
Small PCA	360	7	5	90	81
Large PCA	480	9	6	120	108
All DCA	150/450	3/9	2/6	37-38	32

The minimum weekly, quarterly, and annual sample allocations are set by the Department. State BAM units may elect to sample above the minimum sample levels. Sample Selection Batch reports will assist monitors in reviewing weekly sampling levels. A sample of these reports is presented in Appendix B.

If problems are likely to affect sampling or investigative capacity for an extended period, the monitor must determine whether or not the region can provide technical assistance to assist the state BAM unit in meeting its sampling allocation. Monitors will report the status and progress in resolving these issues to the National Office quarterly.

5. **Determine that the automated weekly sampling has been performed without significant exceptions**. This review requirement covers four other aspects of random sampling: (1) ensuring the representativeness of each weekly sample; (2) judging the appropriateness of

the weekly sampling frames; (3) avoiding inclusion of any extraneous cases in the sampling frames; and (4) ensuring inclusion of all appropriate claims in the sampling frames. The results of this evaluation are included in the QC-5 Worksheet for assessing the states' adherence to BAM random sampling methodology. The outcome of this review is part of the Annual Determination letter.

To identify problems, monitors should run the automated PCA and DCA Comparison Report and the PCA Exceptions Report each quarter. Regional monitors can generate these reports for all states or selected states in their region. Access to these reports is on the OUI Web site under the BAM application as follows:

BAM (Benefit Accuracy Measurement) (OMB No. 1205-0245)
Case Management Reports
- Denied Claims Accuracy
  - Case Aging Report
  - Case Completion and Time Lapse Report
  - Comparison Report
  - Sample Selection Report
  - User Defined Time Lapse Report
- Paid Claims Accuracy
  - Case Completion and Time Lapse Report
  - Comparison Report
  - Exceptions Population UI Weeks and Benefits Paid
  - Sample Selection Report
  - User Defined Time Lapse Report

Examples of these common sampling exceptions are detailed below.

a) Reviewing the Accuracy of BAM Sampling Frames. The population comparison and exceptions reports provide information that help in identifying exceptions in state BAM sampling frames. These reports must be pulled quarterly in conjunction with the Sample Selection Summary reports to determine if any sampling exceptions have occurred. Monitors should review any exceptions with appropriate state BAM personnel and, if necessary, state ADP staff. Monitors will provide the National Office the following information:

1) an explanation of the exception(s) reviewed;
2) information on what has been done by agency staff to correct the problem; and
3) a statement regarding any technical help that is needed from the National Office.

This information will be furnished to the National Office, along with other sample selection review findings, following the guidance presented in section 5, below.

b) Reviewing BAM samples for representativeness. The BAM automated sample selection program produces a file of aggregate sample and population data for selected demographic characteristics. This file (sfsum.dat) is downloaded to the SUN system and stored in the "b_comparison" and "b_dca_comparison" tables in the UI database (UIDB). The BAM unit can then run the Sample Validation and Sample Characteristics reports through the BAM state software. Regional monitors must request states to review the sample characteristics and sample validation reports on a quarterly basis and notify the Regional monitors of any exceptions.

c) Reviewing Extraneous Cases in the Sample. If, on occasion, a state BAM unit selects an

extraneous case in its weekly samples (e.g., Shared work, EB or DUA claims, or a redetermination denial), the state BAM unit can delete the case using the Delete Cases module on the SUN system.

d) Inclusion of all appropriate claims in each weekly population -- including varying key week ending dates in some weekly BAM samples. The computer program that selects weekly BAM samples is designed to draw samples that are representative of all types of claims included in the weekly population. On occasion, state BAM units have discovered that all paid claims samples had the same key week ending date. Due to the inclusion in each weekly sampling frame of back-dated claims, appeals reversals, and two benefit weeks due to bi-weekly certification permitted by many states, the probability of selecting a sample with the same key week ending date for all cases is very small. Such sampling aberrations are likely due to changes made to the program that creates the state UI transactions file, resulting in the inclusion of only claimed weeks.

Regional monitors should urge state BAM supervisors to check their state reports periodically to detect possible deviations from BAM sampling methodology.

In their sampling reviews, regional monitors also review at least one weekly sample to check for varying key week ending dates. If none occurs, the monitor should ask to look at three or more prior weekly samples to ensure that varying weeks are not excluded by the sample selection program.

Regional monitors should also ensure that the state is pulling combined wage claims (CWCs), interstate claims, and Federal UI program cases (i.e., UCFE and UCX) in its samples. Differences in the Comparison report between the BAM population and the benchmark dollars are sometimes caused by the dropping of one or another of these claimant groups from the BAM sampling frame. These cases can be verified by looking at the codes in fields c1 (Program Code) and c2 (CWC Indicator) of the b_master table and the program and cwc data elements in b_dca_master.

6. **National Directory of New Hire Crossmatch Data Submission Review**. Regional monitors are responsible for reviewing their states' BAM NDNH crossmatch submissions. Worksheet QC-5 (a facsimile is included at the end of this chapter and in Appendix B) should be completed for this review. The goal of this review is assess whether all sample cases pulled are submitted directly to NDNH for crossmatch and that the record submission complies with the required parameters.

Regional Office monitors are strongly urged to conduct this review annually until the crossmatch complies with the UIPL 03-07, Change 1 requirements. This review will identify problems that can occur with states' NDNH matching procedures corrections can be made immediately. Thereafter, the NDNH submission review can be incorporated into the on site M & P reviews and be conducted every two years. When not done on site, the monitor should request that the BAM unit provide the necessary SWA submission files ("SWA Input Header Record" and "SWA Input Detail Record") for conducting the review.

In order to assess the integrity of BAM's NDNH matching process, Regional Office monitors must verify that SSN and key weeks selected for review are submitted according to the specified date parameters. This is accomplished by reviewing the NDNH "SWA Input Header Record" and "SWA Input Detail Record" for four or more arbitrarily chosen weekly samples of BAM cases submitted for matching. State BAM units will provide printouts of both the "SWA Input Header Record" and the "SWA Input detail records" for those weeks

The crossmatch requirements specified in UIPL 03-07, Change 1 are:

- Crossmatch the SSNs of the BAM sample cases with new hire directory records that include the period from the claimant's benefit year beginning (BYB) date (or 365 days prior to the KW [Key Week] ending date, whichever is less [shorter]) to 30 days after the KW ending date of the sampled week.

- States will enter 'Y' in the W-4 Same State Data Indicator (Attachment A, position 78 [of the SWA Input Detail Record]) to insure that BAM cases are crossmatched against new hire records submitted to NDNH by its own state (BAM state/Submitting state code).

- States will enter 'Y' – SSN/Name verification is requested.

To review the input file, monitors must parse the text file provided by the SWA according to the input record layout, which is at the end of this chapter (Attachment A). Parsing this data is easier than the hit file because it is a combination of numbers and letters. Instructions for conducting the review and handling each of the four required tasks as follows:

a. Monitors will verify that the sample case was submitted for matching at least 30 days after the key week end date by examining the SWA Input Header Record's date stamp. The date stamp value must be equal to or greater than the key week end date plus 30 days.

CHART 1: SWA INPUT HEADER RECORD				
Field Name	Location	Length	Numeric	Comments
Date Stamp	9-16	8	A/N	**Required = Key week end date plus 30 days or greater.** This field must contain the input file transmission date. This date will be in the of YYYYMMDD format.

b. Monitors will verify that the Name and SSN combination in the SWA Input Detail record matches those of the sample cases selected for the four weeks reviewed by comparing the SWA Input Detail Record fields SSN, Person First Name, and Person Last Name with the values or claimant information in case file.

CHART 2: SWA INPUT DETAIL RECORD				
Field Name	Location	Length	Alpha/ Numeric	Comments
SSN	7-15	9	A/N	**Required** This field must contain a nine-digit Social Security number (SSN).
Person First Name	17-26	10	A	**Required** This field must contain at least one alphabetic character or the record will be eliminated from the match and notification will be returned on the Output Error Detail Record. This field may contain hyphens.
Person Middle Name	27-36	10	A	**Optional** This field must contain alphabetic characters or spaces. This field may contain hyphens.
Person Last Name	37-56	20	A	**Required** This field must contain at least two alphabetic characters or the record will be eliminated from the match and notification will be returned on the Output Error Detail Record. This field may contain hyphens.

c. Monitors will verify that the crossmatch includes a space ' ' between the pass back code and

the W-4 Same State Data Indicator. This space ' ' is the **W-4 Match Indicator and is the request to crossmatch the record with new hire records.**

CHART 2: SWA INPUT DETAIL RECORD				
Field Name	Location	Length	Alpha/ Numeric	Comments
W-4 Match Indicator	77	1	A/N	**BAM require a ' ' space.** This field indicates if a state wants to match the submitted SSN to NDNH W-4 data. This field must contain a space or an 'N'. 'N' - Do not match the submitted SSN to NDNH W-4 data. ' ' - A space in this field indicates that the submitted SSN will be matched to NDNH W-4 data. Default is ' ' space.

d. Monitors will verify that the crossmatch includes the period from the benefit year begin date to 30 days after the key week end date by examining the SWA Input Detail Record's W-4 from date and W-4 through dates. The W-4 from date must be equal to the benefit year begin date or 365 days prior to the key week end date, whichever is less (shorter). The W-4 through date must be equal to or greater than the key week end date plus 30 days

CHART 2: SWA INPUT DETAIL RECORD				
Field Name	Location	Length	Alpha/ Numeric	Comments
W-4 From Date	79-86	8	A/N	**Required for BAM = Benefit year begin date or at least 365 days prior to the key week end date.** If this field contains a date in YYYYMMDD format, match only W-4 records processed from this date forward, dependent upon the W-4 Through Date. If this field contains spaces or an invalid date, match all available W-4 records from two weeks prior to the match, dependent upon the W-4 Through Date.
W-4 Through Date	87-94	8	A/N	**Required for BAM = 30 days after the key week end date.** If this field contains a date in YYYYMMDD format and the W-4 indicator is 'Y', match only W-4 records processed through this date, dependent upon the W-4 From Date. If this field contains spaces or an invalid date, match all available W-4 records, dependent upon the W-4 From Date.

e. Monitors will verify that the crossmatch includes same state data by verifying that the SWA Input Detail Record's W-4 Same State Data Indicator equals "Y."

CHART 2: SWA INPUT DETAIL RECORD				
Field Name	Location	Length	Alpha/ Numeric	Comments
W-4 Same State Data Indicator	78	1	A/N	**"Y" Required for BAM** This field indicates if the submitter is requesting W-4 data submitted to the NDNH by their state. This field must contain a space or one of the following values: 'Y' - Return matches where the submitter is the same as the W-4 submitting state. 'N' - Do <u>not</u> return matches where the submitter is the same as the W-4 submitting state. Default is 'N'.

f. Monitors will verify that the crossmatch includes SSN/Name verification request and notification of verification failures by verifying that the SWA Input Detail Record's Verification Request Indicator equals "Y."

As part of this review step, monitors must identify how the BAM unit is notified of verification failure, determine the steps taken to resolve the failure, and assess the establish procedures for resubmitting the corrected record.

CHART 2: SWA INPUT DETAIL RECORD				
Field Name	Location	Length	Alpha/ Numeric	Comments
Verification Request Indicator	16	1	A/N	**"Y" Required for BAM** This field must contain one of the following values to indicate if the submitter is requesting verification of the person's SSN and Name combination: 'Y' - SSN/Name verification is requested. Verification will be performed using SSA SSN verification routines. If verification fails, the record will be eliminated from the match and the verification result will be returned on the Output Error Detail Record. 'N' - SSN/Name verification is not requested and the submitter is certifying that this SSN/Name combination has been verified using SSA SSN verification routines prior to the match request. Default is 'Y'.

7. <u>Reporting SWA Sampling Review Findings</u>. Monitors should report the findings of each review in the annual determination letter and in response to BAM reports from the National Office. Worksheet QC-5 is provided for this purpose.

a. Worksheet. A facsimile of the QC-5 Worksheet is presented on pages 14-17 of this chapter and in Appendix B.

b. Worksheet Instructions. Worksheet QC-5 - Sample Selection, Assignment and Exceptions Review is used for recording the findings from state BAM sample selection reviews and verification of the NDNH submission process. The worksheet is used to report a summary of these findings to the National Office in Annual Determination Report with the state M & P reviews.

1) Header. Provide information requested.

- Type of Review - Check item appropriate to the period covered.
- Batches - Indicate batches covered by the review.
- Other items in the header are self-explanatory.

2) Questions. The questions in section I of the QC-5 parallel the procedures for reviewing the three aspects of sample selection presented in section 4, a and b; section 5, a, b, c, and d; and section 6, a, b, c, d, and e. Check "yes" or "no", as appropriate, for each question in accordance with the findings of the review. Any discrepancies found in sampling practices should be described in the “Explanation” section of the worksheet.

3) Explanation. Monitors will detail any crossmatch and / or sampling discrepancies and specify the crossmatch or sampling practices that are at variance with established BAM methodology. Monitors will also describe efforts to provide technical assistance and to assess any corrective action measures taken by the state agency. The monitor should establish a timeline for the corrective actions that will be taken

c. Transmitting Sampling Review Reports. The findings of the sampling and NDNH crossmatch reviews will be summarized in the annual state BAM M&P reports for the National Office. (See Chapter VIII, section 4. for more detail on Regional Office BAM reporting to the National Office.)

8. Review Schedule. Regional monitors are responsible for quarterly progress reviews of SWA BAM sample selection and NDNH crossmatch exceptions. The review of the automated sample selection program outputs and sample assignment process should be planned and carried out during regular on-site SWA BAM monitoring trips, but not less than biennially. Whenever a SWA redesigns it benefits system, the monitor must conduct a comprehensive review.

9. Facsimile of Worksheet QC-5

WORKSHEET QC-5
SAMPLE SELECTION, ASSIGNMENT, EXCEPTIONS, AND NDNH CROSSMATCH SUBMISSION REVIEWS

State_____ Date_____ Reviewer_____

Type of Review: Progress __ Biennial ____ Batches: #_____

I. QUESTIONS:

A. Sample Selection and Assignment

1. In all samples reviewed, were the cases assigned the same cases that were pulled? ___Yes ___ No

2. In each batch checked, were the cases in the rec1.dat file the same cases that were pulled by the BAM automated sample selection program ? ___Yes ___ No

B. Adequacy of Sample Levels

1. Did this State, in one or more weeks, fall below the minimum weekly sample? ATTACH SAMPLE SUMMARY REPORTS. ___Yes ___ No

2. Based on the projected annual sample size, is this State likely to meet its annual sample allocation in the calendar year? ___Yes ___ No

3. If the projected annual or the quarterly sample selected is below the allocated size, does the BAM supervisor have plans to adjust the workload to reach requirements? ___Yes ___ No ___N/A

WORKSHEET QC-5
SAMPLE SELECTION, ASSIGNMENT, EXCEPTIONS, AND NDNH CROSSMATCH SUBMISSION REVIEWS

State_____ Date_____ Reviewer_____

Type of Review: Progress __ Biennial ____ Batches: #_____

C. Sample/Population Exceptions

1. Has the State experienced exceptions, which affect representativeness in its weekly samples? ATTACH SAMPLE CHARACTERISTICS, SAMPLE VALIDATION, POPULATION EXCEPTIONS OR COMPARISON REPORTS. ___Yes ___ No

2. Has the SWA selected any samples that included one or more cases that do not belong in the BAM population? (For example, temporary extended benefits programs or excluded programs such as shared work or trade assistance.) ___Yes ___ No

3. Does one or more weekly batches include the same key week ending date for all cases, or exclude certain types of claims from the samples (for example, CWCs, Interstate, UCFEs, UCXs claims)? ___Yes ___ No

4. Has the BAM population of UI weeks or dollars paid fallen outside of the control limits for the year? If "Yes", attach the report. ___Yes ___ No

5. Does the BAM population benefits paid for the quarter fall outside of the control limits in comparison with the ETA 5159 Report? ___Yes ___ No

6. Does the BAM denial population for the quarter fall outside of the control limits in comparison to the ETA 218 and 5159 reports for monetary denials or in comparison to the ETA 207 and 9052 for separation and nonseparation denials? ___Yes ___ No

7. Does the BAM denial population for the quarter fall outside of the control limits in comparison to the ETA 218 and 5159 reports for monetary denials or in comparison to the ETA 207 and 9052 for separation and nonseparation denials? ___Yes ___ No

8. If the BAM paid or denial population for the quarter falls outside of the control limits, has the SWA developed a corrective action plan to resolve the issue? ___Yes ___ No

WORKSHEET QC-5
SAMPLE SELECTION, ASSIGNMENT, EXCEPTIONS, AND NDNH CROSSMATCH SUBMISSION REVIEWS

State_____ Date_____ Reviewer_____

Type of Review: Progress __ Biennial ____ Batches: #_____

D. National Directory of New Hire Crossmatch Data Submission.

1. Is the SWA Input Header Record's date stamp 30 days or greater after the key week end dates for each sample case of the four weeks of transmissions reviewed? ___ Yes ___ No

2. Do the name and SSN combinations of the four weeks of sample cases selected for review match the SWA Input Detail Record fields titled SSN, Person First Name, and Person last name? ___ Yes ___ No

3. Is the "W-4 from date" equal to the benefit year beginning date or less than or equal to 365 days prior to the key week end date? ___ Yes ___ No

4. Is the "W-4 through date" equal to or greater than the key week end date plus 30 days for each sample case? ___ Yes ___ No

5. Does the SWA Input Detail Record's "Verification Request Indicator" contain "Y" for the BAM records submitted to NDNH? ___ Yes ___ No

6. Is the "W-4 Same State Data Indicator" set to "Y"?

All answers for "Section D" (NDNH crossmatch submission) must be "yes" for a BAM unit to be compliant with requirements. Is the BAM program compliant with the NDNH crossmatch requirements specified in UIPL 03-07 Change I? If an answer to any of the questions above is no, then mark "no." ___ Yes ___ No

WORKSHEET QC-5
SAMPLE SELECTION, ASSIGNMENT, EXCEPTIONS, AND NDNH CROSSMATCH SUBMISSION REVIEWS

State_____ Date_____ Reviewer_____

Type of Review: Progress __ Biennial ____ Batches: #_____

EXPLANATION: Describe any issue identified with sample selection / assignment, adequacy of sampling levels, sample / population exceptions, or the NDNH crossmatch. Attach all reports and other records that document the exceptions that the monitor has identified. The monitor should detail efforts to provide TA and document corrective actions taken or planned by the state agency to remedy these situations.

CHART 1: SWA INPUT HEADER RECORD				
Field Name	Location	Length	Alpha/ Numeric	Comments
Submitter Identifier	1-3	3	A/N	**Required** This field uniquely identifies the submitter of the request file and must contain the characters '**SWA**'.
Record Identifier	4-6	3	A/N	**Required** This field must contain the characters '**HDR**'.
Submitting State Code	7-8	2	A/N	**Required for State Submitters** This field must contain the 2-digit numeric state FIPS code of the state submitting the transaction.
Date Stamp	9-16	8	A/N	**Required** This field must contain the input file transmission date. This must be in the Year 2000-compliant format of YYYYMMDD.
Filler	17-24	8	A/N	This field may be used for future enhancements. For the current version, this must be spaces.
Batch Number	25-32	8	N	**Optional** This field may contain the unique number assigned by the submitter to identify the batch of transactions submitted. Batch numbers are not edited for uniqueness. It is the responsibility of the submitter to ensure that a unique batch number is used for each submission.
Filler	33-200	168	A/N	This field may be used for future enhancements. For the current version, this field must be spaces.

Example of a BAM NDNH input detail record

natl_nh_swa_mtch - Notepad

File Edit Format View Help

```
SWAMCH999999999YJAY        G        GATSBY              BAM AUDIT          Y2008062720090727NN
SWAMCH999999999YHOLDEN     R        CAULFIELD           BAM AUDIT          Y2008062720090727NN
SWAMCH999999999YHUMBERT    L        HUMBERT             BAM AUDIT          Y2008062720090727NN
SWAMCH999999999YLEOPLOD    U        BLOOM               BAM AUDIT          Y2008062720090727NN
SWAMCH999999999YRABBIT     R        ANGSTROM            BAM AUDIT          Y2008062720090727NN
SWAMCH999999999YSHERLOCK            HOLMES              BAM AUDIT          Y2008062720090727NN
SWAMCH999999999YSTEPHEN    A        DEDALUS             BAM AUDIT          Y2008062720090727NN
SWAMCH999999999YHOLLY      G        LIGHTLY             BAM AUDIT          Y2008062720090727NN
SWAMCH999999999YBILLIE     B        BARBQUE             BAM AUDIT          Y2008062720090727NN
```

Ln 11, Col 1

CHART 2: SWA INPUT DETAIL RECORD LAYOUT				
Field Name	Location	Length	Alpha/ Numeric	Comments
Submitter Identifier	1-3	3	A/N	**Required** This field uniquely identifies the submitter of the request file and must contain the characters '**SWA**'.
Record Identifier	4-6	3	A/N	**Required** This field must contain the characters '**MCH**'.
SSN	7-15	9	A/N	**Required** This field must contain a nine-digit Social Security number (SSN). If this field is spaces, contains any alphabetic characters, is all zeros, all sixes or all nines, then the record will be eliminated from the match and notification will be returned on the Output Error Detail Record.
Verification Request Indicator	16	1	A/N	**Required for BAM – must equal "Y"** This field must contain one of the following values to indicate if the submitter is requesting verification of the person's SSN and Name combination: 'Y' – SSN/Name verification is requested. Verification will be performed using SSA SSN verification routines. If verification fails, the record will be eliminated from the match and the verification result will be returned on the Output Error Detail Record. 'N' – SSN/Name verification is not requested and the submitter is certifying that this SSN/Name combination has been verified using SSA SSN verification routines prior to the match request. Default is 'Y'.
Person First Name	17-26	10	A	**Required** This field must contain at least one alphabetic character or the record will be eliminated from the match and notification will be returned on the Output Error Detail Record. This field may contain hyphens.
Person Middle Name	27-36	10	A	**Optional** This field must contain alphabetic characters or spaces. This field may contain hyphens.
Person Last Name	37-56	20	A	**Required** This field must contain at least two alphabetic characters or the record will be eliminated from the match and notification will be returned on the Output Error Detail Record. This field may contain hyphens.
Passback Data	57-76	20	A/N	**Required for BAM** This field may be used by the submitter for identifying information and will be returned on the corresponding output match detail or error record.

CHART 2: SWA INPUT DETAIL RECORD LAYOUT				
Field Name	Location	Length	Alpha/ Numeric	Comments
W-4 Match Indicator	77	1	A/N	**Optional – must be a ‘ ‘ space for BAM** This field indicates if a state wants to match the submitted SSN to NDNH W-4 data. This field must contain a space or an ‘N’. ‘N’ – Do not match the submitted SSN to NDNH W-4 data. ‘ ‘ – A space in this field indicates that the submitted SSN will be matched to NDNH W-4 data. Default is ‘ ‘ space.
W-4 Same State Data Indicator	78	1	A/N	**Required for BAM – must equal “Y”** This field indicates if the submitter is requesting W-4 data submitted to the NDNH by their state. This field must contain a space or one of the following values: ‘Y’ - Return matches where the submitter is the same as the W-4 submitting state. ‘N’ – Do **not** return matches where the submitter is the same as the W-4 submitting state. Default is ‘N’.
W-4 From Date	79-86	8	A/N	**Required for BAM – must equal the benefit year begin date or 365 days prior to the Key week end date.** If this field contains a date in YYYYMMDD format, match only W-4 records processed from this date forward, dependent upon the W-4 Through Date. If this field contains spaces or an invalid date, match all available W-4 records from two weeks prior to the match, dependent upon the W-4 Through Date.
W-4 Through Date	87-94	8	A/N	**Required for BAM – must equal Key week end date plus 30 days.** If this field contains a date in YYYYMMDD format and the W-4 indicator is ‘Y’, match only W-4 records processed through this date, dependent upon the W-4 From Date. If this field contains spaces or an invalid date, match all available W-4 records, dependent upon the W-4 From Date.
QW Match Code	95	1	A/N	**Optional** This field must contain one of the following values to indicate if the submitter is requesting QW data and the type of match requested: ‘N’ – QW matching is not requested. ‘R’ – QW matching is requested based on Reporting Period. Default is ‘N’.

CHART 2: SWA INPUT DETAIL RECORD LAYOUT				
Field Name	Location	Length	Alpha/ Numeric	Comments
QW Same State Data Indicator	96	1	A/N	**Optional** This field indicates if the submitter is requesting QW data submitted to the NDNH by their state. This field must contain one of the following values: 'Y' – Return matches where the submitter is the same as the QW submitting state. 'N' – Do **not** return matches where the submitter is the same as the QW submitting state. Default is 'N'.
QW From Reporting Period	97-101	5	A/N	**Optional** If this field contains a reporting quarter in QCCYY format and the QW match code is 'R', match only QW records containing this calendar year reporting period forward, dependent upon the QW Through Reporting Period. If this field contains spaces or an invalid date and the QW Match Code is 'R', match all available QW records, dependent upon the QW Through Reporting Period. Valid quarter values (Q) are 1, 2, 3, or 4.
QW Through Reporting Period	102-106	5	A/N	**Optional** If this field contains a reporting quarter in QCCYY format and the QW Match Code is 'R', match only QW records up through this calendar year reporting period, dependent upon the QW From Reporting Period. If this field contains spaces or an invalid date and the QW Match Code is 'R', match all available QW records, dependent upon the QW From Reporting Period. Valid quarter values (Q) are 1, 2, 3, or 4.
Filler	107-200	94	A/N	This field must contain spaces.

BAM SAMPLE SELECTION - HIT FILE RECORD LAYOUT				
Item #	Field Name	Field Size	Beginning & Ending Positions	Formats
1	State I.D.	2	1-2	FIPS Code
2	Batch #	6	3-8	YYYYWW
3	Social Security #	9	9-17	Actual #
4	Claim Date	8	18-25	MMDDYYYY (Week Ending or Effective Date)
5	Transaction Date	8	26-33	MMDDYYYY
6	Sample Select. Ind.	1	34	1 or 2
7	Transaction Type	1	35	1 to 4
8	Gender	1	36	1, 2 or 8
9	Date of Birth	6	37-42	MMYYYY or 010001
10	Ethnic	1	43	1 to 5 or 8
11	Program Type	1	44	1 to 9
12	UI Duration	1	45	1 to 5
13	Amount Paid	3	46-48	Whole Dollars
14	Amount Offset	3	49-51	Whole Dollars
15	Amount of Intercept	3	52-54	Whole Dollars or Withholding
16	Claim Type	2	55-56	00-04, 11-15
17	Filing Status	1	57	1 to 3
18	Workshare Pct.	2	58-59	00 to 99
19	Run Date	8	60-67	MMDDYYYY
20	Adjustment Ind.	1	68	1 or 2
21	Total Amount "Paid"	3	69-71	Whole Dollars to Claimant
---	Filler	9	72-80	zero-filled; can be used by state for edit codes

CHAPTER IV

TIMELINESS OF CASE COMPLETION

1. Introduction. Regional office staff will monitor the timeliness of BAM case completion by analyzing case completion timeliness data available from the BAM Federal Monitoring System (OUI Web site http://www.uis.doleta.gov/). The purpose of monitoring timeliness is to foster prompt completion of BAM cases. Prompt completion of BAM investigations is important to ensure the integrity of the information collected by questioning claimants and employers before the passage of time affects accessibility and recollections.

Regional monitors will review timeliness performance for their states' BAM units throughout the year in order to determine whether the state agency is meeting BAM completion requirements and to understand problems that may exist which hamper a state BAM unit's efforts to complete cases timely. Monitors will use the outcomes of these reviews in the annual assessment of states' administration of BAM, as detailed in Chapter VII.

Additionally, regional monitors must identify and address performance issues such as case completion standards imposed by the State Workforce Agency (SWA) that are more restrictive than Federal standards. These more restrictive standards may impair the investigators' ability to complete a thorough audit. This timeliness issue may appear as the SWA closing a high percentage of cases without claimant responses, closing cases without reopening to incorporate NDNH crossmatch outcomes, overpayment detection rates higher than 95 percent, or any combination of these. The national office will support the monitor's review with additional detailed analysis and SWA-specific reports that are not generated by the OUI system.

2. BAM Case Completion Requirements. The following standards are established for completion of paid claims cases investigated during the year. (This includes all batches with week ending dates in the calendar year.)

- A minimum of 70 percent of cases must be completed within 60 days of the week-ending date of the batch, and 95 percent of cases must be completed within 90 days of the week ending date of the batch; and

- A minimum of 98 percent of cases for the year must be completed within 120 days of the ending date of the calendar year.

Prompt completion of denied claims investigations is important to ensure the integrity of the information being collected by questioning claimant and employers before the passage of time adversely affects recollections or the ability of the investigator to locate and contact the claimant. However, due to the fact that contacting denied claimants and obtaining information are more difficult than for paid claimants, different timeliness standards have been established for denied claims:

- A minimum of 60 percent of cases must be completed within 60 days of the week ending date of the batch, and 85 percent of cases must be completed within 90 days of the week ending date of the batch; and

- A minimum of 98 percent of cases for the year must be completed within 120 days of the ending date of the Calendar Year.

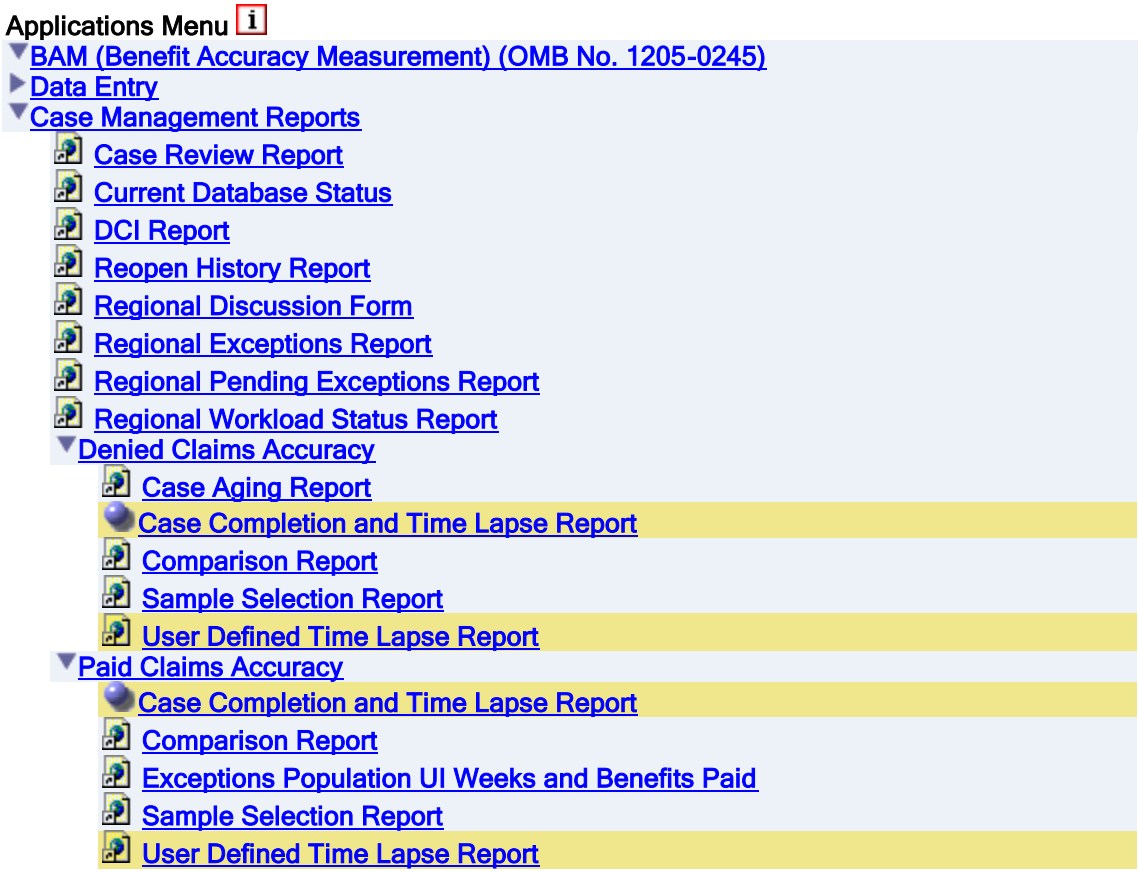
A case is complete when the investigation has been concluded, all official actions (except appeals) have been completed, the results have been entered into the computer, and the supervisor has signed off (review is optional). Beginning in Calendar Year 1993 a state-initiated

reopening of a case (code 3) will result in the recalculation of case completion time lapse using the reopen date.

If a state's timeliness rates for completion of cases sampled for investigation during the BAM sampling year do not meet the requirement, the regional office will determine if good cause existed for not achieving the requirement. Judgment as to what constitutes good cause will be based on individual circumstances, but generally will be considered the result of factors beyond the control of the state agency, such as a natural disaster.

3. Case Completion Review Process. The review process involves the following:

a. Obtaining the timeliness data from the regional office BAM Federal Monitoring System. Reports are available for paid and denied claim accuracy cases. For each audit type, these reports can be accessed on the OUI Web site, BAM Case Management Reports menu as shown below:



b. Comparing the SWA's timeliness results against the requirements and determining if the requirements are being met based on year-to-date information. The data for the 120-day requirement should also be monitored. It is important because it relates to the number of cases completed/included in the annual BAM analytical report published on the OUI public Web site.

c. If the requirements for timeliness are not being met for the year to date, the trends should be analyzed and the results discussed with the BAM supervisor to determine what actions, if any, are needed to achieve the requirements by the end of the measurement period.

4. Case Completion Review Schedule. Each calendar year is a separate measurement period. Progress reviews are made for the first three quarters of the calendar year. The final review is made for the completed calendar year. Each review (progress and final) covers an aggregate of all batches assigned from the beginning of the calendar year through the end of the respective calendar quarter or the calendar year.

The regional monitor will review case completion timeliness on the following schedule:

Type of Review	Quarters	Batch Range	Review Dates
Progress	1	01 - 13	August 1
Progress	1-2	01 - 26	November 1
Progress	1-3	01 - 39	February 1*
Final	1-4	01 - 52	May 1*

*Subsequent program year.

Examples of output reports are shown in Appendix B.

In order to capture complete data for all batches in the designated quarters, the case completion timeliness report must not be run until at least 90 days after the end of the quarter or the end of the batch range selection.

5. Resolution of poor timeliness performance. Regional monitors should identify timeliness failures. If the timeliness requirements are not met, regional staff should track timeliness more frequently (monthly or weekly). It may be useful to isolate batches for selected periods in order to identify and analyze the cause(s) of the problem.

The PCA and DCA user defined time lapse reports provide monitors the opportunity to review aging and completion at the investigator level and case flow characteristics. These reports should be used in analyzing and isolating performance problems.

Monitors must require BAM units to explain the actions being taken to address any failure of a state to meet the case completion timeliness criteria. If the monitor finds the corrective action plan inadequate, then the issue should be raised to the national office's attention. In addition, the monitor should follow dispute resolution procedures described in Chapter VII.

CHAPTER V

CASE REVIEW

1. Introduction. The Department of Labor is responsible for reviewing state BAM case investigative procedures and methodology to assess State Workforce Agency (SWA) adherence to BAM requirements. Standard data definitions and SWA investigative procedures have been designed to ensure that:

- sufficient information is collected to determine whether the key week payment or denial determination is proper; and

- accurate data are collected and recorded for analytical purposes.

Regional Office staff will periodically conduct reviews of BAM investigative case files for three purposes:

- To determine the adequacy of SWA case investigations with emphasis on BAM investigation of new issues and verification of previously resolved issues, and the accuracy of coding.

- To work with state agencies to improve BAM investigative operations; and

- To work with state agencies to correct case data.

Information obtained during a case review monitoring trip or from the peer review will be recorded by the monitor in the BAM Federal Monitoring System. Monitors will transmit the case review results to the SWA using the case review report, exceptions report, and discussion forms available through the OUI system.

2. Investigative Process and Data Collection Requirements. The requirements relating to the investigative process and data collection are located in ET Handbook No. 395, Benefit Accuracy Measurement State Operations Handbook, Chapters IV, V, VI, VII, VIII, and Appendix C (Investigative Guide Source, Action, and Documentation).

Appendix A of this handbook, “Case Review Tools”, contains instructions and descriptions of documents that will help in performing the review of states’ BAM cases. They include the Case Review Guide with instructions; the Exception Codes Summary Sheet; and the Monitoring Process Flow Chart and Explanation Summary, which gives a quick overview of the monitoring process.

3. Case Review to Assure Investigative Process and Data Collection. In order to obtain representative sampling throughout the year in each state, Regional Offices are requested to sample at least 10 cases in each of two non-consecutive quarters or five in each quarter. One on-site review is required during the year. Regional Office monitors may exercise the option of conducting the other case review by mail with state concurrence.

As an alternative to the on-site review, Regional Office monitors may conduct peer reviews in cooperation with their states. Monitors will schedule a session with as many states as agree to participate from the region. These peer reviews mirror the reviews conducted by the Regional monitor except that state staff review and assess the adequacy of the investigation and the accuracy of the coding of other states’ case data. Exceptions are noted and findings shared with the reviewed state (See Section 12 of this chapter for the Peer Quality Assurance Review Process). However, the monitor will communicate the results of the peer review to the state administrator. In addition, Regional Office monitors will enter any exceptions found as a result of the peer reviews into the BAM exceptions recording software application.

Monitors may also be required to conduct special reviews of any states reporting anomalous data in addition to the case monitoring requirements above.

Case review is necessary to verify that:

a. The SWA investigation is adequate (i.e., complete and thorough). This means determining whether:

(1) all issues have been identified;
(2) all issues have been pursued to a supportable conclusion; and
(3) all issues identified have been properly resolved, and that required BAM methodology and procedures have been followed.

b. The coding and entry of case information into the BAM database has been done accurately to reflect documentation in the case file. (This includes verifying that the conclusions concerning error classification have been based on the application of state written law and policy and upon the findings of thorough fact-finding.)

The chart below illustrates the steps in the process of BAM case review monitoring.

CASE REVIEW PROCESS FLOW CHART

The reviewer becomes knowledgeable of:
- State and Federal UI Law
- BAM requirements and procedures
- UI Benefit system display of required information / SWA printouts
- Case Review Guide and its use

↓

Select representative sample using the OUI system sample selection tool
Print sample selection report
Print Data Collection Instruments (DCI) for each case in the sample
Print Case Review Reports for each case in the sample

↓

Request audit case files
Assemble case review packet

↓

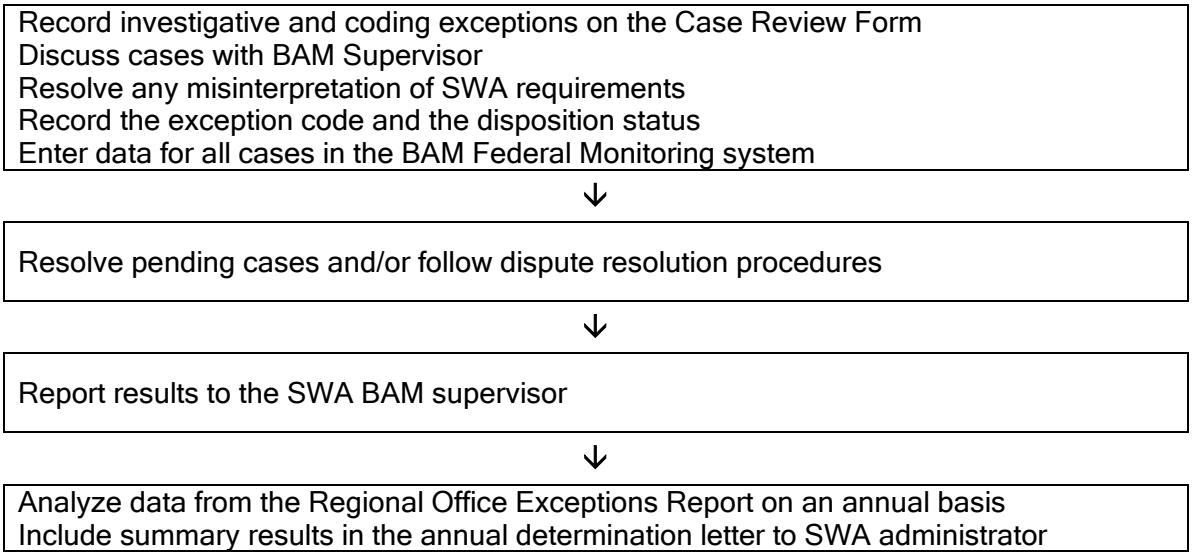
Conduct Case Review assuring compliance with the ET 395 Handbook guidelines and SWA specific requirements

- Review of case documentation using the Case Review Guide as a reference tool
- Review of case coding using the Investigative Requirement Crosswalk as a reference tool

↓

Determine if there is an investigative or coding exception
Assign the appropriate exception code

↓



4. Conduct Case Reviews. Regional Office monitors must conduct reviews of a representative sample of completed cases. The Case Review Guide, found in Appendix A, presents a minimal list of items that must be checked. It does not require any single approach or order of review and should not be construed as comprehensive. However, a final sign-off on a case (Disposition Codes 1, 2 or 3) by a monitor in the BAM Federal Monitoring System (OUI application) is a certification that all BAM investigative requirements have been reviewed. Each Regional Office is encouraged to develop state-specific versions of the Case Review Guide to assist in reviewing and evaluating the case file.

The forms necessary for conducting BAM case reviews are available for use at the time monitors select cases. Monitors access OUI Application to select and print these forms. The instructions for accessing this application are contained in Chapter VI of this handbook.

5. Determine and Classify Exceptions Found in Case Review. A system for classifying exceptions to the BAM methodology has been established. A coding structure suitable for use in the BAM Federal Monitoring System has been developed from this classification system to record information about inadequacies and exceptions to the required BAM methodology established in ET Handbook No. 395 that are detected in case investigations.

a. Definition of Case Exception. An exception arises in a BAM case when a reasonable question exists regarding the adequacy of the investigation or the accuracy of the coding of the findings. Exceptions occur whenever the BAM investigator **does not** do one or more of the following:

- Identify all issues;
- Pursue all issues to a supportable conclusion;
- Properly resolve all issues identified;
- Follow required BAM methodology and procedures; or
- Accurately code and enter the case information into the BAM database.

b. Description of Exception Code System. The exception coding structure has been developed to describe inadequacies detected in a case investigation. Exception Codes are directly derived from the requirements prescribed in ET Handbook No. 395. Each Exception Code consists of two 3-digit components. These component codes are:

(1) Requirement Code – The first three-digit code classifies investigative inadequacies and inconsistencies with uniform BAM requirements found in ET Handbook No. 395. These codes fall into five categories (series):

- **Identification (100) Series**: The BAM unit did not identify an issue.

- **Pursuit (200) Series**: The BAM unit did not pursue an issue to a supportable conclusion.

- **Resolution (300) Series**: The BAM unit did not properly resolve an issue.

- **Procedure (400) Series**: The BAM unit did not apply BAM procedures correctly.

- **Coding (500) Series**: The BAM unit did not code the case accurately.

(2) Issue, Process Point, and Coding Codes: The second three-digit code identifies the point in the BAM investigation process where the exception occurred. These codes fall into three categories:

- **Issue Code** - A three-digit code used to classify the type of eligibility issue related to the exception found.

- **Process Point Code** - A three-digit code used to classify the type of required BAM process or activity that relates to the exception found.

- **DCI Code** - A three-digit code used to classify the Data Element that was entered incorrectly.

Selections from the Identification, Pursuit, and Resolution Series (Codes 100, 200, and 300) of the Requirement Codes are matched with the three-digit Issue Code that best describes the type of eligibility issue affected.

Selections from the Procedures Series (Code 400) of the Requirement Codes are matched with the three-digit Process Point Code that best describes at what point in the BAM investigation that the exception occurred.

The Coding Series (Code 500) Requirement Codes are matched with the DCI item that has been coded inaccurately.

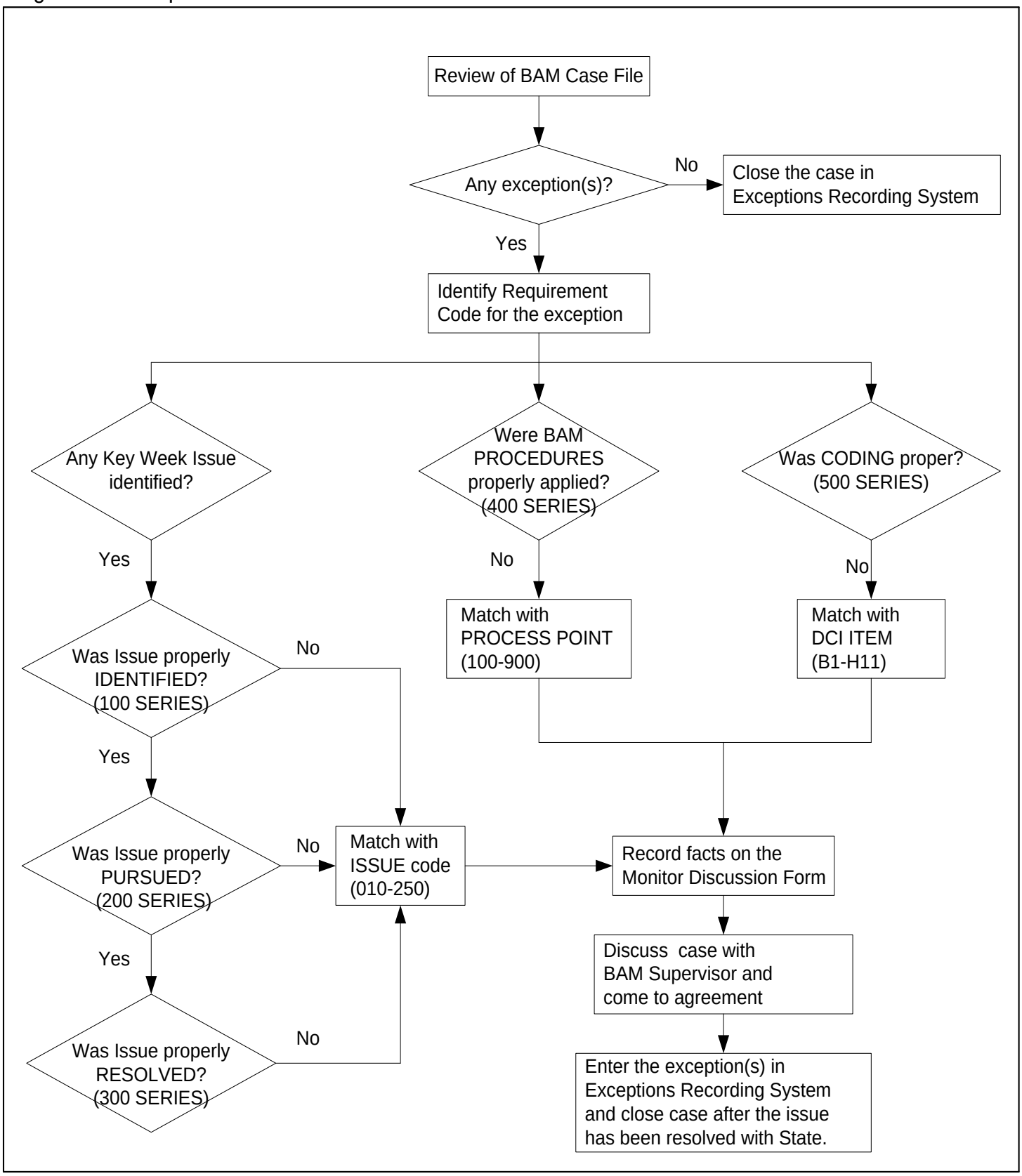
The third digit in the Requirement Codes, Issue Codes, and Process Point Codes is reserved for Regional and National Office use. Regions may choose to leave it as a zero or substitute single-digit codes that will enable them to identify additional factors that will aid technical assistance activities.

The Exception Code Summary Sheet and Exception Code Flow Chart are shown on the next two pages. These forms are also included in Appendix A of this handbook. The definitions for all the codes begin on page V-7.

ET HANDBOOK No. 396, 4TH EDITION
EXCEPTION CODE SUMMARY SHEET

BAM REQUIREMENT CODES		EXCEPTION POINT CODE
IDENTIFICATION SERIES: The BAM Unit DID NOT identify an issue. 110 The unidentified issue could potentially affect the accuracy of Key Week payment or denial of benefits 120 The unidentified issue could not affect the Key Week payment or denial of benefits PURSUIT SERIES: The BAM Unit DID NOT pursue issues to a supportable conclusion 210 Obtain adequate facts from the employer 220 Obtain adequate facts from the claimant 230 Obtain adequate facts from third parties 240 Obtain adequate facts from SWA 250 Obtain a necessary rebuttal 260 Refer to another unit for pursuit 270 Other, not elsewhere classified RESOLUTION SERIES: The BAM Unit DID NOT properly resolve the issue. 310 Issue a monetary redetermination 320 Issue a nonmonetary determination or redetermination 330 Issue a monetary redetermination consistent w/written State law/policy 340 Issue a formal/informal nonmonetary determination or redetermination consistent w/written State law/policy 350 Afford due process 360 Take other actions 370 Issue formal warnings 380 Other, not elsewhere classified	→	ISSUE TYPE CODE The REQUIREMENT exception relates to an ISSUE involving: 010 Monetary Eligibility 020 Covered Employment 030 Dependency 040 Requalifying Wages/Work on Subsequent BY 050 Seasonal Wage Credits 060 Employed 070 Separation, voluntary quit 080 Separation, discharge 090 Labor Dispute 110 Work Refusal 120 Removal of a disqualification 130 Able to Work 140 Available for Work 150 Actively Seeking Work 160 Other Eligibility Issues 170 Between Terms Denial 180 Issuance of Over/Underpayment Actions 190 Disqualifying Wages 210 Disqualifying Income 220 Fraud/Misrepresentation 230 Employment Service Registration 240 Alien Status 250 Other Issues, not elsewhere classified
PROCEDURE SERIES: The BAM Unit DID NOT apply BAM procedures correctly. 410 Include documentation 420 Properly record information 430 Conduct interviews as required, or explain 440 Attend appeal hearings, or explain 450 Follow Interstate procedures, or explain 460 Account for all sampled cases/enter data into the system 470 Other, not elsewhere classified (e.g. New hire crossmatch not performed as required 30 days after the key week end date or other such procedural failures)	→	PROCESS POINT CODES The REQUIREMENT exception relates to an investigative PROCESS involving: 100 SWA records 200 Claimant Interviews 300 Base Period Wage Verifications 400 Employer Separation Statements 500 Work Search, Union, Private Employment Agency Interviews/Verifications 600 Other Income, Work/Earnings Verifications 700 Agency Policy Statements 800 Case Completion/Summary of Investigation 900 Other Process Points, not elsewhere classified
CODING SERIES: The BAM Unit DID NOT code the case accurately. 510 Process data accurately -- careless 520 Process data accurately -- misunderstanding	→	DCI Item The REQUIREMENT exception relates the coding of DCI items, for example: one of the PCA elements B1 through B13 — F1 through F13 C1 through C9 — G1 through G15 D1 through D8 — H1 through H11 E1 through E19 — ei1 through ei9
OTHER: Miscellaneous 900 Grossly incomplete -- case cannot be reviewed without significant improvement.	→	Incomplete Case 000 Investigation grossly incomplete

Exception Codes Flow Chart. This chart illustrates the process utilized for determining the Exception Code to assign for the exception detected.



BAM REQUIREMENT EXCEPTION - ISSUE CODES

The following section defines BAM requirement exception codes (100-300 series) as they relate to identifying, pursuing, and resolving issues.

100 SERIES - IDENTIFICATION. THE BAM UNIT DID NOT IDENTIFY AN ISSUE.

Begin the process of selecting an exception code by reviewing the Identification Series first. Select codes from this series only if an issue was not positively identified. An issue has been positively identified if there is some documentation that shows recognition of the existence of the issue by the BAM unit.

For BAM purposes, the word issue is generally defined as follows:

An issue is any situation in which a reasonable question exists as to the claimant's past, present, or future eligibility for unemployment insurance benefits.

An example of an issue that is not identified properly is the claimant's mention of a Key Week job refusal with no evidence of recognition or pursuit of the issue by the BAM investigator.

Even if other problems exist in the Pursuit, Resolution, Procedure, or Coding Series arising from issue identification exceptions, the case should be coded in the Identification Series. Once an issue identification exception has been found, the monitor should select the code that better describes the exception from the following codes.

110 - The unidentified issue could potentially affect the paid or denied week(s). Use this code for any issue that could potentially affect the payment of the paid or denied week(s).

120 - The unidentified issue could not affect the paid or denied week(s). This code is used only for those issues that could have no possible affect on the paid or denied week(s), for example, a one-week denial of benefits for lack of availability four weeks prior to the Key Week. (Non-Key Week issues that develop must be pursued and resolved, but the BAM investigation should not be structured to detect them.)

200 SERIES - PURSUIT. THE BAM UNIT DID NOT PURSUE AN ISSUE TO A SUPPORTABLE CONCLUSION.

Selection of codes from the Pursuit Series should be considered only after the monitor has first considered selection from the Identification Series codes. Select Pursuit Series codes only if there is evidence that an issue has been positively identified by the BAM unit, but the subsequent pursuit of that issue is found to be inadequate. Inadequate issue pursuit is indicated when the monitor examines the facts of a case and there is not substantial evidence to support a conclusion.

An example of an issue not being pursued properly is obtaining information from the employer that the claimant was discharged for unauthorized absences from work, but failing to seek or obtain evidence on the reasons for the absences, dates that the absences occurred, warnings to the claimant, or behavior after the warnings.

Documentation must be certain and exact. It must contain essential facts. If a fact is missing or its absence is not adequately explained, and the fact is necessary to the resolution of the issue, an exception must be coded. The case cannot stand on its own merit if it is not pursued to a supportable conclusion.

The investigator must conduct new and original fact-finding on newly arising issues, or on previous issues not adequately adjudicated. Facts must be verified on previously resolved issues affecting the paid or denied week(s) that appear to have been handled properly. These codes relate to the quality of the investigation. Each code applies to claimant, employer, or third party.

"New and original fact-finding" means interviewing the best witnesses available, obtaining the best evidence available, and using open-ended inquiries. New and original fact-finding is applicable not only to newly arising issues, but also to those developed in attempted verification (see next paragraph). It must be done in accordance with BAM investigative procedures using any method to obtain the needed information or an adequate explanation must be provided as to why it was not done.

"Verify facts" means confirming previously established statements, reviewing previously established records, and using controlling inquiries. Verification of facts applies to previously resolved issues, but if a **new** issue is developed, new and original fact-finding is employed. (See previous paragraph.) It must be done in accordance with BAM investigative procedures or an adequate explanation must be provided as to why it was not done. Once an issue pursuit exception has been identified, the monitor should select the code that best describes the exception from the following list of codes.

210 - Obtain adequate facts from the employer. This code is selected when the case contains documentation to prove that the investigator realized there was an issue or a question concerning the claimant's past, present, or future right to benefits, but the facts are not adequate to correctly resolve the issue. All errors and/or omissions arising in the collection of facts prior to the point at that the actual decision is made are coded in this series. Facts may be inadequate if they do not cover all aspects of the issue that are required under standard principles of adjudication and any special facts that may be required under state policies.

ET Handbook No. 301, A Performance Based Quality Control Program for Nonmonetary Adjudication, can be used as a reference tool in determining all facts necessary to adjudicate the issue properly. If any necessary information is missing and there is no acceptable explanation of the investigator's inability to secure the information, the facts are inadequate.

Do not code the fact-finding as inadequate if there is documentation that the BAM unit attempted to obtain information and has provided an adequate explanation for the inability to get information that is more detailed.

220, 230 and 240 - Obtain adequate facts from the claimant, third parties and state agency. Same as the definition for 210, only applies to the claimant, third parties and state agencies, respectively.

250 - Obtain/attempt to obtain a necessary rebuttal. Select this code when the documentation in the file establishes that one of the interested parties was not given an opportunity for rebuttal. All parties must be afforded the opportunity to present rebuttal to information that is in conflict with information that they have presented, if the conflicting facts are to be used to resolve the issue. The investigator is not required to obtain agreement between the conflicting statements, but the parties must be apprised of the information and given the opportunity to present information that supports their respective cases.

Both the claimant and employer must be offered the opportunity for rebuttal for both monetary and nonmonetary determinations, irrespective of finality provisions in state law.

Rebuttal includes the opportunity not only to offer opposing facts, but also to argue or explain the facts or suggest other sources where facts can be found.

Opportunities for rebuttal can be initially pursued in person, by phone, or by mail, but if an issue develops, it must be pursued in accordance with BAM investigative procedures.

260 - Refer to another unit for pursuit. This code is selected when an issue that should have been pursued by a unit other than the BAM unit has not been referred to the appropriate unit for action.

270 - Other, not elsewhere classified. This covers any pursuit of an issue requirement not previously listed.

300 SERIES - RESOLUTION. THE BAM UNIT DID NOT PROPERLY RESOLVE ISSUE.

Selection of codes from the Resolution Series is considered only after the monitor has considered selection from the Identification and Pursuit Series. This series is selected only if issues have been properly identified and pursued so that substantial evidence is available to support a proper conclusion. This series applies not only to the BAM unit, but also to non-BAM units that may act on an issue. An example of an issue that has not been properly resolved is where the facts of a given case and State law require that a recoverable overpayment be established, but the action has not been taken by the agency. Even if other problems exist in the Procedure or Coding Series arising from issue resolution exceptions, the case is coded in the Resolution Series. Once an issue resolution exception is identified, the monitor should select the code that best describes the exception from the following list of codes.

310 - Issue a monetary redetermination. Select this code when the issue has been identified and pursued to a supportable conclusion but a monetary redetermination has not been issued.

320 - Issue a nonmonetary determination or redetermination. Select this code when the issue has been identified and pursued to a supportable conclusion but a nonmonetary determination or redetermination has not been issued.

330 - Issue a monetary redetermination consistent with state written law and policy. This code is selected when all issues have been identified, pursued to a supportable conclusion, and a redetermination has been issued, but the decision is incorrect based on the facts and state written law and policy.

340 - Issue a formal/informal nonmonetary determination or redetermination consistent with state written law and policy. This code is selected when all issues have been identified, pursued to a supportable conclusion, and a determination or redetermination has been issued, but the decision is incorrect based on the facts and state written law and policy.

350 - Afford due process. This code is selected when the claimant's rights have been substantively compromised. This is the case with respect to the Secretary's Standard for Claims Determinations, the principles addressed by the U.S. Supreme Court in California Department of Human Resources Development et al. v. Java et al., 402 U.S. 121, or other principles of fair hearing embodied in Section #03(a)(3) of the Social Security Act. For example, a determination was printed but not issued, appeal rights are missing, or the determination fails to state the reasons in a way that a reasonable person understands.

360 - Take other required actions. Select this code when the documentation contained in

the case record proves that an action should have been taken, but the record establishes the fact that the action was never taken. This applies to both BAM and non-BAM units, if the issue was properly identified and pursued, but has not been resolved by official action. This would include instances where a monetary redetermination is required, but the BAM unit did not refer the case to the appropriate unit for issuance of the redetermination; or a monetary redetermination was issued, but supplemental checks were never issued.

370 - Issue formal warnings. This code should be used only in those states having a provision in law and/or a written policy that requires the issuance of a written formal warning for noncompliance with work search or other eligibility requirements. Select this code when the case contains all of the documentation necessary to prove that a formal warning should have been issued, but was not issued or was improperly issued.

380 - Other, not elsewhere classified. This covers any issue resolution requirement not previously listed.

INDENTIFICATION, PURSUIT, OR RESOLUTION EXCEPTIONS ISSUE TYPE CODE

The following section defines BAM exception point codes as they relate to identifying, pursuing, and resolving specific case issues.

ISSUE CODES. Once a Requirement exception from the Identification, Pursuit, or Resolution Series is identified, the monitor should select the Issue Code that best describes the exception.

The 23 issue description codes listed below classify the specific issues relating to exceptions coded in Requirement Codes for Identification, Pursuit, and Resolution Series (Codes 100, 200, 300).

The REQUIREMENT exception relates to an ISSUE involving:

010 - Monetary eligibility
020 - Covered employment
030 - Dependency
040 - Requalifying wages/work on subsequent benefit year
050 - Seasonal wage credits
060 - Employed
070 - Separation, voluntary quit
080 - Separation, discharge
090 - Labor dispute
110 - Work refusal
120 - Removal of a disqualification
130 - Able to work
140 - Available for work
150 - Actively seeking work
160 - Other eligibility issues
170 - Between-terms denial
180 - Issuance of overpayment/underpayment actions
190 - Disqualifying wages
210 - Disqualifying income
220 - Fraud/misrepresentation
230 - Employment Service (Job Service) registration
240 - Alien status
250 - Other issues, not elsewhere classified

BAM REQUIREMENT EXCEPTION - PROCEDURE CODES

The following section defines BAM requirement exception codes (400 series) as related to BAM procedures

400 SERIES -- PROCEDURE. THE BAM UNIT DID NOT APPLY BAM PROCEDURES CORRECTLY.

ET Handbook No. 395 establishes specific procedures and processes that state BAM investigators must follow for conducting BAM investigations to ensure the integrity of the data collected. For example, a BAM investigator fails to verify a work search contact and does not provide an explanation or provides an unacceptable reason for not verifying the contact. If a procedural inadequacy also results in coding exceptions, the monitor should only record the procedural exception in this series. This reflects the hierarchy between procedures and coding: the failure to follow BAM procedures renders the related coding immaterial.

Once a BAM procedural exception is identified, the monitor selects the code that best describes the exception from the following list of codes.

410 - Include Documentation. Use this code only when the BAM unit failed to obtain documentation that would establish that the required procedures had been followed. (The document is missing.) Required documentation includes, at a minimum, a copy of all agency documents from the claimant's original file and any documents pertaining to the BAM investigation as described in Chapter VII of ET Handbook No. 395.

420 - Properly record information. Use this code for any situation where the document is included in the file, but contains an inadequacy. Some examples are:

- missing answers on a BAM form
- missing explanation for discrepancies on a BAM form
- inadequate explanation of inconsistencies on a BAM form
- missing signatures and dates
- inadequate or incomplete Summary of Investigation

430 - Conduct interviews as required, or adequately explain why it was not possible. Use this code when the claimant interview is not conducted and an adequate effort to obtain an interview is not made or not adequately explained; or a work search contact is not verified and an adequate effort to verify is not made or not adequately explained.

440 - Attend appeal hearings or provide an adequate explanation for non-attendance. BAM investigators are required to attend appeals hearings resulting from BAM determinations. See ET Handbook No. 395, Investigative Requirements, Chapter VI.

450 - Follow required Interstate procedures. This code is no longer applicable based on BAM investigative requirements (see #9 of ET Handbook No.395, page VI-6).

460 - Account for all sampled cases/enter data into the system. This code is selected if a case cannot be located for review or if a sampled case has not been included in the state BAM database.

470 - Other, not elsewhere classified. This covers any procedural requirement not previously listed.

PROCEDURE EXCEPTION - PROCESS POINT CODE

The following section defines the process point codes as they relate to BAM investigative responsibilities and documentation.

PROCESS POINT CODES. The nine Process Codes listed below are used in conjunction with the Procedure (Code 400) Series Requirement Codes. Once an exception has been identified in the Procedure Series, the monitor selects the code that best describes the BAM process that was not adequately handled.

100 - State agency claims/tax records (both original & after investigation)
200 - Claimant interviews
300 - Base period wage verifications
400 - Employer separation statements
500 - Work search, union, private employment agency interviews/verifications
600 - Other income, work and earnings verifications
700 - Agency policy statements
800 - Case completion/summary of investigation
900 - Other process points, not elsewhere classified

BAM REQUIREMENT EXCEPTION – CODING SERIES CODES

The following section defines BAM requirement exception codes related to BAM Data Collection Instrument (DCI) coding.

500 SERIES - CODING. THE BAM UNIT DID NOT CODE THE CASE ACCURATELY.

This requirement category is used to describe any exceptions that relate to entering case information into the DCI. The 500-series codes should be used only if there is evidence that an issue has been positively identified by the BAM Unit, the subsequent pursuit of that issue was adequate, the resolution is proper, and correct BAM procedures were followed, but the case is coded inaccurately.

An example of a Coding Series exception is an overpayment that has been established by BAM for $100, but is coded on the DCI as $1000.

Once a BAM coding exception is identified, the monitor selects the code that best describes the exception from the following list of codes.

510 - Process data accurately - unintentional. This code is used for any coding error that appears to be inadvertent. It includes, but is not limited to:

- Data entry errors
- Computation errors
- Transcription errors
- Transposition errors

520 - Process data accurately - misinterpretation. This code is selected if the error in coding a data element is caused by investigator misinterpretation of a data element definition.

CODING SERIES EXCEPTION - DCI ITEM CODE

The following section defines BAM coding exception point codes as they relate to BAM Data

Collection Instrument coding.

For the second three-digit code of the noted exception, the monitor will record the data element that is incorrect. For instance, data element "d01" is coded as a lack of work (10) but should have been coded as a discharge (30). The REQUIREMENT exception relates to one of the DCI items:

Paid Claim Accuracy		Denied Claim Accuracy	
Claimant Info.	B01 through B13	Identifying & claimant Info.	(1) through (21)
Benefit Year Info.	C01 through C09	Benefit Year Information	(22) through (36)
Separation Info.	D01 through D08	Monetary Denial Info.	(42) through (56)
Monetary Eligibility Info.	E01 through E19	Separation Denial Info.	(57) through (61)
Benefit Payment History	F01 through F13	Nonseparation Denial info	(62) through (89)
E.S. and Work Search	G01 through G15	Case Action	(90) through (97)
Payment Propriety	H01 through H11	DCA Error Coding	(98) through (106)
PCA Error Coding	ei1 through ei9		

Hint: If the exception point involves the error coding series (e.g. ei1 to ei9), then the monitor must enter the associated error issue number (error 1 = 1, error 2=2, etc.) in the second entry space.

ISSUE/POINT/DCI CODE	ei3	2

BAM REQUIREMENT EXCEPTION - OTHER CODE

The following section defines BAM requirement exception codes as they relate to overall adequacy of the BAM case investigation.

A final exception code is available for use by monitors to document overall inadequacy of the BAM case investigation. When a BAM investigator's audit is considered grossly inadequate, the state BAM supervisor should reassign the case for reinvestigation. This code is NOT to be used simply because an excessive number of errors are found in the case.

> 900 - Grossly Incomplete – Regional monitor determines that investigation of the case is incomplete and that further review is not warranted; or requires reinvestigation (e.g., wrong week investigated). The monitor will request the BAM supervisor to reassign the case for a new investigation.

This exception point code, 000 - Investigation grossly incomplete, is used exclusively with the 900 BAM requirement exception code.

6. Recording Exceptions. Regional monitors must record findings from case review in sufficient detail to identify the case, provide for discussion with the appropriate BAM staff, and maintain documentation about the review for entry into the BAM Federal Monitoring System. The reports necessary for recording exceptions are accessed from the Application Menu on the OUI Web site. Chapter VI of this handbook provides the step-by-step instructions for retrieval of the reports.

Following a review, the Regional Office monitor enters any case exceptions found into the automated system. Cases sampled but not reviewed are identified by the system as non-reviewed cases. The automated system will include them as non-reviewed cases on the next Sample Selection Report.

7. Completing the Monitor Discussion Form. All exceptions noted during the review of the case must be documented in complete narrative detail. This information is used for discussion with the state BAM supervisor to clarify whether or not an exception actually exists. The narrative provided

on the Monitor Discussion Form is used for follow-up action on the exception(s) to ascertain that proper corrective action has been taken. A separate discussion form is completed for each case.

The regional monitor will record sufficient narrative as to the type, cause, and description of the exception(s) for documentation and provide a trail to properly review the case during a follow-up visit. The explanation should be more case-specific than the items listed on the Investigative Requirement Exception Codes. When an exception is pending correction, it is important that the associated data element be reviewed in follow-up visits.

If the state BAM supervisor and the regional monitor cannot reach a consensus, the monitor should follow dispute resolution procedures described in Chapter VII and use Disposition Code "4 - Pending."

If consensus is reached later, the Disposition Code should be changed to "2 - Resolved."
If it is still not possible to reach a consensus after following the Dispute Resolution procedures, the Disposition Code should be changed to "3 - Disputed."

During subsequent reviews, no further entry is needed if the status of the exception is unchanged.

If a clarification is requested/required prior to final resolution, Disposition Code "4 - Pending" should be used.

Data recorded on the Monitor Discussion Form is entered in the automated system. This will trigger a follow-up report if the action has not been resolved during the initial or subsequent visit(s). When action is completed on each exception, the monitor records the results in the system.

When final action on all exceptions for a case is completed, the Disposition Code on the discussion form is changed to "2 - Resolved." (All codes 4 and 5 must ultimately be resolved as codes 1, 2, or 3.) It is mandatory to keep the discussion form containing the narrative detail of the exception, preferably in the case file. This allows for review by either the Regional or the National Office monitor even if no exception exists.

Record the Exception Code, if appropriate, after discussion with the state BAM Supervisor. If a case has more than one exception, separate entries must be made, but only one exception should be coded for each independently arising issue. For example, if an issue is not identified, this is the exception that is coded; failure to conduct fact-finding or properly resolve the issue would <u>not</u> be coded an exception.

Similarly, if failure to pursue a separation issue is the independently arising issue, an exception is coded for failure to obtain adequate facts from either the employer or the claimant but not both parties.

Each instance of an exception is recorded even though it occurs in every case reviewed. Any question left unanswered without adequate explanation will be coded as an exception. However, multi-part questions that are incomplete are coded as one exception regardless of the number of incomplete items. Any discrepancy in information gathered by an investigator not explained in a marginal note or, if necessary, does not lead to a fact-finding statement is coded as an exception. Incorrect data requested by the state BAM investigator is coded as an exception even though apparently correct information was obtained. Key Week payment or denial of benefits

Coding exceptions are coded only for each independently arising DCI error. For example, if before investigation and after investigation fields do not change as a result of the investigation, but both are coded wrong due to the erroneous coding of the before field, then only one error has occurred. If both are independently coded wrong, then two errors and two exceptions are

recorded. If a work search contact is coded acceptable and the monitor determines it is unverifiable only one error and only one exception are coded, even though two fields are affected. Selection of the best exception code should be determined by using the detailed instructions and definitions listed.

a. How to Handle Cases with No Exceptions. If there are no exceptions in the case, proceed to the "Disposition" column, and enter "1". This code indicates the case is approved without any exceptions.

(b) How to Handle Cases with Exceptions. When exceptions occur, the monitor selects the combination of codes most descriptive of the inadequacy. The flow chart on the next page illustrates the process used for classifying the exceptions.

8. Disposition Codes. Disposition Codes are used to record the current status of the case. The "Disposition" column is completed for cases with exceptions only after the exceptions have been discussed with the SWA BAM supervisor. Record one of the following codes:

1 - Approved. The case has no exceptions. This code constitutes monitor approval and sign-off.

2 - Resolved. When all exceptions in the case have been corrected or it is agreed that no correction will be made, the disposition code will be "2 - Resolved." For example, Work Search Verification is properly completed and signed, but not dated; the monitor and state BAM supervisor agree to correct the problem in the future but not to take action on the particular case. This code constitutes monitor approval of the changes and monitor sign-off. If any correction agreed to is not made before the monitor departs, the case will be coded "4 - Pending."

3 - Disputed. The case cannot be resolved between the state BAM supervisor and Regional Office monitor. This code constitutes final action and monitor sign-off.

4 - Pending. The case exceptions have been discussed with the state BAM supervisor, and corrective action has been agreed upon, but not completed. This code designates work-in-progress and does not constitute monitor sign-off. This entry will trigger a list of cases for follow-up review through the OUI Application's pending exceptions report or through the recover prior sample selection report's pending case generation option.

5 - Reviewed but not Discussed. The case has been reviewed completely and the monitor discussion form lists one or more exceptions, but the supervisor and the monitor have not yet discussed the exceptions and reached agreement on disposition. It designates work-in-progress and does not constitute monitor sign-off. This entry will trigger a list of cases for follow-up review through the OUI Application.

9. Keeping Investigative Exception Tracking Logs. Chapter VI of this handbook provides detailed instructions for entering data on the automated exceptions software application. Refer to Chapter VI for instructions on recording data.

10. Personal Observation of the BAM Investigators Techniques. One of the goals of BAM monitoring is ensuring that BAM Requirements are followed. It may be necessary to accompany the state BAM investigator to the field. The frequency of the field operation visit(s) will be at the discretion of the Regional Office consistent with available resources and program needs.

11. Schedule. Segments of the review are scheduled as follows:

a. Case Review. Ongoing (often enough to ensure an annual specified case review sub-

sample is accomplished). Regional Offices may alternate the case review of BAM Denied Claims Accuracy (DCA) with BAM Paid Claims Accuracy (PCA) every other year for each state, except those with DCA or PCA programs determined to be at-risk because of anomalous data. The table below demonstrates this alternating schedule.

State	Year	DCA	PCA
Columbiana	2008	20 cases	None
Columbiana	2009	None	20 cases; additional cases for anomaly review
New River	2008	20 cases	Anomaly review
New River	2009	None	20 cases

In order to obtain representative sampling throughout the year in each state, monitors are required to sample at least 10 cases in each of two non-consecutive quarters or five in each quarter. Case monitoring may be accomplished as desk review, on-site review, and peer review.

b. Exception Review. Quarterly and annually, based on Regional Office tracking record.

c. Requirement Determination. Annually, based on cumulative results of case findings and exception analyses reports. (This determination will not be made until sufficient data is collected and analyzed to establish benchmarks.)

12. Peer Quality Assurance Review Process.

As an alternative to the on-site review, Regional Office monitors may conduct peer reviews in cooperation with their states. These are known as Peer Quality Assurance Reviews (PQAR) and are similar to the Regional Office review process; however, teams of state BAM experts evaluate the randomly selected audits. The review should evaluate whether staff investigators conformed to the SWA's policy as outlined through State's administrative rules and laws and whether work was completed in accordance with the BAM methodology prescribed in ET Handbook 395 and individual state BAM audit guidelines. PQAR should ensure that completed audits conducted by state investigators:

- Comply with the applicable standards,
- Meet the audit requirements,
- Adhere to SWA's laws, policy, and procedures,
- Demonstrate effectiveness of operations,
- Identify training issues to develop investigators skills,
- Assess whether sound judgment was used for deciding materiality,
- Conclude whether all audit observations are supported by evidence, and
- Standardize methodology, procedures, and audit scope between SWAs.

These PQARs mirror the current case review procedures except that state staffs review the adequacy of the investigation, assess adherence to procedures, and evaluate the case data coding accuracy. However, monitors retain responsibility for assuring the case review integrity.

Peer Quality Assurance Review Methodology

This section provides a description of the BAM Peer Quality Assurance Review procedures for conducting the reviews, and the method for reconciling evaluations. In addition to the normal case review process detailed in this chapter, the core requirements of the PQAR process include the following:

1. The Regional Office monitor will provide to all PQAR participants copies of Chapter V of the ET 396 Handbook and explain the case review process.

2. Regional Office staff will make available copies of the current year's "Comparison of State Laws" (http://ows.doleta.gov/unemploy/statelaws.asp#Statelaw), and "Significant Provisions of State UI Laws" (http://ows.doleta.gov/unemploy/statelaws.asp#sigprouilaws), in addition to ET Handbook 301 Guide Sheets found in chapter VI (pp. VI-1 thru VI-47).

3. The state BAM unit, whose cases are to be reviewed, will present a summary of their SWA's laws, rules, and procedures (including their state-specific BAM manual).

4. The participants of the state BAM unit whose cases are being reviewed must not be involved in PQAR steps five through nine, except for providing clarification and specifics about its SWA's rules, law, and procedures or providing assistance in finding case information.

5. If sample size allows adequate time, then two BAM experts must independently review each denied claim or paid claim audit.

6. Each reviewer should have his or her own copy of the case review guide checklist (pp. V-19 to V-24), data collection instrument (DCI), and review discussion form, which will be used for each case. Each reviewer records his/her findings on these forms for each audit.

7. The findings of the first reviewer should not be disclosed to the second reviewer prior to his/her independent review of the same cases. Before passing the audit file to the second reviewer, the first reviewer's review discussion form, marked-up review guide checklist (pp. V-19 to V-24), and DCI should be removed from audit file and held by the monitor.

8. Once the two independent reviews are completed, the two reviewers must compare their results element by element.

9. Any disagreements are settled by a third person, which is usually the Regional Office monitor. If the reviewers do not agree, the case must be provided to the tie-breaker for an independent evaluation and reconciliation with one of the other reviewers.

10. Once case reviewers agree on appropriate DCI and/or procedure exceptions or the lack thereof, then their findings are shared with the BAM unit that is subject to review.

11. The reviewers and the subject BAM unit should agree on the outcome of each element evaluated before an official score is entered into the database. However, the Regional Office is responsible for recording case findings.

12. Hard copies of the DCI and review discussion forms from all reviewers should be retained by the SWA for future reference. This information, particularly the "Comments" sections, will be helpful in identifying and resolving any inconsistencies in scoring outcomes and in reviewing the validity of issues identified.

13. Monitors may record the case disposition when possible. However, if the subject BAM unit disagrees with the PQAR case review findings, then the Regional Office monitor will follow the dispute resolution process found in Chapter 7.

14. Unless the case exception is in dispute, all findings should be consider final as of the last day of the review.

PQAR Organization

Participation in the PQAR process can vary, including staff from States in other Regions. The process has been designed to allow for maximum flexibility, within the core requirements explained above. National Office staff may also participate in the PQAR. Within the PQAR framework, Regional Office monitors are either directly responsible for and/or responsible for coordinating the following:

- Identifying the participating SWAs, selecting the host state or Regional Office location, and planning PQAR dates;
- Developing the call memo and announcement distribution;
- Meeting planning / facilities / schedule;
- Sample selection and notification to participants of samples selected; and
- Case file mailing instructions or shipping procedures.

Monitors should emphasize that participants must have substantial experience with the BAM program. BAM staff will conduct reviews of BAM investigative case files to determine the adequacy of SWA case investigations with emphasis on BAM investigation of new issues and verification of previously resolved issues, and the accuracy of coding. PQAR participants must be able to determine whether sufficient information was collected to determine whether the key week payment or denial determination was proper, and to ensure that accurate data was collected and recorded for analytical purposes.

Case Review Guide

The Case Review Guide provides a minimum review and should not be construed as all-inclusive. Moreover, each monitor will have an individual method of reviewing each case. A final sign-off on a case (Disposition Codes 1, 2 or 3) by a monitor in the OUI BAM exceptions recording system is a certification that all BAM investigative requirements were reviewed. Each Regional Office is encouraged to develop state-specific versions of the Case Review Guide to assist in reviewing and evaluating the case file.

Each document or process listed in the Guide must be examined thoroughly to determine if the investigation is complete and thorough and the coding accurate. Following are the instructions for the use of the Case Review Guide.

a. The left column of the Case Review Guide lists documents and processes which correspond to elements on the Data Collection Instrument (DCI) and require investigative procedures.

b. The center column lists specific items on the documents, or situations and information that require investigation or verification by the BAM unit.

c. The right column outlines the type of fact-finding that should have been conducted, the type of verification activity that should have been conducted, and the documentation that would be needed to substantiate that the requirements have been adequately met.

CASE REVIEW GUIDE		
DOCUMENT	**ITEM TO REVIEW**	**ACTION / VERIFICATION**
Initial/Additional Claims	Effective date/date filed	Matches monetary determination / claim application
	Employer(s): - Separation date - Reason for separation	Matches employer & claimant statement(s): - Separation date - Reason for separation
	Eligibility Issues: - Able & available - School Referral/work refusal	Fact finding statement(s) that address any of the potential issues listed
	Disqualifying income - Pension - Vacation - Severance	Verification statements from income source(s)
	Alien Status	Status Verification - Systematic Alien Verification for Entitlements (SAVE) Program or secondary verification
	Dependents	Verification/documentation
	Out-of-state employment	Issues addressed
	Benefit Rights Interview	Matches claimant questionnaire
	Requalifying wages	Earnings verification

CASE REVIEW GUIDE		
DOCUMENT	**ITEM TO REVIEW**	**ACTION / VERIFICATION**
Monetary Determination	Number of employers and wages	Employer wage verification for all listed employers
	Weeks of work	Weeks of work
	Effective date	Matches initial claim
	Base period	Correct period for effective date
	Weekly benefit amount (WBA) Maximum benefit amount (MBA)	Calculated properly under law
Monetary Redetermination	Additional employers	Wage verification(s) from added employers
	Base period wages / high quarter wage change (includes alternate or extended base period determinations)	Wage correction in base period quarter(s)
	Increase/decrease in WBA	Supplemental check(s) issued or overpayment determinations
State agency Job Service (JS) or Employment Service (ES) records; ERP records	Active registration date Referral date(s)	JS registration Employer verification of referral result
	Employers listed in JS records that are not listed on monetary determination	Wage & separation statement Claimant statement on employment
	Wage or other restrictions	Claimant statement on restriction & availability determination
	Type of work seeking	Matches claimant questionnaire – claimant statement if inconsistency
	Address	Matches claimant questionnaire – notice to JS if different
Benefit History Printout	Effective date WBA MBA Balance	Matches monetary determination
	Wages/deductions	Wage and separation verifications obtained for all employers/weeks; deductions calculated properly

CASE REVIEW GUIDE		
DOCUMENT	**ITEM TO REVIEW**	**ACTION / VERIFICATION**
Overpayment Printout	Dollar amounts Weeks affected Balance	Matches overpayment determination; notification of errors in calculations to appropriate administrative unit
Supplemental Check Printout	Number of checks issued Dollar amount	Matches monetary redetermination
Key Week (KW) Certification	Eligibility issues - A&A - School - Return to work - Wages / earnings/ hours - Separation Work search contacts Late filing Claimant signature (if KW certification is a paper form)	Claimant statements / determinations on: - A&A - Training institution verification - Employer verification - Wage verification - Separation verification Work search verification(s) Claimant statement & determination Match signature with signature on claimant questionnaire - Investigate if discrepancy
Nonmonetary Determinations	Present for all issues detected in above document reviews	Verification or new fact finding obtained on all issues affecting Key Week; Claimant, employer and other interested parties were afforded due process
Appeals Decisions	Fact finding and conclusion/outcome	Implementation of conclusion/outcome: - Overpayment established - Weeks previously denied are paid
DCI	Coded Correctly	Matches information on documentation

CASE REVIEW GUIDE		
DOCUMENT	**ITEM TO REVIEW**	**ACTION / VERIFICATION**
Claimant Interview	Advised of Interview	Call-in letter sent or telephone interview set – claimant advised of reporting required
	Authorization to Release Information (if required)	Signed and dated by claimant
	Interview completed	Explanation if exception – Exhaustive attempt and SWA reporting procedures followed
	Questionnaire dated & signed by claimant / investigator	Explanation as to how information obtained; explain if exception
	All items completed	Explanation if exception
	Potential issues recognized, for example: - Alien Status - School - Transportation - Wage demands - Hours/days - Type of work - Child care - Physical limitation - Special licenses - Work referral refusal	Explanation if exception Match against Agency records For <u>all</u> issues: - Statements taken on discrepancies - Fact finding statements from employers, claimants, third parties - Nonmonetary determination issued
	Other factors affecting the key week investigated such as: Wages, tips, and other remuneration, misclassified worker Alternate or extended base period (if allowed) Benefit Year Earnings Separation(s) Deductible Income such as pensions	Wage / earnings / separation verification obtained from employer(s)
DCI coding	Coded Correctly	Matches information on documentation

CASE REVIEW GUIDE		
DOCUMENT	**ITEM TO REVIEW**	**ACTION / VERIFICATION**
Employer Interviews	All forms completed, dated, signed	Explanation if exception
	Wages for base period employer(s)	Verification of base period wages - Compare w/monetary; amend if appropriate
	Earnings for benefit year (BY) employer(s)	Verification of BY wages / earnings - Compare w/pay history - Discrepancies resolved - Supplemental check(s) - Overpayment established
	Separation issues	Fact finding statements/rebuttals from claimant/all employers Nonmonetary determinations issued
	Other Incomes - Disability - Retirement / pension - Training allowance - Severance pay - Wages in lieu of notice - Vacation pay - Accrued leave - Back pay - Holiday pay - Bonuses	Verification statements obtained Discrepancies resolved and determination issued if necessary Supplemental check(s) issued Overpayment established
	Work search contacts	Verification obtained; rebuttal as necessary; Determination issued if necessary
DCI Coding	Coded correctly	Matches information on documentation
Other Income Verifications	Supplemental Security Income (SSI) Old-Age and Survivors Insurance (OASI) Workers Compensation Educational training allowances Residuals	Verification statement obtained from income source - Discrepancies resolved - Supplemental check(s) issued - Overpayment established
DCI Coding	Coded correctly	Matches information on documentation

CASE REVIEW GUIDE		
DOCUMENT	**ITEM TO REVIEW**	**ACTION / VERIFICATION**
Other Verifications	Local Office work search policy Union registration Job Service registration policy Private Employment Agency Educational training allowances Dependency	Verification statements obtained Rebuttal statement(s) obtained Nonmonetary determination(s) issued
DCI Coding	Coded correctly	Matches information on documentation
National Directory of New Hire (NDNH) Crossmatch	Documentation that BAM has crossmatched the claim with NDNH from benefit year begin date to 30 days after the key week end date Case reopened if closed with NDNH crossmatch pending and updated (h1) = 4, 5, 7, 9	BAM identify, peruse, and resolve <u>all</u> issues identified from the NDNH crossmatch (i.e. benefit year earnings, separations, suitable work: able, etc.) - Statements taken on discrepancies - Fact finding statements from employers, claimants, third parties -Nonmonetary determination issued
DCI Coding	Coded correctly	Matches information on documentation. If necessary, case reopened to reflect NDNH matching and coding requirements
Findings and Conclusions	Narrative summary - Pertinent facts of investigation - Explanation of non-English speaking, if necessary - Proper/ improper payment or Proper / improper denial - Basis for conclusion - Explanation of unusual delays	Supported by documentation in file Signature of interpreter, if necessary Nonmonetary determination(s) Overpayment / underpayment actions Formal actions by other SWA units - Appeals - Fraud - Local Office
DCI Coding	Coded correctly	Matches information on documentation

BENEFIT ACCURACY MEASUREMENT
CASE REVIEW FORM

State:		RO Case Number:	
Batch Number:		Case Review Name:	
Sequence Number:		Reviewer Signature:	
Sample Type:		Review Date:	

General Comments:	

Except #	Requirement Code	Process or Issue Point	DCI Code/ Element	DCI Value in Error	Correct DCI Value	Disposition Code
1						
Exception Comments:						
Except #	Requirement Code	Process or Issue Point	DCI Code/ Element	DCI Value in Error	Correct DCI Value	Disposition Code
2						
Exception Comments:						
Except #	Requirement Code	Process or Issue Point	DCI Code/ Element	DCI Value in Error	Correct DCI Value	Disposition Code
3						
Exception Comments:						

The Requirement Code identifies the methodology requirement to which the SWA did not adhere.

Issue, Process Point, and Coding Codes: The second three-digit code identifies the point in the BAM investigation process at which the exception occurred. These codes fall into three categories:

- **Issue Code** - A three-digit code used to classify the type of eligibility issue related to the exception found.
- **Process Point Code** - A three-digit code used to classify the type of required BAM process or activity that relates to the exception found.
- **DCI Code** - A three-digit code used to classify the Data Element that was entered incorrectly.

BENEFIT ACCURACY MEASUREMENT
CASE REVIEW FORM

State:		RO Case Number:	
Batch Number:		Case Review Name:	
Sequence Number:		Reviewer Signature:	
Sample Type:		Review Date:	

Except #	Requirement Code	Process or Issue Point	DCI Code/ Element	DCI Value in Error	Correct DCI Value	Disposition Code
4						
Exception Comments:						
Except #	Requirement Code	Process or Issue Point	DCI Code/ Element	DCI Value in Error	Correct DCI Value	Disposition Code
5						
Exception Comments:						
Except #	Requirement Code	Process or Issue Point	DCI Code/ Element	DCI Value in Error	Correct DCI Value	Disposition Code
6						
Exception Comments:						

State Representative Signature		Date:
Regional Monitor Signature		Date:

The Requirement Code identifies the methodology requirement to which the SWA did not adhere.

Issue, Process Point, and Coding Codes: The second three-digit code identifies the point in the BAM investigation process at which the exception occurred. These codes fall into three categories:

- **Issue Code** - A three-digit code used to classify the type of eligibility issue related to the exception found.
- **Process Point Code** - A three-digit code used to classify the type of required BAM process or activity that relates to the exception found.
- **DCI Code** - A three-digit code used to classify the Data Element that was entered incorrectly.

CHAPTER VI

SUPPORT FOR CASE REVIEW

1. Introduction. This chapter provides instruction for uniform selection of random case samples to be reviewed and instruction about entering data into the regional office BAM Federal Monitoring System that will subsequently generate reports to provide both the regional office and national office with information on case review workloads and investigative exceptions. The chapter also includes information about the review of case reopening activity. The tasks associated with BAM case review are fully automated. They include:

- selection of a random sample of completed cases for regional office review;
- information available on the status of a region's case review workload;
- recording of case review findings in the regional office BAM Federal Monitoring System;
- information available on exceptions identified by a region in the case review process;
- review of reopenings of BAM completed cases; and
- generation of standard and statistical reports.

This chapter contains the step-by-step instructions for using these applications. For illustrative purposes, the examples in this chapter reflect PCA case selection. The instructions for selecting both paid cases and denial cases are the same. The automated Exceptions Recording system simplifies the regional monitoring process by:

- providing a method of selecting a random sample of completed BAM cases for states in individual regional offices;
- allowing entry of pertinent facts and observations concerning the monitoring sample that regional staff use when reviewing work performed by state BAM staff; and
- providing a means for recovering prior samples.

An adjunct component to the monitoring system is the generation of reports (standard and statistical) that RO monitors use for determining a state's BAM program performance, and identifying potential problem areas. The individual modules within the system provide an organized recording tool to store, analyze, and retrieve data collected in the general monitoring process.

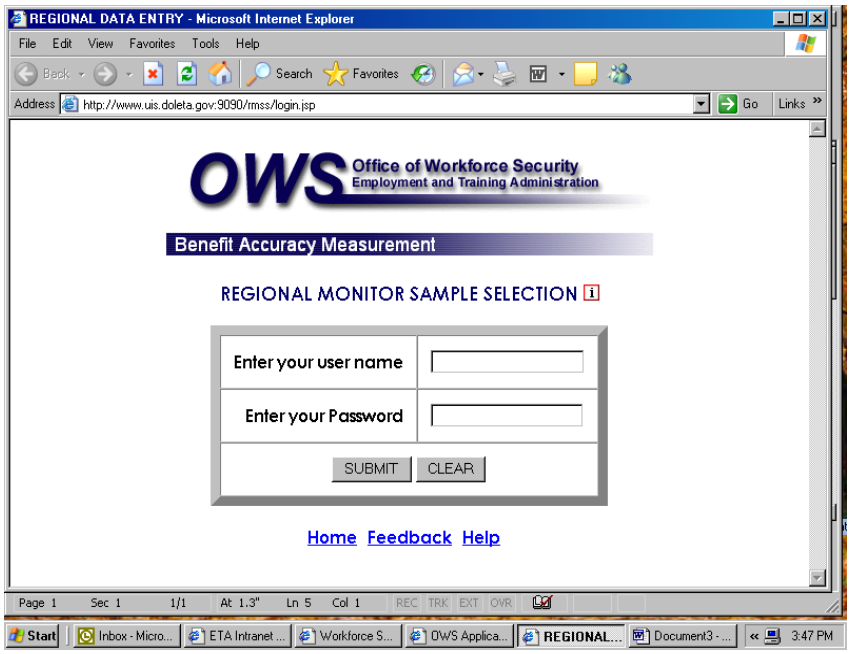
Selecting a sample of cases (whether for paid claims or denied claims) is the initial step in the monitoring process. Once a sample of cases is pulled, the regional monitor prints the necessary forms for case review. These include the Data Collection Instrument [DCI], the Sample Selection Report, Case Review Reports, and Monitor Discussion Forms. As a courtesy to the state BAM unit, monitors should e-mail or fax the list of cases to be reviewed. The monitor reviews the cases according to the methodology described in Chapter V of this handbook. Monitors note exceptions in the cases, discuss them with the state BAM supervisor, come to agreement on any noted exceptions, and enter the results in the system. The exception recording application on UIDB is the means of recording and tracking noted case exceptions.

All these data entry functions and management reports can be accessed on the OUI Web site at: www.uis.doleta.gov. An example application menu follows with the BAM options shown.

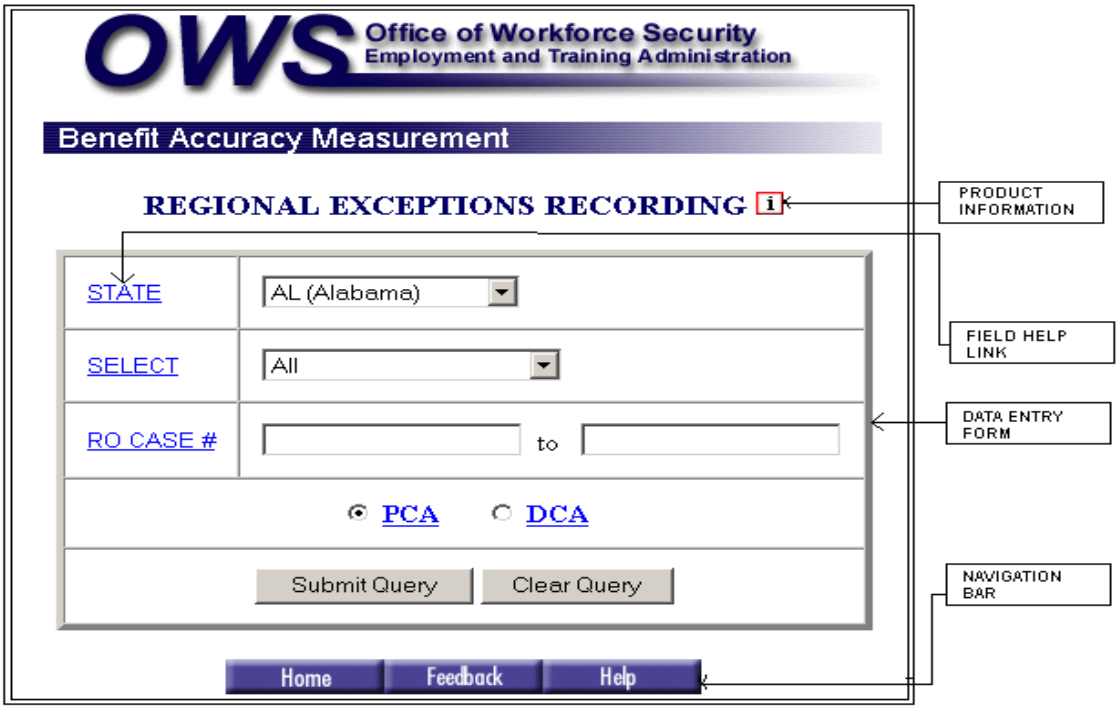
Applications Menu

- REGIONAL MANAGEMENT TOOLS
- PERFORMANCE & WORKLOAD REPORTS
- PROGRAM REPORTS
- UIR (Unemployment Insurance Reports)
- TPS (Tax Performance System) (OMB No. 1205-0332)
- BAM (Benefit Accuracy Measurement) (OMB No. 1205-0245)
  - Data Entry
    - Regional Sample Selection
    - Regional Exceptions Recording
    - Recover Prior Regional Sample Selection
    - National Sample Selection
    - National Exceptions Recording
    - Recover Prior National Sample Selection
  - Case Management Reports
    - Case Review Report
    - Current Database Status
    - DCI Report
    - Reopen History Report
    - Regional Discussion Form
    - Regional Exceptions Report
    - Regional Pending Exceptions Report
    - Regional Workload Status Report
  - Denied Claims Accuracy
    - Case Aging Report
    - Case Completion and Time Lapse Report
    - Comparison Report
    - Sample Selection Report
    - User Defined Time Lapse Report
  - Paid Claims Accuracy
    - Case Completion and Time Lapse Report
    - Comparison Report
    - Exceptions Population UI Weeks and Benefits Paid
    - Sample Selection Report
    - User Defined Time Lapse Report
  - Statistical Reports
    - Denied Claims Accuracy
    - Paid Claims Accuracy

2. General Information about the Monitoring Software. When starting a data entry session, users must first log in with a user name and password prior to gaining access to the different applications. A window appears requesting the user to log into the system. Users are required to perform the login exercise again if the session remains idle for 60 minutes or longer.



Built-in interfaces provide features such as product information, data entry forms, field help links and a navigation bar (see illustration below).

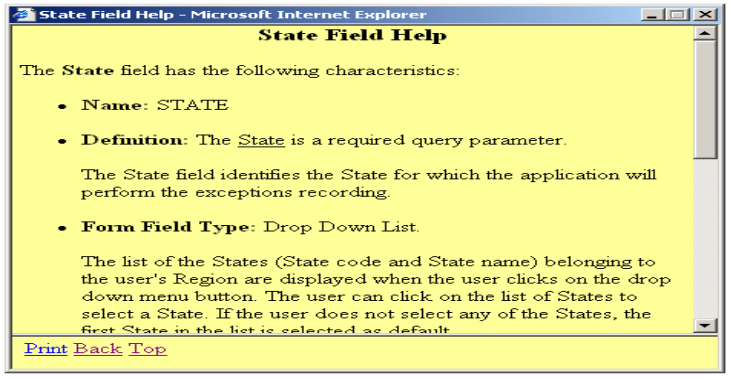


These various links are described on the following page.

Product Information - When the user places the cursor over the icon "i", the product information is displayed in a pop-up window.

BAM RO Web Release 4.1 Last Updated: May 2003

Field Help Link - All the data entry fields or query fields in the application are provided with links to their help information. When the Field Help Link is clicked, the information about the selected input field is displayed as text in the help window.



Data Entry Form - The forms may have 'input query data' fields or 'data entry' fields where the user may select or enter the data. There are "radio buttons" (e. g., Submit Query) which, when clicked, submit the user's request to the server.

Navigation Bar - The Navigation Bar (with tool-tips) as shown in the illustration below helps the user to do one of the following actions:

- Return to the OUI Internal Web Applications Menu Page.
- Send feedback to the OUI Technical Support Staff (Hotline) as an e-mail.
- Display the 'Regional Exceptions Recording' application help with links to all the data entry fields. The application help is similar to the field help as shown in the Field Help link. There is an additional 'Back' link in all the data entry field helps, which, when clicked, returns the user to the main application help.

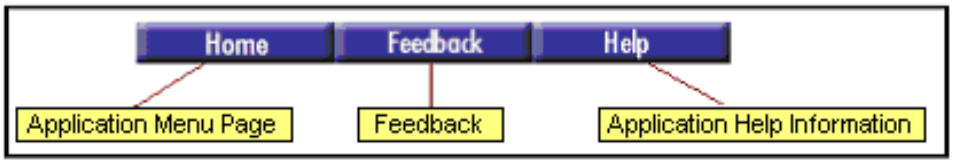


FIGURE 4

3. <u>Case Review Sample Selection</u>. Each year regional office staff are responsible for reviewing a specified number of all the cases that are investigated by the state BAM Unit. The sampling process and method of selection are described below.

a. Process. Each regional office is responsible for reviewing a minimum of 20 cases per year for each state in the region. To ensure that these cases are representative of the annual workload, the following requirements must be observed. If the reviews are done quarterly, at least 5 cases must be done each quarter; if semiannually, each review must include at least 10 cases and the reviews must occur in non-consecutive quarters.

b. Alternate Review Methods. As an alternative to the on-site review, regional monitors may conduct peer reviews in cooperation with the states. The regional monitor schedules a session once a year with as many states in the region that agrees to participate. The peer reviews mirror the current regional BAM reviews except that state participants review and assess the adequacy of the investigation and the accuracy of the coding of case data. Prior to the peer review session, the regional monitor performs all the tasks for conducting the review (i.e., requesting the sample cases for review, printing out case forms). Monitors note and share the exceptions and findings. Any disagreements are settled by a third person, usually the regional monitor. Regional monitors will enter any exceptions found as a result of the peer reviews into the BAM Exceptions Recording system. The RO monitor will communicate the results of the peer review to the state administrator.

Regional monitors may conduct "mail-in" reviews of BAM cases if the following conditions are met:

- the state agency concurs with this method of case review;
- the region reviews at least 10 cases on-site (this may be at least 10 cases in one visit, or at least 5 each in two or three visits); and
- the region establishes appropriate internal controls to ensure that its off-site reviews are completed and the findings are reported to the state agency within 14 calendar days.

4. Selecting a sample:

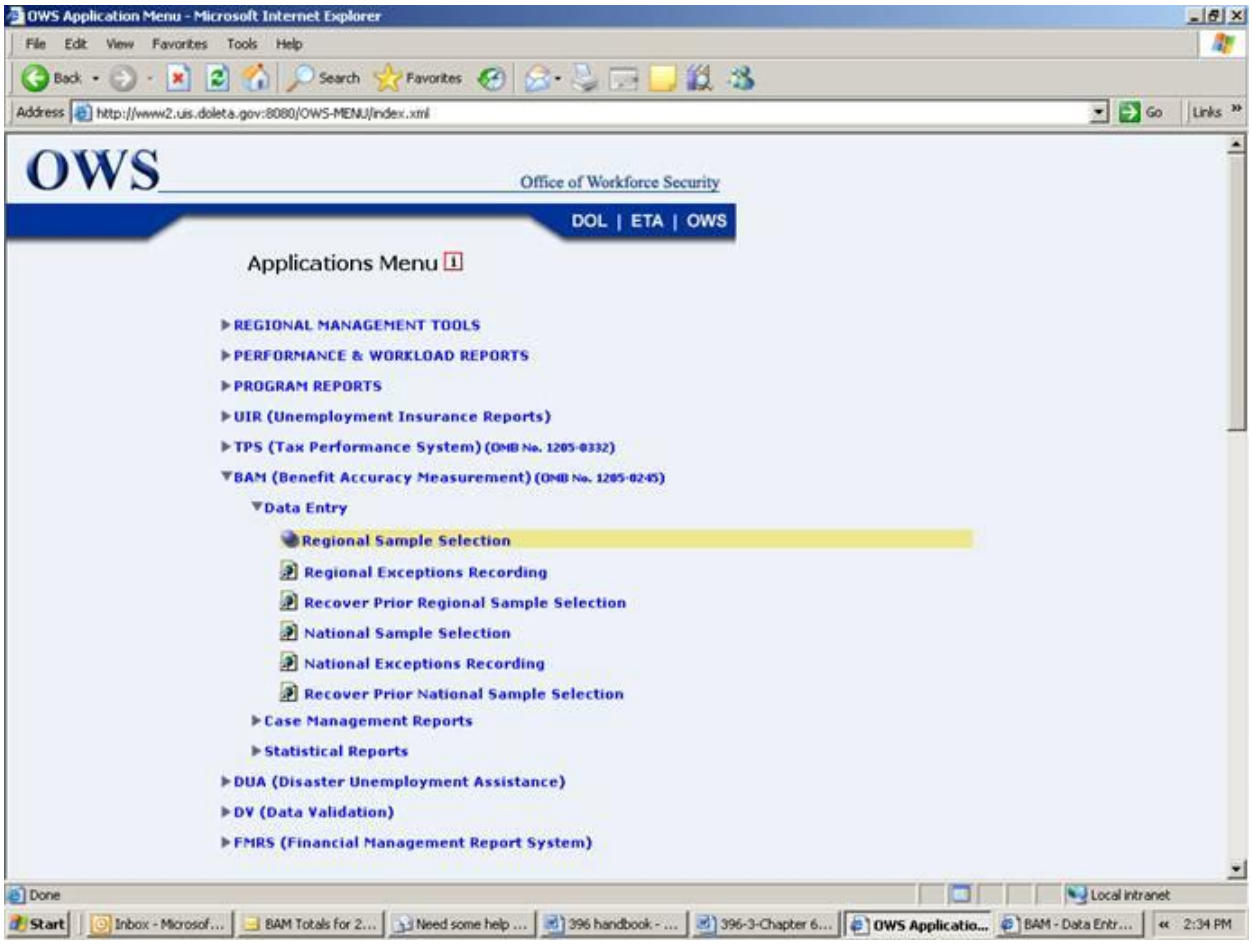
The Regional Sample Selection (RSS) application is a tool designed to help regional monitors in the review process by providing an automated random selection of cases and produce specific reports for the cases to be reviewed. It requires the user to select a state, select the type of cases wanted for review, and display case availability. The application generates the reports needed for reviewing the sampled cases.

Planning is necessary with the automated system. Once the monitor enters the number of cases to be sampled, the selection is final. The sampling frame of available cases is adjusted to the date of the most recent sample selection, so after the sample selection is made there are no more cases available for review until additional cases are closed and entered into the system by the BAM unit. Monitors should review case availability and coordinate the review with the BAM supervisor prior to sample selection.

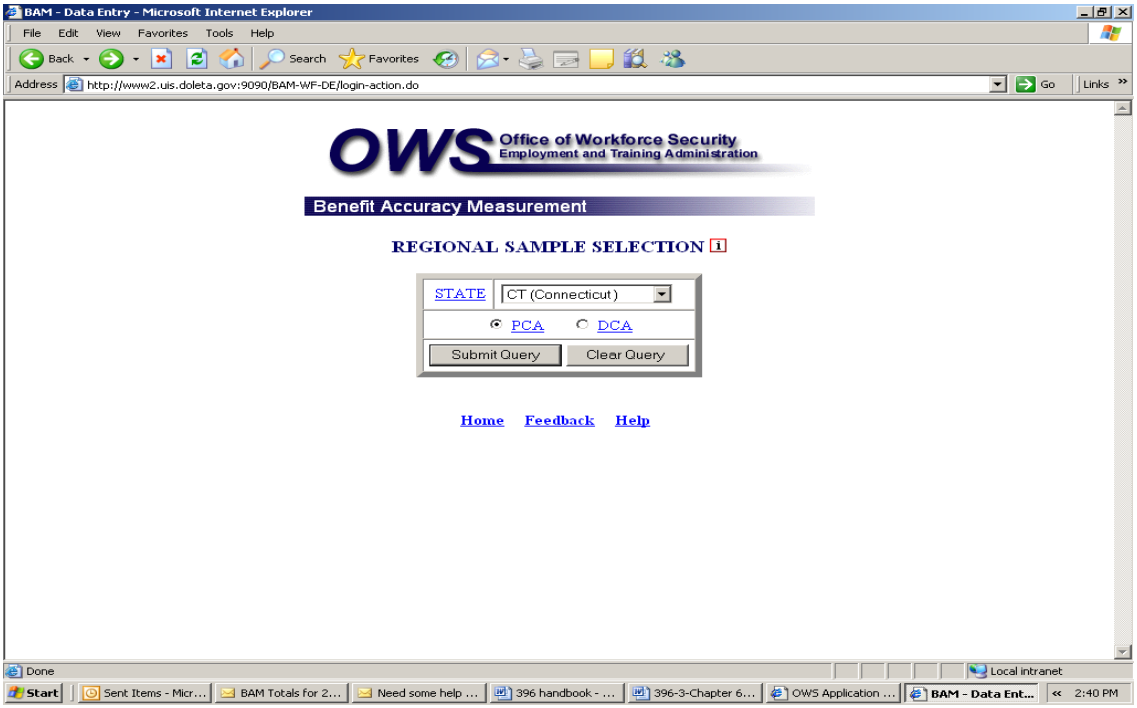
Each case sampled is assigned a unique (for that state) regional office Case Number that is part of the regional office tracking system. Every BAM case will have a Batch Number and a Sequence Number within the batch. Claimants' Social Security are not used as case identifiers. States will use Batch and Sequence Numbers to identify the cases sampled.

The application is accessed through a web-browser from the OUI Web site www.uis.doleta.gov by using the following path:

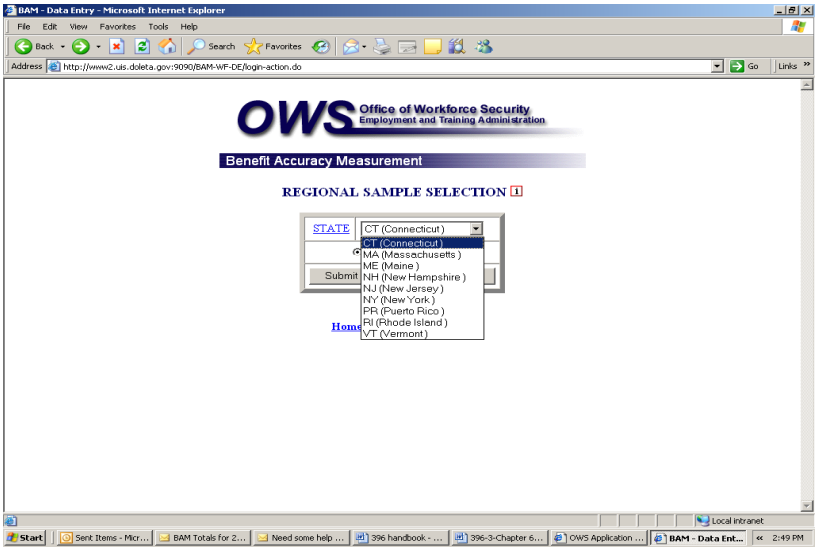
OUI Home Page
Applications
BAM (Benefit Accuracy Measurement)
Data Entry
Regional Sample Selection



Once the user name and password have been entered correctly, the RSS Query Sample screen will appear on the screen:



The user clicks on the button "▼" next to the State query field. A drop-down list displays the states in the user's region. The user selects a state and then selects PCA or DCA by choosing the corresponding radio button. The default selection is 'PCA'.



When the user clicks on the "Submit Query" button, the "Case Availability" screen appears. This screen displays the number of new cases, cases closed in the current year, pending cases, not reviewed cases, cases closed by regional office monitors but reopened by the State, cases sampled in each quarter of the current year. The screen also displays the total number of cases sampled in the current year.

CASE AVAILABILITY SCREEN

The Case Availability screen prompts the user to enter a sample size. If the user clicks on the "Cancel" button, the user is returned to the initial query screen.

BENEFIT ACCURACY MEASUREMENT
PAID CLAIMS ACCURACY
REGIONAL SAMPLE SELECTION

State: Any State

CASE AVAILABILITY AS OF 03/27/2008				
New Cases Available	YTD RO Closed Cases	Previously Sampled Cases		
		Pending	Not Revd.	Reopen
317	0	0	0	0
CASES SAMPLED PER QUARTER FOR CALENDAR YEAR 2008				
1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	YTD Total
0	0	0	0	0
ENTER SAMPLE SIZE:				
Cancel				

The Sample Size field has the following characteristics:

- Name: SAMPLE SIZE.
- Definition: The Sample Size is a required query parameter.

  The Sample Size is a query parameter which represents the number of case samples the Regional user wishes to randomly select from the new cases available in the State.
- Form Field Type: Text Field.
- Field Edits:
  - The Sample Size may not be NULL.
  - The Sample Size must be NUMERIC.
  - The Sample Size must be greater than zero and less than or equal to the number of new cases available.

If the user clicks on the "Submit" button without entering a sample size, a pop-up window appears with a message:

The pop-up window disappears when the "OK" button is clicked.

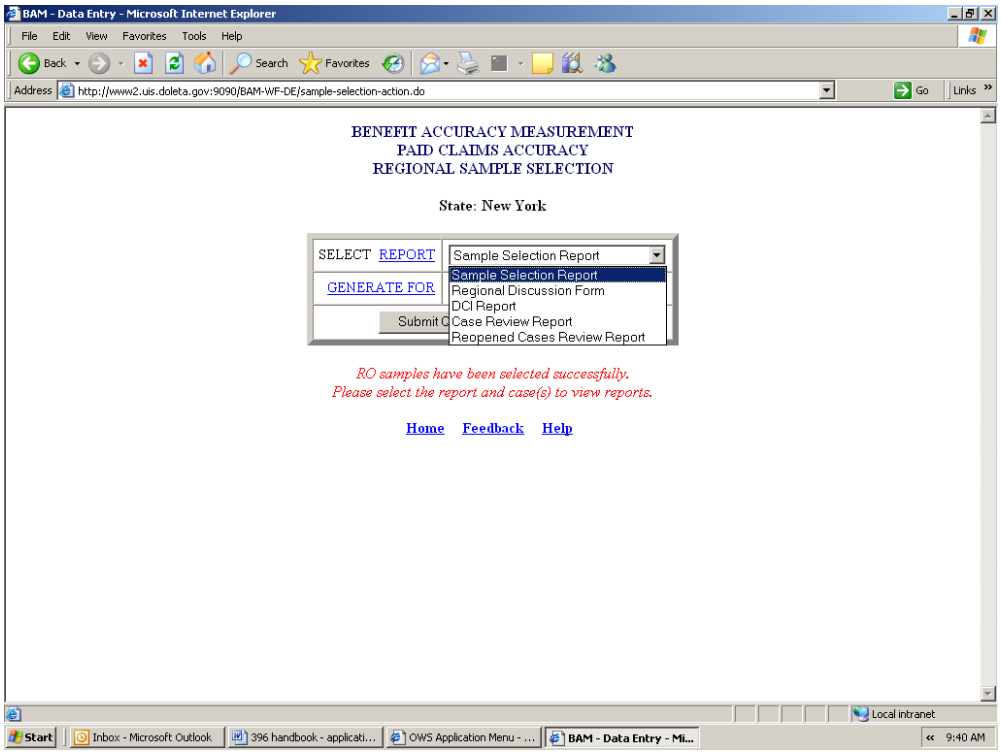
If the user enters an invalid sample size and clicks on the "Submit" button, an appropriate error message displays in a pop-up window:

Again, the pop-up window disappears when the "OK" button is clicked.

If the user enters a valid sample size and clicks on the "Submit" button, a confirmation window appears prompting the user to confirm the sample size entered. If the user clicks on the "OK" button, the sample selection application performs its routine for the selected State and the type of claims (PCA or DCA) to be reviewed.

After the Sample Selection program has run, the user is presented with a number of report generation options.

Note: Federal release 6.0 (Feb. 2007) included a condition that said the eligible cases have to be signed-off within the last 270 days or since the last sampling date, whichever is later. Allowing for case completion time (up to 90 days), this condition allows Monitors to review a SWA's BAM work for the most recent case completion period.



The Report selection option is "Drop Down List" that operates as a query parameter which represents a report to be generated. The user selects an option from the drop down menu. There are several choices available:

- Sample Selection Report
- Regional Discussion Form
- DCI Report
- Case Review Report
- Reopened Cases Review Report

REGIONAL SAMPLE SELECTION REPORT

The initial report option is the Regional Sample Selection Report. The Sample Selection Report displays the case information for all the cases available in each category, for example, Reopened cases, Pending cases, Not Reviewed cases, and New cases.
The Supervisor Completion Date Range displayed is the last monitor sample pull date and the latest supervisor case completion date in the last data pick-up for the selected State.

To generate the report, select Sample Selection Report from one must choose a case situation from GENERATE FOR option from the drop down menu. The Generate For is a query parameter which represents Generate For to create a selected report. The user selects an option from the drop down menu. There are several choices available:

- All Cases - all cases selected for the report
- Newly Selected Cases - all cases that were newly sample selected for the report
- Not Reviewed Cases - all cases that were not reviewed for the report
- Pending Cases - all pending (reviewed but not yet signed off) cases for the report
- Reopened Cases - all reopened cases for the report

Combining the report selection and generate for or options develop query parameters. Unlike case management reports, these options are only available for the cases selected for review. If the process is interrupted after sample selection is completed, then monitor can continue to access the reports using the "Recover Prior Regional Sample Selection" hyperlink. This provides the same report selection and generate for parameters.

The information is displayed in a tabular manner for each case and if there are no cases available for any of the categories, a message is displayed stating that there are no cases available for that particular category.

- Use the scrollbar to 'View' the report.
- Use the 'Printer' icon on the browser's Navigation toolbar to print the report.
- Use the 'Save As' option in the file menu of the browser to save the report to a file.

Below is a presentation of a Sample Selection Report for Newly Selected Cases

BAM - Data Entry - Microsoft Internet Explorer

File Edit View Favorites Tools Help

Address http://www2.uis.doleta.gov:9090/BAM-WF-DE/result-action.do

BENEFIT ACCURACY MEASUREMENT
DENIED CLAIMS ACCURACY
REGIONAL SAMPLE SELECTION REPORT

State: Michigan
Supervisor Completion Date Range: 09/28/2007 ~ 02/22/2008

RO Sample Pull ID:	chicago	RO Sample Pull Date:	03/27/2008
New Cases Available:	184	Not Reviewed Cases:	0
New Cases Sampled:	20	Pending Cases:	0
Percentage Sampled:	10%	Reopened Cases:	1

NEWLY SELECTED CASES

RO Case #	Batch #	Seq #	Sample Type	Inv ID	Claim Date	Action Code	Sup Comp Date
2008001	200732	2	4	40	07/15/2007	1	10/03/2007
2008002	200735	3	2	40	08/12/2007	9	10/19/2007
2008003	200737	1	4	85	08/18/2007	1	10/26/2007
2008004	200737	2	3	85	07/22/2007	1	10/19/2007
2008005	200739	1	2	40	09/09/2007	1	10/26/2007
2008006	200740	1	4	74	09/15/2007	1	12/04/2007
2008007	200741	1	3	74	07/08/2007	1	12/07/2007
2008008	200742	3	2	74	09/30/2007	1	12/10/2007
2008009	200742	3	4	75	10/14/2007	1	12/10/2007
2008010	200744	2	3	74	09/23/2007	1	12/21/2007
2008011	200745	2	4	74	10/20/2007	1	01/02/2008
2008012	200746	1	2	17	10/28/2007	1	01/09/2008
2008013	200747	3	3	32	10/07/2007	9	12/21/2007

Done Local intranet

Start Inbox - Microsoft Outlook 396 handbook - applicati... OWS Application Menu - ... BAM - Data Entry - Mi... BENEFIT ACCURACY ME... 9:53 AM

In addition to showing the number of cases selected for sampling. By using the web browsers back button, the user may also select a variety of case reports and forms:

- Case Review Report
- Regional Discussion Form
- Data Collection Instrument (DCI) Report
- Reopened Cases Review Report

With the exception of the reopened cases report, which information is shown in the DCI report, the monitor should generate all of these reports for the newly selected cases to provide a snapshot of case status at the point of sample selection. These reports support desk, on-site, or peer reviews. The monitor may require several copies of each report to provide working copies for the review process. The same reports can be generated after a review using report options under the case management section. The information is displayed in a tabular manner for each case and if there

are no cases available for any of the categories, a message is displayed stating that there are no cases available for that particular category.

- Use the scrollbar to 'View' the report
- Use the 'Printer' icon on the browser's Navigation toolbar to print the report
- Use the 'Save As' option in the file menu of the browser to save the report to a file

Case Review Report

The Case Review Report displays the case information and warnings regarding the data inconsistencies if any, found in the data elements of the DCI Report for each case in the sample. To generate the report, select Case Review Report from the REPORT dropdown menu and choose a case situation from GENERATE FOR drop down menu. Click on Submit Query button. Below is an example of the automated edits generated for the case review report.

BENEFIT ACCURACY MEASUREMENT
PAID CLAIMS ACCURACY
CASE REVIEW REPORT

State:	NY	RO Case #:	2008001	Key Week Date:	04/08/2007
Batch #:	200715	Sequence #:	1	Sample Type:	1
WARNING - Key Week (mkw) is not a Saturday date.					
WARNING - Weekly Benefit Amount Before (e9) is not equal to Weekly Benefit Amount After (e10), but High Quarter Wages Before (e5) is equal to High Quarter Wages After (e6).					
WARNING - Key Week Action (ei2) is equal to 12, 13, 14, or 15 (and there is no 10 or 11) and Total Whole Dollar Amount of Overpayments (h3) is greater than zero.					
WARNING - The Total Whole $ Amount of Overpayments (include KW) (h3) is greater than the Maximum Benefit Amount (MBA) Before Investigation (e11) plus the Dependents' Allowance Before Investigation (e15). Is this correct?					

Regional Discussion Form

The Regional Discussion Form displays the information useful to the Regional Monitor for each case available in the selected category (i.e., all cases, newly selected cases, pending cases, not reviewed cases, and reopened cases). The report displays the field information, discussion form, and Comments (if available) for each case. To generate the report, select Regional Discussion Form from the REPORT dropdown menu and choose a case situation from GENERATE FOR drop down menu. Click on Submit Query button.

. BENEFIT ACCURACY MEASUREMENT
PAID CLAIMS ACCURACY
REGIONAL MONITOR DISCUSSION FORM
State:
Case Range: 2008001 ~ 2008052

State:		RO Case Number:	2002016
Batch Number:	200150	RO Case Review ID:	r10kari
Sequence Number:	3	Regional Office Closure Date:	07/25/2002
Sample Type:	1	Benefit Year Begin:	04/15/2001

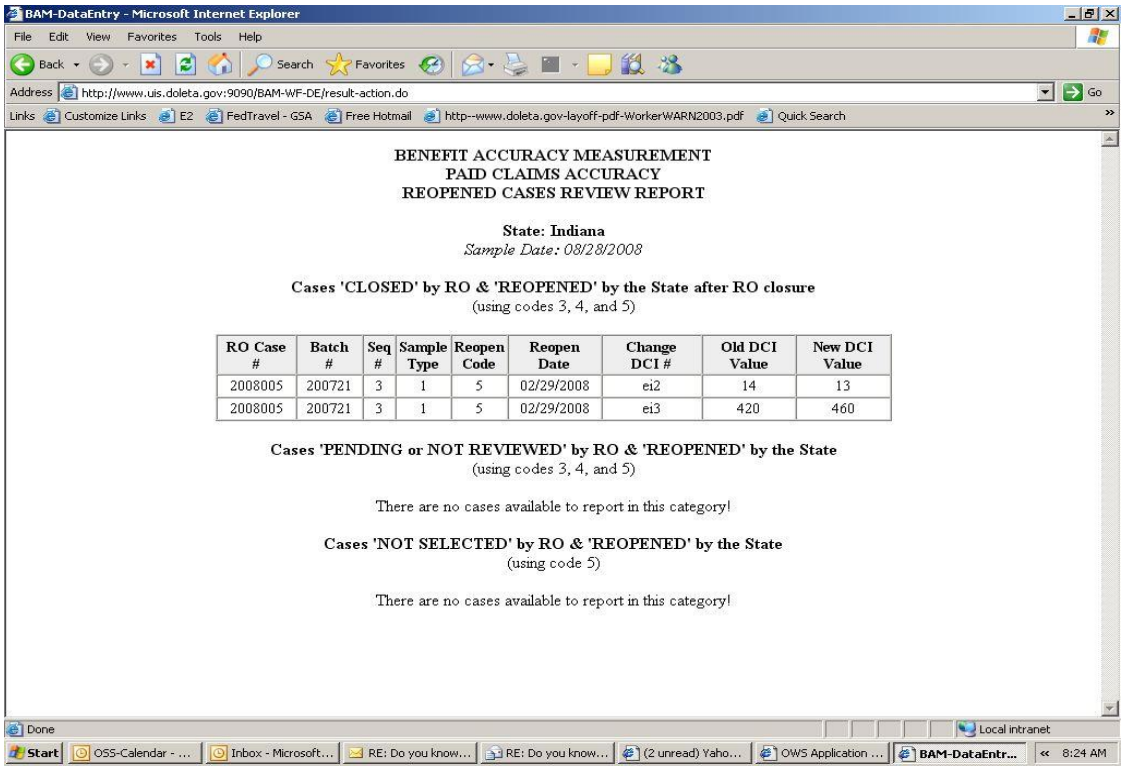
Key Week Date:	12/08/2001	Investigator:	7
Key Week Action:	1	First Assigned:	12/17/2001
Supv Rev Comp:	1	Reassigned:	N

Days to Investigate:	20
Days to Supv Close:	39
Days to Complete:	59

Except #	Exception Code	Correct DCI	Disp Code	Found ID	Resolved ID
1	220 / 110		2	r10kari	r10kari
Exception Comments:		QCI brings up issue on claimant failing to report for a referral - what was the disposition on this? Was it investigated? Where's the write up on it? It doesn't appear that this issued was pursued or resolved. Would it affect the KW?			
2	420 / 300		2	r10kari	r10kari
Exception Comments:		Investigator did not complete total of wages for Qtr. 4/2000 on the BP wage verification form.			

Reopened Cases Review Report

The Reopened Cases Review Report displays the review details of the reopened cases such as the case information, reopen code and date, and the information about the changes made in the DCI values.



BENEFIT ACCURACY MEASUREMENT
PAID CLAIMS ACCURACY
REOPENED CASES REVIEW REPORT

State: Indiana
Sample Date: 08/28/2008

Cases 'CLOSED' by RO & 'REOPENED' by the State after RO closure
(using codes 3, 4, and 5)

RO Case #	Batch #	Seq #	Sample Type	Reopen Code	Reopen Date	Change DCI #	Old DCI Value	New DCI Value
2008005	200721	3	1	5	02/29/2008	ei2	14	13
2008005	200721	3	1	5	02/29/2008	ei3	420	460

Cases 'PENDING or NOT REVIEWED' by RO & 'REOPENED' by the State
(using codes 3, 4, and 5)

There are no cases available to report in this category!

Cases 'NOT SELECTED' by RO & 'REOPENED' by the State
(using code 5)

There are no cases available to report in this category!

Data Collection Instrument (DCI) Report

The Data Collection Instrument (DCI) Report displays all the complete case information, error issues available, reopened case information, and case assignment information for each case in the sample for the selected categories (i.e., all cases, newly selected cases, pending cases, not reviewed cases and reopened cases). To generate the report, select DCI Report from the REPORT dropdown menu and choose a case situation from GENERATE FOR drop down menu.

When the user selects the case types and clicks on the "Submit Query" button, the Data Collection Instrument (DCI) Reports for the cases are generated. The report is a two-page report; the first page contains the entries for all the data elements; the second page provides information regarding any error issues coded for the case as well as case reopen and case assignment information. The next several pages show examples of PCA and DCA DCI reports that are generated by the application software.

PAID CLAIMS ACCURACY
DATA COLLECTION INSTRUMENT (DCI) REPORT

State		Batch #		Sequence #		Sample Type	
R O Case #		Key Week		Investigator ID		Local Office	

b1	Method Info Obtained		e15	Dep Allowance Before	
b2	U.S. Citizen		e16	Dep Allowance After	
b3	Education		e17	Ind Code Primary Empl.	
b4	Voc/Tech School		e18	Mon. Redeterm. Before	
b5	Currently In Training		e19	Remain Balance	
b6	Occ Code Last				
b7	Occ Code Usual		f1	KW Earnings Before	
b8	Normal Hourly Wage		f2	KW Earnings After	
b9	Occ Code Seeking		f3	Earn Deduct Before	
b10	Lowest Hourly Wage		f4	Earn Deduct After	
b11	Date of Birth		f5	Other Income Before	
b12	Gender		f6	Other Income After	
b13	Race/Ethnic		f7	Other Deduct Before	
			f8	Other Deduct After	
c1	Program Code		f9	First CWK Date	
c2	Combined Wage Claim		f10	Date First Pay	
c3	Benefit Year Begin		f11	KW File Method	
c4	Init Claim Filing Meth		f12	KW Certification	
c5	Benefit Rights Given		f13	Original Amount Paid	
c6	ERPs				
c7	Last ERPs		g1	WS Requirement	
c8	Prior Nonsep Issues		g2	JS Requirement	
c9	Prior Nonsep Disq		g3	Act/Cur Registered	
			g4	JS Deferred	
d1	Reason Sep Before		g5	JS Referrals	
d2	Reason Sep After		g6	Regis Private Agency	
d3	Date Sep Before		g7	Priv Agency Refers	
d4	Date Sep After		g8	Union Status	
d5	Recall Status Before		g9	Union Referral Status	
d6	Recall Status After		g10	KW Contacts	
d7	Tax Rate Last Empl.		g11	Prior KW Contacts	
d8	Ind Code Last Empl.		g12	Contacts Inv	
			g13	Contacts Acceptable	
e1	BP Employers Before		g14	Contacts Unacceptable	
e2	BP Employers After		g15	Contacts Unverified	
e3	BP Wages Before				
e4	BP Wages After		h1	Action Code	
e5	High Qtr Wages Before		h2	Should Have Been Paid	
e6	High Qtr Wages After		h3	Total Amount OP	

e7	Weeks Worked Before		h4	Total Amount UP	
e8	Weeks Worked After		h5	Total KW OP	
e9	WBA Before		h6	Total KW UP	
e10	WBA After		h7	Inv Completed	
e11	MBA Before		h8	Inv Completion Date	
e12	MBA After		h9	Supv Review Completed	
e13	Dep Before		h10	Supv Completion Date	
e14	Dep After		h11	Supervisor ID	

BENEFIT ACCURACY MEASUREMENT
PAID CLAIMS ACCURACY
DATA COLLECTION INSTRUMENT (DCI) REPORT

State		Batch #		Sequence #		Sample Type	
R O Case #		Key Week		Investigator ID		Local Office	

ERROR ISSUES

No Error Issues to report for this case.

REOPENED

No Reopen Activity to report for this case.

ASSIGNMENT

Assignment #: 1

ag1	Assignment Date		ag3	Supervisor ID	
ag2	Investigator ID		ag4	Assignment Flag	

BENEFIT ACCURACY MEASUREMENT
DENIED CLAIMS ACCURACY
DATA COLLECTION INSTRUMENT (DCI) REPORT
SEPARATION

State		Batch #		Sequence #		Sample Type	
Claim Type		Claim Date		Investigator ID		Local Office	
R O Case #							

methinfoobt	Method Info Obtained		citizen	U.S. Citizen	
dob	Date of Birth		gender	Gender	
ethnic	Race/Ethnic		educ	Education	
voctech	Voc/Tech School		trainstat	Training Status	
usualocc	Occ Code Usual		seekocc	Occ Code Seeking	
ushrwage	Normal Hourly Wage		lohrwage	Lowest Hourly Wage	
program	Program Code		cwc	Combined Wage Claim	
byb	Benefit Year Begin				
icfilmeth	Init Claim Filing Meth		bri	Benefit Rights Given	
priempsic	NAICS Primary Empl.		lastempsic	NAICS Last Empl.	
wkfilmeth	Week File Method		origamtpd	Original Amount Paid	
wksdenbef	Weeks Denied Before		wksdenaft	Weeks Denied After	
wbabef	WBA Before		wbaaft	WBA After	
mbabef	MBA Before		mbaaft	MBA After	
balbef	Remain Balance Before		balaft	Remain Balance After	
sepbef	Reason Sep Before		sepaft	Reason Sep After	
sepdatebef	Date Sep Before		sepdateaft	Date Sep After	
actflag	Action Code		detapp	Init Determ. Appealed	
apprslt	Result of Init Det. App		unastreq	Union Asst Requested	
unast	Clmnt Union Assisted		unserv	Union Service	
invcomp	Inv Completed		invcompdate	Inv Completion Date	
supcomp	Sup Review Completed		supcompdate	Supv Completion Date	
suplogin	Supervisor ID				

If the user clicks on the "Home" button, the application window closes and the OUI Internal Web Applications Menu Page is displayed.

5. Recording of case review findings:

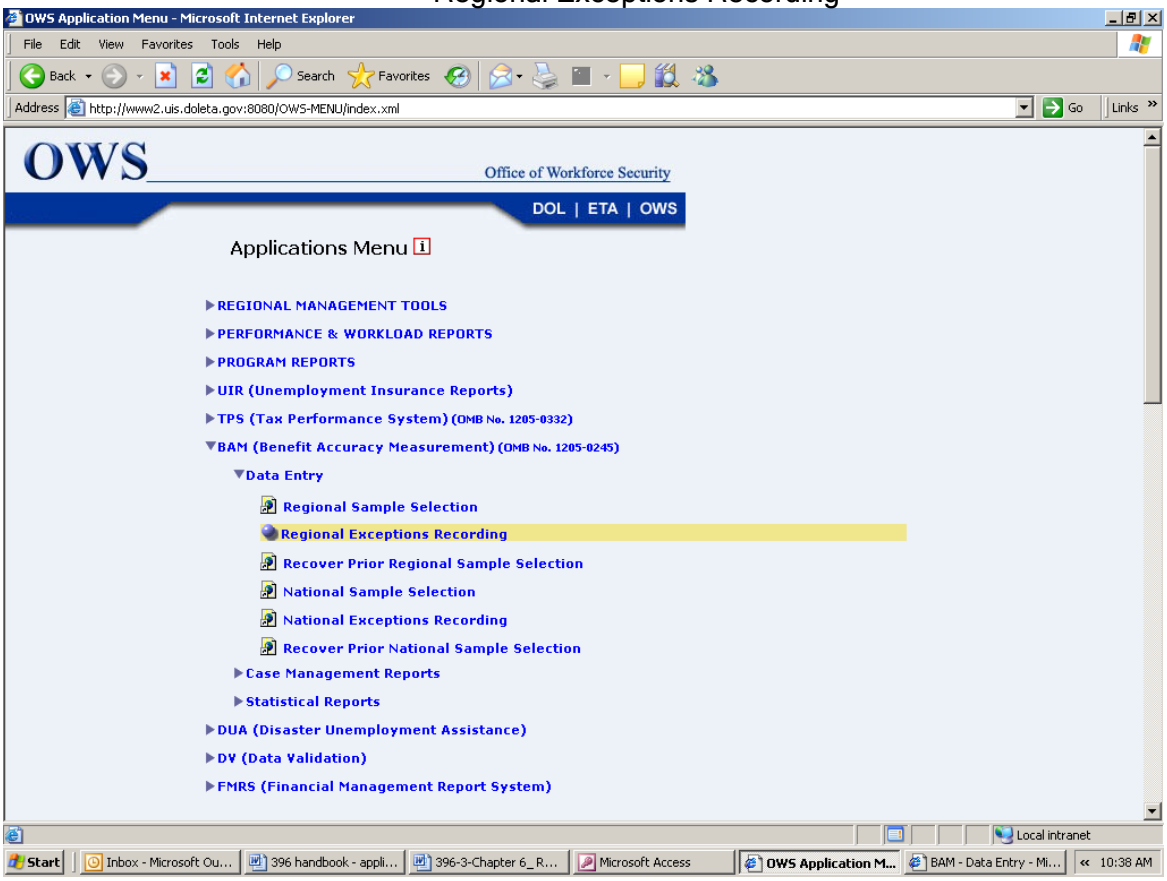
Regional monitors use the "Regional Exceptions Recording" (REP) application to record exceptions found in their reviews of state BAM paid and denied cases. The application also allows the user to add, delete or modify exception information for a reviewed case.

The main functionalities of RER are:

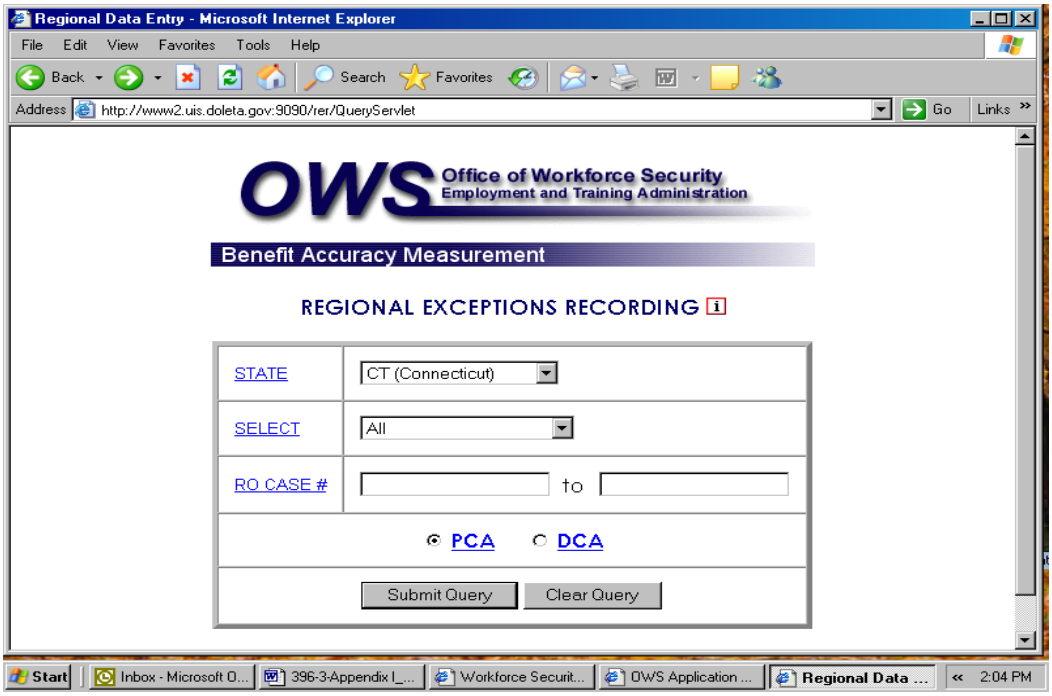
- Add Monitor information for a case.
- Add, update or delete exceptions for a case.
- Add, update or delete general and exception comments for a case.
- Close the case after all the exceptions (if any) are resolved.

The RER application is accessed through a web-browser from the OUI Web site, www.uis.doleta.gov, by using the following path:

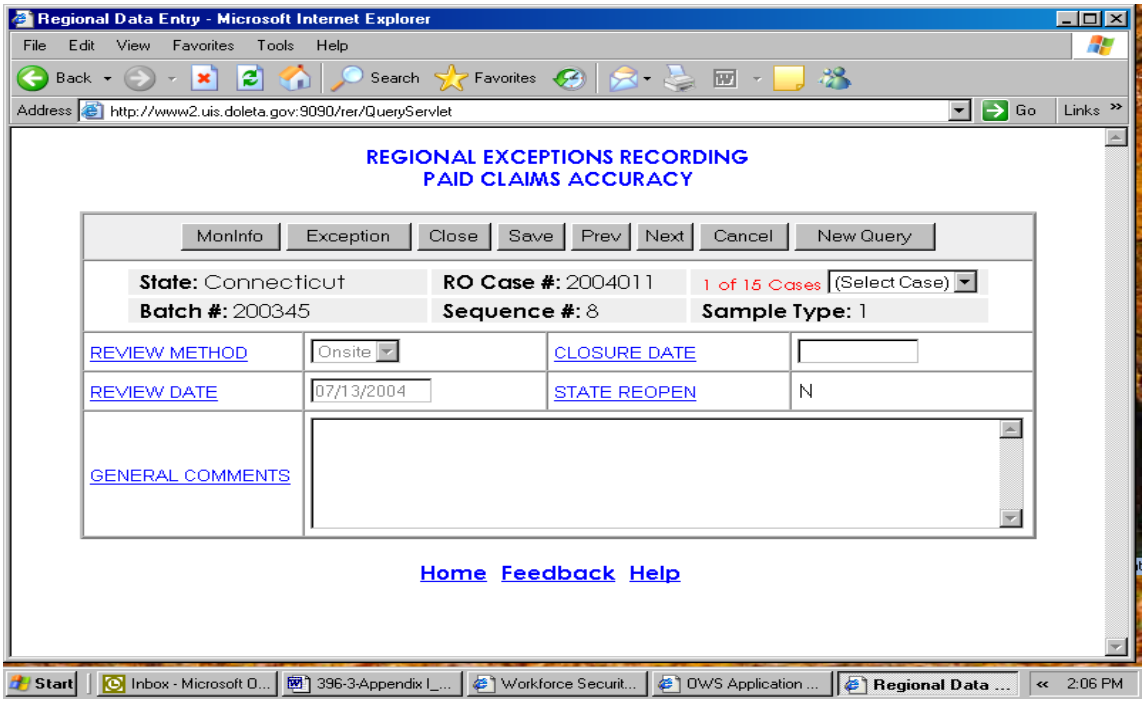
OUI Home Page
Applications
BAM (Benefit Accuracy Measurement)
Data Entry
Regional Exceptions Recording



The RER application displays the entry screen for selecting a state and case selection criterion. The user can choose PCA (Paid Claims Accuracy) or DCA (Denied Claims Accuracy) by selecting the corresponding radio box button. PCA is the default selection.



The application retrieves the sampled cases from the Regional Disposition table in UIDB for the selected option of PCA or DCA and allows the user to record case review information and exceptions for each sampled case. When the "Submit Query" button is selected, the entry screen for recording exceptions appears.



In the upper left corner of the exception recording screen there is a dropdown list to select the case for which data will be entered. Once the monitor select the case for data entry, then a series of commands are available for data entry. There are eight "command" buttons at the top of the entry screen that allow the user to enter various data. They are described as follows:

Moninfo

The 'MonInfo' option allows the user to update 'Review Method' (Mail or Onsite), 'Review Date' and 'General Comments' fields for a case. Review Date is a required field and an error message is displayed, if the field is not entered. The General Comments field is optional. The Review Method is set to Onsite by default. Peer reviews are entered as Onsite activities.

Moninfo

If 'MonInfo' is selected for a sampled case that is closed by the Regional Office and reopened by the State, a pop-up window appears prompting the user to reopen the case.

Exceptions

The 'Exception' option displays the exception information and allows the user to add, update, or delete exceptions data and 'Exceptions Comments' for a sampled case. The Exceptions Screen displays data in the data fields 'Exception Number', 'Requirement Code', 'Issue/Point/DCI Code', 'Correct DCI Value', 'Disposition Code', 'RO Detect ID', 'RO Resolved ID', 'RO Resolved Date' and 'Exceptions Comments' in addition to the options for traversing and deleting the exceptions. Initially the screen is displayed with a new exception containing an 'Exception Number' based on the number of exceptions the case already has and the login ID as the 'RO Detect ID'.

Exceptions

The 'Close' option allows the user to close a case. The user can only close the case when all the exceptions are resolved.

Save

The 'Save' option is used to update the modified case information to the database. All the data is validated and an alert message is displayed, if any error is found. Once the record is updated, the system displays the following confirmation message," The record has been updated successfully". If any information or data changes in a particular case, users must first save the information before moving to another case.

Previous

The 'Previous' option displays the case information of the previous case. The system displays an error message if there is no case before the current case. An alert is displayed asking the user to 'Save' or 'Cancel', if the case information is modified before displaying the previous case.

Next

The 'Next' option displays the case information of the next case. An error message is displayed if there is no case after the current case. Before displaying the next case an alert is displayed asking the user to 'Save' or 'Cancel', if the current case information is modified.

Cancel

The 'Cancel' option allows the user to cancel all the modifications made to the case information, exceptions information and comments.

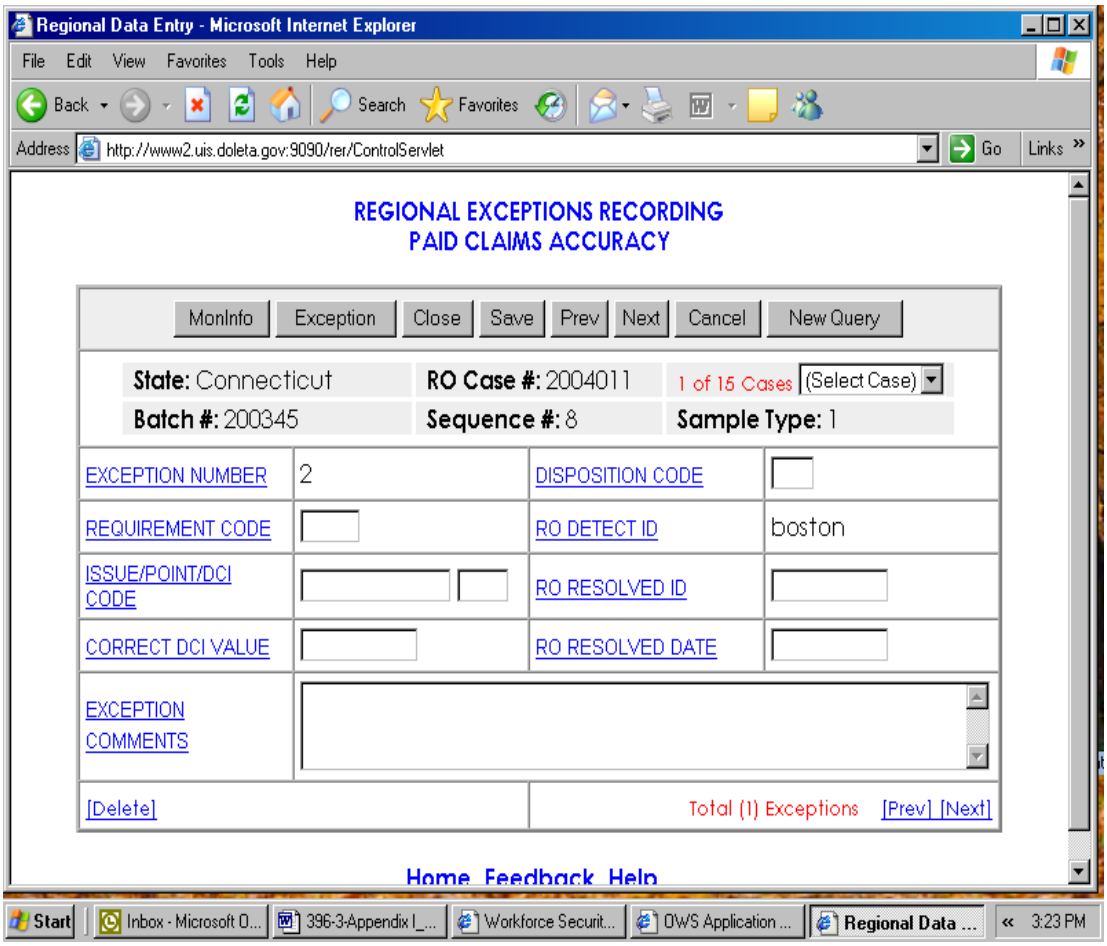
New Query

The 'New Query' option allows the user to perform the exceptions recording for another state or other type of claims (PCA/DCA).

To prepare or activate the case for data entry, the monitor must click the "Moninfo" command button must be used to active the case. Next, the monitor must select the review method from the dropdown menu. Finally, the "Review Date" is a required data entry field. The Review Date is the date a sampled case is reviewed by the Regional Monitor.

Exception Recording

To record exceptions for a case, the user clicks on the Exception command button. The data entry screen appears (see example below).



A description of the different entry fields is provided. The options ([**Delete**], [**Prev**], [**Next**]) at the bottom of the screen pertain only to the exception(s) recorded.

OPTION	DESCRIPTION
[Delete]	Allows the user to delete an exception. Once an exception is deleted all the existing exceptions are reordered.
[Prev]	Allows the user to view the previous exception. If there is no exception prior to the current exception, an error message appears stating that there is no previous exception.
[Next]	Allows the user to view the next exception. If there are no more exceptions, then an error message appears stating that there are no more exceptions and the exception screen is displayed with a new exception.

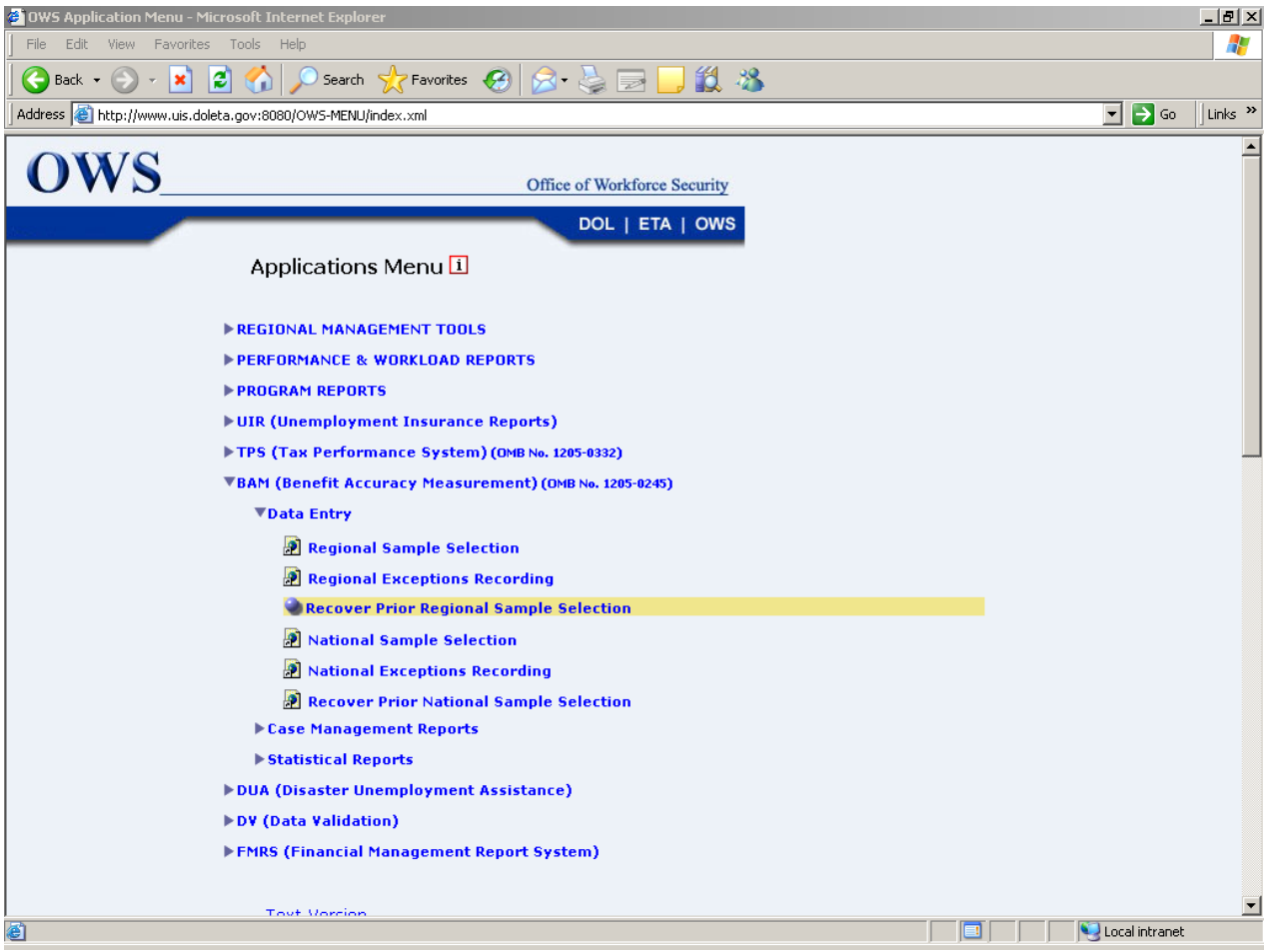
An explanation of the data entry fields on this screen is provided below.

DATA FIELD	DESCRIPTION
Review Date	Entry is always required in this field. An error message displays if the field is not entered. If the user enters a review date greater than the current date, an error message will be displayed informing the user that review date cannot be greater than the current date. Review date should be greater than sampling date and less than minimum resolved date.
Requirement Code	Entry is always required to record exceptions. It should be numeric and must match the corresponding 'Issue/Point/DCI Code'. If the requirement code is 510 or 520, a value is mandatory in the corresponding 'Correct DCI Value' field.
Issue/Point/DCI Code	Entry is always required. It should match against the 'Requirement Code'. If the 'Issue/Point DCI Code' entered is an error issue, then an error issue number is mandatory.
Correct DCI Value	Entry is always required if the requirement code is 510 or 520. If the DCI value entered matches with the DCI value in the State, the exception is automatically resolved. It should match against the 'Issue/Point/DCI Code'.
Disposition Code	Entry is always required. It must be 2, 3, 4 or 5. If the DCI value entered matches with the DCI value in the State, the disposition code must be 2. Otherwise, it can be 3, 4 or 5.
Error Issue Index	Entry is always required if the 'Issue/Point DCI Code' entered is an error issue. It should be a number between 1 and 20.

Recover Prior Sample Selection:

The Regional Recover Prior Sample Selection (RPSS) application is accessed through a web-browser from the OUI Web site, www.uis.doleta.gov, by using the following path:

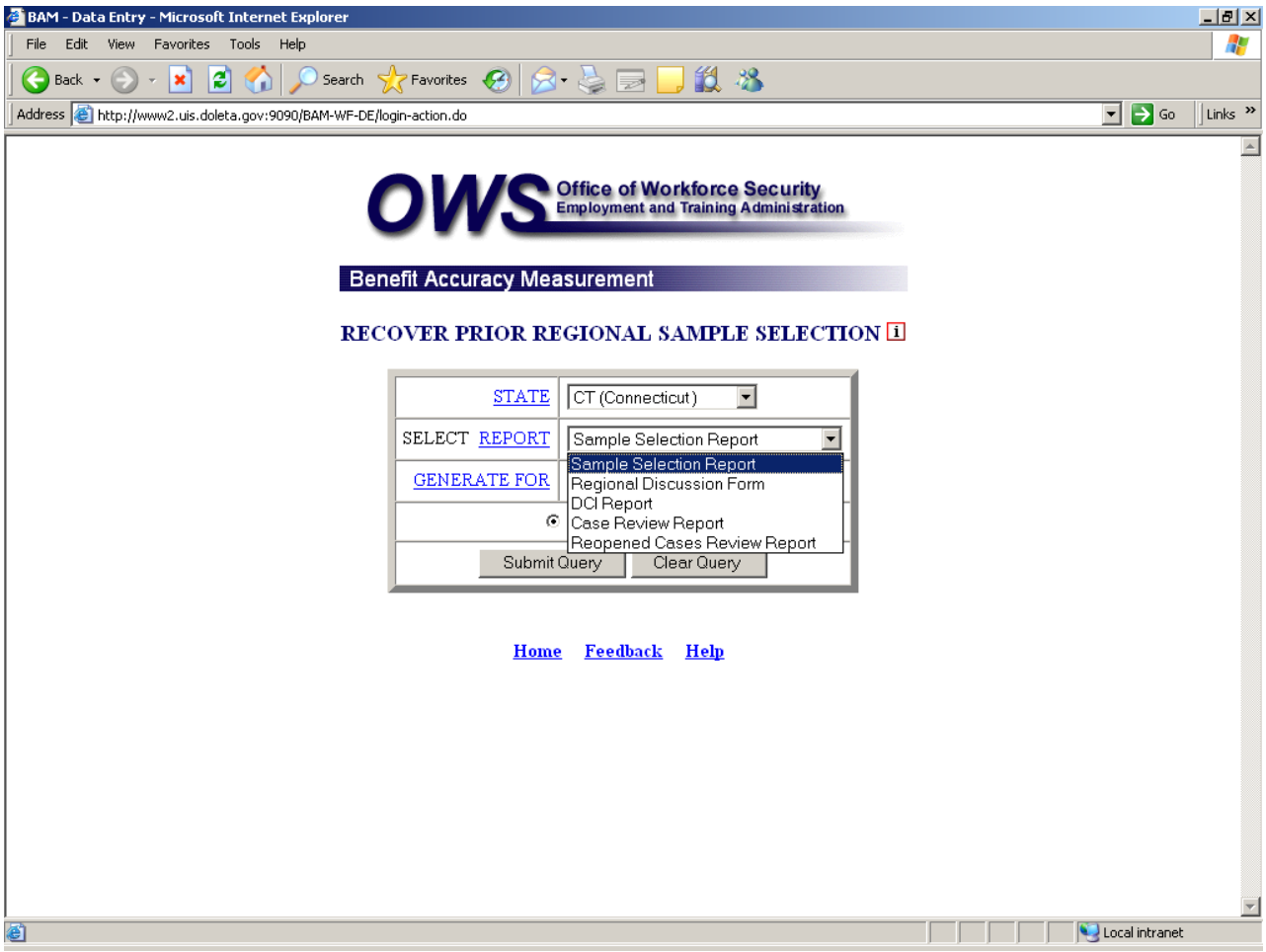
OUI Home Page
Applications
BAM (Benefit Accuracy Measurement)
Data Entry
Recover Prior Sample Selection



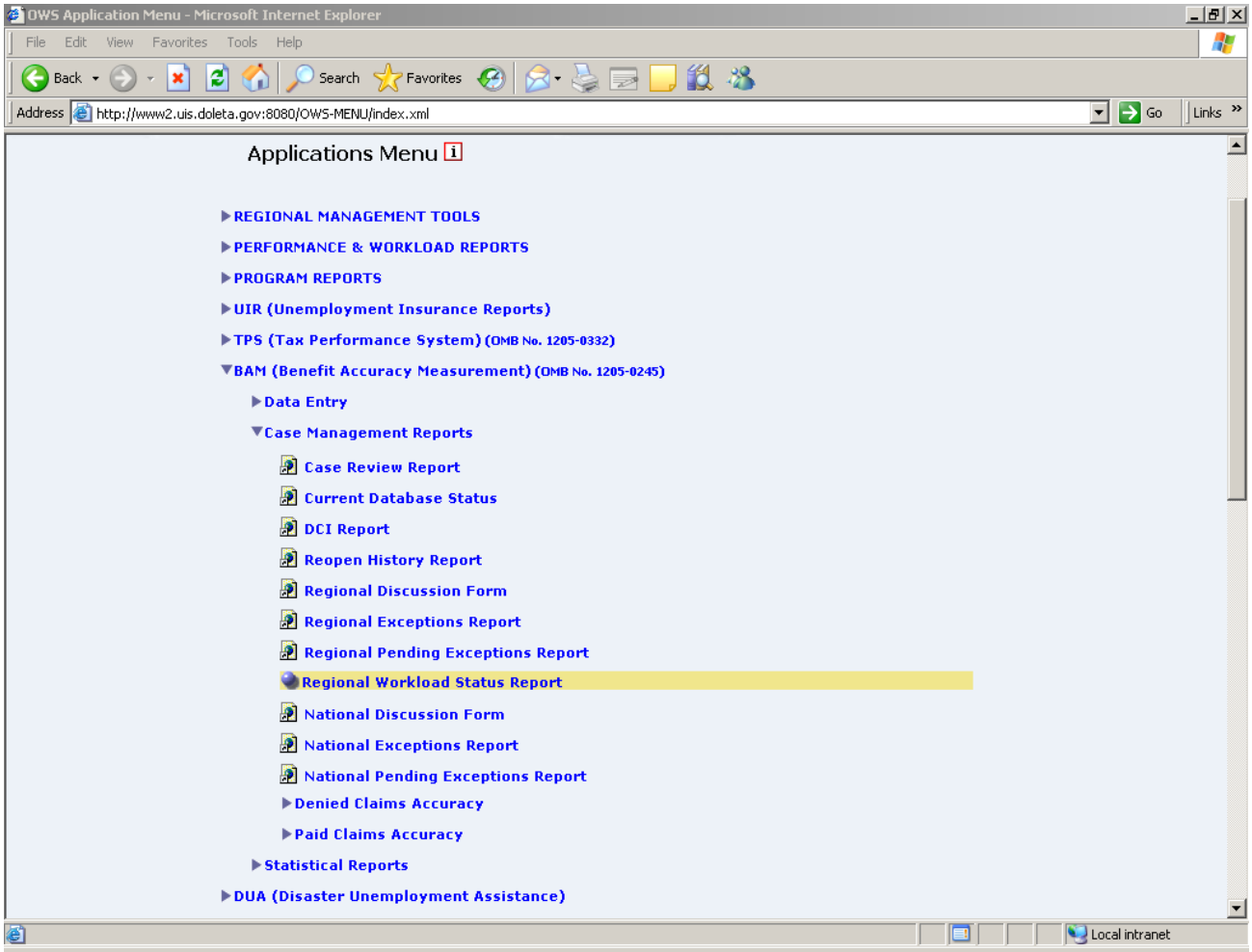
As noted in the opening section, the Recover Prior Regional Sample Selection option allows the user to generate all of the same reports as does the sample selection option does. However, this option excludes the sample selection step.

When the user clicks on “Recover Prior Sample Selection”, the “RPSS Query” screen appears prompting the user to select a state for which the sample selection reports should be generated.

Once a state has been selected the user clicks on the "Submit Query" button. The Selection Report and Generated For are displayed. Again, the user may select the appropriate reports needed for case review (see Section 4 of this chapter for instructions).

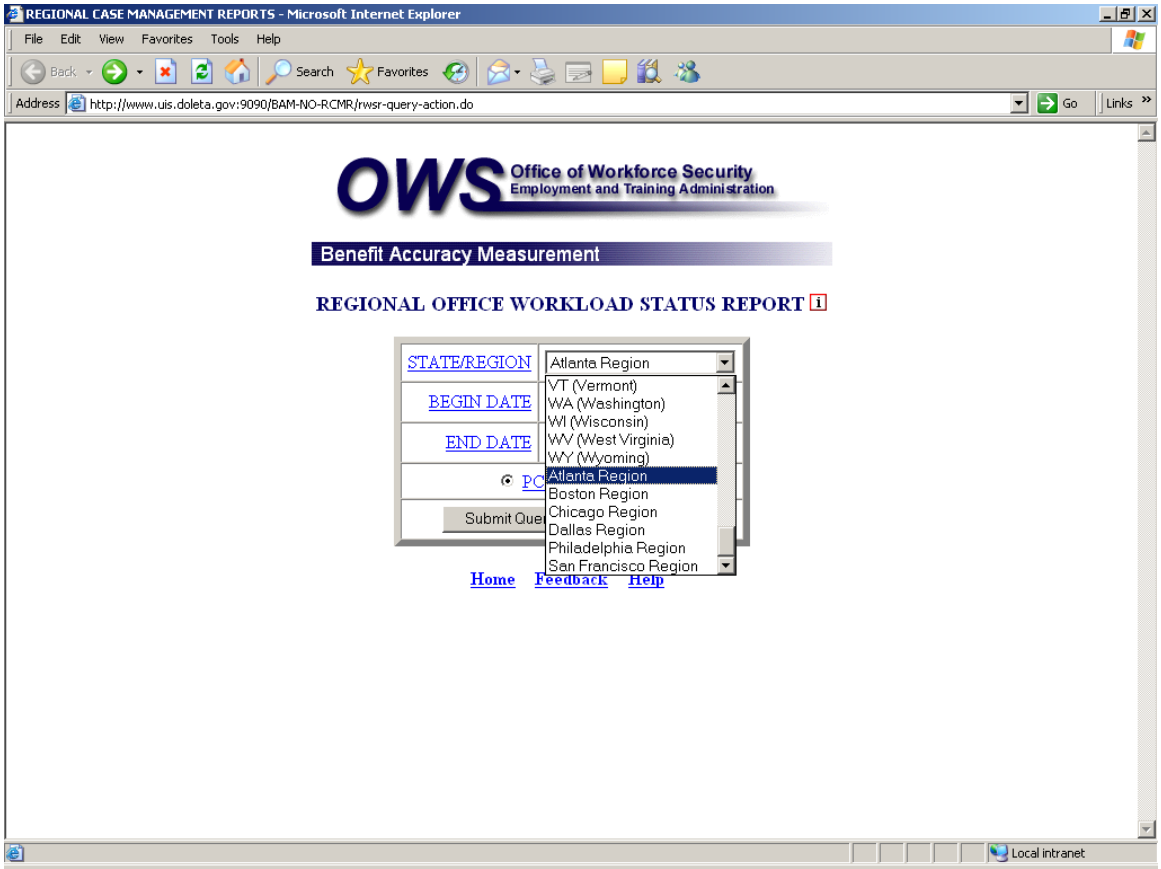


7. **Workload Status Report.** The status of case review workload activity can be assessed at any time by viewing the Case Activity Report screen. This report tells by State how many cases have been closed year to date, how many are pending State action, and how many have been sampled but not yet reviewed. It also provides a quarterly breakout of the number of cases reviewed for each State. The report application is accessed on the OUI Website as shown below.

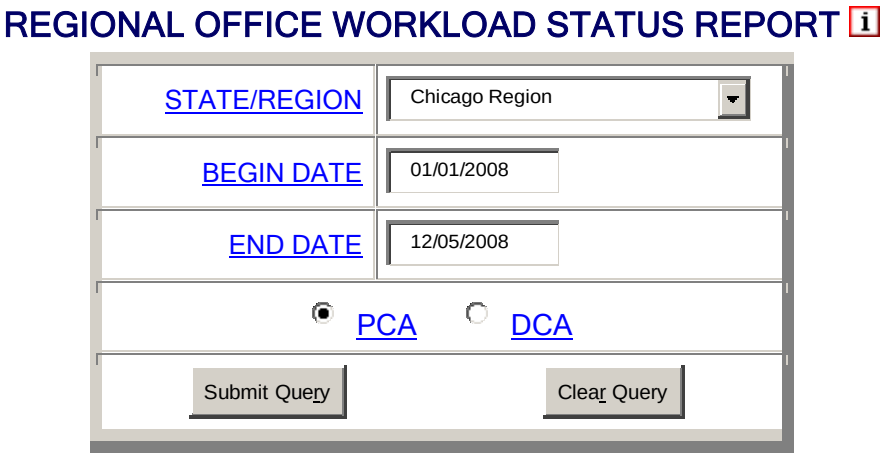


The national office will access this screen on the first working day of the second month after the end of each quarter to assess the status of regional case review workload activity.

The Regional Office Workload Status Report is available to regional monitors and provides information about a region's BAM workload status. Reports can be generated for a specific state or for the region. It differs from the Case Activity Report in that monitors select a date range to determine the number of cases sampled and the status of the cases for a particular period of time. The Case Activity Report only provides the status of cases for the year up to the current date.



In addition to selecting a state or region, the system requires the user to enter a date range.



A sample report is shown below. In this report one can see that the Monitor has sampled an adequate number of cases in alternating quarters; thereby meeting the established case review requirements. However, several states still have pending cases, which must be addressed.

REGIONAL OFFICE WORKLOAD STATUS REPORT
Region: Chicago
Date Range: 01/01/2008 ~ 12/05/2008

Cases Sampled by Regional Office

State	1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	Total
IA	9	0	14	0	23
IL	9	0	15	0	24
IN	18	0	14	0	32
KS	18	0	14	0	32
MI	9	0	15	0	24
MN	18	0	14	0	32
MO	9	0	15	0	24
NE	9	0	15	0	24
OH	9	0	14	0	23
WI	9	0	15	0	24

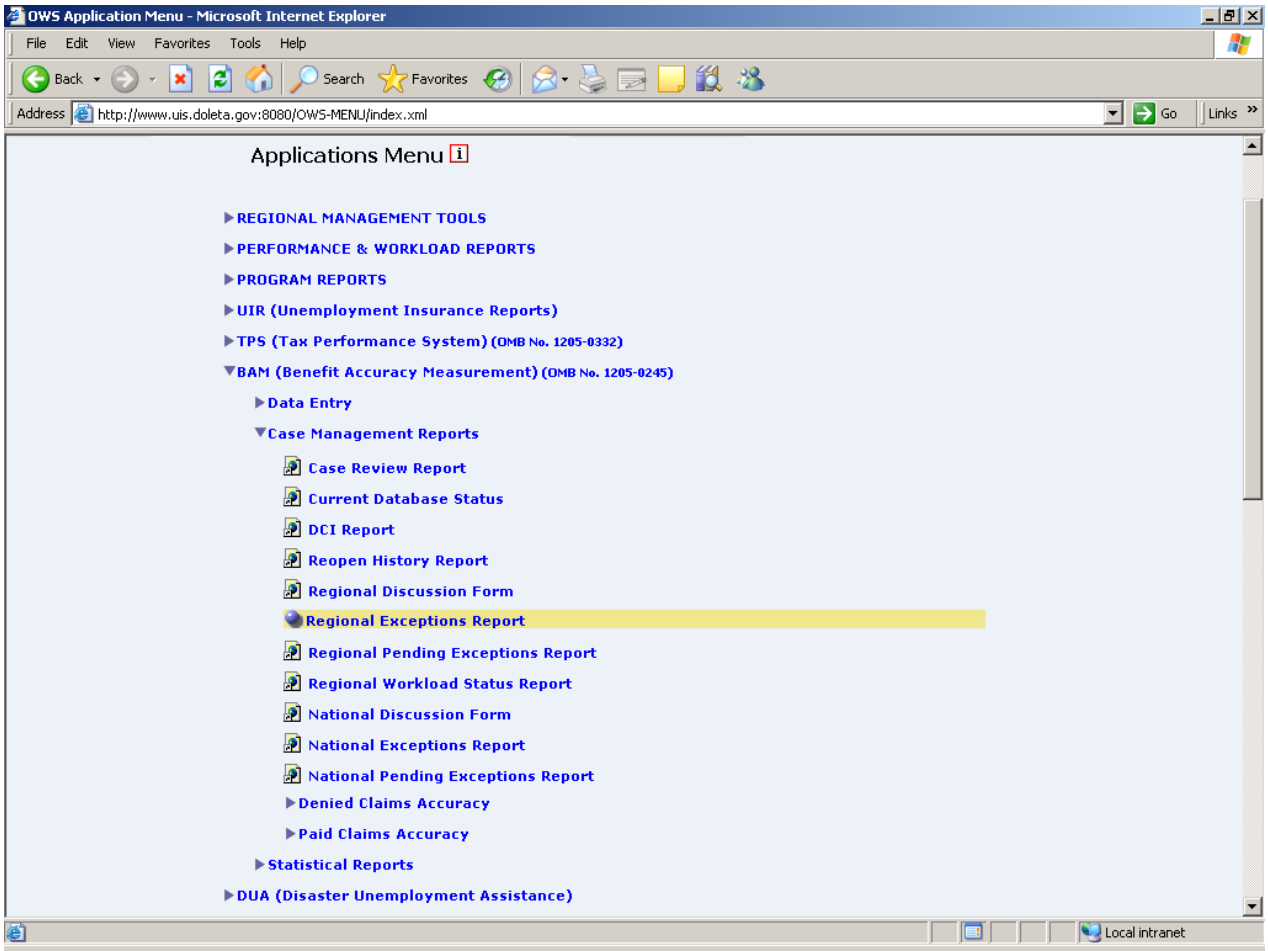
Case Status

State	RO Cases Closed	Pending	Not Discussed	Not Reviewed
IA	23	0	0	0
IL	22	2	0	0
IN	32	0	0	0
KS	32	0	0	0
MI	24	0	0	0
MN	32	0	0	0
MO	13	11	0	0
NE	23	1	0	0
OH	23	0	0	0
WI	24	0	0	0

8. Regional Office Exception Report. The results from case review and the exceptions that have been coded enable the regional office staff to focus on areas for technical assistance, and provide information on the state agency's adherence to BAM requirements. This section provides information about data displayed on the regional office Exception Report, which is generated from the regional office OUI Application System (http://www.uis.doleta.gov).

The regional office Exception Report can be selected for any desired period. This report has value for regional monitors as it can be used for specific reviews as well as quarterly and cumulative analysis.

The national office will access this report on the first working day of the second month following the end of each quarter in order to review and analyze the results of regional monitoring. The regional offices should provide their analysis of this data in their semi-annual reports (refer to Chapter VIII for instruction). The application is accessed on the OUI Web site as shown here:



An example of the output report follows and includes several pages. The report summarizes and provides detail on the types of case file or procedure exceptions identified. These findings are further segregated on the current disposition status.

REGIONAL OFFICE EXCEPTIONS REPORT
State: Any State

Date Range: 01/01/2008 ~ 12/05/2008
TOTAL CASES: 20

SUMMARY (Codes 1, 2, 3, 4, 5)

CASES					
	Number	Percentage		Number	Percentage
Reviewed:	20		Without Exceptions:	11	55.0%
With Exceptions:	9	45.0%	With Multi Exceptions:	7	35.0%
Pending:	9	45.0%	Not Discussed:	0	0.0%

EXCEPTIONS							
Agreed:	5	Disagreed:	0	Pending:	18	Not Discussed:	0

CODING DETAIL (Codes 1, 2, 3, 4)

By Coding Series	Except	Cases W/Exceptions		Cases Pending		Cases Disagree	
	Number	Number	Percentage	Number	Percentage	Number	Percentage
Identification Series	0						
Pursuit Series	5	4	20.0%	4	20.0%	0	0.0%
Resolution Series	0						
Total Issues	5	4	20.0%	4	20.0%	0	0.0%
Procedural Series	4	3	15.0%	3	15.0%	0	0.0%
Coding Series	14	7	35.0%	5	25.0%	0	0.0%
Grossly Incomplete	0						

The BAM Unit DID NOT identify an issue.

Code	Category	Except	Cases W/Exceptions		Cases Pending		Cases Disagree	
		Number	Number	Percentage	Number	Percentage	Number	Percentage
110	Key Week Issue	0						
120	Non Key Week Issue	0						

The BAM Unit DID NOT pursue issues to a supportable conclusion.

Code	Category	Except	Cases W/Exceptions		Cases Pending		Cases Disagree	
		Number	Number	Percentage	Number	Percentage	Number	Percentage
210	Adequate Facts from Employer	3	2	10.0%	2	10.0%	0	0.0%
220	Adequate Facts from Claimant	1	1	5.0%	1	5.0%	0	0.0%
230	Adequate Facts from Third Party	1	1	5.0%	1	5.0%	0	0.0%
240	Adequate Facts from SWA	0						
250	Obtain Rebuttal	0						
260	Refer to Another Unit for Pursuit	0						
270	Other	0						

BENEFIT ACCURACY MEASUREMENT
PAID CLAIMS ACCURACY
REGIONAL OFFICE EXCEPTIONS REPORT
State: Any State
Date Range: 01/01/2008 ~ 12/05/2008
TOTAL CASES: 20

The BAM Unit DID NOT properly resolve issue.

Code	Category	Except	Cases W/Exceptions		Cases Pending		Cases Disagree	
		Number	Number	Percentage	Number	Percentage	Number	Percentage
310	Issue Mon. Redet.	0						
320	Issue Nonmon. Det./Redet.	0						
330	Issue a Mon. Redet. per State Laws	0						
340	Issue formal / Informal Nonmon. Det./ Redet. per State Laws	0						
350	Afford Due Process	0						
360	Other Required Action	0						
370	Issue Formal Warning	0						
380	Other	0						

The BAM Unit DID NOT apply correct BAM procedures.

Code	Category	Except	Cases W/Exceptions		Cases Pending		Cases Disagree	
		Number	Number	Percentage	Number	Percentage	Number	Percentage
410	Documentation	3	3	15.0%	3	15.0%	0	0.0%
420	Properly Record	0						
430	Interview Procedure	1	1	5.0%	1	5.0%	0	0.0%
440	Attend Hearing	0						
450	Interstate Procedure	0						
460	Missing Case/data	0						
470	Other	0						

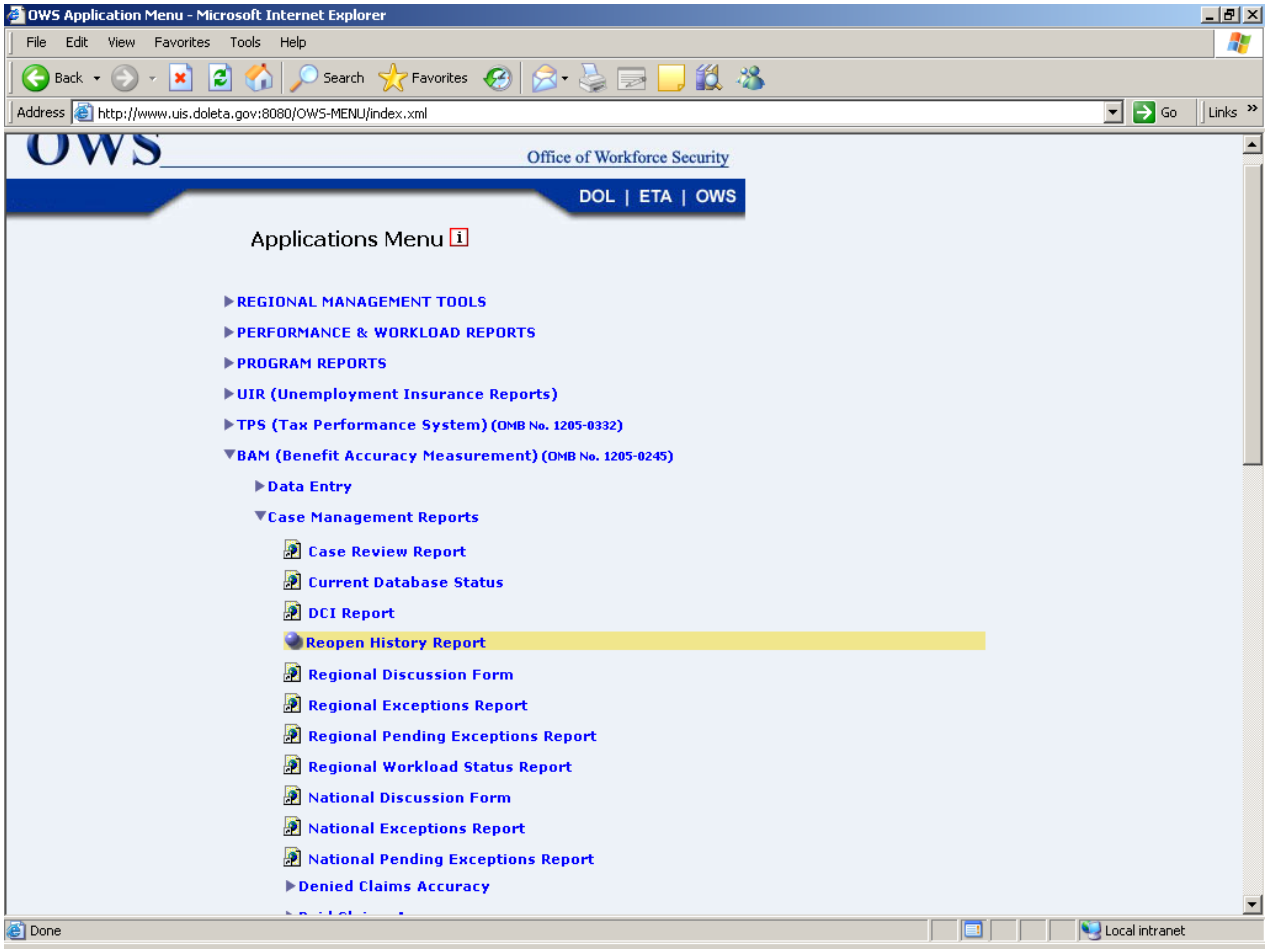
The BAM Unit DID NOT code the case accurately.

Code	Category	Except	Cases W/Exceptions		Cases Pending		Cases Disagree	
		Number	Number	Percentage	Number	Percentage	Number	Percentage
510	Erroneous	8	5	25.0%	3	15.0%	0	0.0%
520	Misinterpretation	6	5	25.0%	4	20.0%	0	0.0%

The BAM Unit DID NOT complete investigation of the case.

Code	Category	Except	Cases W/Exceptions		Cases Pending		Cases Disagree	
		Number	Number	Percentage	Number	Percentage	Number	Percentage
900	Grossly Incomplete	0						

9. <u>Review of state BAM Case Reopenings</u>. Case reopenings are transactions that relate closely to timely completion of BAM case investigations and to the integrity of BAM data generated by the state BAM units. BAM case management methodology provides the option of reopening cases, when necessary, to change or correct a completed case. BAM software provides the "reopening codes" that indicate in the database why it is necessary to take such actions.
This report application is found on the OUI Web site as shown below:



Regional staff can now review state BAM case reopening activity on an ongoing basis. Both the Case Activity Report and the Reopen History Report provide information about such cases. An example of this report can be found in Appendix B. Regional staff will need to review cases coded as reopened to ensure states are using reopen codes properly. Users should pay particular attention to cases that are reopened as a result of Federal monitoring, but not a case pulled for sampling by a regional monitor. The use of Code 5 is allowed for any case reopened because of Federal monitoring.

CHAPTER VII

REVIEW COMPLETION, CORRECTIVE ACTION, DISPUTE RESOLUTION, AND ANNUAL BAM ADMINISTRATIVE DETERMINATION

1. Introduction to Monitoring Findings. Monitoring of state BAM operations by the regional offices is a continuing process. It is pursued at intervals during the year to assess the status of the SWAs in meeting the requirements of BAM methodology and in its performance of BAM case investigation.

Regional office reviews consist of three types: Methods and Procedures (M & P) Reviews of state agencies (biennially), program reviews performed throughout the year, and a final review covering cumulative performance for the program year. Examples of the BAM facets covered by program and final reviews are: case investigation, BAM sample selection, and timeliness of case completion.

Regional office case reviews, where systemic BAM process or procedural issues are identified, and other program reviews will culminate in one of three possible findings by the monitor. These findings are:

- that the SWA meets the BAM requirement(s);
- that the SWA does not meet the BAM requirement but agrees to make needed corrections; and
- that the SWA *does not meet* the BAM requirement and *does not agree* to make needed corrections.

Chapters II, III, IV, and V provide guidance for scheduling and conducting BAM program reviews. This chapter describes actions necessary on the part of the regional monitor, subsequent to a BAM monitoring visit. This is to keep both the SWA and national office informed of adequate performance or to ensure that problems or exceptions that are identified during reviews are dealt with so that the state's BAM program meets BAM requirements by the end of the program year. All actions taken will culminate in an Annual BAM Administrative Determination of the SWA's overall BAM program performance.

2. Achieving Review Completion. The review process is a series of assessments undertaken during the monitoring year to document and inform the SWA periodically about its progress in meeting established BAM methodology and procedural requirements. A review can be completed initially based upon acceptable program review findings, or following the outcome of successful corrective action or dispute resolution.

Altogether, there are seven areas of a BAM review: organization, authority, written procedures, standard BAM forms, BAM sample selection and assignment, timeliness of case completion, and case investigative performance.

When the findings of a final review or a program review show that the SWA meets or is making progress that ensures that it will meet applicable BAM requirements, monitors follow a number of steps to ensure closure or completion of the review process.

These steps are:

- Complete the appropriate BAM review worksheets (e.g., BAM-3, BAM-4, etc.) and

assemble adequate documentation to justify the review findings.

- Notify the SWA of findings (usually in close-out conference between the monitor and the BAM supervisor).
- Summarize review findings.
- Maintain summary review notes and BAM worksheets in regional office file.
- Report findings and appropriate explanations to the National Office in the annual comprehensive report (see Chapter VIII of this handbook), which culminates in the annual determination letter.

3. BAM Corrective Action Process

a. Initiating the BAM Corrective Action Process: When the regional monitor and the BAM supervisor agree that a problem exists in the BAM program, and corrective action is appropriate, they should define the scope of the problem. Is the problem confined within the BAM unit, or does it extend to UI program areas outside of the BAM unit?

Each regional monitor should have a clear understanding of regional policy before engaging state UI personnel in planning BAM corrective action. In some instances, it may be appropriate for the monitor to initiate the process with agency staff while on site. In others, the appropriate procedure may be for the monitor to discuss the issue with the BAM team leader, other regional office program staff, and/or the UI Regional Director before undertaking the resolution of a problem with the SWA. This may be especially important in situations where there questions about the independence and accountability of the BAM (unit does not lie outside regular UI operations, e.g., Administrative Management Services, Research and Analysis, or Administration. Having made this determination, the monitor is ready to work with the SWA in the development of a corrective action plan.

b. Corrective Action Plan (CAP) Development and Implementation. This process consists of four major steps:

- research the subject and collect appropriate data and documentation;
- determine actions most likely to result in the needed change; and
- establish a written corrective action plan (CAP) with a schedule for the completion of each significant step; and
- implementation of the CAP according to specified schedule and ongoing review of actions completed or milestones achieved and those remaining.

The regional office staff should work cooperatively with the SWA in this undertaking.

1) Research the Subject While on Site. Corrective action must be based on current, accurate information. It is necessary to identify individuals and/or units in the SWA with authority to take actions to correct problems that cannot be resolved by the BAM supervisor.

   The monitor should undertake discussions with appropriate agency staff as early as feasible. He/she should also gather any written materials, such as state law, policy, and procedures, which may be involved in the corrective action decision.

2) Involve Appropriate Staff in Corrective Action Planning. The decision as to what

action to take in order to correct a problem rests with the SWA. Some decisions may be made by the BAM supervisor; others may come from other agency management staff. The regional office should be aware of the division of authority in the SWA and include the appropriate agency management staff in corrective action planning and implementation.

3) Establish Written Corrective Action Plan. Whenever a plan of action is agreed upon, it should be drafted and circulated to the appropriate SWA staff for review, concurrence, and signature. The plan of action should be supported by an implementation schedule or a period for completion.

When the action plan is completed and signed by appropriate SWA staff, it should be reviewed by regional office staff. If the proposed plan is satisfactory, the SWA should be notified of regional office concurrence and proceed with implementation.

c. Monitoring Corrective Action. The progress of the SWA's corrective action implementation must be monitored by regional office staff. On occasion, it may become necessary for a SWA to revise its corrective action plan in order to accommodate unexpected difficulties in internal staff or program developments. Regional monitors should secure documentation of such changes and report them to the regional management.

1) Documentation of the Corrective Activities. It is important to document SWA BAM corrective actions as they occur. Case review visit notes and the quarterly regional office BAM activity reports provide regular means of recording such actions. Such documentation should cover all activities undertaken as well as modifications made subsequent to adoption of the plan. This may include a record of meetings, discussions, and decisions; dates for completion of specific actions, and descriptions of follow-up efforts which have occurred or may occur prior to the next review visit. Such a record should facilitate regional office staff working in concert to advise, monitor, and ultimately evaluate the corrective action measures of the agency BAM unit.

2) Informing Other Regional Office Staff. Regional monitors should be aware of regional office responsibilities beyond BAM findings. Findings from BAM may impact other UI responsibilities carried by other regional staff. Therefore, regional monitors should remember to inform their UI colleagues of any SWA BAM practices, which warrant their attention. These staff may also be tapped for valuable knowledge and expertise in assisting state agencies in making program improvements based upon BAM findings.

3) Possible Outcomes of Corrective Action Initiative. Corrective action can result in different outcomes. Logically, the desired outcome is the achievement of BAM program adjustments that will correct the problem. Once it has been clearly shown -- via regional review that the SWA is now meeting BAM requirements, the monitor will complete the appropriate BAM worksheet to document the results in the regional office file.

Another outcome could be completion of a planned corrective action, but the desired results are not realized. If the SWA agrees to initiate further corrective action, the regional office should assist the SWA in a new corrective action effort.

A third outcome could be that the planned corrective action fails, but the SWA refuses to take further action. If this situation occurs, the regional office should proceed to dispute resolution. General guidance for dispute resolution follows in the next

section.

4. Dispute Resolution

a. Types of Disputes. Occasionally regional office review of states' BAM program will identify SWA practices which are inconsistent with BAM requirements. If the SWA disagrees with the reviewer's findings, it is important that effort be made to resolve the dispute. Sources of disagreement between a regional office and a SWA will likely fall into one of five categories.

1) Adherence to Required BAM Procedures. This type of dispute arises when the monitor finds that the BAM unit is not following required BAM procedures (and coding) in its program, and the SWA does not agree to make a correction. The regulation establishing the BAM program at 20 CFR Part 602 provides the authority for required BAM methodology and procedures. ET Handbook No. 395, Benefit Accuracy Measurement State Operations Handbook, Chapters II-VIII, set forth BAM procedures and define the SWA responsibilities as mandated by Subpart C of the regulation.

2) Adherence to Written State Law and Policy. A dispute of this type arises when a monitor tentatively determines that the SWA BAM unit is not adhering to written state law or policy. A central requirement set forth in ET Handbook No. 395 is that "states' written laws and policies are the basis for all determinations".

3) Interpretation of State Law and Policy. This type of dispute arises when the regional office perceives that the state BAM unit may not be correctly interpreting state law and policy. This situation differs from (2) above in that it is likely to arise in situations where written state law and/or policy lacks specific operational definitions. In the absence of objective criteria to guide interpretation of state law and policy, monitors will apply the "test of reasonableness". However, the interpretation of state law is left to state officials. Therefore, monitors must follow the dispute resolution process (discussed in section c. below) for such disputes, only to the point of obtaining a written interpretation of the law section in question from the SWA administrators.

4) Conflict between State Law and Written Policy. A dispute of this category may not be a BAM problem alone. When a conflict between state law and written policy involves state law only, follow the process as in (3) above.

5) Consistency with Federal Law. A dispute of this type is one in which SWA BAM practice is not in compliance with Federal law or regulation, even though there is conformity between state and federal law. In such a situation, the regional office must ultimately refer the matter to the national office for resolution.

b. General Practices to Enhance Regional Office - SWA Communication. To ensure as full communication as possible during dispute resolution proceedings, regional monitors are urged to follow the practices noted below during resolution negotiation. The initial approach can be informal and need not be in writing. It should be undertaken between the regional office monitor and the BAM supervisor in a spirit of cooperation. At times these discussions may be elevated to include the Director or his representative. If such discussion does not produce resolution, the monitor should resort to the following approaches:

1) Discuss with the UIRD and/or Other Appropriate Regional Personnel. Monitors must inform other potentially interested regional staff of the dispute. Some disputes may involve only BAM procedures, but others may impact the UI program statewide.

2) Conclude Dispute Resolution. When the regional office and SWA officials agree to resolution of the dispute, the preparation of adequate documentation (such as a revised written policy) by the SWA will confirm that the dispute can be considered resolved. However, further action may still be necessary on some occasions in the form of SWA corrective action and regional technical assistance. The correction process, discussed in section 3 above, describes these procedures.

   If the monitor is ready to conclude that the SWA position should prevail, then the review process should be carried to completion. (See section 2. a.)

3) Document Resolution Outcomes. The region should have an adequately documented record of any disputes that occur. The monitor will therefore prepare a summary of each dispute resolution in a memorandum to the file. The summary must include records of meetings/discussions, agreements about actions and schedules, and the outcome of attempted resolutions (e.g., new policies).

c. Resolve the Dispute. This process begins with a discussion between the regional monitor and the BAM supervisor. It may later move to include the Director and/or other high level SWA staff. There are several basic steps that the monitor will need to follow. Generally these are:

1) Agree on Elements of Dispute. First, both parties must agree that a dispute exists. (For example, a situation may arise that appears to be in dispute, but upon discussion is found to be only a misunderstanding.)

   To resolve a dispute, the specific elements that make up the dispute must be known. The more precisely these elements are defined, the easier they will be to address. Refine only the elements critical to the dispute, and avoid inessential matters. The monitor must clearly focus the discussion to highlight essential elements.

2) Reach Agreement on Steps for Both Regional Office and SWA. Once the monitor and the BAM supervisor have identified the key elements, they must construct a resolution framework. This begins with each party outlining a position, which has a basis in fact. (Differences of opinion over BAM procedures are not considered "disputes", but must be forwarded in writing to the National Office for disposition.) Establishing a resolution framework may include additional steps. For example:

   a) Discuss with other Policy Units and Managers. Sometimes resolution of a dispute will require discussion with other units within the SWA. The BAM supervisor may state that the source of the problem is with another unit which will not take necessary action on a BAM case, or that BAM cannot take specific action on a case because of a verbal policy established by another unit. To avoid misunderstandings that occur from second-hand communication, the monitor should approach these units directly (within established protocols) to determine the SWA's official position. Such discussion often provides clarification which eliminates the dispute. It also may serve to inform other units about BAM and its operating principles.

   b) Obtain Written Policies and Procedures. A dispute commonly occurs when the BAM supervisor states that the unit's actions are guided by SWA policy unknown to the monitor up to that time. If such SWA policies are official, they should exist in writing. Sometimes, "unofficial" policies and practices inconsistent with written state law/policy are not committed to writing. In other cases, search for a written policy may reveal that the "policy" is only prevailing practice.

3) Resolve Dispute at This Point if Possible. If the above guidelines are followed, monitors and BAM supervisors should be able to resolve most disputes. Upon successful resolution, the way is clear to proceed with either corrective action or review completion.

If resolution is not reached, it is generally wise to engage the Director, or his designee, in the effort.

d. Seek Resolution via Office of the Director. Generally, the monitor will seek the BAM supervisor's assistance in engaging the Director in the resolution of a dispute. The same process pursued with the BAM supervisor will generally be followed.

Generally it should be possible to settle BAM disputes at the level of the Director. If necessary, other staff support from the Region should be provided to assist the monitor in this task. If resolution is still not possible, formal action may be required.

e. Elevation of the Dispute. When discussions with the Director are not fruitful, a more formal process must be introduced. This may take the form of written correspondence to the SWA Administrator in which the unresolved dispute is referenced. The letter must accurately present the elements of the dispute, justification for the regional office position, and the steps that have been taken to resolve the dispute, and request a written response from the SWA.

f. Refer to national office. Disputes that raise issues of consistency with Federal Benefit Accuracy Measurement requirements which cannot be resolved directly by the region, or that are so serious as to jeopardize the basic integrity of BAM data or the BAM program, must be referred to the national office. Close cooperation should be maintained between the region and the national office in the decision that is reached.

5. Annual BAM Administrative Determination Report and Determination Letter. The annual administrative determination regarding a SWA's BAM operations is made by the regional office at the end of the BAM program (calendar) year. It comes as a culmination of periodic field review during the year by regional office monitoring staff.

a. Completion of the Annual BAM Administrative Determination. The Annual BAM Administrative Determination is based upon findings of regional office field reviews of various aspects of SWA BAM operations throughout the calendar year. Chapters II, III, IV, and V provide instructions for conducting these reviews and for drawing conclusions about whether BAM requirements are met by a SWA.

Generally, the regions should be able to conclude whether or not the SWA has met major BAM requirement, based upon criteria presented in ET 396. A major exception is that of case investigative performance, for which no numeric standards have been established. However, the review system supports the reporting of review findings. In respect to case completion timeliness, the Annual Determination addresses only the 60-day and 90-day timeliness standards.

Because final annual reviews of case completion timeliness and methods and procedures take place in the last quarter or first quarter of the successive program year, the Annual BAM Administrative Determination should be completed in April following these delayed reviews. The monitoring schedule for each calendar year will provide for findings to be developed over varying periods of time, as detailed on the next page.

Subject	Period Review Conducted
Methods and Procedures	On-going throughout the year. Formal M&P for SWAs being reviewed and on-going for all SWAs.
Timeliness of Case Completion	On-going throughout the year. Final April of successive year for all SWA BAM cases from batches in the prior calendar year.
Sample Selection and Assignment	Quarterly during the year for SWA BAM cases assigned January through December. Biannually for assignment review
Case Investigative Procedures	Periodically during the year for completed BAM cases available to the monitor (Peer and/or Desk Reviews).
BAM NDNH Record Submission	Annually until the BAM unit crossmatch procedures comply with UIPL 03-07 change 1 requirements, and then biennially with the M&P review.
Case Reopenings	On-going throughout the year. Prior to and after completion of case reviews.

Regional offices will monitor SWA corrective action undertaken during the year to determine if satisfying outcomes are realized. Likewise, outcomes of dispute resolutions will be reviewed, with findings recorded in appropriate regional office SWA files.

The Annual BAM Administrative Determination must be prepared in narrative form for each SWA. Worksheet BAM-9 should be used in preparing the determination. The findings oft his determination for the prior calendar year, covering the program areas identified in the table above must be communicated in a letter to the SWA Administrator by May 1. Facsimiles of the BAM-9 worksheet and the Annual Determination letter are on the following pages. A copy of each Annual Determination Letter is to be saved in GEMS. This letter should be available to the national office on or before May 15.

b. Regional Office Action Following Annual Administrative Determination. Depending upon the findings of the annual determination, the regional office may need to take further action with one or another of the State agencies in its jurisdiction. For example, if a SWA does not meet a Federal BAM requirement, the regional office should review the history of the Annual BAM Administrative Determination and take either of the following steps.

1) Notify the SWA that it must prepare a corrective action plan (CAP) if the performance is falling below 50 percent covering the failed requirement(s) to be submitted with its State Quality Service Plan (SQSP). The CAP should specify measures to be taken for correcting the problem(s) in question, and provide projected dates for the completion of each step in the plan. In the interim DOL will expect any state reporting an overpayment detection rate below 50 percent to explain the reasons for the low performance in the narrative section of the SQSP.

2) Prepare a memorandum for the national office presenting a history of the SWA's Benefit Accuracy Measurement operational performance and recommending review for possible initiation of UIS administrative proceedings to find the SWA out of compliance with the BAM regulation (Reference: 20 CFR Part 602, Subpart E, sections 602.41 and 602.42).

A facsimile of an Annual BAM Administrative Determination Report Summary (Worksheet BAM-

9) and BAM Annual Determination Letter follow.

WORKSHEET BAM-9 ANNUAL BAM ADMINISTRATIVE DETERMINATION REPORT SUMMARY	
State Argenta	Date of Completion: April 15, 2009
Regional Monitor Completing Determination	Wanda Garner

Findings emerge by a process of comparing "what should be" with "what is." Whether or not there is a difference, Outcomes and findings should be based on the following attributes:

- **Criteria:** The standards, measures, or expectations used in making an evaluation and/or verification (what should exist).
- **Condition:** The factual evidence which the Monitor found in the course of the examination (what does exist).
- If there is a difference between the expected and actual conditions, then:
- **Cause:** The reason for the difference between the expected and actual conditions (why the difference exists and/or why the noncompliance occurred is occurring).
- **Effect:** The risk or exposure the SWA organization and/or others encounter because the condition is not the same as the criteria (the impact of the difference).

When conditions meet the criteria, acknowledgment in the Annual Determination Report and letter of satisfactory performance is appropriate.

Regional Office Determination	Findings	
Requirement (Source)	SWA Adheres	SWA Does Not Adhere
Organization (M&P or recent review)	X	
Authority (M&P)	X	
Written Procedures (M&P)	X	
Forms (M&P)	X	
Sample Selection (OUI System Reports & case assignment review)	X	
Timeliness of Case Completion (OUI System Reports)		X
Investigative Procedures & Methodology (Peer & Desk Case Reviews, System queries and reports)		X
BAM NDNH Record Submission & Documentation (SWA Input Header, SWA Input Detail Record, and Case file documentation)	X	

If any requirement(s) is(are) not met, explain status. Additional narrative and documentation should be attached to support the conclusion, if not previously transmitted.

SWA performance of 58% of case investigations completed within 60 days and 79% within 90 days does not meet the requirement of 70% and 95% respectively. The majority of delayed cases result from BAM referral to other units for completion of determinations. This delay was controllable by the SWA and therefore it is considered avoidable. This is the second year in which the BAM unit failed to meet this standard.

Monitoring found that one-third of the cases reviewed, did not obtain necessary facts to support the determinations reached. This is a related issue to the one noted above where another unit is completing determinations on BAM cases. BAM units are required to independently conduct new and original fact-finding or to verify the established facts. Both systems failed standards.

WORKSHEET BAM-9 ANNUAL BAM ADMINISTRATIVE DETERMINATION REPORT SUMMARY	
State Argenta	Date of Completion: April 15, 2009
Regional Monitor Completing Determination	Wanda Garner

Technical assistance provided and/or dispute resolution procedures followed. Additional narrative and documentation should be attached, if not previously transmitted.

ET Handbook No. 395, Benefits Accuracy Measurement State Operations Handbook, requires 70% of BAM case investigations be completed within 60 days and 95% be completed within 90 days. Negotiations are ongoing to obtain authority for BAM investigators to issue determinations. Additionally, the Handbook requires the investigator to conduct new and original fact-finding on newly arising issues, or on previous issues not adequately adjudicated. The BAM unit must independently verify established facts in instances where the investigator finds previously resolved issues or payment adjustments appear to have been handled properly.

Conclusion: The SWA's administration of the Benefit Accuracy Measurement program:
___ meets _X_ does not meet Federal regulations.

Recommendation:

The SWA is recognized for its efforts in correcting these compliance issues identified. It has developed a workgroup have been meeting regularly and expect to have recommendations prepared in the near future. They have expanded their focus from work search and fraud cases to include review of all BAM findings. It appears that Argenta soon will be one of the leaders in effective analysis and usage of BAM data for program improvement.

It will be necessary to develop a corrective action plan in your SQSP to address this issue. Monitors will continue to review cases for compliance.

May 2, 2009

Mr. John Smith
U.I. Administrator
Argenta Employment Security Commission
123 Main Street
Magenta, Argenta 30719

Gentlemen:

During calendar year 2008, the Unemployment Insurance Regional Office conducted a series of reviews of the State's Benefits Accuracy Measurement (BAM) operations to ensure uniformity in the administration of the program and to ensure compliance with BAM Regulations and ET Handbook No. 395, Benefits Accuracy Measurement State Operations Handbook. Regional monitoring consisted of a Methods and Procedures (M&P) review of the Argenta BAM organization, authority, written operating procedures, and forms; a review of the sampling program; a review of adherence to the timeliness requirements for completion of case investigations; and a review of the adequacy and accuracy of the investigative process through monitoring 30 completed BAM cases. The Annual BAM Administrative Determination is enclosed.

The Regional Office has determined that the Argenta Employment Security Commission did not meet the Federal BAM timeliness requirements during 2008. A corrective action plan to resolve this inadequacy needs development for inclusion in your State Quality Service Plan (SQSP) submission. Although no benchmarks have been established for determining the adequacy of case investigation, a problem of sufficient magnitude to require corrective action did arise when reviewing fact-finding. The details of these inadequacies are furnished later in this letter.

The Regional Office has determined that the Argenta Employment Security Commission did meet the requirements for organization, authority, written operating procedures, forms and BAM sampling.

The review of administrative areas resulted in the following findings:

Organization: The requirement for organization is being met now that previous negotiations have resulted in the BAM Supervisor's reporting to the Executive Director rather than the Chief of Benefits.

Authority: The requirement for authority is being met; however, discussions are continuing in an attempt to grant additional authority to BAM investigators to issue determinations that should result in improving case completion timeliness performance.

Written Procedures: The written procedures developed by the BAM Unit are outstanding and have been used as a model by other States.

Forms: All of the BAM forms necessary to conduct the BAM program have been developed and meet the requirements.

State Sample Selection: During the routine reviews throughout the year, only one extraneous case was selected. Additional edits were immediately implemented to eliminate the cause of this problem. No other problems have surfaced. Comparison of the populations from which BAM drew its samples compared to reported values are within established limits.

Timeliness of Case Completion: ET Handbook No. 395 requires that 70% of BAM cases investigated be completed within 60 days and 95% of the cases investigated be completed within 90 days. However, only 58% of the case investigations were completed within 60 days and 79% within 90 days.

An analysis of the 52 delayed cases showed that 23 cases were untimely because of delayed responses to Interstate requests (uncontrollable); 3 cases were untimely because the BAM Unit delayed some investigative action (controllable); and 32 cases were delayed as the result of the failure of another unit within the SWA to complete action timely (controllable). It is our understanding that discussions are continuing in an attempt to grant authority to BAM investigators to issue all determinations (except monetary). This action should go a long way toward resolving the problem of untimely completion of case investigations.

Investigative Procedures: Although no benchmarks currently exist to determine whether or not SWAs meet the requirement, our review of 30 cases reveals the following:

Prior to April 10, 2008, the BAM Unit failed to set up overpayments if the total amount was less than $40, although Argenta law requires that all overpayments be established and recouped. After discussion, it was determined to take action on all overpayments in accordance with State law. It is our understanding that the Department's Advisory Council is formulating an amendment to the law which would allow the SWA to waive the establishment of overpayments of $35 or less if the erroneous benefits were received through no fault of the claimant.

There was a dispute concerning the BAM in-person verification requirement during the first quarter of 2008. This dispute was resolved and verifications subsequent to August, 2008, have been conducted in accordance with BAM requirements.

The primary area of concern at this time is the pursuit of issues (fact-finding) by the BAM investigators. Although there was some improvement in fact-finding following training conducted by the Regional Office, the quality declined to an unacceptable level several months later. There were 12 nonmonetary determinations in the 30 case files reviewed. Most of the nonmonetary determinations (9) were initiated in the local office with the remainder initiated by the BAM Unit. The fact-finding contained in the case files for 6 of these nonmonetary determinations was not sufficient to support the determinations. These were coded as "pursuit exceptions." It is the responsibility of the BAM investigator to review all prior actions on a case including a thorough analysis of nonmonetary determinations. When it is questionable that sufficient fact-finding has been conducted to support a determination, the BAM investigator must conduct "new and original" fact-finding. It will be necessary to develop a corrective action plan in your SQSP to address this issue. As noted above, your agency requires the BAM unit to refer nonmonetary determinations to other units. Because of this, it appears that the fact-finding issue is systemic and not restricted to BAM.

We are pleased to note that the two work groups that were established following the meeting with Arlandria have been meeting regularly and expect to have recommendations prepared in the near future. They have expanded their focus from work search and fraud cases to include review of all BAM findings. It appears that Argenta soon will be one of the leaders in effective analysis and usage of BAM data for program improvement.

BAM National Directory of New Hire (NDNH) Crossmatch: Unemployment Insurance Program Letters 03-07 and 03-07 Change I established the requirement that all paid claim accuracy cases beginning with batch 200801 forward were to be crossmatched with NDNH. The BAM program meets crossmatch parameter requirements, documents compliance, and follows associated procedure and coding guidance.

Regional Office staff members would be pleased to assist in the development of a corrective action plan upon your request. We look forward to the opportunity to assist your staff in any way we can.

Sincerely,

Shirley Jones
Regional Administrator
Region XXII

Enclosure

cc: National Office

WORKSHEET BAM-9 ANNUAL BAM ADMINISTRATIVE DETERMINATION REPORT SUMMARY	
State	Date of Completion:
Regional Monitor Completing Determination	

Findings emerge by a process of comparing "what should be" with "what is." Whether or not there is a difference, When conditions meet the criteria, acknowledgment in the Annual Determination Report and letter of satisfactory performance is appropriate. Outcomes and findings should be based on the following attributes:

- **Criteria:** The standards, measures, or expectations used in making an evaluation and/or verification (what should exist).
- **Condition:** The factual evidence which the Monitor found in the course of the examination (what does exist).
- If there is a difference between the expected and actual conditions, then:
- **Cause:** The reason for the difference between the expected and actual conditions (why the difference exists and/or why the noncompliance occurred is occurring).
- **Effect:** The risk or exposure the SWA organization and/or others encounter because the condition is not the same as the criteria (the impact of the difference).

Regional Office Determination	Findings	
Requirement (Source)	SWA Adheres	SWA Does Not Adhere
Organization (M&P or recent review)		
Authority (M&P)		
Written Procedures (M&P)		
Forms (M&P)		
Sample Selection (OUI System Reports & case assignment review)		
Timeliness of Case Completion (OUI System Reports)		
Investigative Procedures & Methodology (Peer & Desk Case Reviews, System queries and reports)		
BAM NDNH Record Submission & Documentation (SWA Input Header, SWA Input Detail Record, and Case file documentation)		

If any requirement(s) is (are) not met, explain status. Additional narrative and documentation should be attached to support the conclusion, if not previously transmitted.

Technical assistance provided and/or dispute resolution procedures followed. Additional narrative and documentation should be attached, if not previously transmitted.

Conclusion: The SWA's administration of the Benefit Accuracy Measurement program:
___ meets ___ does not meet Federal regulations.

Recommendation:

CHAPTER VIII

REVIEW DOCUMENTATION AND REGIONAL OFFICE REPORTING

1. Introduction. This chapter contains an explanation of BAM procedures for regional monitors to follow in creating and documenting an adequate record of the periodic review of each state agency's BAM operations. These procedures are offered to ensure that the Regional Office maintains a complete monitoring record of each state agency's BAM program during the monitoring year. This guidance is intended to encourage both uniformity and effectiveness in regional monitoring.

In addition, the chapter spells out BAM reporting requirements that the Regional Offices must follow to ensure proper communication between themselves and the state agencies, on the one hand, and the National Office on the other.

2. Documentation. An important aspect of effective monitoring is thorough documentation of review findings and conclusions, and the basis of such findings. Each Regional Office should maintain a monitoring file for each state in the Region. Progress review summaries and supporting documents from the monitoring visits will constitute the core of these files. Notations (memos to the files) on subsequent follow-up actions by either state or regional staff should be included to ensure a complete record of the state agency's response to progress, final, and annual reviews.

Standard worksheets to be used by the Regional Offices for recording and reporting their findings are included in Appendix B.

Each Regional Office state agency file should contain the following types of material:

- Progress review summaries and supporting BAM review worksheets.
- Copies of correspondence to and from the state agency relating to the BAM program, and correspondence relating to issues within the UI program that have been addressed as part of the BAM program.
- Copies of correspondence to the National Office pertaining to the state agency BAM program.
- Internal memoranda relating to the state agency BAM program.
- State agency corrective action plans relating to BAM issues and state BAM operations.
- Comprehensive annual BAM reports for each state agency, which are the basis for the annual determination letter to the SWA administrator and copied to the National Office.
- All available documentation relating to disputed issues. This should include documentation of the efforts of the Regional Office to resolve the dispute, copies of responses from the state agency, and copies of state agency policies, if applicable.

3. BAM Records Retention. Regional Offices should retain for a minimum of three years all records generated in the monitoring of state agency BAM programs. Such records include BAM worksheets and other materials generated in recording and reporting the findings of progress and final BAM reviews. Also include supportive documentation and correspondence compiled by the Regions in the

course of discharging their BAM responsibilities.

States may have to retain records longer than three years if, for example, an administrative hearing is planned or under way or a problem has developed with a state that might lead to court proceedings.

4. Biennial Methods & Procedures (M & P) Review Report. Findings of the biennial M & P Review of state agency BAM programs must be submitted to the National Office 30th day of April. If the review findings show compliance in all areas, no further M & P reporting will be necessary during the year. If the state agency is out of compliance as the result of M & P findings or subsequent changes, further reporting is required and is completed via GEMS.

Monitors need to submit BAM Worksheets BAM-1, BAM-2, BAM-3, and BAM-4 with the M & P Report to confirm and explain conclusions. The reports must be entered into the Grants e-Management System (GEMS) in the UI Base Admin Integrity state-specific electronic case file folder. Monitors will use the following convention in naming the report, "BAM M&P Review YYYY", where YYYY is the BAM batch year reviewed. The report should include worksheet attachments or copies of system reports.

5. Transmitting the Annual Determination Review Reports to the National Office. The regional monitors are required to submit, on an annual basis, a comprehensive report on the status of each state's BAM program. These reports -- one for each state agency -- are designed to provide information to the National Office regarding the region's on-going support and guidance of state BAM operations. The reports must be entered into the GEMS in the UI Base Admin Integrity state specific electronic case file folder. Monitors will be use he following convention in naming the report "BAM Annual Determination Review YYYY" where YYYY is the BAM batch year reviewed. When appropriate, the report should include worksheet attachments or copies of system reports.

These narrative reports should be analytical in nature. They should identify specific BAM problems or issues presented or faced by the state agencies, and describe significant BAM program developments and accomplishments in each state during each quarter. See page VIII-6 for due dates of annual reports.

The report will also cover the regular monitoring effort of the Regional Office and should discuss sample selection and assignment, case timeliness, investigative exceptions, case reopening activity addressed by the region, Regional Office workload status, and any changes related to M & P requirements which are detected during on-going monitoring. The annual report supports the annual determination letter's findings.

The following paragraphs discuss the purpose, organization, and content of the annual regional BAM report.

Purposes of Annual Regional Office Reporting to the National Office.

- To assess the status of each state's BAM program, by identifying both significant State agency developments and problems and BAM procedural issues pending in the State agency.

- To report and analyze the effects of Regional Office initiatives and state agency efforts to solve ongoing problems or procedural practices which are at variance with established BAM methodology and program requirements.

b. Report Organization and Content. The annual regional BAM report will be organized around the three broad BAM responsibilities of the Regional Offices:

1) Active program leadership by the region in each state agency to promote long-term UI program improvement based upon analysis and interpretation of BAM findings.

2) Periodic monitoring of state agency BAM operations and staff performance via progress reviews (on-site or mail-in) to foster and maintain an effective UI BAM operation in each state agency.

3) Continuing technical support of the administration and development of UI BAM programs in each agency.

Each annual report will cover for each state agency, as appropriate, some or all of the following subjects or program areas:

- case review
- management of regional case review workload
- state agency sample selection, assignment, exceptions, and NDNH compliance
- changes to state agency adherence to BAM methods and procedures following the biennial M&P review
- analysis of case completion and timeliness
- state agency BAM corrective action and dispute resolution
- status reports on program improvement studies underway, as well as UI program improvement measures planned and/or underway
- other Regional Office BAM leadership initiatives - review of state agency reopenings of completed BAM cases - progress review conclusions and follow-up goals

Each successive annual report should include an updated assessment of the standing of each state agency in the development and maintenance of a sound BAM program and utilization of BAM data to improve the effectiveness and efficiency of State UI benefit payment operations.

To a degree, each annual report will extend the previous ones, detailing progress achieved in meeting program goals and measures taken to deal with problems reported previously.

c. Annual Report Format. The following reporting format is offered to aid each Regional Office in the organization and preparation of the individual state agency reports. It is intended to serve as a comprehensive guide or checklist to encourage thoughtful analysis and reporting regarding significant Regional Office initiatives and findings during the quarter.

Material in the annual state agency reports should be presented in the following sections:

I. Program Leadership.

A. Regional Office Initiative and Guidance. Describe Regional Office actions taken or continued with the state agency to foster the use of UI/BAM program findings to improve UI program operations. Some examples are: assist the state agency in organizing, analyzing, and interpreting BAM data; consult with a state agency on the formulation of potential program improvement (PI) measures based upon BAM findings; assist a state agency in planning and conducting BAM-related PI projects.

Discuss status of pending Regional Office actions to address specific state agency issues; indicate results achieved from monitor leadership initiatives.

Note: "Program improvement" is used in BAM in lieu, of "corrective action", to cover a wide range of UI operational, policy, and program changes that are undertaken by state agency management to reduce payment errors. The term "corrective action" is used in BAM to refer to actions taken by the state agencies to modify or correct some aspect of its BAM operations and/or practices in order to comply with established BAM methodology.

B. Developments in UI Program Improvements. Describe the state agency's actions and results in analyzing and interpreting BAM data, and in utilizing their findings to bring about UI program improvements. Also, report any significant problems or difficulties facing the state agency which may impede active program improvement efforts.

II. Monitoring: Findings and Results of Regional Progress Reviews.

A. Case Review. Peer and Desk Reviews may highlight BAM program operational issues. Monitors should conduct an analysis of case review findings for each state, complete a summary of findings (exceptions), explain guidance provided to the BAM unit. Regional Office monitors should detail efforts to correct BAM operational deficiencies (revealed by monitoring exceptions) and to resolve issues or disputes. Additionally, monitors must detail their follow-up on prior corrective actions.

B. Management of Regional Office Case Review Workload. Provide an assessment of case review workload status and monitor backlogs. The report should identify problems incurred, if any, in meeting the required review targets for each state, and action planned to deal with the situation.

C. Sample Selection Review. Use the BAM-5 worksheet to summarize findings of sampling review in each state and report on state agency and Regional Office efforts to correct any problems detected.

D. Case Timeliness. Report on analysis of state agency case completion performance data during prior quarter(s) of the program year.

E. Case Reopening. Report results of RO action on state agency code 5 case reopenings which were not part of the RO review sample and other activity which had the potential to be a problem.

F. State M & P Review. If the findings of biennial state M & P reviews show compliance in all areas, no further M & P reporting will be necessary until the subsequent review unless changes are noted by the Region. If subsequent changes cause the state agency to be out of compliance, further reporting will be required. (Ref: Chapter II of the Handbook.)

Whenever the M & P findings show non-compliance, further monitoring by the Region is required to assess necessary state agency corrective action. After a State has completed appropriate corrective action, the monitor will verify compliance. Results of either state agency or Regional Office actions should be reported in subsequent regional BAM reports.

G. Attachments - Submit appropriate M&P worksheets with subsequent reports to confirm and explain any changes to M & P conclusion.

III. Implementation of UI/BAM Support Services.

In this section present information on all supportive assistance planned and/or provided to the state agency during the quarters covered. Provide a negative report for any item on which no substantive information is available.

A. Technical Assistance (TA). Note and describe TA planned and/or extended this reporting period. (Do not repeat discussion of TA efforts already mentioned in Sections I and II). Some examples: assist a state agency with UI/BAM staff training; assist a state agency to plan and launch a special study; and develop/conduct BAM investigative training for state agency staff. Describe special situations and progress in the delivery of TA to the state agency.

B. Clarifications needed from the National Office. Report any BAM methodology and procedure issues on which clarification is required for the state agency.

C. Review Conclusions and Follow-up Goals. Under this heading, the Region should offer a brief current assessment of the status of each state agency's BAM program. Give attention to internal organizational problems or situations, investigative performance (improving, declining in quality), and quality of state's BAM database as evidenced by efforts to analyze and utilize data for UI program modification. Also, describe state agency BAM situations which require Regional Office attention and discuss Regional Office plans for follow-up action.

6. **Preparation of the State Agency Annual Determination Reports and Letter for Transmittal**. The following steps are offered as a checklist to ensure that reporting on the status of each state agency BAM program by the Regions will be generally uniform and complete.

a. Develop a report for each state agency separately, following the format provided in Section 5c. above.

b. Attach all BAM worksheets that are appropriate to each state agency report. Include any special documentation available which will confirm or clarify findings or issues pending in these annual state agency assessments.

Each state agency will receive an annual determination that it either does or does not comply with BAM requirements (See Chapter VII, sec. 5.). It is important that during the program year agency administrators be informed whenever M & P reviews or progress reviews for case timeliness, sample selection, or investigative procedures reveal that the state agency is not adhering to the standard methodology, or that progress to date shows that the state agency may not meet BAM requirements by the end of the year. Accordingly, regions will report such findings in writing to the states immediately following completion of a given review.

A copy of the Annual Determination Letter must be entered into the GEMS in the UI Base Admin Integrity state specific electronic case file folder. Monitors will use the following convention in naming the report “BAM Annual Determination LTR YYYY” where YYYY is the BAM batch year reviewed. The letter entered into the system should include worksheet attachments or copies of system reports submitted to the SWA.

7. **Due Dates of Regional BAM Reports**.

Monitors must submit their BAM annual reports through the GEMS system by April 30th of each calendar year. All monitoring findings for the review quarters need to be entered into the system prior to this date, so they will be included in the regions' analyses. The National Office will also use this date to establish a point in time to begin its review of the regional reports.

For the convenience of both regional and National Office BAM staff, an annotated list of required BAM reports generated by the Regions, along with due dates for the respective reports, is presented in the following table.

Due Dates of Regional Office BAM Reports
(BAM Reporting Cycle)

Required BAM Reports	Due Dates*
1. Annual BAM Determination Review Report (Ref.: Chapter VIII, pp. 2-5 of ET 396)	April 30
2. Biennial Review of state agency BAM Methods and Procedures (M & P) (Ref.: Chapter II of ET 396)	April 30
- Use worksheets BAM-1, 2, 3, and 4.	
3. Sampling Reviews (Ref.: Chapter III of ET 396)	April 30
- Use worksheet BAM-5; incorporate to supplement the annual activity report.	
4. Annual BAM Administrative Determination Letter. (Ref.: Chap. VII of ET 396.)	
Regions must make annual assessments of the adequacy of each state's BAM operations and performance. Findings of the determination should be transmitted by letter to the state agency, with copy to the NO (through GEMS). Use of worksheet BAM-9 is optional.	
- Date due the state agency	May 1
- Copy of letters to the SSAS due the National Office	May 15

5. BAM Corrective Actions must follow the same quarterly reporting requirements and timetables as those established for SQSP correction actions.

ORGANIZATION WORKSHEET BAM-1

State_____ Date_____ Reviewer_____

Section I. Organization Findings

1. Circle one of these chain of command structures which represents who the BAM supervisor reports to:

a. A person who has no line responsibility (up or down) for any function audited by BAM

b. The head or deputy head of the state agency

c. The head or deputy head of UI, or equivalent, who has staff or line management responsibility for other functions and activities in addition to UI benefits and the BAM chain of command, does not pass through UI benefit operations and it does not pass through BPC.

d. The BAM chain of command passes directly through a supervisor or manager who oversees a function that BAM audits (e.g. the chain of command passes through a unit that BAM audits).

If "a" or "b" or "c "is circled, then mark "yes" ____ Yes
If "d" is circled, then mark , then mark "no" ____ No

Name, of BAM supervisor's superior:_____
Title of BAM supervisor's superior:_____
Supervisor's Department name:_____

2. Does the BAM vision or mission statement reflect independent audit operations and the major objectives of the BAM system which include:
   - assessing improvements in program accuracy and integrity; and,
   - encouraging more efficient administration of the UI program. ____Yes
   If BAM does not have an agency approved mission or vision statement, ____ No
   which reflects independent operations and BAM objectives then mark "no"

3. Does the BAM unit have access (by policies and procedures) ____ Yes

   to the all records and databases necessary to carry out its functions? ____ No

4. Are there written procedures and processes in place to resolve conflicts ____ Yes
   between BAM and other units including the reporting of BAM findings ____ No
   (Mandatory if BAM refers finding to another department for determination)

5. Are the BAM supervisor and investigators ____ Yes
   covered by the State Merit System? ____ No

II. Conclusion

____ State agency adheres to BAM requirements.
____ State agency does not adhere to BAM requirements - agrees to correct.
____ State agency does not adhere to BAM requirements - does not agree to correct.

III. Explanation (if necessary add additional pages) _____

_____

_____

AUTHORITY WORKSHEET BAM-2

State _____ Date _____ Reviewer _____

I. Decision Authority Findings - Enter the number from the "Options" section below which explains how each of the following are issued, when BAM identifies an error:

.

__ Monetary redeterminations
__ Findings of fraud
__ Nonmonetary determinations/redeterminations
__ Formal warning for work search
__ Employment Service (labor exchange) registration
__ Other actions not included above (OP's, UP's, voided offsets, etc.)

Options

1. The state agency's written policies and procedures give the BAM unit the authority to issue a determination/redetermination when an error is found in a case.

2. The BAM unit refers findings to other units to issue determinations/redeterminations, and in the event of disputes with those units, the BAM unit has access to a higher authority to obtain resolution and the mechanism assures program integrity. The higher authority must be identified along with the resolution process and standards employed.

3. Other (explain). Procedure meets requirement in that_____
_____
_____

4. Does not meet BAM requirements for authority

II. Conclusion.

__ State agency adheres to BAM requirements.
__ State agency does not adhere to BAM requirements - agrees to correct.
__ State agency does not adhere to BAM requirements - does not agree to correct.

III. Explanation. (if necessary add additional pages)

_____
_____
_____

WRITTEN PROCEDURES
WORKSHEET BAM-3
(Page 1 of 2)

State _____ **Date** _____ **Reviewer** _____

I. Written Procedures Findings.

1. Does the state agency BAM Operations Manual cover all investigative and administrative functions of the BAM unit? Consider the following: __ Yes __ No

- Responsibilities of BAM staff – including training and staff development
- Information Technology Support - data processing and Sun System administration
- Maintaining data files
- Sampling and sample population validation
- Assignment of cases
- Questionnaire completion standards and minimum procedure requirements
- Investigations including new and original fact finding
- Standards for exploration of issues outside of the key week or denial, which might affect the accuracy of the payment or denial decisions.
- Interstate procedures for assisting other States and for requesting assistance
- Coding/error classification
- Records – case review procedures, data input & review, documentation, retention
- Relationships with other agency units - BPC, Benefits, Tax, Appeals, Job Service
- Process for making determinations resulting from BAM investigations
- Source references for law, rules, appeal precedents, and SWA procedures
- Case file and required documentation organization

2. Have the procedures been adapted to particular circumstances of the State in addition, do these procedures accurately reflect law and policy? __ Yes __ No
Consider the following:
- Work search requirements
- ES registration (labor exchange) requirements
- Procedures for obtaining necessary dependency information, if applicable
- Alternate or extended base period wage determinations
- Fraud determinations
- Procedures for contacts with non-English speaking claimants
- Method or process for reporting findings, such as systemic issues
- Procedure for conflict resolution between BAM and other UI departments

3. Ascertain whether or not the requirements of ET Handbook No. 395, including Appendix C – Investigative Guide, are properly incorporated into its BAM procedures manual. Consider:

a. Are the procedures consistent with ET Handbook No. 395? __ Yes __ No
Consider:
- Data collection
- Crossmatch of the PCA audit with NDNH
- Investigations
- Documentation
- Retention of records
- Reporting (claimant questionnaire completion)

b. Are the investigative procedures designed to accord with standard agency fact-finding practices? __ Yes __ No

WRITTEN PROCEDURES WORKSHEET BAM-3

(Page 2 of 2)

State _____ Date _____ Reviewer _____

I. Written Procedures Findings continued.

3. Ascertain whether or not the requirements of ET Handbook No. 395, including Appendix C – Investigative Guide, are properly incorporated into its BAM procedures manual. **(Continued)** Consider:

c. Do the case completion timeliness objectives facilitate investigative procedures? __ Yes __ No

d. Do agency procedures outline specifically that appeal hearings be attended by the BAM investigator responsible for the determination being appealed? __ Yes __ No

e. Do instructions for completing the required formats specify that the investigator must explain if the information was not obtained (This may be satisfied by space on the formats designated for this information.) __ Yes __ No

4. Does the state agency BAM Operations Manual document the NDNH crossmatch process and procedures for investigations on PCA audits. Do these procedures include an adequate wait time (e.g. a minimum of 5 business days after the record submission allowing for the crossmatch results to be returned to the SWA? __ Yes __ No

5. Does process meet the requirement specified in UIPL 03-07 change I __ Yes __ No

a. The BAM records are submitted to NDNH and not an internal repository of NDNH "hits"
b. Independent crossmatch date parameters are used, which are from the benefit year begin date to 30 days after the key week end date
c. Submission of the case SSN is not subjected to other SWA NDNH crossmatch process filters (e.g. weeks claimed, weeks compensated, partial payments, current investigation - same employer with different dates, employer type, etc.)
d. BAM NDNH Crossmatch includes request for name-SSN verification
e. BAM has access to all NDNH "hits" returned without SWA filtering

II. Conclusion.

__ State agency adheres to BAM requirements.

__ State agency does not adhere to BAM requirements – agrees to correct.

__ State agency does not adhere to BAM requirements - does not agree to correct.

III. Explanation. (if necessary add additional pages)

_____
_____
_____
_____

FORMS WORKSHEET BAM-4
(PAGE 1 OF 3)

State _____ **Date** _____ **Reviewer** _____

I. Section I Form Review Findings

(a) Claimant Questionnaire

1. Has the questionnaire been altered as required to cover specific provisions of state law? Consider the following: __ Yes __ No __ N/A

- Base period separations
- Base period weeks or hours worked
- Base period wages to include alternate and extended base periods
- Work search
- Separations (initial, additional, and continued claim, lag period or last employing unit and covered employment requirement) and compelling reasons
- Work force attachment and partial employment
- Employment Service registration
- Disqualifying Income during Key Week
- Key week or other week earnings
- Temporary employment
- Dependency allowances

2. Are all changes to the questionnaire adequate to obtain the necessary information or cause further investigation? __ Yes __ No __ N/A

3. Were changes to the questionnaire limited to those necessitated by specific provisions of State law or policy? __ Yes __ No __ N/A

(b) Standard Forms

1. Work Search Verification - Employer

a. Are questions on the form adequate to determine whether claimant's work search contacts were acceptable according to state agency written law and policy? Yes __ No

b. Is space provided for signature of the investigator, signature or name of the person interviewed, and the date? __ Yes __ No

2. Work Search Verification - Labor Organization

a. Are questions on the form adequate to determine claimant's union status? __ Yes __ No

b. Are questions on the form adequate to determine, according to state written law and policy, if any issues resulted from job referrals or job refusals? __ Yes __ No

c. Is space provided for signature of the investigator, signature of the person interviewed, and the date? __ Yes __ No

FORMS WORKSHEET BAM-4

(PAGE 2 OF 3)

State _____ **Date** _____ **Reviewer** _____

I. Section I Form Review Findings

(b) Standard Forms continued

3. Employment / Base Period Wages / Separation / Benefit Year Earnings and New Hire Reporting Verification

a. Are questions on the form(s) adequate to obtain, according to state written law and policy, reason for separation from employment, recall status, base period wages, other income or special payments (pension, vacation, separation pay, wages in lieu of notice, etc.), earnings received during the benefit year and payment frequency, and current employment status? Yes __ No

b. Does the form(s) capture whether the employer reported the claimant as a new hire, if the claimant was hired since the beginning of the benefit year? __ Yes __ No

c. Is space provided for signature of the investigator, signature or name of the person interviewed, and the date? __ Yes __ No

4. Disqualifying/Deductible Income Verification

a. Are questions on the form used for BAM adequate to determine eligibility or reductions to benefits, according to state written law and policy, regarding receipt of or application for pension/income/remuneration? __ Yes __ No

b. Is space provided for signature of investigator and date? __ Yes __ No

5. Authorization to Release Information

a. If required by the State, is the form used for BAM adequate according to state requirements? __ Yes __ No __ N/A

b. Is space provided for signature of claimant and date? __ Yes __ No

6. Fact-finding Statement

Does the form used for BAM provide space for the signature or name of the person providing the information and the date? __ Yes No

7. Dependency Eligibility Verification

a. Are questions on the form adequate to obtain, according to state written law and policy, data needed to determine eligibility? __ Yes __ No __ N/A

b. Is space provided for signature of the investigator and the date? __ Yes __ No

FORMS WORKSHEET BAM-4

(PAGE 3 OF 3)

State _____ **Date** _____ **Reviewer** _____

I. Section I Form Review Findings
(b) Standard Forms continued

8. Summary of Investigative Narrative

a. Is adequate space provided on the form to enter pertinent facts of the case? __ Yes __ No

b. If a "fill-in-the-blank" summary is used, is it adequate to summarize pertinent facts of cases? __ Yes __ No

c. Is space provided for signature of the investigator and date? __ Yes __ No

II. Conclusion.

__ State agency adheres to BAM requirements.

__ State agency does not adhere to BAM requirements – however it agrees to correct

__ State agency does not adhere to BAM requirements – and it does not agree to correct.

III. Explanation.

_____

_____

_____

_____

_____

_____

_____

_____

WORKSHEET QC-5
SAMPLE SELECTION, ASSIGNMENT, EXCEPTIONS, AND NDNH CROSSMATCH SUBMISSION REVIEWS

State_____ Date_____ Reviewer_____

Type of Review: Progress __ Biennial ___

Batches: #_____

I. QUESTIONS:

A. Sample Selection and Assignment

1. In all samples reviewed, were the cases assigned the same cases that were pulled? ___Yes ___ No

2. In each batch checked, were the cases in the rec1.dat file the same cases that were pulled by the BAM automated sample selection program? ___Yes ___ No

B. Adequacy of Sample Levels

4. Did this State, in one or more weeks, fall below the minimum weekly sample? ATTACH SAMPLE SUMMARY REPORTS. ___Yes ___ No

5. Based on the projected annual sample size, is this State likely to meet its annual sample allocation in the calendar year? ___Yes ___ No

6. If the projected annual or the quarterly sample selected is below the allocated size, does the BAM supervisor have plans to adjust the workload to reach requirements? ___Yes ___ No ___N/A

WORKSHEET QC-5
SAMPLE SELECTION, ASSIGNMENT, EXCEPTIONS, AND NDNH CROSSMATCH SUBMISSION REVIEWS

State_____ Date_____ Reviewer_____

Type of Review: Progress __ Biennial ___

Batches: #_____

C. Sample/Population Exceptions

1. Has the State experienced exceptions, which affect representativeness in its weekly samples? ATTACH SAMPLE CHARACTERISTICS, SAMPLE VALIDATION, POPULATION EXCEPTIONS OR COMPARISON REPORTS. ___Yes ___ No

2. Has the SWA selected any samples that included one or more cases that do not belong in the BAM population? (For example, temporary extended benefits programs or excluded programs such as shared work or trade assistance.) ___Yes ___ No

3. Does one or more weekly batches include the same key week ending date for all cases, or exclude certain types of claims from the samples (for example, CWCs, Interstate, UCFEs, UCXs claims)? ___Yes ___ No

4. Has the BAM population of UI weeks or dollars paid fallen outside of the control limits for the year? If "Yes", attach the report. ___Yes ___ No

5. Does the BAM population benefits paid for the quarter fall outside of the control limits in comparison with the ETA 5159 Report? ___Yes ___ No

6. Does the BAM denial population for the quarter fall outside of the control limits in comparison to the ETA 218 and 5159 reports for monetary denials or in comparison to the ETA 207 and 9052 for separation and nonseparation denials? ___Yes ___ No

7. If the BAM paid or denial population for the quarter falls outside of the control limits, has the SWA developed a corrective action plan to resolve the issue? ___Yes ___ No

WORKSHEET QC-5
SAMPLE SELECTION, ASSIGNMENT, EXCEPTIONS, AND NDNH CROSSMATCH SUBMISSION REVIEWS

State_____ Date_____ Reviewer_____

Type of Review: Progress __ Biennial ___

Batches: #_____

D. National Directory of New Hire Crossmatch Data Submission.

1. Is the SWA Input Header Record's date stamp 30 days or greater after the key week end dates for each sample case of the four weeks of transmissions reviewed? ___ Yes ___ No

2. Do the name and SSN combinations of the four weeks of sample cases selected for review match the SWA Input Detail Record fields titled SSN, Person First Name, and Person last name? ___ Yes ___ No

3. Is the "W-4 from date" equal to the benefit year beginning date or less than or equal to 365 days prior to the key week end date? ___ Yes ___ No

4. Is the "W-4 through date" equal to or greater than the key week end date plus 30 days for each sample case? ___ Yes ___ No

5. Does the SWA Input Detail Record's "Verification Request Indicator" contain "Y" for the BAM records submitted to NDNH? ___ Yes ___ No

6. Is the "W-4 Same State Data Indicator" set to "Y"? ___ Yes ___ No

All answers for "Section D" (NDNH crossmatch submission) must be "yes" for a BAM unit to be compliant with requirements. Is the BAM program compliant with the NDNH crossmatch requirements specified in UIPL 03-07 Change I? If an answer to any of the questions above is no, then mark "no." ___ Yes ___ No

WORKSHEET QC-5
SAMPLE SELECTION, ASSIGNMENT, EXCEPTIONS, AND NDNH CROSSMATCH SUBMISSION REVIEWS

State_____ Date_____ Reviewer_____

Type of Review: Progress __ Biennial ___

Batches: #_____

EXPLANATION: Describe any issue identified with sample selection / assignment, adequacy of sampling levels, sample / population exceptions, or the NDNH crossmatch. Attach all reports and other records that document the exceptions that the monitor has identified. The monitor should detail efforts to provide TA and document corrective actions taken or planned by the state agency to remedy these situations.

WORKSHEET BAM-9
ANNUAL BAM ADMINISTRATIVE DETERMINATION REPORT SUMMARY

State	Date of Completion:
Regional Monitor Completing Determination	

Findings emerge by a process of comparing "what should be" with "what is." Whether or not there is a difference, When conditions meet the criteria, acknowledgment in the Annual Determination Report and letter of satisfactory performance is appropriate. Outcomes and findings should be based on the following attributes:

- **Criteria:** The standards, measures, or expectations used in making an evaluation and/or verification (what should exist).
- **Condition:** The factual evidence which the Monitor found in the course of the examination (what does exist).
- If there is a difference between the expected and actual conditions, then:
- **Cause:** The reason for the difference between the expected and actual conditions (why the difference exists and/or why the noncompliance occurred is occurring).
- **Effect:** The risk or exposure the SWA organization and/or others encounter because the condition is not the same as the criteria (the impact of the difference).

Regional Office Determination	Findings	
Requirement (Source)	SWA Adheres	SWA Does Not Adhere
Organization (M&P or recent review)		
Authority (M&P)		
Written Procedures (M&P)		
Forms (M&P)		
Sample Selection (OUI System Reports & case assignment review)		
Timeliness of Case Completion (OUI System Reports)		
Investigative Procedures & Methodology (Peer & Desk Case Reviews, System queries and reports)		
BAM NDNH Record Submission & Documentation (SWA Input Header, SWA Input Detail Record, and Case file documentation)		

If any requirement(s) is(are) not met, explain status. Additional narrative and documentation should be attached to support the conclusion, if not previously transmitted.

Technical assistance provided and/or dispute resolution procedures followed. Additional narrative and documentation should be attached, if not previously transmitted.

Conclusion: The SWA's administration of the Benefit Accuracy Measurement program:
___ meets ___ does not meet Federal regulations.

Recommendation:

BENEFIT ACCURACY MEASUREMENT
CASE REVIEW FORM

State:		RO Case Number:	
Batch Number:		Case Review Name:	
Sequence Number:		Reviewer Signature:	
Sample Type:		Review Date:	
General Comments:			

Except #	Requirement Code	Process or Issue Point	DCI Code/ Element	DCI Value in Error	Correct DCI Value	Disposition Code
1						
Exception Comments:						
Except #	**Requirement Code**	**Process or Issue Point**	**DCI Code/ Element**	**DCI Value in Error**	**Correct DCI Value**	**Disposition Code**
2						
Exception Comments:						
Except #	**Requirement Code**	**Process or Issue Point**	**DCI Code/ Element**	**DCI Value in Error**	**Correct DCI Value**	**Disposition Code**
3						
Exception Comments:						

The Requirement Code is a code which identifies the methodology requirement to which the SWA did not adhere.

Issue, Process Point, and Coding Codes: The second three-digit code identifies at what point in the BAM investigation process where the exception occurred. These codes fall into three categories:

- **Issue Code** - A three-digit code used to classify the type of eligibility issue related to the exception found.
- **Process Point Code** - A three-digit code used to classify the type of required BAM process or activity that relates to the exception found.
- **DCI Code** - A three-digit code used to classify the Data Element that was entered incorrectly.

BENEFIT ACCURACY MEASUREMENT
CASE REVIEW FORM

State:		RO Case Number:	
Batch Number:		Case Review Name:	
Sequence Number:		Reviewer Signature:	
Sample Type:		Review Date:	

Except #	Requirement Code	Process or Issue Point	DCI Code/ Element	DCI Value in Error	Correct DCI Value	Disposition Code
4						
Exception Comments:						
Except #	Requirement Code	Process or Issue Point	DCI Code/ Element	DCI Value in Error	Correct DCI Value	Disposition Code
5						
Exception Comments:						
Except #	Requirement Code	Process or Issue Point	DCI Code/ Element	DCI Value in Error	Correct DCI Value	Disposition Code
6						
Exception Comments:						
Except #	Requirement Code	Process or Issue Point	DCI Code/ Element	DCI Value in Error	Correct DCI Value	Disposition Code
7						
Exception Comments:						

State Representative Signature		Date:
Regional Monitor Signature		Date:

The Requirement Code is a code which identifies the methodology requirement to which the SWA did not adhere.

Issue, Process Point, and Coding Codes: The second three-digit code identifies at what point in the BAM investigation process where the exception occurred. These codes fall into three categories:

- **Issue Code** - A three-digit code used to classify the type of eligibility issue related to the exception found.
- **Process Point Code** - A three-digit code used to classify the type of required BAM process or activity that relates to the exception found.
- **DCI Code** - A three-digit code used to classify the Data Element that was entered incorrectly.

BENEFIT ACCURACY MEASUREMENT
EXCEPTION CODE SUMMARY SHEET

BAM REQUIREMENT CODES

IDENTIFICATION SERIES: The BAM Unit DID NOT identify an issue.

110 The unidentified issue could potentially affect the accuracy of Key Week payment or denial of benefits
120 The unidentified issue could not affect the Key Week payment or denial of benefits

PURSUIT SERIES: The BAM Unit DID NOT pursue issues to a supportable conclusion

210 Obtain adequate facts from the employer
220 Obtain adequate facts from the claimant
230 Obtain adequate facts from third parties
240 Obtain adequate facts from SWA
250 Obtain a necessary rebuttal
260 Refer to another unit for pursuit
270 Other, not elsewhere classified

RESOLUTION SERIES: The BAM Unit DID NOT properly resolve the issue.

310 Issue a monetary redetermination
320 Issue a nonmonetary determination or redetermination
330 Issue a monetary redetermination consistent w/written State law/policy
340 Issue a formal/informal nonmonetary determination or redetermination consistent w/written State law/policy
350 Afford due process
360 Take other actions
370 Issue formal warnings
380 Other, not elsewhere classified

→

EXCEPTION POINT CODE

ISSUE TYPE CODE

The REQUIREMENT exception relates to an ISSUE involving:

010 Monetary Eligibility
020 Covered Employment
030 Dependency
040 Requalifying Wages/Work on Subsequent BY
050 Seasonal Wage Credits
060 Employed
070 Separation, voluntary quit
080 Separation, discharge
090 Labor Dispute
110 Work Refusal
120 Removal of a disqualification
130 Able to Work
140 Available for Work
150 Actively Seeking Work
160 Other Eligibility Issues
170 Between Terms Denial
180 Issuance of Over/Underpayment Actions
190 Disqualifying Wages
210 Disqualifying Income
220 Fraud/Misrepresentation
230 Employment Service Registration
240 Alien Status
250 Other Issues, not elsewhere classified

PROCEDURE SERIES: The BAM Unit DID NOT apply BAM procedures correctly.

410 Include documentation
420 Properly record information
430 Conduct interviews as required, or explain
440 Attend appeal hearings, or explain
450 Follow Interstate procedures, or explain
460 Account for all sampled cases/enter data into the system
470 Other, not elsewhere classified (e.g. New hire crossmatch not performed as required 30 days after the key week end date or other such procedural failures)

→

PROCESS POINT CODES

The REQUIREMENT exception relates to an investigative PROCESS involving:

100 SWA records
200 Claimant Interviews
300 Base Period Wage Verifications
400 Employer Separation Statements
500 Work Search, Union, Private Employment Agency Interviews/Verifications
600 Other Income, Work/Earnings Verifications
700 Agency Policy Statements
800 Case Completion/Summary of Investigation
900 Other Process Points, not elsewhere classified

CODING SERIES: The BAM Unit DID NOT code the case accurately.

510 Process data accurately -- careless
520 Process data accurately -- misunderstanding

→

DCI Item

The REQUIREMENT exception relates the coding of DCI items, for example: one of the PCA elements

B1 through B13	F1 through F13
C1 through C9	G1 through G15
D1 through D8	H1 through H11
E1 through E19	ei1 through ei9

OTHER: Miscellaneous

900 Grossly incomplete -- case cannot be reviewed without significant improvement.

→

Incomplete Case

000 Investigation grossly incomplete

APPENDIX B

CASE REVIEW
QUARTERLY WORKSHEET AND REPORTS

Case Management Reports:

- Case Activity Report
- Workload Status Report
- Reopen History Report
- Regional Office Pending Exceptions Report
- QC-5 Worksheet

Standard Reports:

- Sample Selection Reports:
  - A - Sample Selection Summary
  - B - Sample Selection by State and Batch (Current Quarter)
  - C - Sample Selection Cumulative Summary
  - Comparison Population UI Benefits Paid Report
  - Exceptions Population UI Weeks and Benefits Paid Report
- Case Completion and Timelapse Report
- Regional Office Exceptions Report

CASE REVIEW
QUARTERLY WORKSHEET AND REPORTS

The worksheet and reports in this appendix are for use in conducting case reviews for BAM PCA and DCA cases and performing data analysis. The reports should be run for both BAM paid and denied cases at least on a quarterly basis to:

- ensure adherence to established standards of random selection assignment;
- identify a number of sampling exceptions that occur occasionally in SWA sampling data that require RO investigation and SWA resolution;
- provide information about the review of case reopening activity;
- provide information on case review workloads and investigative exceptions; and
- determine if any exceptions or aberrations are occurring in the sampling process that need correction.

It is advisable for the RO monitor to request the BAM unit, well in advance of the monitoring review, to make arrangements for the documents that will be needed (i.e., "hit files" and benefit histories of each claim to be verified) so that these will be available for the scheduled review. This is especially true for the BAM-5 Worksheet. The monitor uses this worksheet to validate that all sample cases pulled weekly are assigned; determines that no errors occurred that resulted in incorrect records being downloaded; determines the adequacy of sample levels investigated; determines that the automated weekly sampling has been performed without significant exceptions; and reviews the samples for representativeness and accuracy. The monitor will work with the state BAM supervisor to obtain the sampling validation and sampling characteristics reports to make this assessment.

The reports are separated into two types. Case Management Reports portray information relative to actual case monitoring. Standard Reports portray information on a SWA's performance over a period of time, including information on exceptions recorded from prior reviews.

All reports can be accessed on the OUI Web site at:

www.uis.doleta.gov

Applications Menu

- REGIONAL MANAGEMENT TOOLS
- PERFORMANCE & WORKLOAD REPORTS
- PROGRAM REPORTS
- UIR (Unemployment Insurance Reports)
- TPS (Tax Performance System) (OMB No. 1205-0332)
- BAM (Benefit Accuracy Measurement) (OMB No. 1205-0245)
  - Data Entry
    - Regional Sample Selection
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    - Case Review Report
    - Current Database Status
    - DCI Report
    - Reopen History Report
    - Regional Discussion Form
    - Regional Exceptions Report
    - Regional Pending Exceptions Report
    - Regional Workload Status Report
  - Denied Claims Accuracy
    - Case Aging Report
    - Case Completion and Time Lapse Report
    - Comparison Report
    - Sample Selection Report
    - User Defined Time Lapse Report
  - Paid Claims Accuracy
    - Case Completion and Time Lapse Report
    - Comparison Report
    - Exceptions Population UI Weeks and Benefits Paid
    - Sample Selection Report
    - User Defined Time Lapse Report
  - Statistical Reports
    - Denied Claims Accuracy
    - Paid Claims Accuracy

CASE ACTIVITY REPORT

BENEFIT ACCURACY MEASUREMENT
PAID CLAIMS ACCURACY
CASE ACTIVITY REPORT
REGION:

Case Availability as of 01/18/2006

State	New Cases Available	YTD RO Closed Cases	Previously Sampled Cases		
			Pending*	Not Reviewed	Reopen**
CT	359	0	1	14	0
MA	1317	0	0	0	0
ME	978	0	0	0	0
NH	313	0	0	10	0
NJ	784	0	9	51	6
NY	1182	0	2	0	3
PR	363	0	1	108	3
RI	410	0	0	10	0
VT	831	0	1	0	2
Total	6537	0	14	193	14

* Exceptions identified in previous review remain outstanding.

** Cases reopened after the Regional Office reviewed and closed the case. (The reopen date is equal to or greater than the Regional Office closure date.)

Cases Sampled for Calendar Year 2006

State	1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	YTD Total
CT	0	0	0	0	0
MA	0	0	0	0	0
ME	0	0	0	0	0
NH	0	0	0	0	0
NJ	0	0	0	0	0
NY	0	0	0	0	0
PR	0	0	0	0	0
RI	0	0	0	0	0
VT	0	0	0	0	0

BENEFIT ACCURACY MEASUREMENT
PAID CLAIMS ACCURACY
REGIONAL OFFICE WORKLOAD STATUS REPORT

Region: Atlanta
Date Range: 01/01/2004 ~ 12/31/2004

Cases Sampled by Regional Office

State	1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	Total
AL	5	5	0	0	10
FL	5	55	0	0	60
GA	5	10	0	0	15
KY	5	5	0	0	10
MS	5	5	0	0	10
NC	5	5	0	0	10
SC	5	5	0	0	10
TN	5	5	0	0	10

Case Status

State	RO Cases Closed	Pending	Not Discussed	Not Reviewed
AL	10	0	0	0
FL	2	0	0	58
GA	9	0	1	5
KY	0	0	0	10
MS	0	0	0	10
NC	10	0	0	0
SC	5	0	0	5
TN	7	1	2	0

BENEFIT ACCURACY MEASUREMENT
PAID CLAIMS ACCURACY
REOPEN HISTORY REPORT

State: Vermont
Batch Range: 200527 ~ 200552

Total Cases:	102	Total Reopened:	1	Percentage Reopened:	0.98%

Reopen Code	Count	% Total Cases
3	1	0.98%
4	0	0.00%
5	0	0.00%

Cases with Reopen Code '5'
There are no cases reopened with a reopen code '5'.

Cases with Reopen Code '4'
There are no cases reopened with a reopen code '4'.

Cases with Reopen Code '3'

Batch #	Sequence #	RO Case #	Sample Type	Reopen Date	Supv Comp Date
200532	1	N/A	1	09/28/2005	09/27/2005

REGIONAL OFFICE PENDING EXCEPTIONS REPORT

BENEFIT ACCURACY MEASUREMENT
PAID CLAIMS ACCURACY
REGIONAL OFFICE PENDING EXCEPTIONS REPORT

State: New Hampshire
Date Range: 01/01/2005 ~ 01/31/2006

There are no cases pending in the date range specified

SAMPLE SELECTION SUMMARY REPORTS

Regional office monitors should review a SWA's sampling at least quarterly to determine if, on occasion, the state has dropped below its appropriate minimum weekly sample.

The Sample Summary, Comparison Population, and Exceptions Population reports provide information regarding a state's BAM weekly sampling levels.

Examples of the Sample Selection output reports for this application are shown on the following pages. Each report is a separate report. They are displayed together on the next page for illustrative purposes only.

Using this report, monitors can spot if problems are occurring which call for special attention. Monitors can draw attention to the problem and point out that below-minimum sample may decrease the precision of estimated error rates. Insufficient sample sizes also affect a state's ability to analyze types and causes of errors, or analyze population subgroups. Monitors should describe any technical assistance planned or offered to the state agency in the semi-annual Regional BAM reports prepared for the National Office.

The term "current quarter" always applies to the latest quarter (partial or complete) covered in this report.

Sample Selection Summary Reports provide a year-to-date data on SWA core BAM sampling. Sample Selection Batch Report provides data for the current quarter of SWA BAM sampling, displaying weekly batches pulled by States and summary data for batches pulled during the current quarter.

BENEFIT ACCURACY MEASUREMENT
PAID CLAIMS ACCURACY
SAMPLE SELECTION REPORT (SUMMARY)
Region: Boston
Batch Range: 200840 ~ 200852

State	Total in Quarter Specified	Actual Annual to Date	Batches Selected in QTR	Batches Missed in QTR*	Projected Annual Sample#	Annual Sample Allocation	Difference @
CT	80	431	8	0	477	480	-3
MA	79	501	7	0	566	480	86
ME	60	324	8	0	358	360	-2
NH	49	322	7	0	364	360	4
NJ	76	439	8	0	486	480	6
NY	76	439	8	0	486	480	6
PR	62	444	8	0	491	480	11
RI	71	433	8	0	479	480	-1
VT	56	330	8	0	365	360	5

SAMPLE SELECTION REPORT (BATCH)
Region: Boston
Batch Range: 200840 ~ 200852

State	Samples per batch in the quarter													Curr Qtr to Date	Wkly Samp Avg	Wkly Samp Alloc	Diff @	Batch Below Min	Comp Repts Recd
	40	41	42	43	44	45	46	47	48	49	50	51	52						
CT	10	10	10	10	10	10	10	10	--	--	--	--	--	80	10	9	1	0	8
MA	9	10	12	12	12	12	12	--	--	--	--	--	--	79	11	9	2	0	7
ME	7	8	7	8	8	8	7	7	--	--	--	--	--	60	8	7	1	0	8
NH	7	7	7	7	7	7	7	--	--	--	--	--	--	49	7	7	0	0	7
NJ	10	9	10	9	10	9	10	9	--	--	--	--	--	76	10	9	1	0	8
NY	9	9	9	10	10	10	10	9	--	--	--	--	--	76	10	9	1	0	8
PR	10	6	6	6	10	8	8	8	--	--	--	--	--	62	8	9	-1	0	8
RI	10	10	10	8	8	8	8	9	--	--	--	--	--	71	9	9	0	0	8
VT	7	7	7	7	7	7	7	7	--	--	--	--	--	56	7	7	0	0	8

* Samples missed for batches 2 or more weeks prior to current batch.
-- Samples for the batch have not yet been loaded.
@ Difference between 'Weekly Sample Average' and 'Weekly Sample Allocation'.

The OUI system produces Summary and Batch selection reports for denied claims. It includes all three denial types.

BENEFIT ACCURACY MEASUREMENT
DENIED CLAIMS ACCURACY
SAMPLE SELECTION REPORT (SUMMARY)

State: Alaska
Batch Range: 200840 ~ 200852

State	Sample Type	Total in Quarter Specified	Actual Annual to Date	Total Valid DCA*	Batches Selected in QTR	Batches Missed in QTR@	Projected Annual Sample#	Difference+
AK	Monetary	27	144	140	8	0	155	5
	Separation	27	144	137	8	0	152	2
	Nonseparation	26	144	139	8	0	154	4

***** Excludes deleted cases (Program Code = 8 or 9) and withdrawn claims (Action Flag = 8).
@ Samples missed for batches 2 or more weeks prior to current batch.
# Estimated number of valid DCA cases by end of CY.
+ Based on an annual sample allocation of 150 cases.

BENEFIT ACCURACY MEASUREMENT
DENIED CLAIMS ACCURACY
SAMPLE SELECTION REPORT (BATCH)

State: Alaska
Batch Range: 200840 ~ 200852

State	Batch	Monetary Cases		Separation Cases		Nonseparation Cases	
		Sampled	Valid*	Sampled	Valid*	Sampled	Valid*
AK	200840	3	3	3	3	4	4
	200841	3	3	3	3	4	4
	200842	4	4	3	3	3	3
	200843	4	4	3	3	3	3
	200844	4	4	3	3	3	3
	200845	3	3	4	4	3	3
	200846	3	3	4	4	3	3
	200847	3	3	4	4	3	3
	200848	0	0	0	0	0	0
	200849	0	0	0	0	0	0
	200850	0	0	0	0	0	0
	200851	0	0	0	0	0	0
	200852	0	0	0	0	0	0

***** Excludes deleted cases (Program Code = 8 or 9) and withdrawn claims (Action Flag = 8).

PAID CLAIM ACCURACY
COMPARISON POPULATION REPORTS

The Population Comparison report provides information on the accuracy of the BAM sampling frames. Statistical control limits are set so that, if a particular population batch is above or below the control limit, it "flags" the batch as an exception for the monitor to investigate to determine the cause.

BENEFIT ACCURACY MEASUREMENT
PAID CLAIMS ACCURACY
COMPARISON REPORT

Region: Philadelphia
Batch Range: 200827 ~ 200839

State	ETA 5159 Reported UI Benefits Paid	BAM Population UI Benefits Paid	Percent Difference
DC	$46,994,171	$29,637,489	-36.93 *
DE	$31,272,298	$31,168,575	-0.33
MD	$154,091,046	$154,384,964	0.19
PA	$645,347,025	$647,888,190	0.39
VA	$127,128,749	$120,542,106	-5.18
WV	$31,835,144	$31,782,238	-0.17

* Difference is outside statistical control limits of -10.0 and 5.0 and needs to be investigated to insure accurate coverage of the sampling frame of UI Payments.

\+ Estimated due to the missing BAM Comparison data.

\# Estimated due to the missing ETA 5159 data.

EXCEPTIONS POPULATION UI WEEKS
AND BENEFITS PAID REPORT

The Exception Comparison report provides information on a state agency's BAM population. This quarterly report compares the SWA BAM population with the state agency's ETA 5159 report. Discrepancies between the two sets of population data that fall outside of the statistical control limits warrant further investigation by the monitor. These discrepancies are "flagged" in this report.

BENEFIT ACCURACY MEASUREMENT
PAID CLAIMS ACCURACY
EXCEPTIONS POPULATION UI WEEKS AND BENEFITS PAID

State: District of Columbia
Batch Range: 200827 ~ 200839

State	Batch	BAM Population UI Weeks		BAM Population UI Benefits	
		Weeks Paid	Excep. Status	Dollars Paid	Excep. Status
DC	200827	7,062	OK	$2,029,222	OK
	200828	7,453	OK	$2,153,234	OK
	200829	7,747	OK	$2,218,906	++
	200830	7,839	OK	$2,243,672	++
	200831	7,986	**	$2,288,903	++
	200832	7,977	**	$2,290,468	++
	200833	7,984	**	$2,292,003	++
	200834	8,100	**	$2,318,338	++
	200835	8,492	**	$2,426,095	++
	200836	8,058	**	$2,323,014	++
	200837	8,430	**	$2,422,638	++
	200838	8,123	**	$2,323,494	++
	200839	8,024	**	$2,307,502	++
	Total	103,275		$29,637,489	

NA Control limits cannot be verified for missing and unloaded batches.
** UI Population Weeks Paid are outside the control limits.
++ UI Population Benefits Paid are outside the control limits.

DENIED CLAIM ACCURACY
COMPARISON POPULATION REPORTS

The Population Comparison report provides information on the accuracy of the BAM sampling frames. Statistical control limits are set so that, if a particular population batch is above or below the control limit, it "flags" the batch as an exception for the monitor to investigate to determine the cause.

DENIED CLAIMS ACCURACY COMPARISON REPORT
Region: Atlanta
Batch Range: 200827 ~ 200839

State	Sample Type	Population #	Benchmark Population+	Difference	Percent Difference
AL	Monetary	9,841	11,751	-1,910	-16.25% *
	Separation	8,658	11,590	-2,932	-25.30% *
	Nonseparation	7,197	9,010	-1,813	-20.12% *
FL	Monetary	66,517	62,568	3,949	6.31%
	Separation	32,382	41,604	-9,222	-22.17% *
	Nonseparation	16,214	21,213	-4,999	-23.57% *
GA	Monetary	7,867	8,602	-735	-8.54%
	Separation	23,212	23,680	-468	-1.98%
	Nonseparation	8,626	9,039	-413	-4.57%
KY	Monetary	3,218	4,436	-1,218	-27.46% *
	Separation	8,609	8,951	-342	-3.82%
	Nonseparation	6,596	6,667	-71	-1.06%
MS	Monetary	2,896	5,856	-2,960	-50.55%**
	Separation	8,297	7,656	641	8.37%
	Nonseparation	4,040	4,196	-156	-3.72%
NC	Monetary	3,854	29,167	-25,313	-86.79%**
	Separation	18,025	18,305	-280	-1.53%
	Nonseparation	7,417	7,653	-236	-3.08%
SC	Monetary	9,718	9,022	696	7.71%
	Separation	13,547	14,952	-1,405	-9.40%
	Nonseparation	5,959	6,212	-253	-4.07%
TN	Monetary	4,158	5,414	-1,256	-23.20% *
	Separation	9,254	9,464	-210	-2.22%
	Nonseparation	2,140	2,148	-8	-0.37%

** Difference between DCA population and benchmark is 50 percent or more.

* Difference between DCA population and benchmark is at least 15 percent but less then 50 percent.

Adjusted for cases not meeting DCA definition for inclusion in population claims for which monetary eligibility was established upon receipt of wage credits, and weeks for which DCA samples were not selected.

+ Benchmark Populations:
Monetary: Percent of dets. denied in ETA 218 rpt. times number of new initial claims (intrastate and interstate liable) plus transitionals in ETA 5159 rpt.
Separation: Percent of dets. denied in ETA 207 rpt. times number of separations in ETA 9052 rpt.
Nonseparation: Percent of dets. denied in ETA 207 rpt. times number of nonseparations in ETA 9052 rpt.

CASE COMPLETION AND TIMELAPSE REPORT

These reports provides information to determine whether BAM case completion requirements are being met and determine what problems may exist which hamper a state BAM unit's efforts to complete cases timely. These PCA or DCA reports may be produced for any batch period and may reflect a single SWA or an entire region

DENIED CLAIMS ACCURACY
CASE COMPLETION AND TIME LAPSE REPORT
Region: Boston
Batch Range: 200801 ~ 200833

State	Denial Type	Cases Sampled	Cases Completed	Percent Completed	60 Day Time Lapse	90 Day Time Lapse
CT	Monetary	93	93	100.00	96.77	100.00
	Separation	95	95	100.00	95.79	98.95
	Nonseparation	95	95	100.00	95.79	98.95
MA	Monetary	99	99	100.00	97.98	100.00
	Separation	98	98	100.00	91.84	97.96
	Nonseparation	97	97	100.00	97.94	100.00
ME	Monetary	84	79	94.05	78.57	92.86
	Separation	88	87	98.86	96.59	98.86
	Nonseparation	89	89	100.00	97.75	98.88
NH	Monetary	106	106	100.00	98.11	99.06
	Separation	97	97	100.00	100.00	100.00
	Nonseparation	95	95	100.00	100.00	100.00
NJ	Monetary	98	98	100.00	88.78	97.96
	Separation	99	99	100.00	84.85	93.94
	Nonseparation	99	99	100.00	82.83	95.96
NY	Monetary	99	98	98.99	92.93	97.98
	Separation	95	95	100.00	98.95	100.00
	Nonseparation	100	100	100.00	97.00	100.00
PR	Monetary	91	91	100.00	91.21	100.00
	Separation	90	90	100.00	96.67	100.00
	Nonseparation	90	90	100.00	93.33	100.00
RI	Monetary	92	92	100.00	91.30	100.00
	Separation	92	92	100.00	86.96	100.00
	Nonseparation	92	92	100.00	90.22	98.91
VT	Monetary	98	98	100.00	100.00	100.00
	Separation	98	98	100.00	98.98	98.98
	Nonseparation	98	98	100.00	98.98	100.00

Note: Time lapse has been adjusted for cases reopened with code '3'.

* Failed to meet 60 day time lapse standard of 60% complete.

\+ Failed to meet 90 day time lapse standard of 85% complete.

CASE COMPLETION AND TIMELAPSE REPORT

BENEFIT ACCURACY MEASUREMENT
PAID CLAIMS ACCURACY
CASE COMPLETION AND TIME LAPSE REPORT

Region: Dallas
Batch Range: 200801 ~ 200835

State	Cases Sampled	Cases Completed	Percent Completed	60 Day Time Lapse	90 Day Time Lapse
AR	332	332	100.00	97.29	100.00
CO	324	290	89.51	82.41	89.20 +
LA	340	340	100.00	90.29	99.12
MT	255	255	100.00	94.12	98.82
ND	245	245	100.00	87.76	100.00
NM	329	329	100.00	89.97	99.39
OK	324	324	100.00	93.21	100.00
SD	243	242	99.59	79.42	97.53
TX	313	304	97.12	62.30 *	85.94 +
UT	312	308	98.72	93.27	97.12
WY	241	241	100.00	97.93	100.00
Total	**3,258**	**3,210**	**98.53**	**87.94**	**96.87**

Note: Time lapse has been adjusted for cases reopened with code '3'.
* Failed to meet 60 day time lapse standard of 70% complete.
\+ Failed to meet 90 day time lapse standard of 95% complete.

CASE COMPLETION AND TIMELAPSE REPORT

BENEFIT ACCURACY MEASUREMENT
PAID CLAIMS ACCURACY
USER DEFINED TIME LAPSE REPORT (SUMMARY)
State: Colorado
Batch Range: 200801 ~ 200852

State	Case Status	Time Lapse*									
		<=60 days		61-90 days		91-120 days		>120 days		Total	
		Cases	Perct.	Cases	Perct.	Cases	Perct.	Cases	Perct.	Cases	Perct.
CO	Under Investigation	88	19.51	17	3.77	17	3.77	17	3.77	139	30.82
	Awaiting Final Review	0	0.00	1	0.22	0	0.00	0	0.00	1	0.22
	Total Open Cases	88	19.51	18	3.99	17	3.77	17	3.77	140	31.04
	Closed Without Review	194	43.02	15	3.33	0	0.00	1	0.22	210	46.56
	Closed After Review	93	20.62	8	1.77	0	0.00	0	0.00	101	22.39
	Total Closed Cases	287	63.64	23	5.10	0	0.00	1	0.22	311	68.96
	Total Cases	**375**	**83.15**	**41**	**9.09**	**17**	**3.77**	**18**	**3.99**	**451**	**100.00**

* Time lapse has been adjusted for cases reopened with Code '3'.

BENEFIT ACCURACY MEASUREMENT
PAID CLAIMS ACCURACY
USER DEFINED TIME LAPSE REPORT (LISTING)
State: Colorado
Batch Range: 200801 ~ 200852

Total Cases: 451	Cases Under Investigation: 139	Percentage: 30.82 %

Batch	Seq	Inv	LO	Days	Assigned	Reassigned	Comments
200805	6	7	3165	305	02/04/2008		
200809	5	10	3111	277	03/03/2008		
200815	5	8	3163	235	04/14/2008		
200821	5	2	5151	193	05/27/2008		
200823	1	2	3111	179	06/09/2008		
200823	3	2	4131	179	06/09/2008	06/09/2008	
200823	10	10	7131	179	06/09/2008		
200825	6	2	7111	165	06/23/2008		
200826	5	2	3129	158	06/30/2008		
200827	6	2	5221	151	07/07/2008		
200827	9	10	3151	151	07/07/2008		
200828	1	8	3180	144	07/14/2008		
...							

REGIONAL OFFICE EXCEPTIONS REPORT

The Regional Office Exception Report is a report generated from exceptions recorded by the monitor after a review. It provides information on the SWA's adherence to BAM requirements.

BENEFIT ACCURACY MEASUREMENT
PAID CLAIMS ACCURACY
REGIONAL OFFICE EXCEPTIONS REPORT
State:
Date Range: 01/01/2004 ~ 12/31/2004
***TOTAL CASES: 20* SUMMARY (Codes 1, 2, 3, 4, 5)**

CASES					
	Number	Percentage		Number	Percentage
Reviewed:	0		Without Exceptions:	0	0.0%
With Exceptions:	0	0.0%	With Multi Exceptions:	0	0.0%
Pending:	0	0.0%	Not Discussed:	0	0.0%

EXCEPTIONS							
Agreed:	0	Disagreed:	0	Pending:	0	Not Discussed:	0

CODING DETAIL (Codes 1, 2, 3, 4)

By Coding Series	Except	Cases W/Exceptions		Cases Pending		Cases Disagree	
	Number	Number	Percentage	Number	Percentage	Number	Percentage
Identification Series	0						
Pursuit Series	0						
Resolution Series	0						
Total Issues	0						
Procedural Series	0						
Coding Series	0						
Grossly Incomplete	0						

The BAM Unit DID NOT identify an issue.

Code	Category	Except	Cases W/Exceptions		Cases Pending		Cases Disagree	
		Number	Number	Percentage	Number	Percentage	Number	Percentage
110	Key Week Issue	0						
120	Non Key Week Issue	0						

The BAM Unit DID NOT pursue issues to a supportable conclusion.

Code	Category	Except	Cases W/Exceptions		Cases Pending		Cases Disagree	
		Number	Number	Percentage	Number	Percentage	Number	Percentage
210	Adequate Facts from Employer	0						
220	Adequate Facts from Claimant	0						
230	Adequate Facts from Third Party	0						
240	Adequate Facts from SWA	0						
250	Obtain Rebuttal	0						
260	Refer to Another Unit for Pursuit	0						
270	Other	0						

BENEFIT ACCURACY MEASUREMENT
PAID CLAIMS ACCURACY
REGIONAL OFFICE EXCEPTIONS REPORT
State:
Date Range: 01/01/2004 ~ 12/31/2004
TOTAL CASES: 20

The BAM Unit DID NOT properly resolve issue.

Code	Category	Except	Cases W/Exceptions		Cases Pending		Cases Disagree	
		Number	Number	Percentage	Number	Percentage	Number	Percentage
310	Issue Mon. Redet.	0						
320	Issue Nonmon. Det./Redet.	0						
330	Issue a Mon. Redet. per State Laws	0						
340	Issue formal/informal Nonmon. Det./Redet. per State Laws	0						
350	Afford Due Process	0						
360	Other Required Action	0						
370	Issue Formal Warning	0						
380	Other	0						

The BAM Unit DID NOT apply correct BAM procedures.

Code	Category	Except	Cases W/Exceptions		Cases Pending		Cases Disagree	
		Number	Number	Percentage	Number	Percentage	Number	Percentage
410	Documentation	0						
420	Properly Record	0						
430	Interview Procedure	0						
440	Attend Hearing	0						
450	Interstate Procedure	0						
460	Missing Case/data	0						
470	Other	0						

The BAM Unit DID NOT code the case accurately.

Code	Category	Except	Cases W/Exceptions		Cases Pending		Cases Disagree	
		Number	Number	Percentage	Number	Percentage	Number	Percentage
510	Erroneous	0						
520	Misinterpretation	0						

The BAM Unit DID NOT complete investigation of the case.

Code	Category	Except	Cases W/Exceptions		Cases Pending		Cases Disagree	
		Number	Number	Percentage	Number	Percentage	Number	Percentage
900	Grossly Incomplete	0						