The Unemployment Insurance (UI) program requires a State Quality Service Plan (SQSP) on a 2-year planning cycle that is a condition of receipt of administrative funding to administer the program. The SQSP is the State’s UI performance management and planning process that allows for an exchange of information between Federal and State partners to enhance the UI program’s ability to reflect their joint commitment to performance excellence and client-centered services. A formal two-year SQSP is submitted biennially. On the off years, States may be required to modify the SQSP with additional corrective action plans and narrative if they are failing any new performance measures, and they are required to provide updated budget documents, certifications, and assurances. ETA Handbook No. 336, 18th Edition provides detailed guidance for the preparation and submittal of the SQSP and supplemental guidance is provided in an annual UIPL, issued as UIPL 15-19 for the FY 2020 SQSP. The Social Security Act (SSA) sections 302 and 303 authorize the Secretary of Labor to provide funds to administer the UI program and govern the expenditure of those funds. States that choose the option to include UI in a WIOA Combined State Plan will be required to submit their SQSP through the Combined State Plan process. The SQSP must be prepared in accordance to the instructions in ET Handbook 336, 18th Edition and there are no changes to the established SQSP cycle if a State chose to submit their SQSP through the Combined State Plan process.

a. CONTENTS OF A COMPLETE UI SQSP PACKAGE

A complete UI SQSP package includes the following documents, as described in Chapter 1, ETA Handbook 336, 18th Edition:

1. Transmittal Letter

A cover letter to the appropriate Regional Office (RO) transmitting all the required SQSP documents.
October 28, 2021

Ms. Ann Leonetti  
Mr. Frank Stiuka  
Acting Regional Administrators, Region 6  
USDOL/Employment and Training Administration  
90 7th Street, Suite 17-300  
San Francisco, CA 94103-1516

Dear Ms. Leonetti and Mr. Stiuka,

Enclosed is the Idaho Department of Labor’s Unemployment Insurance Fiscal Year 2022 Alternate State Quality Service Plan.

If you have any questions, please contact Carrie Peterman at 208-332-3570 ext. 4011, carrie.peterman@labor.idaho.gov.

Sincerely,

[Signature]  
Jani Revier  
Director
2. Budget Worksheets/Forms

Budget worksheets/forms and plan for program administration based on projected allocations received from the Federal partner. These forms include Worksheet UI-1 and SF 424, SF 424A and SF 424B. The SF 424A is only required if the State vary the quarterly distribution of base claims activity staff years.
Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:
   A. STATE GOVERNMENT

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:
   US DEPARTMENT OF LABOR EMPLOYMENT AND TRAINING ADMINISTRATION

11. Catalog of Federal Domestic Assistance Number:
    17.225

CFDA Title:

UNEMPLOYMENT INSURANCE

* 12. Funding Opportunity Number:
   UIPL No. 25-21

* Title:
   UIPL No. 25-21 FY 2022 UI State Administration

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):
   ID - ALL

* 15. Descriptive Title of Applicant's Project:
   UIPL No. 25-21 - FY 2022 UI State Administration

Attach supporting documents as specified in agency instructions.
16. Congressional Districts Of:
   a. Applicant: **2ND IDAHO**
   b. Program/Project: **ALL IDAHO**

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:
   a. Start Date: **01/01/2021**
   b. End Date: **09/30/2022**

18. Estimated Funding ($):
   a. Federal
   b. Applicant
   c. State
   d. Local
   e. Other
   f. Program Income
   g. TOTAL: **$15,616,685**

19. Is Application Subject to Review By State Under Executive Order 12372 Process?
   a. This application was made available to the State under the Executive Order 12372 Process for review on
   b. Program is subject to E.O. 12372 but has not been selected by the State for review.
   c. Program is not covered by E.O. 12372.

20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)
   a. [ ] Yes
   b. [ ] No

   If "Yes", provide explanation and attach

21. "By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 216, Section 1001)

   [ ] I AGREE

   ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: **MS.**
First Name: **JAN**
Middle Name: ****
Last Name: **REVER**
Suffix: ****

Title: **DIRECTOR - IDAHO DEPARTMENT OF LABOR**
Telephone Number: **208-332-3510 EXT 3110**
Fax Number: **208-334-6430**
Email: **JAN.REVER@LABOR.IDAHO.GOV**

Signature of Authorized Representative: [Signature]
Date Signed: **8-27-2021**
3. The State Plan Narrative

State Plan Narrative is a vital element of the SQSP that provides a vehicle for sharing with the Federal partner State-specific efforts that affect the administration of the UI Program. The State Plan Narrative allows the State to describe in a single narrative: a) State performance in comparison to the Government Performance Review Act goals; b) actions planned to correct deficiencies regarding UI programs, UI program reviews and reporting requirements; and c) results of customer satisfaction surveys (optional).

State Quality Service Plan
State Plan Narrative
Idaho – FY 2021-2022

A. Overview

1. The Idaho Department of Labor’s priorities for the FY 2021-2022 SQSP include:
   a. The timely and accurate payment of UI benefits in concert with the implementation of the new programs authorized by the Coronavirus Aid, Relief, and Economic Security Act.
   b. An overall integrity goal of reducing the number of improper payments and the prevention, detection, and recovery of improper and fraudulent payments.
   c. Continuous business process analysis in all areas of UI to improve program performance with technology.
   d. Improve state capacity to administer and operate the UI program effectively and efficiently.
   e. To provide adjudication and claims processing performance that meets the standards established by USDOL.
   f. To assist and improve the timely reemployment of UI claimants with continued use of the Reemployment Services and Eligibility Assessment (RESEA) program.
Prior to the Pandemic, Idaho’s UI Division underwent a major process analysis and deployed a modernized UI Tax and Benefits system. Those initiatives have shaped the current structure and processes in all areas of UI. The initiatives helped IDOL develop a strategic plan for the reorganization of the UI Division that allowed for consistency in planning, training, and UI delivery. The events of this year have proven that the initiatives undertaken at that time have been instrumental in allowing the department to implement the new programs required under the CARES Act. The modernized system has improved UI operations by providing user-friendly graphical interfaces, significant automation, and real-time claim processing.

Idaho has reduced the number of field offices from 25 to 11 and provides remote services to more communities shifting focus to demand driven Employment Services and WIOA activities. Idaho continues to utilize lean processes to reduce inefficiencies and eliminate redundancies.

Due to the increase in unemployment insurance activity brought on by the pandemic, the department has significantly increased the number of UI staff.

2. Idaho’s performance remains strong considering the continued reductions in base funding levels over the past years.

Idaho has met or exceeded most of the ALP’s for all measures in tax, benefits, and appeals. Idaho ranks very high in first pay timeliness, effective audit measures, and lower authority appeals and is above the average in most other areas.

Idaho has six issues that are included in the 2021-2022 SQSP Corrective Action Plan(s). All of the issues are minor and the plans to correct the deficiencies are included in the 2020-2021 SQSP Quarterly Reporting Workbook.

In the area of Integrity, Idaho meets or exceeds all but one of the core measures. The core measure that has been a problem is the improper payment rate, which for 2019 is listed as 13.25%, a full 3.25% over the benchmark of 10%. During the second half of 2019, IDOL modified the work search criteria to include recommendations from both NASWA and USDOL. Because of those modifications, Idaho’s improper payment rate for the year ending March 31, 2020, dropped to 8.9%. IDOL will continue making improvement in the areas that effect the improper payment rate.

Idaho was continuing to make progress on Data Validation but that work stopped with the advent of the CARES Act programs. Work on data validation will commence once programmatic changes stabilize.

The BAM population variances have undergone significant work over the past few years and for the most part are always in tolerance. We recently had one quarter get out of balance on the monetary and the corrective action is included in the CAP.

Idaho has met or exceeded all USDOL GPRA goals.

Idaho has used past supplemental budget requests to enhance IT security and to carry out many of the integrity efforts with respect to identity theft and fictitious employer schemes. Idaho will actively participate in the SBR process when funding is available. If Idaho is awarded funds in accordance with UIPL 28-20, in addition to staffing, Idaho will focus on increased integration between IDH and Idaho’s fraud detection systems.
Due to the inclusive organizational structure of the Idaho Department of Labor, coordination within the department with other plans is a common practice. The department’s Workforce Development Division administers the Employment Services and WIOA. UI Adjudication and Claims Processing has been consolidated with UI Compliance into one UI division. This change has allowed closer coordination between the RESEA and WIOA as field management staff is no longer required to oversee UI Functions. These changes continue to enhance Idaho’s ability to meet the employment needs of the employer community. In addition, claimants are directed during the claims process to utilize the IDOL reemployment services offered in our 11 field offices located statewide.

The Idaho Department of Labor is the administrative entity for unemployment insurance, employment security and Labor Market Information and is also the WIOA Adult, Dislocated Worker and Youth service provider in each of the 11 One-Stop centers. Collaboration and connectivity is inherent and will ensure claimant access to the full array of services. Career center staff have the skills to provide a comprehensive One-Stop service orientation and assessment and are able to provide claimants with the information, tools and technology to build quality work search and career development plans. Idaho has exceeded the performance measure of 72% for Facilitating Reemployment with a score of 84.6%.

B. Federal Emphasis (GPRA)

1. Idaho has met all GPRA measures
   a. First Pay Promptness – 95.73%
   b. Detect Benefit Overpayments – 91.80%
   c. Establish Tax Accounts Promptly – 91.50%
2. Idaho will continue to provide adequate administration to achieve the GPRA goals and targets in FY2019-2020.

C. Program Review Deficiencies

1. Idaho did participate in program reviews during the prior period.
2. Idaho will continue to participate in the reviews when requested.

D. Program Deficiencies

Tax Quality Part A and B- There were two quality issues discovered in the last TPS audit. The deficiencies identified in the audit are in the areas of successor status and collections. Steps have been taken to correct the problems and they are outlined in the corrective action plan-reporting workbook.

E. Reporting Deficiencies

The ar227 report for the 2nd quarter 2020 is late – the changes required by the CARES Act require changes to the ETA227 report and work on this is underway. Idaho takes reporting seriously and we will strive to ensure timely submission of all reports.

F. Customer Service Surveys (optional)

The department has not completed formal customer service surveys this past performance year.
G. Other

The Idaho Unemployment Insurance Division has significantly streamlined initial claims processing as well as increasing the use of technology to enhance integrity efforts.

Idaho was one of the pilot states in the Suspicious Actor Repository project (SAR)/Integrity Data Hub and as of April of 2017, matches 100% of all new and continued claims against the Integrity Data Hub database.

Idaho participated as one of the pilot states in the UI Self-Assessment project and now that that project is complete, Idaho has completed the self-assessment and is now working on year two.

Idaho has no requests for technical assistance at this time.

H. Assurances:

The Idaho Department of Labor certifies we will comply with the assurances listed below:

a. Assurance of Equal Opportunity (EO).

b. Assurance of Administrative Requirements and Allowable Cost Standards.


d. Assurance of Program Quality.

e. Assurance on Use of Unobligated Funds.


g. Drug Free Workplace (29 CFR Part 98).

h. Assurance of Contingency Planning:

Information Technology (IT) Contingency Plan Implemented: In March 2006, the Idaho Department of Labor published a major release of its Disaster Recovery Plan which is the basis for the plan in its current state.

IT Contingency Plan Reviewed/Updated: The plan is reviewed annually, particularly since the State of Idaho requires the Idaho Department of Labor to coordinate its contingency plan efforts with the Idaho Office of Emergency Management. The plan was reviewed and updated in March 2021 and will be reviewed annually again in March 2022.

IT Contingency Plan Tested: The Idaho Department of Labor’s most recent test of contingency recovery procedures was conducted in June 2021. In addition, a tabletop training exercise is scheduled for November 2021.

The Idaho Department of Labor certifies the state will comply with the assurances listed below:

i. Assurance of Conformity and Compliance.

Idaho Department of Labor assures that it complies in all areas of Conformity and Compliance.


Idaho Department of Labor assures that it complies in all areas of Automated Information Systems Security.

Risk Assessment Conducted: In October 2021, the Idaho Department of Labor began a qualitative and quantitative risk analysis. This is scheduled for completion in early 2022.
System Security Plan Reviewed/Updated: In August 2019, the Department of Treasury, Internal Revenue Service, Department of Safeguards, preformed their triennial IRS Publication 1075 audit of the Department during which a review of Risk Assessment and System Security Plan was conducted.

k. The Idaho Department of Labor certifies we will comply with the Assurance of Confidentiality.

4. Corrective Action Plans (CAPs)

CAPs are expected as a part of the SQSP when State’s annual performance does not meet the established criteria for core measures, Secretary’s Standards, UI program, assurances, and other program deficiencies identified in the annual SQSP guidance provided by the Department. The CAP must list both specific milestones for key corrective actions or improvement activities, and the completion date for each milestone.
5. UI Program Integrity Action Plan (UI IAP)

The UI IAP outlines the strategies the State will undertake during the planning period regarding the prevention reduction and recovery of UI improper payments.
# Alternate UI Integrity Action Plan (IAP)

## Federal Fiscal Year 2022

<table>
<thead>
<tr>
<th>State</th>
<th>Federal Fiscal Year</th>
<th>Accountability Agency Official(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Idaho</td>
<td>2022</td>
<td></td>
</tr>
</tbody>
</table>

### Top Three Root Causes (Calendar Year 2020)

<table>
<thead>
<tr>
<th>Root Cause</th>
<th>Description</th>
<th>Calendar Year 2020</th>
<th>Calendar Year 2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benefit Year Earnings</td>
<td>25.6%</td>
<td>48.6%</td>
<td></td>
</tr>
<tr>
<td>Separation Issues</td>
<td>1.0%</td>
<td>10.6%</td>
<td></td>
</tr>
<tr>
<td>Other Eligibility</td>
<td>1.0%</td>
<td>10.6%</td>
<td></td>
</tr>
</tbody>
</table>

### National Priority Strategies

- Benefit Year Earnings
- Separation Issues
- Other Eligibility

(If these areas are addressed in the top 3 root causes, there is no need for duplication)

### Work Search

<table>
<thead>
<tr>
<th>Strategy</th>
<th>Actions</th>
<th>Targets &amp; Milestones</th>
<th>Resources</th>
</tr>
</thead>
<tbody>
<tr>
<td>UI Focus Group</td>
<td>BOC II Integrity Focus Group</td>
<td>Reduce the improper payment rate with respect to benefit year earnings. Multiple recommendations to management.</td>
<td>UI Staff/WAB Staff</td>
</tr>
<tr>
<td>Management Review</td>
<td>Management will review the focus group's recommendations and if the recommendations are viable, develop plans for implementation.</td>
<td>UI Management</td>
<td></td>
</tr>
<tr>
<td>Additional</td>
<td>Offer UI staff in regions the benefit year earnings BOC II train and provide guidance.</td>
<td>UI Staff</td>
<td></td>
</tr>
</tbody>
</table>

### Six-Month (October-March) Update: Please provide a detailed update on the integrity strategies identified for the above root cause, including information on any changes in strategies, delays, positive outcome, and identified outcomes.

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<tr>
<td>UI Focus Group</td>
<td>BOC II Integrity Focus Group</td>
<td>Reduce the improper payment rate with respect to work search. Multiple recommendations to management.</td>
<td>UI Staff/WAB Staff</td>
</tr>
<tr>
<td>Management Review</td>
<td>Management will review the focus group's recommendations and if the recommendations are viable, develop plans for implementation.</td>
<td>UI Management</td>
<td></td>
</tr>
<tr>
<td>Additional</td>
<td>Offer UI and Work Force staff to discuss the work search base and provide guidance.</td>
<td>UI Staff/Work Force Staff</td>
<td></td>
</tr>
</tbody>
</table>

### Six-Month (October-March) Update: Please provide a detailed update on the integrity strategies identified for the above root cause, including information on any changes in strategies, delays, positive outcome, and identified outcomes.

### Work Search Strategies

<table>
<thead>
<tr>
<th>Strategy</th>
<th>Actions</th>
<th>Targets &amp; Milestones</th>
<th>Resources</th>
</tr>
</thead>
<tbody>
<tr>
<td>Technology</td>
<td>Develop and/or implement training for work search documentation and completion processes</td>
<td>UI Staff/IT Staff</td>
<td></td>
</tr>
<tr>
<td>Verification</td>
<td>Conduct on-site and offsite verifications of work search activities conducted by the claimant</td>
<td>UI Staff/Claims</td>
<td></td>
</tr>
</tbody>
</table>

### Six-Month (October-March) Update: Please provide a detailed update on the integrity strategies identified for the above root cause, including information on any changes in strategies, delays, positive outcome, and identified outcomes.
6. Organizational Chart

The organization chart must conform to the requirement for delivery of service through public employment offices, or such other designated providers as the Secretary may authorize; show the State’s configuration from the Governor of the State down to the point of Employment Service and UI customer service delivery; and provide sufficient detail to show each organizational unit involved and the title of the unit manager.
7. SQSP Signature Page

The State administrator must sign and date the SQSP Signature Page. By signing the Signature Page, the State administrator certifies that the State will comply with all the assurances and activities contained in the SQSP guidelines.

Though a State needs to submit the complete SQSP package on a 2-year cycle, there are certain documents contained in the SQSP package which are required to be submitted by States annually as part of the off-year submission. The documents which are required to be submitted annually are considered a modification to the complete SQSP submitted the previous year. Since funds for State UI operations are appropriated each year, each State is required to annually submit the transmittal letter, budget worksheets, organizational chart and the signature page. The modification may also include CAPs for new identified performance deficiencies, and any required modifications to existing CAPs.

Since the UI program is a required one-stop partner, States have the option of including UI in the Combined State Plan authorized by WIOA sec. 103.
b. Requirements for States electing to include UI in the Combined State Plan

States that elect to include UI in the Combined State Plan must:

1. Submit an SQSP in the following manner depending on their timing in the SQSP cycle:
   A. If a State is in the first year of their 2-year cycle, the State is required to submit the most recently approved complete SQSP package. A complete SQSP package will include the Transmittal Letter, Budget Worksheets/Forms, State Plan Narrative, CAPs (including the milestones and the completion date for each milestone), the UI IAP, Organizational Chart, and the SQSP Signature Page. One of the
key goals for the UI program is to ensure that claimants are able to successfully return to work. As such, the SQSP State Plan Narrative must provide a discussion of the plan coordination with other WIOA Combined Plan programs to ensure a coordinated effort and integrated service delivery.

Idaho is in the second year of the 2-year cycle as such the required documents are submitted in the appropriate sections.

B. If a State is in the second year of the 2-year cycle, the State is required to submit the most recently approved complete SQSP package with a modification that must include the Transmittal Letter, Budget Worksheets/Forms, Organizational Chart, and the SQSP Signature page. The modification may also include CAPs for new identified performance deficiencies, and any required modifications to existing CAPs. The CAP must list both specific milestones for key corrective actions or improvement activities, and the completion date for each milestone.

Idaho is in the second year of the 2-year cycle as such the required documents are submitted in the appropriate sections.

2. Submit the required off-year SQSP components as a modification to the Combined State Plan on the same cycle as the regular SQSP process which must be approved by September 30th each year

Idaho is in the second year of the 2-year cycle as such the required documents are submitted in the appropriate sections.