

OFFICE OF THE STATE AUDITOR

DIANA DIZOGLIO

Official Audit Report – Issued September 21, 2026

Department of Unemployment Assistance

For the period July 1, 2022 through June 30, 2024



OFFICE OF THE STATE AUDITOR

DIANA DIZOGLIO

September 21, 2026

Katie Dishnica, Director
Department of Unemployment Assistance
100 Cambridge Street, Suite 400
Boston, MA 02108

Dear Director Dishnica:

I am pleased to provide to you the results of the enclosed performance audit of the Department of Unemployment Assistance. As is typically the case, this report details the audit objectives, scope, methodology, findings, and recommendations for the audit period, July 1, 2022 through June 30, 2024. As you know, my audit team discussed the contents of this report with agency managers. This report reflects those comments.

I appreciate you and all your efforts at the Department of Unemployment Assistance. The cooperation and assistance provided to my staff during the audit went a long way toward a smooth process. Thank you for encouraging and making available your team. I am available to discuss this audit if you or your team has any questions.

Best regards,



Diana DiZoglio
Auditor of the Commonwealth

cc: Lauren Jones, Secretary of the Executive Office of Labor and Workforce Development
David Gold, Chief Legal Counsel of the Department of Unemployment Assistance

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LIST OF ABBREVIATIONS

BAM	Benefit Accuracy Measurement
CAP	corrective action plan
DUA	Department of Unemployment Assistance
EMT	Employment Modernization and Transformation
ETA	Employment and Training Administration
EOLWD	Executive Office of Labor and Workforce Development
SQR	solution request
UI	unemployment insurance

EXECUTIVE SUMMARY

In accordance with Section 12 of Chapter 11 of the Massachusetts General Laws, the Office of the State Auditor has conducted a performance audit of certain activities of the Department of Unemployment Assistance (DUA) during the period July 1, 2022 through June 30, 2024. When analyzing DUA's call log data, we revised the audit period to August 26, 2024 through August 26, 2025 because, according to conversations with DUA officials, DUA only retains call log data for the latest 13-month period, and this revised timeframe allowed us to review call log data that DUA had in its possession.

The purpose of our audit was to determine the following:

- To what extent did DUA establish formal metrics for timely responses to claimant inquiries and requests made via telephone calls?
- Did DUA process initial unemployment insurance (UI) claims in a timely manner by issuing each claimant's first benefit payment in accordance with the federal Employment and Training Administration's (ETA's) "UI PERFORMS Core Measures"?
- Did DUA ensure that its vendor, Fast Enterprises LLC, resolved system issues that were reported during the implementation of the Employment Modernization and Transformation (EMT) project before the EMT system's full implementation for claimant use, in accordance with the "EMT Production Support Procedures"?
- To what extent did DUA provide a minimum level of in-person assistance for individuals applying for unemployment compensation at its regional offices in accordance with the language of Section 62A(a) of Chapter 151A of the General Laws that was in effect during the audit period?

Below is a summary of our findings, the effects of those findings, and our recommendations, with hyperlinks to each page listed.

Finding 1 Page 19	The Department of Unemployment Assistance mismanaged the oversight of its call center's performance by not establishing performance standards or monitoring procedures to ensure timely responses to claimant telephone inquiries, leading to significant call wait times.
Effect	If DUA does not establish formal performance standards or metrics and does not monitor call log data, then it cannot ensure that it handles claimant inquiries in a timely and consistent manner. Significant wait times for callers may result in delayed access to unemployment insurance (UI) benefits, decreased trust in DUA, and reduced overall efficiency of call center operations. Without monitoring and performance standards, DUA lacks the ability to identify operational bottlenecks, allocate resources effectively, or implement improvements to enhance service delivery.

Recommendations Page <u>25</u>	1. DUA should develop and document policies that define expected response times for claimant telephone inquiries, including measurable targets for wait times and call handling. 2. DUA should routinely review call log data, including call volume, wait times, and abandoned calls, to ensure timely service and identify areas that need improvement. DUA should retain documentation of monitoring activities. 3. DUA should incorporate practices—such as adding staff members when wait times exceed a certain threshold—into formal policies with documentation showing how staffing decisions are made and implemented. 4. DUA should analyze call log data trends regularly and use the results to make operational changes, improve service delivery, and ensure that response standards are being met.
Finding 2 Page <u>27</u>	The Department of Unemployment Assistance failed to meet the federal Employment and Training Administration’s timeliness standards for claimant first benefit payments.
Effect	Delays in first benefit payments can cause undue financial stress to claimants who rely on their benefit payments to pay everyday expenses. In addition, by not meeting ETA’s first benefit payment promptness standards, DUA risks losing federal funding for noncompliance, which would further affect its ability to effectively administer UI benefits. See Other Matters 1 and 2 for more information.
Recommendations Page <u>33</u>	1. DUA must ensure that the EMT system includes real-time wage reporting from employers, thus eliminating the need for DUA staff members to perform manual wage verification. 2. DUA should implement system alerts for any missing information from claimants during the submission of claims. 3. DUA should identify the specific issues driving the delays in first benefit payment promptness and how these issues will be addressed. 4. DUA should improve the processing of claim payments, which may include the need to hire additional staff members.
Finding 3 Page <u>36</u>	The Department of Unemployment Assistance violated Section 62A(a) of Chapter 151A of the Massachusetts General Laws by failing to provide in-person assistance at three of its regional offices.
Effect	Because in-person assistance was only available at the Boston Re-Employment Center, claimants in other regional locations were required to travel to Boston. This limited access to face-to-face support, particularly for individuals who lacked time, resources, or reliable transportation to Boston or internet access to file a claim online. Some claimants may have had to rely solely on telephone calls or DUA’s online portal, with the significant delays and other issues cited in Finding 1. This reduced accessibility, further increased wait times, and created barriers for certain populations in the Commonwealth and interstate claimants, potentially delaying access to essential unemployment assistance.
Recommendations Page <u>39</u>	1. DUA should ensure that it complies with Section 62A(a) Chapter 151A of the General Laws, including the requirement of providing in-person assistance at its regional offices. 2. DUA should regularly assess whether its regional offices provide sufficient in-person assistance to meet the needs of the communities they serve.

Finding 4 Page <u>40</u>	The Department of Unemployment Assistance violated Section 8 of Chapter 66 of the General Laws and state records retention requirements.
Effect	By not retaining call log data for the required time, DUA limits its ability to review and evaluate its call-handling performance, identify trends, and take corrective action to improve its service. This also adversely impacted our audit by preventing a complete and accurate review of the intended audit period, and ultimately, of DUA's performance over time.
Recommendation Page <u>41</u>	DUA should ensure that all call log data is retained for three years, in accordance with Section M02-08 of the <i>Massachusetts Statewide Records Retention Schedule</i> .

In addition to the conclusions we reached regarding our audit objectives, we also identified issues not specifically addressed by our objectives regarding DUA's processes for monitoring and verifying claimant work search activities and managing claimant complaints. The audit process was delayed due to DUA's inability to timely identify and provide documentation supporting claimant complaints for our review. See Other Matters for more information.

Also, we asked DUA about its compliance with a corrective action plan created by ETA to address DUA's overspending of approximately \$2.5 billion in COVID-19 pandemic-related UI benefits. See Other Matters for more information.

OVERVIEW OF AUDITED ENTITY

The Department of Unemployment Assistance (DUA), which falls under the Executive Office of Labor and Workforce Development (EOLWD), is responsible for administering the Commonwealth's unemployment insurance (UI) program. DUA provides eligible individuals with temporary income assistance while they search for new employment. DUA also determines and collects employer contributions to UI, processes claims for UI, establishes UI eligibility, collects contributions to help fund certain health insurance programs in the Commonwealth,¹ and provides resources and reemployment services to claimants through the MassHire Department of Career Services' Career Centers² to aid in their job search.

DUA's main office is located at 100 Cambridge Street in Boston. DUA also has four regional offices in Boston, Brockton, Lawrence, and Springfield. The Boston regional office, located at 2 Avenue de Lafayette, is called the Boston Re-Employment Center and offers in-person meeting hours (available by appointment only). The other three regional offices do not offer in-person meeting services. DUA told us that it had approximately 570 employees during the audit period.

Federal and State UI Programs

The federal Social Security Act of 1935 created the UI program as a joint federal-state partnership, with each state responsible for designing its own program within broad federal guidelines. The US Department of Labor oversees the federal UI program, and each state administers its own program. In 1937, Congress passed the Federal Unemployment Tax Act, which authorized the Internal Revenue Service to collect an annual federal employer tax that is used to fund state workforce agencies and cover the costs of administering the UI program in all states. The federal government sets broad guidelines for coverage and eligibility, but states vary in how they determine eligibility. Within these federal constraints, individual states are allowed to establish their own UI payment requirements for employers and run their own programs.

-
1. According to DUA's website, DUA calculates and collects an employer medical assistance contribution, which helps fund state health insurance programs.
 2. The MassHire Department of Career Services oversees 29 physical Career Centers that job seekers can visit for services and events like career guidance, résumé writing, workshops, and trainings.

Federal and Massachusetts Budget and Expenditures

Table 1 outlines the federal and Commonwealth UI fund expenditures for fiscal years 2023 and 2024, according to Massachusetts Statewide Single Audit Reports.³

Table 1. Commonwealth and Federal UI Expenditures

Funds	2023	2024
Commonwealth UI Funds—Benefits	\$ 1,743,540,616	\$2,104,820,336
Federal UI Funds—Benefits	7,362,637	6,336,737
Federal UI Funds—Administration	72,969,007	47,128,592
COVID-19 Federal UI Funds—Benefits	21,038,160	1,726,797
COVID-19 Federal UI Funds—Administration	3,898,026	2,993,301
Total Expenditures	<u>\$ 1,848,808,446</u>	<u>\$2,163,005,763</u>

DUA received federal appropriations of approximately \$66 million in fiscal year 2023 and \$46 million in fiscal year 2024. These appropriations were separate from the federal UI funds reported in [Table 1](#).

Massachusetts UI Law

The Massachusetts UI law (Chapter 151A of the Massachusetts General Laws) governs all aspects of the Commonwealth’s UI program, including the following:

- employer contribution requirements and applicable contribution rates;
- liability and payment obligations for nonprofit organizations and public employers;
- filing requirements and collection of overdue payments;
- unemployment benefit claims, including eligibility, payment, and appeals;
- recordkeeping and reporting requirements;
- the establishment, powers, and duties of a state advisory council;
- the write-off of uncollectible amounts; and
- jurisdiction for actions to enforce the law.

3. According to the Office of the Comptroller of the Commonwealth’s website, “The [Statewide] Single Audit Report is an entity-wide audit of the Commonwealth of Massachusetts that includes its financial statements, and the expenditures of federal awards by all state agencies, excluding institutions of higher education.”

Employer Contributions

According to DUA's website, most employers in Massachusetts must pay UI contributions if they employ one or more individuals on a permanent, temporary, or part-time basis on one or more days in any 13 weeks during a calendar year, or if the employer pays wages totaling at least \$1,500 in any calendar quarter. Employers of agricultural workers must pay UI contributions if they employ 10 or more individuals on any day during any 20 weeks in a calendar year, or if they pay wages of \$40,000 or more in any calendar quarter.

Unemployment Insurance Trust Fund

According to Section 904(a) of the Social Security Act of 1935, the US Secretary of the Treasury receives UI funds from states and holds these funds in the federal Unemployment Trust Fund. These funds are collected and deposited by states and are derived from employer contributions under the Federal Unemployment Tax Act and the State Unemployment Tax Act. In Massachusetts, these contributions are collected in the Unemployment Insurance Trust Fund. This fund is used to pay Commonwealth UI benefits, while DUA's administrative costs are paid through Federal Unemployment Tax Act contributions.

Employers in Massachusetts make contributions to the Unemployment Insurance Trust Fund. DUA calculates each employer's contribution rate based on factors such as whether the employer is new⁴ or established, the employer's account balance and activity over the previous 12 months, employee wages, and more. The types of contributions an employer makes depend on what kind of organization it is.

- Private, for-profit employers must make quarterly contributions to the Unemployment Insurance Trust Fund.
- Public and nonprofit employers may choose to either make quarterly contributions to the Unemployment Insurance Trust Fund or reimburse DUA for the full amount of UI benefits paid to their former employees. If these employers choose to reimburse DUA, then DUA sends the employer a bill for any month in which there were charges to the employer's account from UI benefit claims made by any of the employer's former employees.

UI Eligibility and Benefits

According to DUA's website, individuals may apply for UI benefits if they meet all of the following monetary and nonmonetary eligibility requirements:

4. Employers are considered new employers for their first three years.

- **Monetary**
 - The individual earned income in Massachusetts.
 - The individual earned at least \$6,300 in the past 12 months.
- **Nonmonetary**
 - The individual either lost their job or their working hours have been significantly reduced through no fault of their own.
 - The individual is authorized to work in the United States.
 - The individual is able to work, available for work, and actively looking for work.

The Commonwealth provides a maximum weekly unemployment benefit of \$1,105 for up to 30 weeks. Actual benefit amounts are based on an individual's wages earned during the previous fiscal year.

Claimants may receive unemployment benefits while working or receiving income from self-employment, part-time employment, severance pay, vacation pay, sick leave, or pensions. However, benefit amounts may vary based on these sources of income; therefore, individuals must report all such income to DUA when filing an initial claim and when submitting continued claims (which are weekly certifications for benefits).

Ability to Work, Availability, and Active Job Searching

According to DUA's website, to remain eligible for unemployment benefits, individuals must file weekly claims and certify that they are able to work, available for work, and actively seeking employment. Claimants are required to provide proof of at least three work search activities each week and disclose any changes in income, work status, ability to work, or availability to work.

Examples of eligible work search activities include the following:

- submitting an application, résumé, or letter of interest to an employer through the employer's website or separately through an employment website, such as Indeed or the MassHire Department of Career Services' website;
- making in-person visits with employers that might be hiring;
- attending a privately sponsored or a MassHire Department of Career Services' Career Center-sponsored job fair, networking event, or employment workshop;
- interviewing with potential employers in person, by telephone, or online; or

- registering for work with private employment agencies or placement services.

There are cases where a claimant may not be eligible for a week of UI benefits, such as if a claimant certifies that they did not actively search for work; a claimant had earnings over their benefit rate;⁵ or a claimant refuses an offer of suitable work. Claimants may also be required to register with and participate in services offered by the MassHire Department of Career Services.

UI Claims Processing

According to DUA's website, claimants can file unemployment claims online, by telephone, or in person (by appointment). Multilingual services and reasonable accommodations for accessibility are available upon request.

Claimants must verify their identity and meet minimum monetary eligibility requirements after filing a claim to establish their initial eligibility. Next, the claimant must meet nonmonetary eligibility requirements and certify eligibility each week they claim benefits. A DUA claims adjudicator may need to review separation information gathered from both the claimant and the employer to determine nonmonetary eligibility.

If DUA denies a claim at any stage of the eligibility process, then the claimant can appeal the decision. The claimant must file their appeal within 10 days of the denial. After DUA receives an appeal, it schedules a hearing. Claimants can request a hearing through DUA's online portal⁶ or by mail.

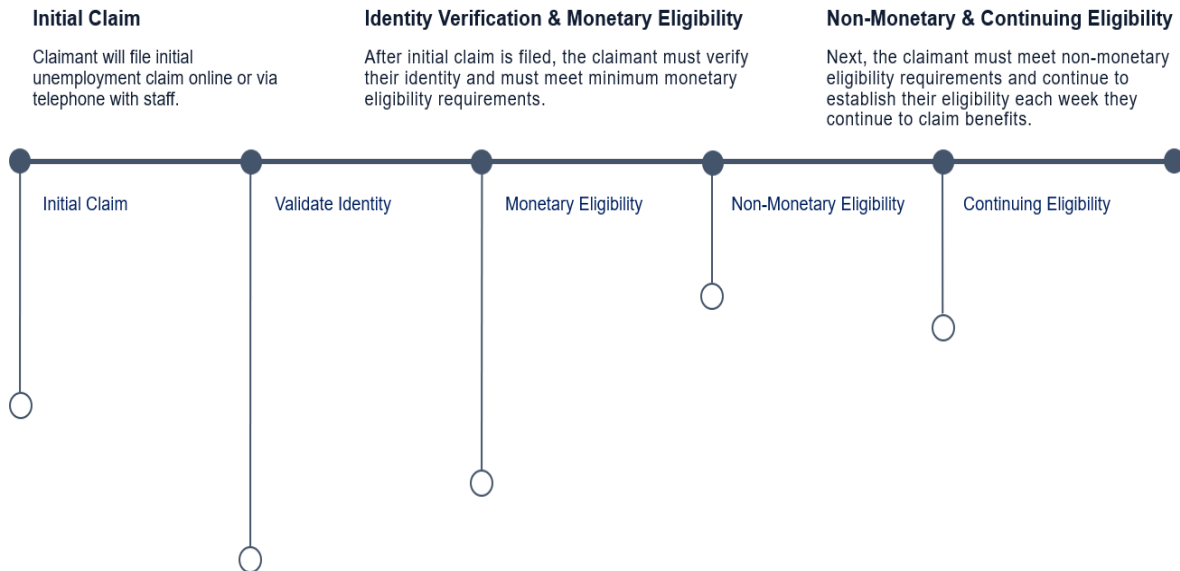
If DUA approves a claim, then the claimant must continue to be able to work, be available to work, and be actively searching for work in order to maintain their UI eligibility.

5. According to DUA's website, "On weeks you work, income that exceeds 1/3 of your weekly benefit amount will be taken out of your payment for that week. For example, if your weekly benefit is usually \$300, and you make \$105 in a week, \$5 will be deducted from your benefit payment, and it will be \$295 that week."

6. DUA's online portal is an official website used by DUA for managing unemployment claims. It allows users to file claims, certify weekly benefits, and view claim statuses and payment histories. It also allows employers to conduct business with DUA electronically.

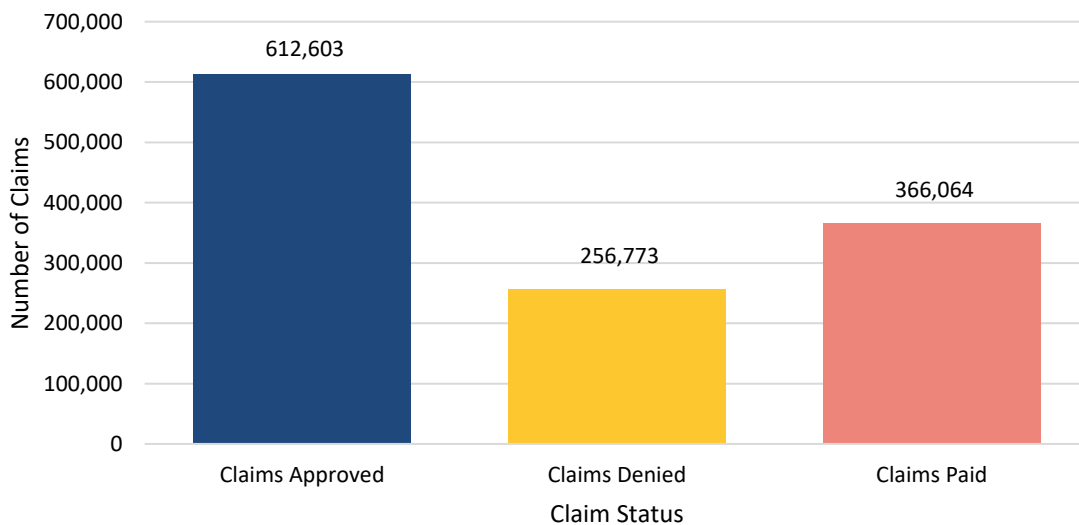
Figure 1 outlines the roadmap for processing DUA UI claims, while Figure 2 shows the number of DUA claims that were approved, denied, and paid during the audit period.

Figure 1. Unemployment Claim Roadmap



Source: DUA management

Figure 2. Total Number of DUA Claims Approved, Denied, and Paid During Fiscal Years 2023 and 2024 Combined



Note: According to DUA, claims may have been approved but not paid for various reasons. For example, one submitted claim could be associated with an approval only, and not a payment, because the claimant found employment after the claim was submitted but before the payment was disbursed.

Employment and Training Administration UI Core Measurements

The federal Employment and Training Administration (ETA) sets UI core measurements and acceptable levels of performance for the timely payment of UI benefits for both intrastate and interstate UI claims.⁷ These acceptable levels of performance function as minimum federal standards that states are expected to achieve.

ETA requires the following:

- Intrastate UI Claims: At least 87% of all first benefit payments should be made within 14 days of the week ending date of the first compensable week claimed, and at least 93% of all payments should be made within 35 days of the week ending date of the first compensable week claimed.
- Interstate UI Claims: At least 70% of all first benefit payments should be made within 14 days of the week ending date of the first compensable week claimed, and at least 78% of all payments should be made within 35 days of the week ending date of the first compensable week claimed.

Massachusetts has a one-week waiting period before benefits are paid, requiring that a claimant's first benefit payment be made within 14 days of the week-ending date of the first compensable week claimed.

See [Table 4](#), found in [Finding 2](#), for more information.

DUA Call Center

According to DUA's website, one of DUA's primary methods for providing customer assistance is through its call center. Customer service representatives assist claimants with filing new claims, managing existing claims, resolving payment issues, understanding eligibility requirements, and navigating the online portal. During the audit period, DUA's call center was open from 8:30 a.m. until 4:30 p.m., Monday through Friday. Currently, DUA's call center is open from 8:30 a.m. until 4:30 p.m., Monday through Thursday. Callers can select from DUA's automated prompts to receive details and updates related to their accounts.

DUA told us during a walkthrough that, during the audit period, the call center received an average of approximately 12,000 calls per week. During the audit period, callers were assisted by approximately 75 call center agents (35 full-time staff members and 40 part-time staff members) and 88 contracted call center agents. During the audit period, contracted call center agents supported DUA from July through August 2022 and from April through July 2023. DUA did not use contracted agents from September 2022

7. For the purposes of this audit report, intrastate UI claims refer to UI claims filed by individuals who formerly worked and currently reside in Massachusetts, while interstate UI claims refer to UI claims filed by individuals who formerly worked in Massachusetts but currently reside in a different state.

through March 2023. DUA told us during a walkthrough that contracted support is deployed based on operational need and is not maintained continuously due to cost constraints. DUA officials told us that if the wait time to speak with a call center agent exceeds 30 minutes, then DUA increases the number of agents on call duty to help reduce the wait time and ensure timely assistance.

ETA encourages state workforce agencies, including DUA, to evaluate their online portals, telephone systems, and in-person services to enhance the customer experience. To support this, ETA developed a customer experience checklist (see [Appendix](#)) that outlines principles for improving customer interactions and suggests baseline operational, experience, and outcome metrics for agencies to consider.

Employment Modernization and Transformation Project

On June 14, 2022, EOLWD signed a contract with Fast Enterprises LLC to design, build, and implement a new online unemployment system as part of EOLWD's Employment Modernization and Transformation (EMT) project, an initiative to replace the Commonwealth's legacy UI system. The total contract cost is set at \$163 million, including the dedicated support resource cost of \$71 million and the base subscription fee of \$92 million over a 15-year term.⁸ Phase 1 of the EMT project began in fall 2022 and included the implementation of tax functionality. Phase 1 went live for DUA on September 11, 2023, making the new EMT system available for use by employers. To ensure that the EMT system was functioning effectively, Fast Enterprises LLC established a postproduction support plan. Under this plan, DUA staff members monitored the EMT system through daily operations and customer interactions. DUA staff members reported any defects or new ideas using a ticketing application within the EMT system. The system automatically generated tickets based on these staff members' inputs, along with notes from Fast Enterprises LLC during system monitoring. We determined during our audit that Fast Enterprise LLC employees documented and addressed these tickets.

When DUA users submit a ticket through the ticketing application within the EMT system to report a system defect or propose a new idea, the EMT production support team triages the ticket. After review, the EMT system automatically creates a solution request (SQR). Fast Enterprise LLC prioritized SQRs based on the ticket review's issue priority level and discussions during meetings between itself and DUA. Fast Enterprise LLC would identify a solution for the SQR and test this solution in a staging environment. Once

8. The contract includes an initial two-year term, followed by one optional two-year renewal, and up to eleven additional one-year renewal options, totaling a maximum potential duration of 15 years.

the SQR's solution was successfully tested, Fast Enterprise LLC made changes in the EMT system to resolve the identified issue. Once a solution was successfully implemented, the SQR ticket was closed.

On May 6, 2025, Fast Enterprises LLC implemented Phase 2 of the EMT project, which entailed making the EMT system available for use by claimants.

DUA In-Person Assistance Requirements

According to the language of Section 62A(a) Chapter 151A of the General Laws that was in effect during the audit period,

The division of unemployment assistance shall provide a minimum level of in-person assistance at the following regional offices: Worcester, Milford, Dudley, Springfield, Gardner, Greenfield, Pittsfield, North Adams, New Bedford, Northampton, Taunton, Brockton, Boston, Lawrence and Framingham.

The language of Section 62A of Chapter 151A of the General Laws that was in effect during the audit period required DUA to maintain walk-in services at the above-specified regional offices, including providing general guidance, assistance with UI applications, UI claim-related information, and claimant orientation. This same section of the General Laws further required DUA to provide orientation to claimants within 15 days of their application and to provide claimants with an opportunity to meet with a DUA staff member in person. This orientation included information for claimants on the claim determination process and eligibility criteria, and claimants received contact information for DUA in order to have access to further services.

The language of this law was changed July 1, 2024, after the end of the audit period.

According to DUA officials, all the regional offices listed in the statute above were permanently closed before the audit period, except for the regional offices in Boston, Brockton, Lawrence, and Springfield. This made it impossible for DUA to provide in-person services at those regional offices. For the Boston, Brockton, Lawrence, and Springfield regional offices, which were open and operating during the entire audit period, all were staffed with at least one member of the MassHire Department of Career Services who was trained on the Commonwealth's legacy UI system and/or the new EMT system to assist claimants with basic questions; however, the language of Section 62A(a) of Chapter 151A of the General Laws that was in effect during the audit period required that DUA itself, not the MassHire Department of Career Services, or another agency, provide this in-person assistance.

AUDIT OBJECTIVES, SCOPE, AND METHODOLOGY

In accordance with Section 12 of Chapter 11 of the Massachusetts General Laws, the Office of the State Auditor has conducted a performance audit of certain activities of the Department of Unemployment Assistance (DUA) for the period July 1, 2022 through June 30, 2024. When analyzing DUA's call log data, we revised the audit period to August 26, 2024 through August 26, 2025 because, according to conversations with DUA officials, DUA only retains call log data for the latest 13-month period, and this revised timeframe allowed us to review call log data that DUA had in its possession.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Below is a list of our audit objectives, indicating each question we intended our audit to answer; the conclusion we reached regarding each objective; and, if applicable, where each objective is discussed in the audit findings.

Objective	Conclusion
1. To what extent did DUA establish formal metrics for timely responses to claimant inquiries and requests made via telephone calls?	To an insufficient extent; see Findings <u>1</u> and <u>4</u>
2. Did DUA process initial unemployment insurance (UI) claims in a timely manner by issuing each claimant's first benefit payment in accordance with the federal Employment and Training Administration's (ETA's) "UI PERFORMS Core Measures"?	No; see Finding <u>2</u>
3. Did DUA ensure that its vendor, Fast Enterprises LLC, resolved system issues that were reported during the implementation of the Employment Modernization and Transformation (EMT) project before the EMT system's full implementation for claimant use, in accordance with the "EMT Production Support Procedures"?	Yes
4. To what extent did DUA provide a minimum level of in-person assistance for individuals applying for unemployment compensation at its regional offices in accordance with the language of Section 62A(a) of Chapter 151A of the General Laws that was in effect during the audit period?	To an insufficient extent; see Finding <u>3</u>

To accomplish our audit objectives, we gained an understanding of the DUA internal control environment relevant to our objectives by reviewing applicable agency procedures and by interviewing DUA

management. We evaluated the design and implementation of the internal controls relevant to our objectives. In addition, to obtain sufficient, appropriate evidence to address our audit objectives, we performed the procedures described below.

Claimant Inquiries and Requests

To determine to what extent DUA established formal metrics for timely responses to claimant inquiries and requests made via telephone calls, we interviewed DUA management and asked them whether they had developed any formal performance standards or metrics to evaluate call handling performance. We found that DUA did not establish performance standards or monitoring procedures for timely responses to claimant telephone inquiries.

We then requested, from DUA management, a list of records of all the calls received during the audit period. DUA informed us that it could not provide the data for the period July 1, 2022 through June 30, 2024 because it only retains call log data for the latest 13-month period, and the requested log data for the audit period had been deleted. Because of this, we extended our audit period to include August 26, 2024 through August 26, 2025 and requested the call log data for that time range. See [Finding 4](#) for more information.

We performed analytical procedures on 100% of the call log data from August 26, 2024 through August 26, 2025 to determine the queue time (which comprises the time that the caller spent waiting after automatic voice prompts to speak with an agent), the total queue time (which is the period comprising the queue time and the queue callback time), and the total wait time (which is the period comprising the queue time, the queue callback wait time, and the automatic voice prompt time) to determine the length of time it took for a claimant to receive customer assistance.

Further, we calculated the monthly average call handling time⁹ and the monthly call abandonment rate¹⁰ and compared the results to industry best practice.¹¹ To calculate the monthly average call handling time, we added together the total talk time, total hold time, and total after-call work time. (See Figure 3.) We

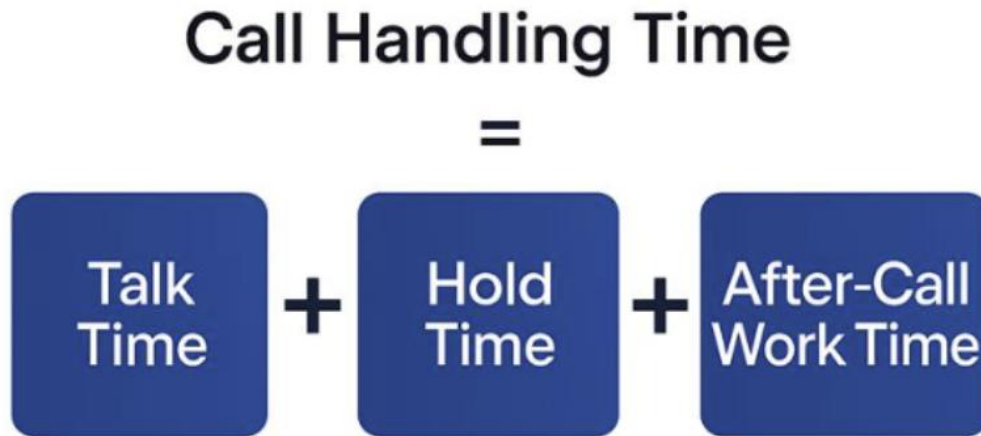
9. The average call handling time measures the total time that a DUA call center agent spends on each call, including the conversation itself and any related tasks such as data entry or follow-up.

10. The call abandonment rate measures the percentage of customers who hung up before reaching a live agent.

11. For the purposes of this audit report, because Massachusetts did not have established standards, we used the New York State call center standards as a benchmark for evaluating call center efficiency. These standards, which apply broadly to New York State agencies delivering public services, suggested an average call handling time of approximately four to six minutes and a call abandonment rate below 5% of the total number of incoming calls.

then divided this sum by the total number of calls that DUA handled during each month in the revised audit period. Finally, we converted the average call handling time from seconds to minutes.

Figure 3. Call Handling Time Formula



To calculate the monthly abandonment rate, we divided the number of abandoned calls by the total number of incoming calls received during each month in the revised audit period.

For this objective, we found certain issues during our testing; namely, that DUA did not establish policies that defined formal metrics for timely responses to claimant inquiries and requests made via telephone calls, as would be best practice. See [Finding 1](#) and [Finding 4](#) for more information.

First Benefit Payments

To determine whether DUA processed initial UI claims in a timely manner by issuing each claimant's first benefit payments in accordance with ETA's "UI PERFORMS Core Measures," we obtained from DUA management a list of UI claims submitted during the audit period. We performed analytical procedures on 100% of the population to determine the total number of first benefit payments for intrastate and interstate UI claims categorized as paid within 14 days, paid within 35 days, and paid after 35 days. (See [Table 4](#), found in [Finding 2](#), for more information.) We calculated the monthly percentage of UI claims paid within each of these categories by dividing the UI claims paid for the category in question by the total number of UI claims for the month. We compared these percentages to the acceptable performance levels set by ETA.

In addition, we selected a random, nonstatistical¹² sample of 25 UI claims that experienced delayed payments and reviewed with DUA officials the claims in this sample to identify the underlying reasons for delayed payments.

For this objective, we found certain issues during our testing; namely, that DUA did not meet the acceptable levels of performance for first benefit payment promptness required by ETA's standards. See [Finding 2](#) for more information.

EMT Project Issue Resolution

To determine whether DUA ensured that its vendor, Fast Enterprises LLC, resolved EMT system issues that were reported during the implementation of the EMT project before the EMT system's full implementation for claimant use, in accordance with the "EMT Production Support Procedures," we requested a list of solution requests (SQRs) generated during the audit period.

We selected a random, statistical¹³ sample of 60 out of 1,112 SQRs, using a 95% confidence level,¹⁴ a 0% expected error rate,¹⁵ and a 5% tolerable error rate.¹⁶ For each SQR in our sample, we calculated the number of days to completion by comparing the dates of submission and resolution. Additionally, we determined whether each SQR had been tested and confirmed that the SQR was reviewed and approved before implementation.

For this objective, we found no significant issues during our testing. Therefore, we concluded that, based on our testing, DUA ensured that SQRs were resolved by its vendor in accordance with the "EMT Production Support Procedures" before the system's full implementation for claimant use.

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12. Auditors use nonstatistical sampling to select items for audit testing when a population is very small, the population items are not similar enough, or there are specific items in the population that the auditors determine are appropriate to review.
 13. Auditors use statistical sampling to select items for audit testing when a population is large (usually over 1,000) and contains similar items. Auditors generally use a statistics software program to choose a random sample when statistical sampling is used. The results of testing using statistical sampling, unlike those from judgmental sampling, can usually be used to make conclusions or projections about entire populations.
 14. Confidence level is a mathematically based measure of the auditor's assurance that the sample results (statistic) are representative of the population (parameter), expressed as a percentage. A 95% confidence level means that 95 out of 100 times, the statistics accurately represent the larger population.
 15. Expected error rate is the number of errors that are expected in the population, expressed as a percentage. It is based on the auditor's knowledge of factors such as prior audit results, the understanding of controls gained in planning, or a probe sample. In this case, we are assuming there are no errors in the data provided to us by the auditee.
 16. The tolerable error rate (which is expressed as a percentage) is the maximum error in the population that is acceptable while still using the sample to conclude that the results from the sample have achieved the objective.

DUA In-Person Assistance

To determine to what extent DUA provided a minimum level of in-person assistance for individuals applying for unemployment compensation at its regional offices in accordance with the language of Section 62A(a) of Chapter 151A of the General Laws that was in effect during the audit period, we performed the procedures outlined below.

We interviewed DUA officials to determine to what extent DUA provided in-person assistance for individuals applying for UI at its four regional offices during the audit period. Additionally, we conducted an in-person site visit in Springfield, one of DUA's four regional offices, to observe whether the office currently provides UI services.

For this objective, we found certain issues during our testing, namely that in-person service was not available at three of the four regional offices that were open during the audit period: Brockton, Lawrence, and Springfield. Instead, DUA only offered in-person assistance at the Boston Re-Employment Center, and this service was available by appointment only. See [Finding 3](#) for more information.

We used a combination of statistical and nonstatistical sampling methods for testing, and we did not project the results of our testing to the corresponding populations.

Data Reliability Assessment

DUA's Online Portal

To assess the reliability of the UI claim data that we obtained from DUA's online portal, we interviewed DUA officials who were knowledgeable about the data. We reviewed the System and Organization Control 2 Type 2 Reports¹⁷ covering the audit period, including information about access controls, security management, configuration management, contingency planning, and segregation of duties. We also tested whether DUA had access and account management controls and personnel member screenings and whether DUA conducted cybersecurity awareness training for its employees.

We tested the UI claim data for any duplicates, gaps, and worksheet errors (hidden rows, headers, and missing data elements). We reviewed the parameters used in generating the list from the system to verify whether we received the data expected. Further, we compared the total number of records

17. A System and Organization Control report is a report, issued by an independent contractor, about a service organization's systems relevant to security, availability, processing integrity, confidentiality, and/or privacy.

in the dataset we received to the ETA 5159¹⁸ report that DUA submitted to the US Department of Labor during the audit period.

Call Center Software

To assess the reliability of the call log data that we obtained for the period August 26, 2024 through August 26, 2025 from the call center software, we interviewed DUA officials who were knowledgeable about the data. We reviewed the System and Organization Control 2 Type 2 Reports covering the period November 1, 2023 through October 31, 2024, including information about access controls, security management, configuration management, contingency planning, and segregation of duties. We also tested whether DUA conducted access and account management controls, personnel member screenings, and cybersecurity awareness training. We also checked the data for any duplicates, gaps, and worksheet errors (hidden rows, headers, and missing data elements).

EMT System

To assess the reliability of the SQR data that we obtained from the EMT system, we interviewed DUA officials who were knowledgeable about the data. We reviewed the System and Organization Control 2 Type 2 Reports covering the audit period, including information about access controls, security management, configuration management, contingency planning, and segregation of duties. We also checked the data for any duplicates, gaps, and worksheet errors (hidden rows, headers, and missing data elements).

Based on the results of the data reliability assessment procedures described above, we determined that the information we obtained during our audit was sufficiently reliable for the purposes of our audit.

18. According to Section B of ETA's *UI Reports Handbook No. 401*, an "ETA 5159 report contains monthly information on claims activities and on the number and amount of payments under State unemployment insurance laws (State UI) and Federal unemployment insurance laws for Federal workers (UCFE) and for ex-service members (UCX)."

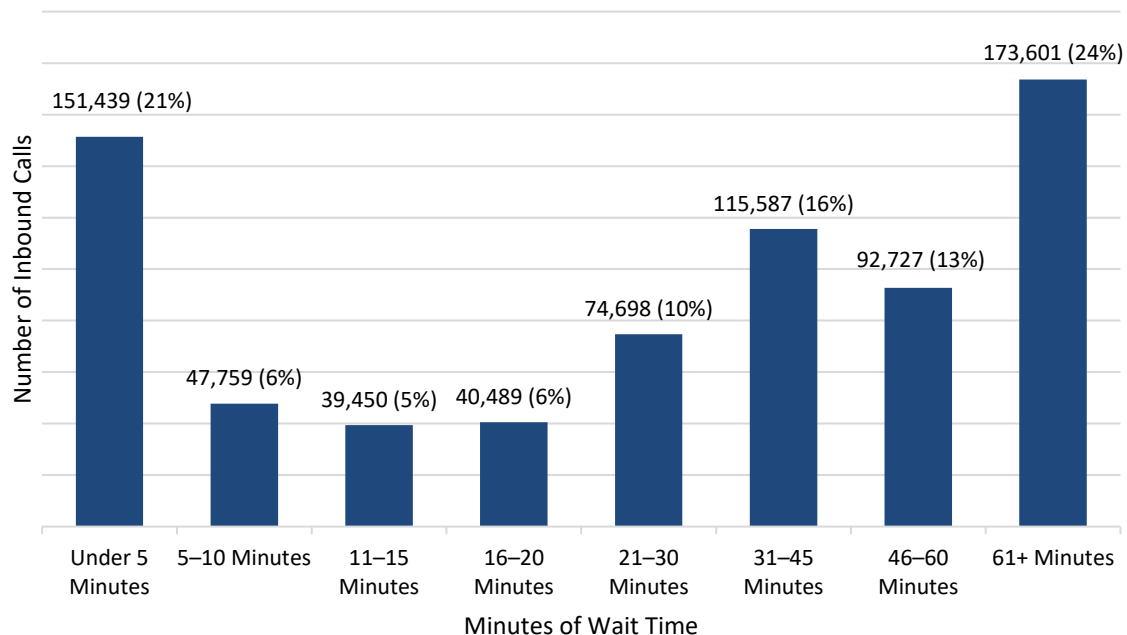
DETAILED AUDIT FINDINGS WITH AUDITEE'S RESPONSE

1. The Department of Unemployment Assistance mismanaged the oversight of its call center's performance by not establishing performance standards or monitoring procedures to ensure timely responses to claimant telephone inquiries, leading to significant call wait times.

Telephone calls are one of the primary ways that claimants interact with the Department of Unemployment Assistance (DUA) as a means to apply for unemployment benefits, obtain assistance with their claims, and address questions or issues. Despite the importance of claimant access to DUA services through telephone calls, DUA did not establish performance standards, including metrics for timely responses to claimant inquiries made via telephone. Additionally, DUA could not demonstrate that call log data was being monitored at all to evaluate call-handling performance.

Our review of the call log data identified significant wait times for the majority of callers. DUA received a total of 735,750 calls during the period August 26, 2024 through August 26, 2025. Our analysis of the call log data determined that a DUA call center agent or automated voice prompt took 30 minutes to respond to 381,915 (52%) inbound calls during this period. Of these 381,915 calls, wait times exceeded 60 minutes for 173,601 (24% of the total calls). See Figure 4.

Figure 4. Total Number of Inbound Calls by Wait Time



Note: Percentages were rounded to the nearest whole number.

Call Handling Times

Industry best practices, as outlined by New York State call center standards, provide a benchmark for evaluating call center efficiency. These standards recommend an average call handling time of approximately four to six minutes per call. Call handling time refers to the total time a call center agent spends actively assisting a caller after the call is connected to the call center agent. This includes time talking and any time the caller is placed on hold by the call center agent during the interaction, as well as after-call work. It excludes any time a caller spends waiting in a queue or on hold before reaching a call center agent.

Table 2 shows DUA's monthly average call handling time in minutes and seconds for the period August 26, 2024 through August 26, 2025. As shown in the table, DUA's average call handling time was consistently more than double the benchmark range of four to six minutes, indicating potential inefficiencies in call handling processes.

Table 2. Average Call Handling Times

Month and Year	Total Talk Time in Seconds	Total Hold Time in Seconds	Total After-Call Work Time in Seconds	Total Time of Customer Interaction in Seconds	Total Number of Calls Handled	Average Call Handling Time in Minutes
August 2024*	3,371,065	557,112	106,638	4,034,815	3,711	0:18:07
September 2024	14,212,607	2,137,620	452,313	16,802,540	15,328	0:18:16
October 2024	14,819,681	2,177,901	452,408	17,449,990	15,000	0:19:23
November 2024	12,400,585	1,930,973	368,805	14,700,363	12,568	0:19:30
December 2024	12,893,231	1,865,017	395,354	15,153,602	13,626	0:18:32
January 2025	13,424,335	1,887,013	402,783	15,714,131	14,059	0:18:38
February 2025	12,167,807	1,452,251	374,410	13,994,468	13,831	0:16:52
March 2025	41,552,916	2,276,140	1,312,230	45,141,286	47,947	0:15:41
April 2025	43,232,687	1,206,162	1,530,892	45,969,741	58,632	0:13:04
May 2025	40,534,347	2,413,393	1,697,747	44,645,487	52,427	0:14:12
June 2025	38,643,406	1,898,283	1,837,411	42,379,100	54,589	0:12:56
July 2025	33,070,498	1,840,600	1,586,921	36,498,019	45,139	0:13:29
August 2025**	21,238,977	1,262,846	968,199	23,470,022	27,913	0:14:01

* This month contains only 5 days of call log data because our data was from August 25, 2024 through August 26, 2025.

** This month contains only 26 days of call log data because our data was from August 25, 2024 through August 26, 2025.

Call Abandonment Rates

According to the New York State call center’s standards, call abandonment rates should generally be maintained below 5%. Table 3 shows DUA’s monthly call abandonment rates for the period August 26, 2024 through August 26, 2025. As shown, DUA’s call abandonment rates were consistently above the 5% benchmark for most of the period—in most instances, almost six times the 5% standard—indicating challenges in managing call volume and access to service.

Table 3. DUA Call Abandonment Rates

Month and Year	Number of Abandoned Calls	Number of Inbound Calls	Call Abandonment Rates	Average Wait Time Before Abandonment (Minutes)
August 2024*	3,081	10,782	29%	38
September 2024	12,405	42,798	29%	37
October 2024	12,734	43,352	29%	40
November 2024	11,196	37,728	30%	44
December 2024	11,542	41,094	28%	48
January 2025	10,831	40,054	27%	49
February 2025	11,457	39,607	29%	45
March 2025	8,122	69,468	12%	20
April 2025	3,365	69,708	5%	18
May 2025	10,769	88,139	12%	20
June 2025	20,382	113,242	18%	25
July 2025	19,403	112,808	17%	27
August 2025**	13,244	70,106	19%	27

* This month contains only 5 days of call log data because our data was from August 25, 2024 through August 26, 2025.

** This month contains only 26 days of call log data because our data was from August 25, 2024 through August 26, 2025.

Of the 148,531 abandoned calls during the period August 26, 2024 through August 26, 2025, 138,383 (93%) calls were abandoned while the caller was waiting to reach a call center agent and were not included in DUA’s average call handling time in [Table 2](#). The remaining 10,148 (7%) abandoned calls had callers who reached a DUA call center agent before abandoning the call; and these calls were included in the average call handling time data ([Table 2](#)). This likely reduced the reported average call handling time for all 374,770 calls shown, making performance appear more favorable than the actual time required to fully serve callers.

It is also important to note that abandoned calls are included in the wait time data in [Figure 4](#). Across the total number of 148,531 abandoned calls, the average wait time before callers disconnected was approximately 34 minutes. For abandoned calls that were disconnected before reaching a DUA call center agent, the recorded wait time ended when the caller disconnected. As a result, the wait time data does not capture how much longer these callers may have waited if they had remained on the line until reaching a call center agent. Because 93% of abandoned calls did not reach an agent, the inclusion of these calls in the wait time data makes the overall wait times appear more favorable than they would have been if these callers had stayed on the line.

Figure 5 shows the call abandonment rate relative to the number of calls that DUA received during the audit period, and how that rate compares to the 5% benchmark.

Figure 5. Number of Inbound and Abandoned Calls and Call Abandonment Rates Compared to the 5% Benchmark

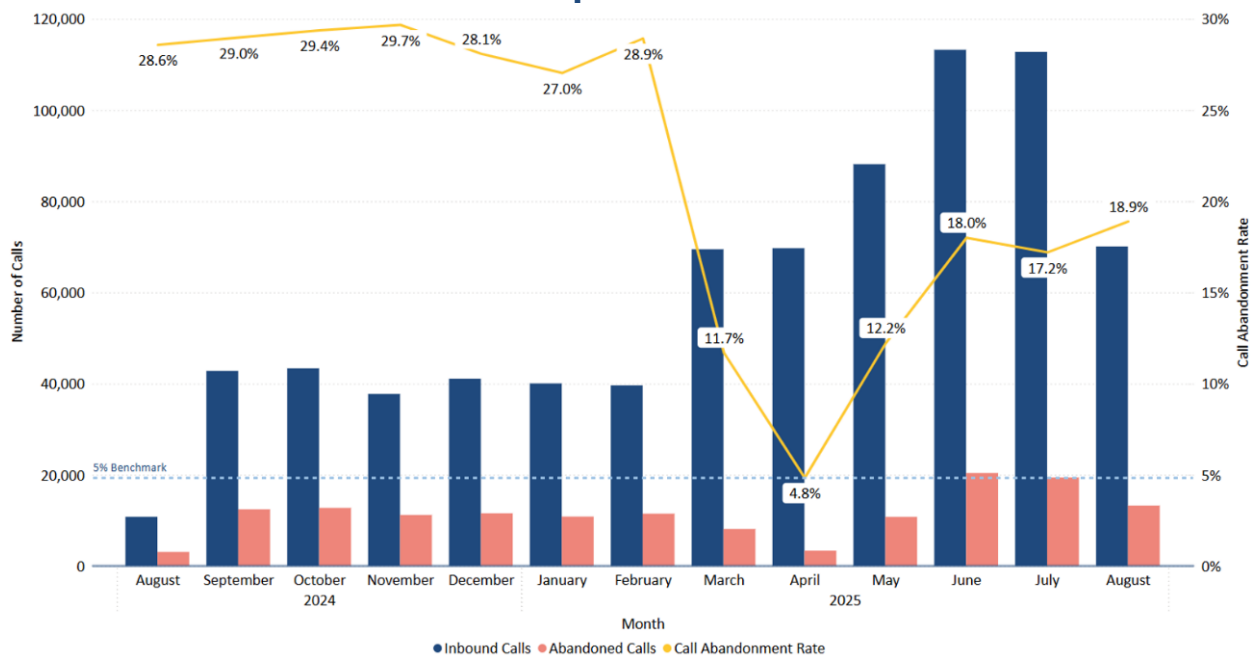
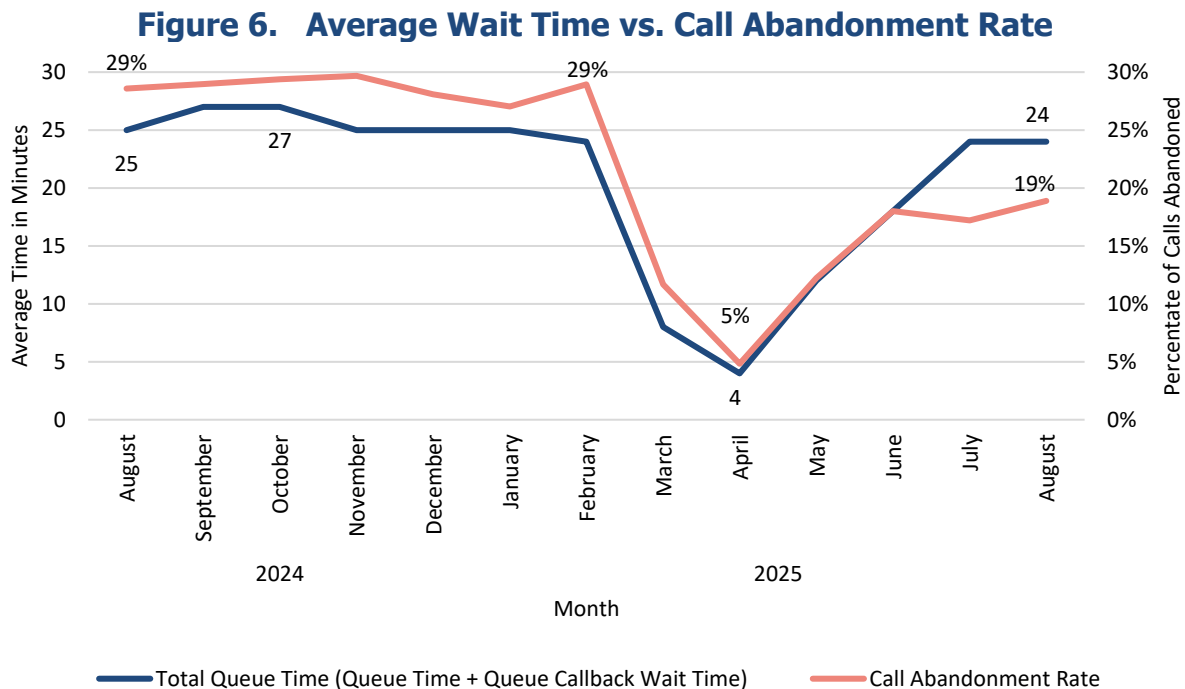


Figure 6 shows the average wait time callers experienced and the abandonment rate of calls during each month of the audit period.



If DUA does not establish formal performance standards or metrics and does not monitor call log data, then it cannot ensure that it handles claimant inquiries in a timely and consistent manner. Significant wait times for callers may result in delayed access to unemployment insurance (UI) benefits, decreased trust in DUA, and reduced overall efficiency of call center operations. Without monitoring and performance standards, DUA lacks the ability to identify operational bottlenecks, allocate resources effectively, or implement improvements to enhance service delivery.

Authoritative Guidance

The federal Employment and Training Administration (ETA) issued Training and Employment Notice No. 18-24, which provides state UI agencies with a customer experience checklist and resources to improve state UI programs. According to Section 4 of ETA's Training and Employment Notice No. 18-24,

- c. **Baseline [Customer Experience (CX)] Metrics (Attachment I – Section B).** There are three categories of CX metrics the Department is recommending that [State Workforce Agencies (SWAs)] use to evaluate the current status of their [Employment Modernization and Transformation (EMT)] system. . . .*

- i. *Operational metrics*, also called *interaction metrics*, are centered around transactions and measure specific parts of UI application processes and the [EMT] system. Some examples of what can be measured is how many individuals accessed their online portal in a week, how long it takes an individual to complete tasks, number of minutes it takes to answer a phone call, and more.
- ii. *Experience metrics* are based on how the individual felt about their interaction with the state agency and are captured via surveys or questions asked after an in-person, online, or phone interaction. The answers are typically a scale that ranges from extremely dissatisfied to extremely satisfied, with a neutral middle. Some metrics that can be baselined and measured at various intervals are trust, satisfaction, ease of use, timeliness, helpfulness of staff interaction, etc. It is important to remember that these metrics are completely based on the perception of the individual.
- iii. *Outcome metrics* are based on actions completed by individuals and are used to evaluate and determine where improvements can be made in SWAs' UI processes. Click-through rates between sections of the UI application, number of errors resulting at the end, and percentage of claimants who do not complete their application or weekly certification (abandonment rates) are some examples of outcome metrics.

Although DUA is not required to follow this notice, since this is an encouraged practice for states from ETA, we consider it a best practice. We also consider it a best practice for government agencies to track, and seek to improve, the performance of their work in service to the public.

We referenced New York State call center standards as a benchmark for assessing DUA's call center performance. DUA could consider these benchmarks to improve operational efficiency and customer service quality. According to New York State's official website,

Call center standards are a set of guidelines, benchmarks, and best practices designed to ensure high-quality customer service, operational efficiency and compliance with government regulations. . . .

Average handling time (AHT) . . . can vary by agency, but the general range is between 4 to 6 minutes. However, more complex customer inquiries may have longer AHT due to the detailed nature of customer needs.

Call Abandonment Rate: This measures the percentage of customers who hang up before their call is answered. . . . Call abandonment rates should ideally be kept under 5%, though this can vary depending on the agency and the complexity of customer queries.

Although DUA is not required to follow these standards, since they are written for New York State call centers, we consider these standards to be best practices.

Reasons for Issue

According to DUA officials, the issue was caused by insufficient staffing levels and budget constraints.

DUA stated that additional staff members are added when call wait times exceed 30 minutes. However, there was no documentation or evidence to demonstrate that this practice was implemented, monitored, or effective. Additionally, this approach was not incorporated into formal policies or procedures, and data did not exist to help us determine whether this reported practice helped reduce wait times and by how much, or whether it was an effective use of taxpayer dollars. Such data could assist DUA in conducting a cost-benefit analysis to determine whether it is more effective to hire additional staff members or additional contractors to address long wait times.

Recommendations

1. DUA should develop and document policies that define expected response times for claimant telephone inquiries, including measurable targets for wait times and call handling.
2. DUA should routinely review call log data, including call volume, wait times, and abandoned calls, to ensure timely service and identify areas that need improvement. DUA should retain documentation of monitoring activities.
3. DUA should incorporate practices—such as adding staff members when wait times exceed a certain threshold—into formal policies with documentation showing how staffing decisions are made and implemented.
4. DUA should analyze call log data trends regularly and use the results to make operational changes, improve service delivery, and ensure that response standards are being met.

Auditee's Response

The DUA call center plays a critical role in the customer service experience, which is why the agency has made significant improvements, added resources, and prioritized its success.

DUA already tracks call center performance data, including call wait times, call volume, and staffing, through various reports (Director's Report and All Queue Summary) to DUA leadership. These reports help DUA leadership monitor staffing and allocate resources, identify slowdowns, and make improvements to enhance the customer service experience. Historically, DUA experiences seasonal increases and decreases in call volume and evaluates staffing needs throughout the year.

During the time frame covered by this Audit, DUA was transitioning from its legacy unemployment system to its new [Employment Modernization and Transformation (EMT)] system, which launched in two phases. Phase 1, focused on revenue, launched September 12, 2023; Phase 2, focused on benefits launched May 6, 2025. In each instance, prior to and after each phase of the new system went live, DUA provided extensive new training to staff, focusing on how to navigate and perform

their jobs in the new system. DUA has since increased staffing, continues to evaluate staffing capacity, and provide training for new staff to timely and efficiently handle calls. DUA's contact center (call center) supervisors are continuously working with staff to assist them in learning and improving their skills.

In addition to the longstanding call monitoring reports, the EMT system offers numerous operational and outcome-driven metrics that DUA reviews to measure both the efficiency of the system itself and any common pain points in the application process. For example, the new system tracks the percentage of claimants requesting benefits using a mobile device and the average time it takes a claimant to request weekly benefits. The system also includes an "experience" metric that allows claimants to provide feedback to DUA. While DUA reviews and considers all such feedback, DUA currently maintains an average 4.6 out of 5 rating for user experience in the new system.

Call Handling Times vary at DUA based on individual caller needs. Unlike other call centers, DUA provides more than typical "customer assistance" including assistance in completing tasks that claimants may be unable or unwilling to complete themselves using online resources or self-service tools. Every call is unique and next steps and time to handle will vary. For example, a claimant may request that staff manually file an unemployment claim for them, which takes on average approximately 20 to 30 minutes. By contrast, someone calling simply to check on claim status typically takes 5 minutes or less on average. As another example, a claimant may call specifically to have staff assist in recording fact-finding for a non-monetary issue(s), which may take approximately 10 minutes on average for just one fact-finding. Managers and supervisors routinely monitor call center performance data, including call wait times, call volume, and staffing through the Director's Report, All Queue Summary, and ad hoc reports. In addition to call center monitoring, managers and supervisors routinely review overall staff performance through employee work items completed, issues cleared, and overall efficiency and work with staff to ensure acceptable service is being provided.

DUA is focused on providing full service, delivering accurate information, and answering all questions a claimant may have on the telephone. Balancing quality and efficiency are vital to DUA's call center operations, but inherent in that balance is a requirement that DUA staff need to take the time necessary to resolve a claimant's problem or reason for calling in order to minimize the claimant's need for follow-up phone calls.

Auditor's Reply

Although DUA states that it tracked call center performance data through various reports during the audit period, DUA could not provide documentation demonstrating that its leadership reviewed these reports, assessed performance, or used data from the reports to make operational decisions during the audit period. In addition, DUA did not have documented policies or procedures establishing how call center performance should be monitored and evaluated.

DUA describes steps it has taken to improve call center operations, including providing additional training, increasing staffing, and utilizing the new capabilities of its Employment Modernization and

Transformation (EMT) system. However, Phase 2 of the EMT system, which made the system available to claimants, was not implemented until after the audit period; therefore, DUA's claims regarding effectiveness have yet to be determined.

DUA states that call handling times vary depending on the type and complexity of assistance required for each claimant inquiry. We recognize that some claimant inquiries may require additional time based on the services provided. However, our finding was not based on an expectation that all calls should have the same call handling time. We found that DUA had not established documented performance standards, including targets for wait times and call handling. Without established standards and a documented monitoring process, DUA cannot demonstrate that it is consistently evaluating whether service goals are being met or identifying areas where improvements may be needed to support timely and consistent service for claimants.

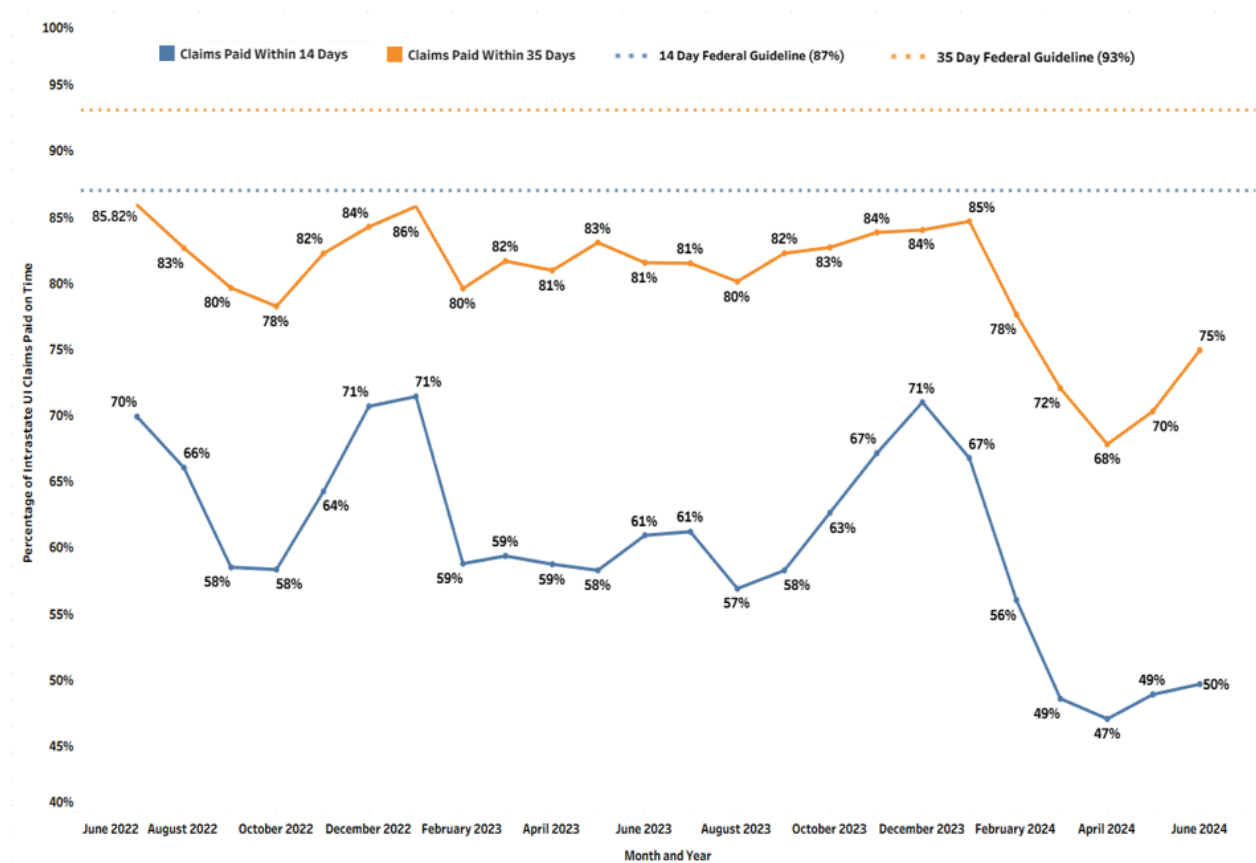
We urge DUA to fully implement our recommendations. As part of our post-audit review process, we will follow up on this matter in approximately six months.

2. The Department of Unemployment Assistance failed to meet the federal Employment and Training Administration's timeliness standards for claimant first benefit payments.

DUA failed to meet ETA's timeliness standards for claimant first benefit payments. Our analysis of 365,533 total claims paid, consisting of 352,644 intrastate UI claims and 12,889 interstate UI claims made during the audit period, revealed the issues described below.

For intrastate UI claims, DUA did not consistently meet ETA's standard in fiscal years 2023 and 2024. Specifically, DUA did not reach 87% of claims paid within 14 days in any month that we reviewed (see [Table 4](#)). Similarly, DUA did not meet the 93% standard for claims paid within 35 days (see [Table 4](#)), with timeliness calculated each month, during the same period. See Figure 7.

Figure 7. Percentage of DUA Intrastate UI Claims Paid Within 14 and 35 Days of Claimant Submission During Fiscal Years 2023 and 2024



For interstate UI claims payments, DUA did not meet the ETA standard in fiscal years 2023 and 2024. Specifically, DUA did not meet the standard of paying 70% of claims within 14 days in 23 out of the 24 months that we reviewed. Similarly, DUA did not meet the 78% standard for claims paid within 35 days for 5 out of the 24 months that we reviewed. See Figure 8.

Figure 8. Percentage of DUA Interstate UI Claims Paid Within 14 and 35 Days of Claimant Submission During Fiscal Years 2023 and 2024

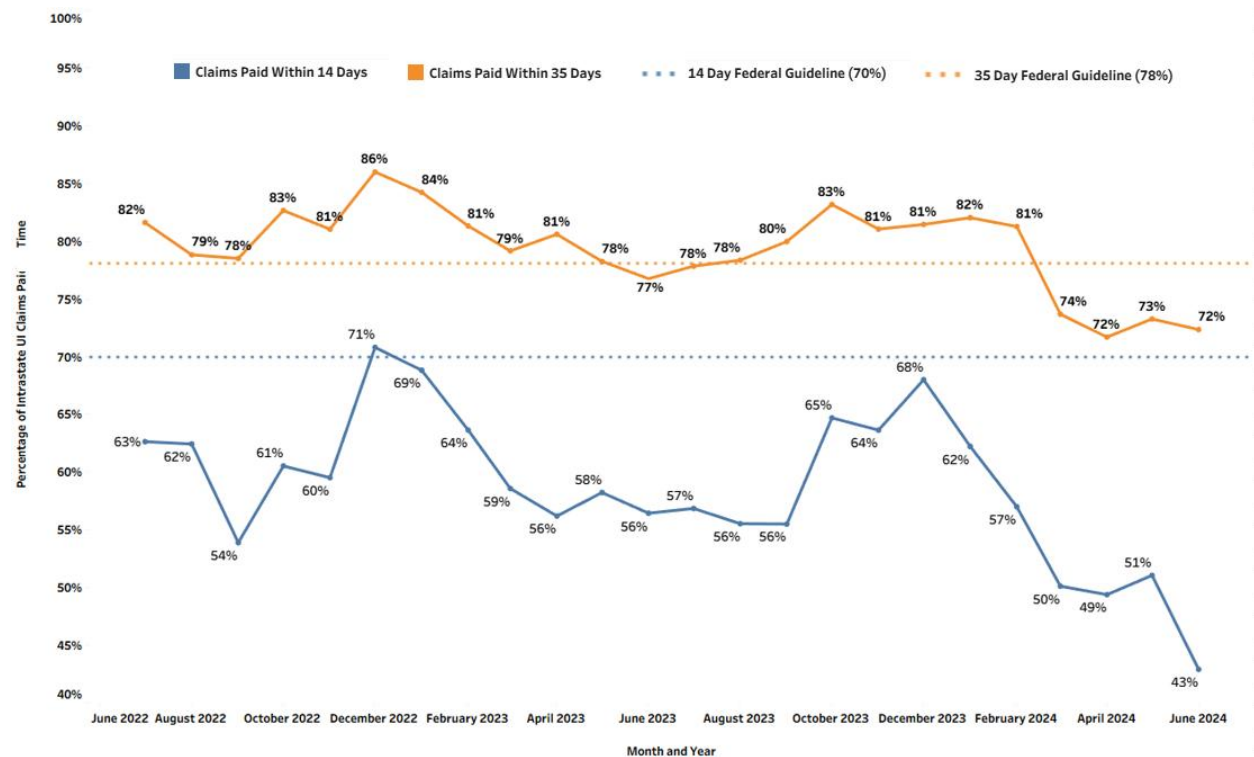


Figure 9 and Figure 10 show the number of intrastate and interstate UI claims paid by DUA during fiscal years 2023 and 2024.

Figure 9. Number of DUA Intrastate UI Claims Paid in Fiscal Years 2023 and 2024

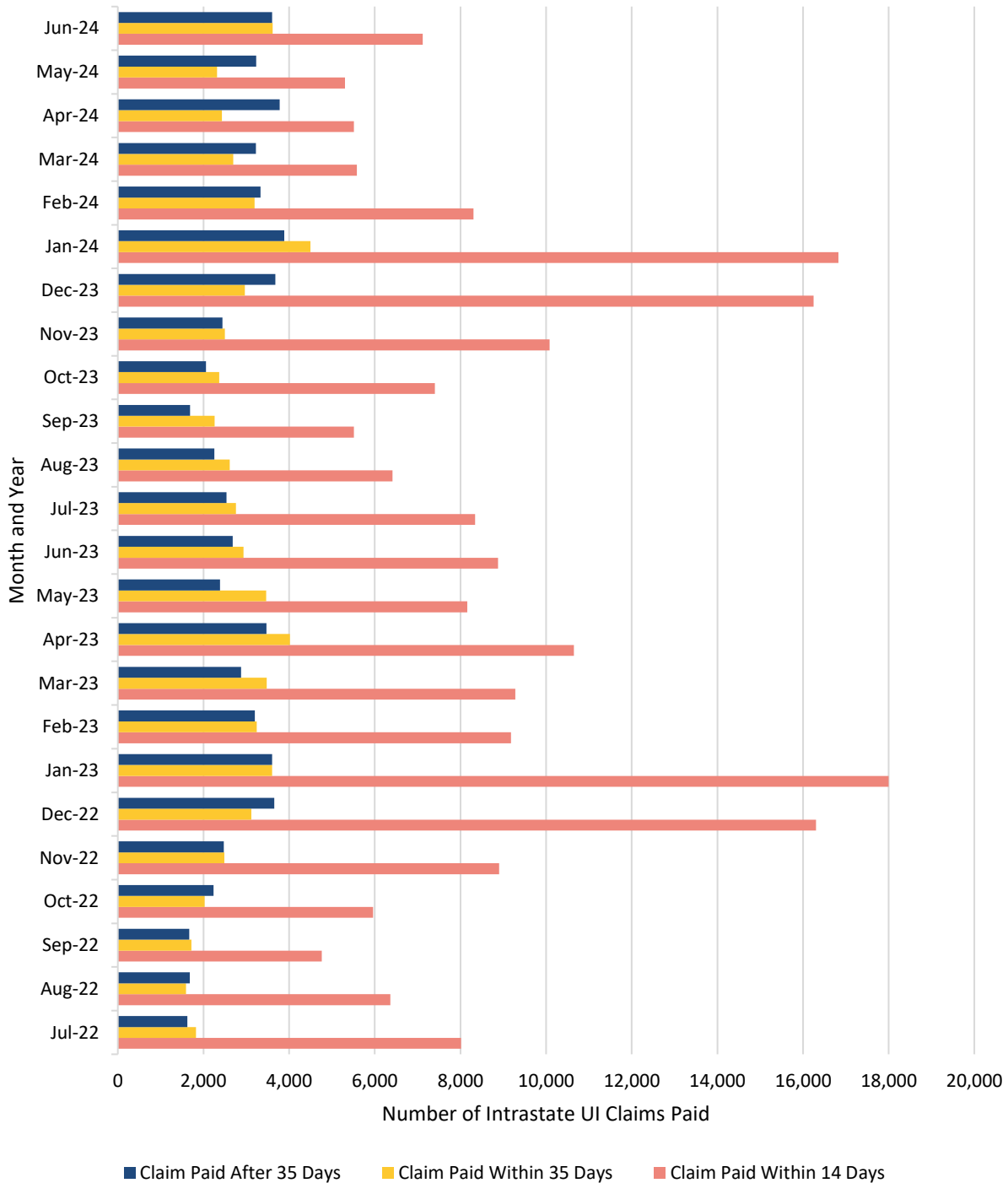
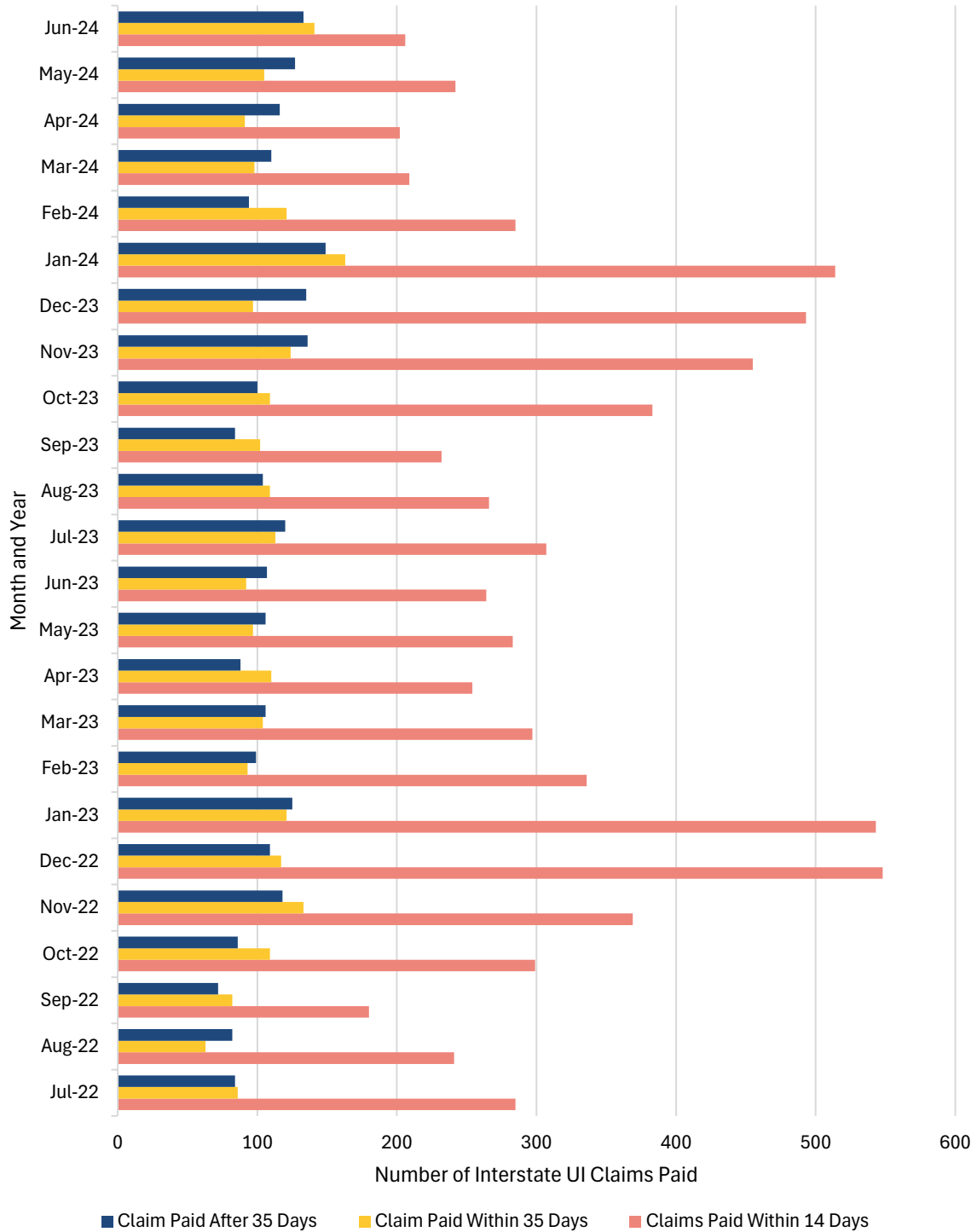


Figure 10. Number of DUA Interstate UI Claims Paid in Fiscal Years 2023 and 2024



Delays in first benefit payments can cause undue financial stress to claimants who rely on their benefit payments to pay everyday expenses. In addition, by not meeting ETA’s first benefit payment promptness standards, DUA risks losing federal funding for noncompliance, which would further affect its ability to effectively administer UI benefits. See Other Matters 1 and 2 for more information.

Authoritative Guidance

Table 4 outlines the performance level metrics required by ETA’s “UI PERFORMS Core Measures.”

Table 4. “UI PERFORMS Core Measures” and Acceptable Levels of Performance

SECRETARY STANDARDS IN REGULATIONS	Acceptable Levels of Performance
First Payment Promptness (Regulation): % of all 1st payments made within 14/21 days: Intrastate, UI, full weeks	≥87%
First Payment Promptness (Regulation): % of all 1st payments made within 35 days: Intrastate, UI, full weeks	≥93%
First Payment Promptness (Regulation): % of all 1st payments made within 14/21 days: Interstate UI, full weeks	≥70%
First Payment Promptness (Regulation): % of all 1st payments made within 35 days: Interstate, UI, full weeks	≥78%

Source: ETA—UI Performs Score Cards; https://oui.doleta.gov/unemploy/pdf/Core_Measures.pdf

Reasons for Issue

DUA officials informed us that the above performance challenges related to the delay in first benefit payments are due to a decline in federal funding over the years for the administration of UI benefits. DUA officials stated that these reductions have led to states lacking sufficient resources to adequately support operational needs. Although DUA officials stated that the agency has not received any notifications regarding potential consequences for its underperformance, they indicated that DUA is currently in discussions with the US Department of Labor for technical assistance on how to meet timeliness standards.

We completed further analysis of UI claim payments that were not made within 35 days during the audit period. From our sample of 25 of these UI claim payments, we identified several specific reasons for DUA not meeting the acceptable performance levels for UI payments, as follows:

- Six claims required additional documentation from claimants and/or their employers and needed further investigation and manual review, such as a failure to report earnings, claimants misreporting layoffs and/or discharges, and unreported wages.
- Two claims were delayed because there were insufficient staff members available to review the claims. (Claims flagged in the system require additional investigation.)
- Five claims were delayed because of identification verification issues, which required manual review.
- Four claims were delayed due to inconsistent revenue sources or nontypical income that are paid in unpredictable amounts or frequency, such as retirement, severance, tips, or other dividends, which can cause system misinterpretation, and require manual engagement from a claims specialist.
- Eight claims were delayed because of issues outside of DUA's control, including but not limited to a claimant's late submission of the application, termination due to misconduct, or not responding to an investigator or attending appeal hearings at DUA after a claim denial.

During our testing, DUA told us that several of the issues we identified are being addressed through the Phase 2 implementation of the EMT system, which was introduced on May 6, 2025.

Recommendations

1. DUA must ensure that the EMT system includes real-time wage reporting from employers, thus eliminating the need for DUA staff members to perform manual wage verification.
2. DUA should implement system alerts for any missing information from claimants during the submission of claims.
3. DUA should identify the specific issues driving the delays in first benefit payment promptness and how these issues will be addressed.
4. DUA should improve the processing of claim payments, which may include the need to hire additional staff members.

Auditee's Response

DUA is committed to improving the customer experience and ensuring eligible claimants receive benefits in a timely manner. That is why DUA implemented a multi-month pilot in August 2025 to close the DUA call center on Fridays to allow staff to process claims more efficiently. DUA has also hired more adjudicators and seasonal staff to improve processes that may impede timeliness. These efforts build on the modernized EMT system and DUA remains focused on continued improvement.

[The US Department of Labor's (USDOL's)] Employment and Training Administration agency ("ETA") sets timeliness standards for when benefits should be paid following an initial claim. The ETA timeliness standards for claimant first benefit payments are outdated and do not account for the complexity of processing unemployment claims in 2026, where sophisticated program integrity measures are necessary to safeguard against potential fraud. DUA has prioritized robust program integrity protocols to detect and prevent fraud, ensure investigations are completed properly, and

that benefits are paid accurately. Recognizing the inherent tension between timeliness standards for claimant first benefit payments and fraud detection and prevention, DUA requested technical assistance from USDOL in December 2025. Discussions with USDOL and other states on how to balance these competing priorities and ensure DUA is following ETA best practices remain ongoing.

Additionally, the performance challenges identified during the audit period are attributable to a decline in federal funding, with a reduction of roughly \$11.8M during the audit period. As a result, Massachusetts, like other states, is not receiving sufficient resources to adequately support operational needs. Additionally, there are several known reasons beyond DUA's control that a claimant might file a claim and not receive timely first payment. For example, if after filing an initial claim, a claimant fails to certify, that individual's claim would negatively impact DUA's timeliness metric. Other examples include federal shutdowns or strikes where workers may file timely to preserve eligibility but not actually collect on a claim. The same can be true in the context of certain part-time work or seasonal employment.

Recommendations #1 and #2 suggest that DUA should ensure that its system includes real-time wage reporting from employers and that DUA should implement system alerts for any missing information from claimants during the submission of claims. The EMT system already includes both "real-time" wage reporting from employers and system alerts to claimants for missing information dating back to the launch of the EMT system in May 2025.

Recommendation #3 proposes that DUA identify the specific issues driving the delays in first benefit payment promptness and how these issues will be addressed. During the time frame covered by this Audit, DUA engaged with many stakeholders, including labor, legal advocates, and employers, and leveraged media and website updates to acknowledge the delays were driven by reduced funding, the learning curve experienced by both staff and returning users, new system prompts, and a backlog caused by the conversion of claims from the old system to the new system. For example, help language has been added to the EMT user portal to support certain occupations based on trends DUA noticed for users in navigating the new system. DUA continues to identify specific issues that may cause delays or confusion and remains focused on improving processing of claim payments.

Recommendation #4 proposes that DUA improve the processing of claim payments, which may include the need to hire additional staff. Improving customer service remains a top priority for DUA, and DUA continues to have active discussions to identify potential strategies to enhance customer service.

Other recent improvements include:

- In January 2025, call wait times exceeded two hours; today, the average call wait times range between 5 and 20 minutes (depending on various factors including day of the week, complexity of the issue, etc.).*
- Since the beginning of the call center pilot in August 2025, DUA has eliminated its initial backlog, resolving more than 338,600 issues.*
- The new call center hours allow DUA to process claims more efficiently, including those that have aged beyond the 21-day timeliness standard.*

- *In the summer and fall of 2025, approximately 53% of claims were processed within 30 days. In June 2026, nearly 70% of claims are processed within 30 days. (Note: this differs from first pay timeliness that USDOL publishes monthly as it covers all claims processed, including both claims that have been paid and claims that have been denied).*
- *Since August 2025, claims paid within 21 days and 28 days have improved, ranging between 37% and 43% improvement for both categories.*

Ongoing improvements:

- *DUA is always looking for opportunities to improve and consistently monitoring and reviewing its performance against internal and USDOL standards.*
- *DUA has an outstanding request to USDOL ETA for technical assistance to balance timeliness standards for claimant first benefit payment guidelines with sometimes competing program integrity priorities.*
- *Every claim is unique and the claimant journey can look different for everyone. DUA has identified common "speed bumps," which can be operationally burdensome for staff or lead to delays in the processing of claims. DUA is working on solutions to eliminate these "speed bumps" and continue to improve claim processing times.*
- *DUA also launched a seasonal employee program in 2026, adding 150 new seasonal employees in a variety of roles specially identified to meet the needs of the department. These temporary staff are being onboarded in phases.*

Auditor's Reply

We acknowledge DUA's efforts to attempt to improve operations; however, these initiatives that are said to have been implemented after the audit period, do not automatically resolve the issues raised in this finding. An April 30, 2026 article published by *Commonwealth Beacon*, titled "One year after implementing new system, Mass. continues to struggle in issuing unemployment benefits," reported that nearly a year after the launch of the EMT system, which DUA touted in its response as having resolved several of the issues raised in this finding, claimants continue to face significant delays in the processing of their claims and receipt of their benefits. The EMT system has also contributed to significant delays in issuing payments and processing appeals, according to the same article, and performance remains uneven, leaving many claimants waiting months for decisions. Additionally, according to this *Commonwealth Beacon* article, lawmakers said that they continue to receive high volumes of constituent complaints. While the newly implemented EMT system may support performance improvements, we note that effective management of these systems and personnel is critically important. These issues are not resolved by implementation of a new technology alone.

During the audit period, DUA consistently failed to meet ETA's required timeliness standards for first benefit payments. DUA's assertion that the federal timeliness standards are outdated does not change the fact that they remain the applicable performance measures established by ETA. Unless and until ETA revises those standards, DUA is expected to meet them. The existence of fraud prevention requirements does not exempt DUA from complying with federal timeliness expectations. Other states face the same program integrity requirements and are evaluated against these same standards.

Similarly, DUA's explanation regarding reduced federal funding, claimant behavior, seasonal employment, strikes, or other circumstances does not change our finding. These known factors within the UI program are faced by other states as well and do not invalidate the responsibility that DUA, itself, has to ensure that it achieves performance standards.

3. The Department of Unemployment Assistance violated Section 62A(a) of Chapter 151A of the Massachusetts General Laws by failing to provide in-person assistance at three of its regional offices.

DUA did not provide in-person assistance for UI claims at three of its regional offices: Brockton, Lawrence, and Springfield. According to DUA officials, its regional offices were designated exclusively for appeal hearings. In-person assistance for UI claims was only available by appointment at DUA's Boston Re-Employment Center.

Because in-person assistance was only available at the Boston Re-Employment Center, claimants in other regional locations were required to travel to Boston. This limited access to face-to-face support, particularly for individuals who lacked time, resources, or reliable transportation to Boston or internet access to file a claim online. Some claimants may have had to rely solely on telephone calls or DUA's online portal, with the significant delays and other issues cited in [Finding 1](#). This reduced accessibility, further increased wait times, and created barriers for certain populations in the Commonwealth and interstate claimants, potentially delaying access to essential unemployment assistance.

Table 5 shows the approximate distance each gateway municipality¹⁹ in the Commonwealth is from DUA's Boston Re-Employment Center by motor vehicle.

Table 5. Driving Distance from Gateway Municipalities to DUA's Boston Re-Employment Center

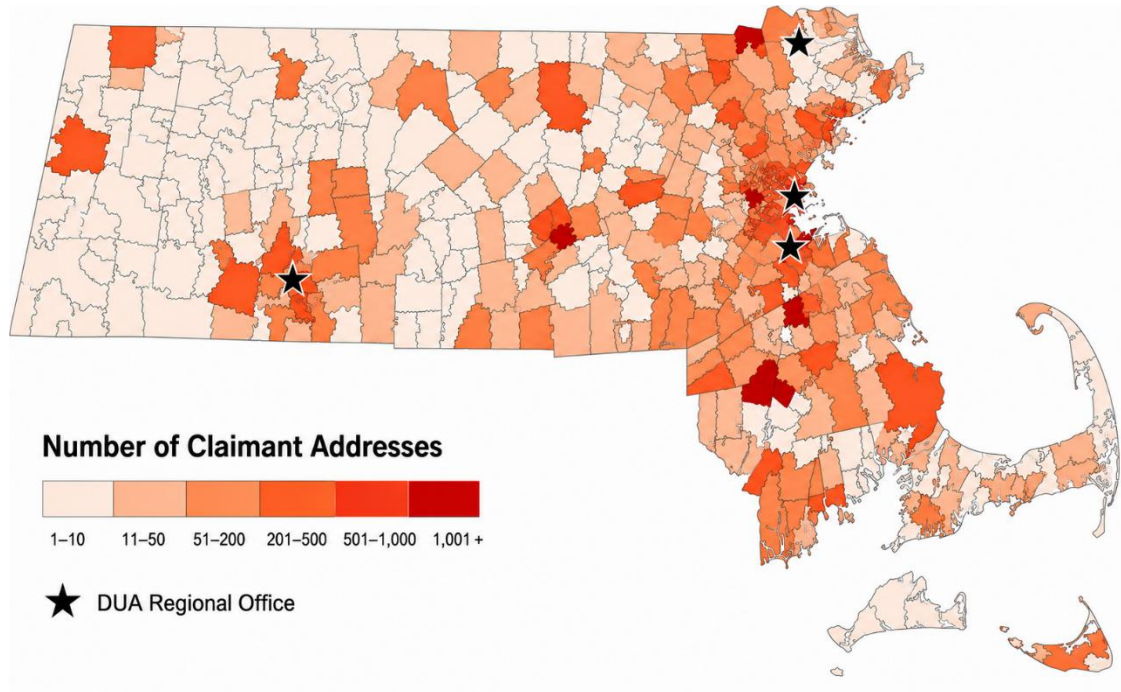
Gateway Municipality	Approximate Distance in Miles from DUA's Re-Employment Center*
Attleboro	38
Barnstable	71
Brockton	23
Chelsea	5
Chicopee	89
Everett	5
Fall River	51
Fitchburg	52
Haverhill	37
Holyoke	90
Lawrence	30
Leominster	47
Lowell	31
Lynn	12
Malden	7
Methuen	31
New Bedford	58
Peabody	20
Pittsfield	136
Quincy	9
Revere	7
Salem	19
Springfield	91
Taunton	38
Westfield	97

* Distances are rounded to the nearest mile using the shortest route from each municipality's center to DUA's Boston Re-Employment Center. Distances were calculated using Google Maps.

19. Section 3A of Chapter 23A of the Massachusetts General Laws defines a gateway municipality as "a municipality with a population greater than 35,000 and less than 250,000 with a median household income below the commonwealth's average and a rate of educational attainment of a bachelor's degree or above that is below the commonwealth's average."

Figure 11 shows the number of claimants from each ZIP code who filed UI claims during the audit period.

Figure 11. UI Claimants by ZIP Code for Fiscal Years 2023 and 2024



Authoritative Guidance

According to the language of Section 62A(a) Chapter 151A of the Massachusetts General Laws that was in effect during the audit period,

The division of unemployment assistance shall provide a minimum level of in-person assistance at the following regional offices: Worcester, Milford, Dudley, Springfield, Gardner, Greenfield, Pittsfield, North Adams, New Bedford, Northampton, Taunton, Brockton, Boston, Lawrence and Framingham.

The language of Section 62A of Chapter 151A of the General Laws that was in effect during the audit period required DUA to maintain walk-in services at the above-specified regional offices, including providing general guidance, assistance with UI applications, UI claim-related information, and claimant orientation. This same section of the General Laws further required DUA to provide orientation to claimants within 15 days of their application and to provide claimants with an opportunity to meet with a DUA staff member in person.

Reasons for Issue

DUA officials told us that Section 62A(a) Chapter 151A of the General Laws was outdated. However, this was the law in effect during the audit period. In addition, DUA officials told us that staff reductions and budget constraints contributed to the closure of general assistance services at regional offices. DUA officials also noted that, as of July 1, 2024, after the audit period, the statute was amended to require regional in-person assistance in each workforce area, coordinated with the MassHire Department of Career Services, clarifying the scope and frequency of in-person support.

Recommendations

1. DUA should ensure that it complies with Section 62A(a) Chapter 151A of the General Laws, including the requirement of providing in-person assistance at its regional offices.
2. DUA should regularly assess whether its regional offices provide sufficient in-person assistance to meet the needs of the communities they serve.

Auditee's Response

DUA has consistently provided in-person services for claimants at the Boston Re-Employment Center and has partnered with the MassHire Department of Career Services to train staff on assisting DUA claimants visiting any of the MassHire Career Centers. Additionally, in July 2025, DUA placed staff at MassHire Career Centers, with in-person services available in regions across Massachusetts. In partnership with MassHire, DUA continues to assess whether these services are being utilized and meeting the needs of its constituency.

While at the time of the Audit, Chapter 151A required in-person assistance at regional offices, those offices no longer exist, and, as [the Office of the State Auditor] acknowledges, the law was amended effective July 1, 2024, and no longer requires DUA staff to provide in-person services at the nonexistent locations.

Auditor's Reply

We acknowledge that Chapter 151A was amended, effective July 1, 2024, and that the requirement to provide in-person services at regional offices changed. However, our finding was based on DUA's practices during the audit period and the law that was in effect at that time. The changes DUA describes occurred after the audit period and were not evaluated as part of our audit.

We urge DUA to continue evaluating the availability and utilization of in-person services to ensure that claimants across the Commonwealth have reasonable access to assistance and that delivery of this assistance meets claimants' needs. We also note that DUA advised us that it did not comply with the law at the time because it viewed the law as outdated (just as it does not meet the federal government's

timeliness standards for claimant first benefit payments because it views them as outdated—see Finding 2). With regard to this finding, DUA was not complying with the law because it did not agree with the law. As a result, accessibility to UI benefits was unlawfully limited throughout this time period. We remain concerned that, due to DUA's willingness to break the prior law, similar actions may continue to occur under the new law, negatively impacting DUA's ability to provide in-person assistance. We strongly urge DUA to implement our recommendation and ensure that it follows the law.

4. The Department of Unemployment Assistance violated Section 8 of Chapter 66 of the General Laws and state records retention requirements.

DUA violated Section 8 of Chapter 66 of the General Laws, which is part of the state's Public Records Law, and the *Massachusetts Statewide Records Retention Schedule* because DUA only retained call log data for 13 months instead of the required three years.

By not retaining call log data for the required time, DUA limits its ability to review and evaluate its call-handling performance, identify trends, and take corrective action to improve its service. This also adversely impacted our audit by preventing a complete and accurate review of the intended audit period, and ultimately, of DUA's performance over time.

Authoritative Guidance

According to Section M02-08 of the *Massachusetts Statewide Records Retention Schedule*, DUA must retain UI claims for three years, including documents such as claims for unemployment with the state, payment information, and related correspondence.

Additionally, according to Section 8 of Chapter 66 of the General Laws,

Every original paper belonging to the files of the commonwealth . . . and every other paper belonging to such files shall be kept for seven years after the latest original entry therein or thereon, unless otherwise provided by law or unless such records are included in disposal schedules approved by the records conservation board for state records . . . and no such paper shall be destroyed without the written approval of the supervisor of records.

Reasons for Issue

DUA officials stated that they retain call log data for 13 months, which complies with the standards outlined in Sections F04-03 and F04-03(b) of the *Massachusetts Statewide Records Retention Schedule*, which state,

F04-03: Audio-Visual Tape or Digital Recordings . . .

Consists of agency program data captured as sound or moving images. Includes intake or dispatch telephone call recordings, digital messaging system messages, security video tapes, hearing testimony tapes, investigators audio and video tapes, special projects videos, meeting minutes and proceedings recordings, or other digital renderings.

F04-03 (b): *Dispatch, digital messaging, program intake tapes.*

Retain 1 year.

Additionally, DUA stated that customer service call recordings—regardless of whether they reference specific claims or are made by currently unemployment claimants—are more comparable to the types of telephone call recordings mentioned in the retention schedule than to documents associated with specific claims. Further, DUA feels it is unreasonable to require indexing and associating these calls with particular claims. Therefore, DUA asserts that the provision applied to electronic and physical UI claim files (which includes all claims, payment information, and related correspondence) does not apply to the vast number of calls received on the customer service lines daily.

We disagree with DUA's interpretation of the *Massachusetts Statewide Records Retention Schedule* as it applies specifically to digital recordings, rather than documentation related to a claimant's telephone activity, including information such as the queue time, queue callback wait time, and interactive voice response time to determine the length of time it takes for a claimant to receive assistance. We believe that this information falls under Section M02-08 of the *Massachusetts Statewide Records Retention Schedule*, which requires records to be retained for three years.

Recommendation

DUA should ensure that all call log data is retained for three years, in accordance with Section M02-08 of the *Massachusetts Statewide Records Retention Schedule*.

Auditee's Response

DUA disagrees with the Audit's interpretation of records retention requirements. DUA maintains that a 3-year retention period is not required for customer service call data received by DUA. During the one-year audit period, DUA handled 735,750 incoming calls from constituents. These calls cover a wide variety of requests to the agency and are by-definition Audio-Visual Tape or Digital Recordings, often relating to program intake. These calls, as a group, are much more akin to the type of telephone call recordings referenced in Section 04-03 of the [Massachusetts] Statewide Record Retention Schedule and, therefore, subject only to a one-year retention period. DUA retains these records for thirteen months, which is longer than the Retention Schedule requires.

Auditor's Reply

We agree with DUA that its customer service call recordings are audiovisual tape or digital recordings under Section 04-03 of the *Massachusetts Statewide Records Retention Schedule* and subject to a one-year retention period. However, the records we requested, and that are at issue in this finding, are not DUA's customer service call recordings themselves, but rather the call log *data* associated with those customer service call recordings, including but not limited to, the date and time of the call, queue time, talk time, the time to reach a call center agent, conference or consultation time (if any), whether the claim was placed on hold and for how long, the DUA skill category, the call center agent's name, identifying case or file numbers, and the final outcome of the call. Such call log data, which is distinct from call recordings, is subject to a three-year retention period under Section M02-08: Unemployment Insurance Claims of the *Massachusetts Statewide Records Retention Schedule* as records that "document claims for unemployment with the state, [including] claims, payment information, and related correspondence."

Beyond compliance with the *Massachusetts Statewide Records Retention Schedule* and the Massachusetts Public Records Law, there is value to retaining these records in order to analyze trends over time, identify areas of improvement, maintain and facilitate institutional knowledge, and ultimately better serve claimants.

OTHER MATTERS

1. The Department of Unemployment Assistance violated federal regulations by not completing the required number of Benefit Accuracy Measurement program claim reviews.

The Benefit Accuracy Measurement (BAM) program is a federal program designed to assess the accuracy of paid and denied unemployment insurance (UI) claims, according to the Employment and Training Administration's (ETA's) "Benefit Accuracy Measurement Program Fact Sheet." BAM program audits are required by Section 602 of Title 20 of the Code of Federal Regulations. The Department of Unemployment Assistance (DUA), as part of the BAM program, evaluates its accuracy in administering the Commonwealth's UI program. This administration includes DUA's review of a claimant's availability for work and their efforts to find suitable employment. As part of this process, DUA randomly selects weekly BAM samples of UI claim payments and denials from three groups: general claimants, federal employee claimants,²⁰ and ex-service member claimants.²¹ It also looks at DUA's determinations for approving and denying eligibility.

States with a higher number of claims must use a sample size of 480 cases per year for BAM investigation, according to the "Benefit Accuracy Measurement Program Fact Sheet." DUA must also select a sample of 150 cases per year for each type of denial: monetary, separation, and nonseparation. Using this system, in order to complete the BAM investigation, DUA usually selects at random 10 paid claims and 9 unpaid claims each week, but the sample size may vary depending on weekly claim volumes. The goal is to ensure sufficient coverage throughout the year to meet the required sample size.

During the audit period, DUA did not complete the required number of claim reviews to meet BAM program requirements. Specifically, we found the following issues:

- In fiscal year 2023, DUA reviewed 439 paid claims, 137 monetary claims, 134 separation claims, and 133 nonseparation unpaid claims.
- In fiscal year 2024, DUA reviewed 434 paid claims and 135 claims in each denial category.

20. The UI for federal employees program provides unemployment compensation for federal employees who lost their employment through no fault of their own.

21. The UI for ex-service members program provides benefits for eligible ex-military personnel.

By not completing the required number of claim reviews (480 per year), DUA may limit its ability to accurately assess both paid and denied claims, which could increase the risk of DUA not identifying improper payments.

DUA stated that the shortfall was because of staffing constraints during the implementation of the Employment Modernization and Transformation system, which temporarily reduced DUA's BAM Unit from 10 investigators to 4. BAM investigators were reassigned to support the system launch because of their professional expertise in DUA's claims process. DUA stated that, despite this reassignment, it was able to complete 91% of the required claim investigations for fiscal year 2023 and 90% for fiscal year 2024.

DUA should ensure that its BAM Unit completes the required number of reviews for paid claims and for each denial category to comply with federal BAM program requirements.

Auditee's Response

As DUA was preparing to transition from its legacy system to a new, modernized [Employment Modernization and Transformation (EMT)] system, BAM staff were temporarily reassigned to support the project, and DUA was unable to meet the minimum required number of audits during the audit period. Those staff have now returned to the BAM unit, restoring the unit's capacity to timely complete BAM casework.

DUA has also taken additional corrective actions to strengthen BAM operations. . . . The agency is actively working to hire two BAM investigators, which will increase investigative capacity and help ensure that required audit completion levels are met. . . .

The new EMT system has incorporated BAM functionality, including a case management tool designed to reduce the amount of clerical time required to develop and manage BAM cases. This system enhancement is expected to improve workflow efficiency, allow investigators to focus more time on substantive case review, and support more timely completion of BAM audits.

DUA is committed to meeting BAM requirements consistent with federal guidelines. DUA will continue to monitor staffing levels, workload, and case completion rates to ensure that the BAM unit completes the required number of audits going forward and that public guidance accurately reflects its current practices.

Auditor's Reply

Based on its response, DUA is taking measures to address our concerns regarding this matter. As part of our post-audit review process, we will follow up on this matter in approximately six months.

2. The Department of Unemployment Assistance did not ensure that claimants met weekly work search requirements.

To determine whether DUA's BAM Unit verified that claimants met the weekly work search requirement, we reviewed a random sample of 50 completed BAM cases that were investigated during the audit period. A BAM investigator classifies each work search activity provided by a claimant as acceptable, unacceptable, or unverifiable based on the supporting documentation submitted by the claimant. If a claimant did not provide three work search activities for the week in question, then a BAM investigator should create a work search availability issue in the system.

Our review identified 6 cases in which BAM investigators correctly determined that claimants did not meet the weekly work search requirement. However, we identified an additional 13 cases in which BAM investigators determined that claimants met the work search requirement, but the determinations relied on unverifiable work search activities for which claimants did not provide sufficient evidence that the requirement was met. As an example, a DUA BAM investigator accepted a work search activity where the claimant provided an explanation over the telephone about a review of the local newspaper for work; however, there were no jobs available that the claimant was qualified for, and the claimant did not apply for any job postings at all.

We found that DUA's BAM Unit rarely used work search verification as a basis for denying claims, even when claimants' submitted activities could not be verified. Instead, determinations were often based on a combination of acceptable and unverifiable activities, resulting in claims being approved without sufficient supporting documentation. This increases the risk of improper payments and reduces integrity and compliance with eligibility requirements. It may also create an administrative burden for employers, particularly small businesses, when claimants report job search activities, such as submitting applications and scheduling interviews, but they do not subsequently attend those interviews.

DUA explained that, according to an email between the ETA administrator and DUA on March 20, 2019, a BAM investigator must prove—with clear and convincing evidence—that a claimant *did not* perform a work search activity before creating a work search issue. This email states,

*If the best evidence is that the Claimant indicated they made a Work Search on the weekly [certification] (meaning that they answered "YES" on their weekly certification via phone or internet), you have to prove by **clear and convincing evidence** that they didn't. As such, a failure to respond would be an ineligible going forward (if a state has that disqualification), but you haven't proven an unverifiable work search. Therefore, a failure to return a BAM Claimant*

*Questionnaire would not automatically make the claim ineligible due to lack of Work Search, according to Federal guidelines. **Of course State Laws and Policies take precedence** [emphasis added]. . . . I sincerely hope this helps you reduce your Improper Payment Rate when it comes to Work Search.*

Under this guidance, DUA investigators considered the work search requirement met as long as claimants submitted at least three work search activities in a given week, regardless of whether all the activities could be verified. This practice contradicts the information on DUA's website, which states that claimants must provide proof of at least three job search activities each week. Considering unverifiable activities to be sufficient documentation may result in overpayments to ineligible claimants, which reduces the effectiveness of work search verification as a control.

DUA should ensure that BAM investigators consistently follow DUA's guidelines when evaluating work search activities and that they obtain sufficient documentation to support claimant eligibility. If current practice is considered acceptable by ETA, then DUA should update its policies and website guidance to accurately reflect the federal guidance for work search verification.

Auditee's Response

As previously mentioned, the Audit period predates the complete implementation of the [Employment Modernization and Transformation (EMT)] system. During that time, BAM investigators evaluated work search activities in accordance with [the US Department of Labor] ETA BAM guidance. Since launch of EMT, work search has been fully integrated into the new system. DUA is continuously reviewing and working to improve its policies and procedures, including work search.

DUA remains committed to protecting the integrity of the UI program, reducing improper payments, and ensuring that work search requirements are administered fairly and consistently.

Auditor's Reply

As previously mentioned, we appreciate DUA's attempt to improve its systems. However, DUA's response does not fully address our finding that BAM investigators relied on unverifiable work search activities when determining claimant eligibility. We understand that new technology is being implemented. However, this does not resolve the lack of management and oversight of these activities or address the inconsistency between DUA's website, which states that claimants must provide proof of at least three work search activities each week, and its practice of treating unverifiable activities as sufficient to satisfy that requirement.

We are also concerned about the language in the March 20, 2019 email from the ETA administrator, which states, “I sincerely hope this helps you reduce your Improper Payment Rate when it comes to Work Search.” This language gives the impression that the guidance was focused, at least in part, on reducing DUA’s reported improper payment rate according to federal standards, rather than strengthening the verification of work search activities, which would actually reduce improper payments, according to DUA’s standards, Massachusetts law, and DUA policies. The email also makes clear that state laws and policies take precedence. Given this, DUA should re-evaluate its decision to accept unverifiable work search activities as meeting the requirement and strengthen its verification process beyond the federal guidance given at that time.

When benefits are paid to claimants who do not meet minimum eligibility requirements, the cost of these improper payments falls on all employers, including small local business owners. These small business owners not only continue to pay for potential improper payments, but they may also lose time and energy at scheduled interviews with claimants who may not be showing up to interviews because there is no requirement to demonstrate that the claimant made any follow through. For the sake of transparency, accountability, and the judicious use of taxpayer resources going to those truly in need, we continue to recommend that DUA ensure that its own policies, procedures, and publicly available guidance are consistently applied by BAM investigators and that it not rely solely on the bare minimum guidance provided by one federal official several years ago, which clearly stated that Massachusetts state law and policy supersedes the guidance provided in the email. Again, this email guidance at the time was focused more on reducing the improper payment rate, according to the minimum federal standard, rather than ensuring that the payments are actually proper under DUA’s own policies. DUA should ensure that eligibility determinations are supported by sufficient documentation, as stated on its own website. As shown below in Figure 12, DUA’s website specifically states that claimants are required to provide proof of at least three work search activities each week. As part of our post-audit review process, we will follow up on this matter in approximately six months.

Figure 12. UI Benefit Requirements Listed on DUA's Website

THE DETAILS

What you need

How to file

Weekly eligibility

Downloads

Contact

What you need

You must request benefits every week you need unemployment. This is also called "weekly certification."

Start submitting requests the week after you apply for benefits, even while we're reviewing your application.

Each week, we'll ask you if you are able to work, available to work, and actively looking for work. If you are, you'll also need to:

- Provide proof of at least 3 job search activities each week
- Report changes in your income or current work status
- Report changes in your ability and availability to work

Eligible work search activities

Eligible work search activities include (but are not limited to):

- Submitting an application, resume, letter of interest, etc., through an employer or an employment website, such as [MassHire JobQuest](#)
- Making in-person visits with employers who might be hiring
- Attending private or [MassHire Career Center](#) sponsored job fairs, networking events, employment workshops, and much more
- Interviewing with potential employers in person, by phone, or online
- Registering for work with private employment agencies or placement services

Reporting work search activities

- You should keep a [written record of work search activities](#) (including the type of activity and when you did it) in case staff need to verify this information.

CONTACTS

Department of Unemployment Assistance

Phone

Call Center (877) 626-6800
Monday–Thursday 8:30 a.m.–4:30 p.m.

Voice Relay 711
Monday–Friday 8:30 a.m.–4:30 p.m.

TeleCert Line (617) 626-6338
To request weekly benefits, daily 6 a.m.–10 p.m.

Payment Status Line (617) 626-6563
To check your claim or benefit payment status

PIN Selection Line (617) 626-6943
Select or reset your 4-digit Personal Identification Number (PIN)

Direct Deposit Line (617) 626-6570
Set up, change, or cancel direct deposit

Online

Unemployment Services for Workers
[Log in as a claimant →](#)
[Reset your password →](#)
[Make an appointment with the Boston Re-Employment Center →](#)

[more contact info >](#)

RELATED

[Apply for unemployment insurance benefits →](#)

Source: DUA— "File your weekly unemployment claim" (<https://www.mass.gov/how-to/file-your-weekly-unemployment-claim>)

3. The Department of Unemployment Assistance mismanaged claimant complaints, impacting its ability to ensure timely and consistent service.

We requested records of all complaints received during the audit period to understand how DUA manages complaints from claimants regarding UI benefits, but DUA officials stated that they could not provide this information because the request was too broad in scope. They stated that every contact by a claimant, whether by telephone, text, email, DUA's online portal, or mail, could indicate a potential problem with a claim but is treated as generic correspondence by default. DUA claimed that attempting to collect all such contacts would result in millions of records, making it impractical to identify actual complaints.

We found that claimant contacts are recorded across multiple channels, and there is no centralized complaint-tracking system to monitor or consolidate these interactions. Because DUA did not have a readily available method to identify and provide documentation supporting claimant complaints, the audit process was constrained by delays. DUA officials repeatedly informed us that our request for all claim-related complaints received during the audit period was too broad in scope, requiring multiple rounds of discussions and refinements over approximately five months to determine what information could be provided. These delays significantly affected the timing of our audit procedures related to claimant complaints and extended the overall audit timeline.

Potential complaints could arise through a variety of sources, including telephone calls to DUA's call center, feedback submissions via DUA's website, communications (usually emails) routed through the Secretary of Labor and Workforce Development's office, or contacts from external stakeholders, such as the Legislature, via DUA's Constituent Services Unit. While DUA officials noted that some of this data could potentially be extracted and tracked, it was evident to us that doing so would be a cumbersome process and is not routinely performed by DUA. Most contacts are not categorized and/or monitored, limiting DUA's ability to identify and resolve issues quickly, efficiently, or at all.

Although DUA initially told us that identifying claimant complaints would be impractical because of the large volume of correspondence it receives, we were ultimately able to work with DUA officials to narrow the scope of our request and obtain a sample of records involving DUA's Constituent Services Unit. Specifically, we limited our request to emails involving DUA's director of constituent services unit, covering the period July 1, 2022 through June 30, 2024, that were sent from or received by state senators, state representatives, or officials in their offices and contained terms such as "Claim #," "Claim no.," "Claim number," or "Complaint(s)." We requested emails from these sources to evaluate the agency's response to escalated complaints, under the assumption that these cases would represent examples of the most urgent complaints and allow us to assess both (1) how DUA responded to escalated cases and (2) how those responses compared to non-escalated cases. Using these criteria, DUA provided us with approximately 33,000 emails for review. This process demonstrated that, while extracting and reviewing complaint-related correspondence is possible, doing so required significant manual narrowing that was not supported by a centralized complaint-tracking system. As detailed below, we found that DUA did not sufficiently track either standard or escalated complaints, making it impossible for us to evaluate how

effectively cases were managed, whether escalation improved outcomes, or what improvements could be made by comparing escalated and non-escalated processes.

In reviewing these emails, we observed that many involved legislative aides from state senators' and representatives' offices contacting DUA on behalf of constituents. Common themes were claimants experiencing issues with their UI claims and claimants being unable to reach DUA directly. Many individuals turned to their state senators and representatives, who then rightly contacted DUA's Constituent Services Unit to help resolve the issues on their behalf.

The emails also highlighted several types of issues that were raised by claimants and employers. These issues included business owners questioning the contribution rates they were required to pay DUA; claimants reporting difficulty submitting claim information or navigating the claims process; and claimants who were disqualified from unemployment benefits without understanding the reason, experienced delays with their claims, and were unable to reach anyone at DUA for assistance or clarification. We also observed multiple instances involving suspected fraud and identity theft, where individuals discovered that someone had attempted to file an unemployment claim using their personal information. In some cases, this resulted in claimants being unable to access the Commonwealth's legacy UI system. In another instance, an individual reported that when attempting to register online, they found that someone with a different Social Security number was already receiving benefits under their information. The individual further stated that they had been trying to report the fraud for several weeks but had been unsuccessful in reaching anyone at DUA to assist with resolving the issue.

DUA's inability to distinguish complaints from general correspondence significantly limits its ability to monitor, report, and respond to claimant issues. This situation makes it difficult to identify recurring issues, track resolution statuses, follow up on actions, analyze trends, or measure performance. As a result, claimants may experience delays in having their issues addressed or receiving necessary benefits. It also hampers efforts to identify and improve problems that people experience with DUA's systems and processes. Combined with the long call center wait times identified in [Finding 1](#), these delays may also affect the timely delivery of UI benefits and increase the risk that important issues remain unresolved or overlooked, requiring DUA employees to repeatedly solve the same problem, rather than helping identify repeated issues and supporting their timely resolution. Complaints can become difficult to distinguish among millions of routine contacts, reducing oversight and limiting DUA's ability to effectively address claimant concerns in a timely manner.

We do not dispute the intent or purpose of DUA's Constituent Services Unit. On the contrary, we fully recognize the important role that state officials play in advocating on behalf of their constituents. However, the volume of inquiries from state officials and the apparent need for their intervention raises concerns and suggests underlying challenges in DUA's ability to directly address claimant issues through its primary service channels. In a more effective DUA system, fewer claimants would need to rely on legislative offices to resolve routine problems with their claims, and complaints would be tracked and would serve as an important source of information for DUA to improve its services.

There is also a potential equity concern in how this process operates in practice. Claimants who are not aware of the Constituent Services Unit, or who do not have established connections to their elected officials, may be at a disadvantage in resolving issues with their claims. As a result, access to assistance may vary depending on a claimant's awareness of, or ability to access, alternative support channels rather than being consistently supported by DUA itself.

We recommend that DUA implement a centralized complaint-tracking system to record all contacts by claimants. The system should allow contacts to be classified (e.g., complaint, question, request for information), track resolution statuses and follow-up actions, and enable reporting and trend analyses. DUA should regularly review the consolidated data to identify trends, recurring issues, and opportunities for process improvement, ensuring that claimant concerns are addressed promptly and consistently. In addition, DUA should assess opportunities to improve direct claimant support and issue resolution. Finally, DUA should regularly review inquiries coming through its Constituent Services Unit to spot recurring problems and use that information to fix issues in its frontline processes.

Auditee's Response

DUA is committed to providing world class customer service for its constituents and routinely corresponds with claimants in various ways. As the Audit notes, a centralized complaint-tracking system would be unduly burdensome for DUA because there are so many mechanisms through which the agency can be contacted (e.g., call, email, web submission, legislative request, mail, direct message, social media post, etc.). Not all inquiries require follow up nor does each rise to the level of a formal complaint. DUA does track formal complaints about agency determinations in the form of appeals of agency decisions. "Complaint" does not have a formal definition in unemployment insurance outside of an adjudicatory context and tracking all general inquiries to the agency would be incredibly cumbersome. DUA routinely assesses opportunities to improve direct claimant support and issue resolution.

Auditor's Reply

We acknowledge that not every claimant contact constitutes a formal complaint or requires follow-up. Our recommendation is not intended to require DUA to treat every communication as a complaint, but rather for DUA to honor the time and effort expended by the public to provide it with important feedback regarding its services. We recommend that DUA implement a process to identify, classify, and monitor claimant contacts that do represent complaints or indicate potential service issues. To clarify, when we pointed to statements of alleged impracticality, we were referring to DUA's rationalization to our audit team about why it believed it couldn't implement our recommendations. It was a restatement of DUA's opinion and rationale, not our team's opinion. We reiterate our recommendation to implement a centralized complaint tracking system.

DUA's assertion that the term complaint does not have a formal definition in the context of UI does not change the issue and ignores the fact that government agencies routinely establish their own definitions or criteria for terms, such as complaint, when necessary to assist in the management and operation of public services. Regardless of what DUA chooses to call these contacts, DUA should be able to distinguish expressions of dissatisfaction and service-related problems from routine inquiries so it can better monitor performance and improve customer service. As noted above, DUA's inability to do so has significantly limited its ability to identify recurring problems, analyze underlying causes of claimant concerns, monitor the status and resolution of claimant concerns, and use this information to improve service delivery. It also prevented us from fully evaluating how DUA managed claimant complaints during the audit period and raises reasonable questions as to why it would not seek to track complaints itself.

We recognize that DUA tracks formal appeals of its determinations. However, appeals represent only one category of claimant concern and do not capture many of the service-related issues identified during our review, including a claimant's inability to reach DUA, delays in processing claims, difficulty navigating the claims process, and reports of suspected fraud and identity theft. These issues may not result in appeals but nevertheless affect a claimant's ability to receive timely assistance and benefits. The April 30, 2026 *Commonwealth Beacon* article, titled "One year after implementing new system, Mass. continues to struggle in issuing unemployment benefits," reported that nearly a year after the launch of the Employment Modernization and Transformation (EMT) system, claimants continued to face prolonged delays, confusion, and unresolved issues related to their UI claims. The article also noted a significant surge in pending appeals; and it reported nearly 13,000 cases with pending appeals in March 2026. The

article also included statements from two state representatives who said that their offices received many complaints from constituents related to access to UI benefits. These statements match our review of DUA's correspondence with legislative offices during the audit period.

DUA's response does not address the central issue identified in this matter: The agency lacks a documented process to identify, classify, and monitor claimant complaints across its various communication channels. Until such a process is implemented, DUA will remain limited in its ability to effectively manage claimant concerns and improve service to the public. We strongly urge DUA to fully implement our recommendations. As part of our post-audit review process, we will follow up on this matter in approximately six months.

4. The Department of Unemployment Assistance did not complete all actions in its corrective action plan regarding approximately \$2.5 billion that it overspent in Unemployment Insurance Pandemic Benefits.

An audit issued by CliftonLarsenAllen for fiscal year 2023 determined that DUA overdrew approximately \$2.5 billion from the federal Unemployment Compensation Trust Fund. The audit also found that, between 2020 and 2021, DUA drew on federal funds to pay claims that were the responsibility of the Commonwealth's Unemployment Insurance Trust Fund, which is supported by employer contributions. As a result, the Executive Office of Labor and Workforce Development (EOLWD) engaged in discussion with ETA to address the issue related to EOLWD's mistaken use of funds from the federal Unemployment Compensation Trust Fund.

DUA officials reported that the state has since entered into a settlement with the US Department of Labor, reducing the total repayment obligation to \$2.1 billion, to be paid over a 10-year period. Repayment began on December 1, 2025, with annual installments scheduled through the terms of the agreement. Under the terms, the principal will be repaid using funds from the state's Unemployment Insurance Trust Fund, while interest costs will be covered by the state's General Fund.

During our audit, we inquired about the measures that EOLWD implemented to mitigate the risk of future overspending. In July 2023, ETA conducted a monitoring review to identify the root causes of the improper use of funds. Following this review, EOLWD was required to develop and submit a corrective action plan (CAP) to ETA outlining the steps the Commonwealth has taken, or plans to take, to address deficiencies in internal controls and financial reporting that contributed to the issue.

On November 27, 2024, ETA provided an update to the Secretary of EOLWD regarding its monitoring of DUA's implementation of the CAP.

- **CAP Element 1** pertained to the Statewide Single Audit Report and oversight findings from auditors regarding the issues that led to the overspending of approximately \$2.5 billion in UI Pandemic Benefits. The CAP required DUA to update policies and procedures to address the root causes of the identified issues. EOLWD provided documentation demonstrating that it had addressed the lack of internal controls and ineffective oversight processes that resulted in the overspending of UI Pandemic Benefits funding, including the dates on which the internal controls were implemented. Additionally, EOLWD must supply documentation detailing the process it uses to deposit refunds and returned benefit payment claims into the appropriate UI subaccounts.
- **CAP Element 2** pertained to the accuracy of Federal Accounting and Financial Reporting (including reports ETA-2112, ETA-5159, and ETA-902P). The CAP aimed to improve DUA's accuracy with its reports to ETA and other federal agencies. This initiative coincided with DUA's EMT project. The plan outlined the timeline for submitting ETA reports and identified the best strategy for transitioning reports from the Commonwealth's legacy UI system to the EMT system.
- **CAP Element 3** planned to address the organizational structure and communication challenges between EOLWD and DUA to ensure appropriate financial management of the Commonwealth's Unemployment Insurance Trust Fund and accurate accounting of benefit payments. This included updates to policies and procedures to address challenges in DUA's organizational structure.
- **CAP Element 4** planned to improve the Commonwealth's Unemployment Insurance Trust Fund's accounting and transactions, including account reconciliation. This included updates to policies and procedures, ensuring that financial transaction details are supported by appropriate source documentation.

ETA reviewed EOLWD's responses for all the CAP elements described above and confirmed that EOLWD provided supporting documentation and that all CAP elements had been addressed. However, the CAP required EOLWD to provide ETA with a written update about its new system features, including internal controls and the structure of its communications, following the implementation of Phase 2 of the EMT project. According to our discussions with EOLWD officials, they have not sent ETA a written update, despite regular meetings to discuss the implementation of Phase 2 of the EMT. Additionally, EOLWD mentioned that the CAP did not include a deadline for this update that ETA needed.

Given the exorbitant amount of taxpayer dollars involved, we recommend that DUA ensure that it provides ETA with the required written update regarding the implementation of Phase 2 of the EMT project. Although the CAP did not establish a specific deadline for this update, DUA should have written documentation about its ongoing activities and progress related to the CAP throughout the EMT implementation process to increase transparency and accountability. We recommend that DUA provide ETA the required written update and revise it as necessary to reflect progress made.

APPENDIX

Figure 13. Customer Experience Checklist from the Employment and Training Administration (Page 1 of 5)

Customer Experience (CX) Checklist

This CX Checklist is available for State Workforce Agencies' (SWAs) use to help improve CX in the Unemployment Insurance (UI) programs. This checklist is not an exhaustive list of considerations but builds the foundation for SWAs to focus on improving the CX. As SWAs make improvements in processes and updates to UI websites, applications, and content, states should revisit the items on the check list over time. SWAs should have staff from different divisions complete the checklist and compare answers in order to gain a full understanding of staff perspectives on progress.

A. Principles to Improve CX						
1.	Use Plain Language			Yes	No	Partially (if applicable)
a.	Has plain language been applied to the following items across the state's phone, web, and in-person service delivery systems?					
	i.	Pre-claim information (e.g., general state agency websites, chat box responses, phone lines, American Job Centers etc.)	☐	☐	☐	
	ii.	Initial application forms	☐	☐	☐	
	iii.	Weekly certification forms	☐	☐	☐	
	iv.	Requests for information	☐	☐	☐	
	v.	Determination and appeals notices	☐	☐	☐	
	vi.	Overpayment instructions	☐	☐	☐	
	vii.	Overpayment waiver notices	☐	☐	☐	
	viii.	Overpayment waiver applications	☐	☐	☐	
	ix.	Miscellaneous forms	☐	☐	☐	
	x.	Informing individuals of the next steps in the claim cycle process	☐	☐	☐	
b.	Does online content include helper text? (providing an explanation when a user hovers over a word or phrase)			☐	☐	☐
c.	Are there videos to explain the unemployment process?			☐	☐	☐
	i.	If yes, do the videos explain the various steps and requirements at each key point in the claim process?	☐	☐	☐	
	ii.	If yes, has plain language been applied to the videos?	☐	☐	☐	
2.	Focus on action instead of information			Yes	No	Partially (if applicable)
a.	Are instructions presented in a clear manner on the SWA websites?			☐	☐	☐
b.	Are instructions presented in a clear manner on the different SWA applications?			☐	☐	☐
c.	Are instructions presented in a clear and consistent manner in the different SWA's publications?			☐	☐	☐

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d.	For notices sent to claimants and employers, do they clearly identify whether the recipient is required to perform an action?	☐	☐	☐
e.	Are determination letters presented in a clear manner to indicate a favorable or non-favorable decision?	☐	☐	☐
f.	Are determination letters presented in a clear manner to indicate how to appeal a determination and the deadline to submit an appeal?	☐	☐	☐
g.	Are appeals notices presented in a clear manner to indicate how to respond to the notice and the deadline to submit a response?	☐	☐	☐
3.	Personalize the content	Yes	No	Partially (if applicable)
a.	Does staff understand the applicable privacy and disclosure laws in your state that inform the extent to which messages can be personalized?	☐	☐	☐
b.	Has the SWA identified where personalized messaging can be implemented in the following?	☐	☐	☐
i.	Online system	☐	☐	☐
ii.	Phone system	☐	☐	☐
iii.	In-person services	☐	☐	☐
iv.	Correspondences	☐	☐	☐
v.	Reminders	☐	☐	☐
c.	Is communication sent to individuals in their preferred language where possible and/or when required by law?	☐	☐	☐
4.	Proactively and clearly state instructions to support navigation and wayfinding	Yes	No	Partially (if applicable)
a.	Is there a claim status tracker?	☐	☐	☐
b.	Does the claim status tracker or the UI system the SWA utilizes provide updates on the following?	☐	☐	☐
i.	Any outstanding issues requiring adjudication	☐	☐	☐
ii.	Next steps in the claim life cycle	☐	☐	☐
iii.	Critical messaging	☐	☐	☐
iv.	Deadline reminders	☐	☐	☐
5.	Improve mobile usability	Yes	No	Partially (if applicable)
a.	Is UI content responsive to a variety of mobile screen sizes?	☐	☐	☐
b.	Are stacking elements utilized on mobile sites?	☐	☐	☐
c.	Are page lengths standardized for website content?	☐	☐	☐
d.	Is white space utilized to help structure content?	☐	☐	☐
e.	Are alerts used as a means of providing information that is relevant to most users?	☐	☐	☐
f.	Are elements easy to tap on UI sites?	☐	☐	☐

Figure 15. Customer Experience Checklist from the Employment and Training Administration (Page 3 of 5)

g.	Are click-to-call options available on UI sites?	☐	☐	☐
h.	Are font hierarchies implemented to help distinguish information requiring completion?	☐	☐	☐
i.	Is text on sites set to wrap to fit various mobile screen sizes?	☐	☐	☐
j.	Is helper text functionality implemented?	☐	☐	☐
k.	Are the correct keyboards (numbers/alphabet) utilized when completing various fields in UI systems?	☐	☐	☐
l.	Is auto format utilized to automatically apply correct formatting to information provided by users in UI system(s)?	☐	☐	☐
6.	Provide appropriate digital off-ramps	Yes	No	Partially (if applicable)
a.	When experiencing an issue in a digital process, can users easily find a solution when seeking assistance?	☐	☐	☐
b.	Are there non-digital ways for individuals to access general UI information?	☐	☐	☐
c.	Is information about alternative access options broadly and conspicuously disseminated in ways that individuals are aware of how to utilize them? (e.g., websites, phones, fliers, correspondences, etc.)	☐	☐	☐
d.	Are there alternatives to verifying identity online?	☐	☐	☐
e.	Are there non-digital ways to submit weekly certifications?	☐	☐	☐
f.	Are there non-digital ways to respond to requests for information?	☐	☐	☐
g.	Do individuals have the option to choose if they want to receive information electronically or non-electronically?	☐	☐	☐

B. Baseline CX Metrics				
1.	Operational Metrics	Currently tracked	Planning to track	Not tracked
a.	Percentage of completed applications (tracks the percentage of applications completed within a time frame)	☐	☐	☐
b.	Time it takes to complete an action with minimal error or staff intervention:			
i.	Initial claim	☐	☐	☐
ii.	Check status of claim	☐	☐	☐
iii.	Weekly certification	☐	☐	☐
iv.	Employer registration	☐	☐	☐
v.	Employer wage report submission	☐	☐	☐
vi.	Employer tax payment	☐	☐	☐
vii.	Manage documents	☐	☐	☐

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	viii.	Reset passwords	☐	☐	☐
	c.	Call volume	☐	☐	☐
	d.	Call duration	☐	☐	☐
	e.	Website clicks	☐	☐	☐
	f.	Video view counts	☐	☐	☐
	g.	Website outages	☐	☐	☐
	h.	Missed submission deadline	☐	☐	☐
	i.	First call resolution	☐	☐	☐
	j.	Abandonment Rate	☐	☐	☐
	k.	First call resolution	☐	☐	☐
	l.	Interpretation services	☐	☐	☐
2.	Experience Metrics (can be applied to internal and external customers)		Currently tracked	Planning to track	Not tracked
	a.	Trust	☐	☐	☐
	b.	Satisfaction	☐	☐	☐
	c.	Timeliness (a process indicator to measure the customer's perception on how well a procedure, process, or operation is working)	☐	☐	☐
	d.	Ease: User friendly	☐	☐	☐
	e.	Ease: Readability	☐	☐	☐
3.	Outcome Metrics		Currently tracked	Planning to track	Not tracked
	a.	Number of errors in processes performed by internal and external customers	☐	☐	☐
	b.	Number of calls per error/section of application	☐	☐	☐
	c.	Number of follow-ups required	☐	☐	☐
	d.	Number of in person visitors requiring assistance with routine processes	☐	☐	☐
	e.	Click-through rate (measures the percentage of users who click on links or buttons on the portal that lead to other pages or tasks)	☐	☐	☐
	f.	Staff time saved on manual data entry or processing	☐	☐	☐
	g.	Improvement in first-payment promptness	☐	☐	☐

C. Identify Areas for Continuous (Needing) Improvement				
1.	Conduct Direct Observation and Interview Studies	Currently used	Planning to use	Not used
	a. Focus groups	☐	☐	☐
	b. Interviews	☐	☐	☐
	c. Usability testing	☐	☐	☐

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2.	Survey Types	Currently used	Planning to use	Not used
a.	Always-on surveys	☐	☐	☐
b.	Intercept surveys	☐	☐	☐
c.	Ad-hoc surveys	☐	☐	☐