OMB 1205-0245: JUSTIFICATION PART A
SUPPORTING STATEMENT FOR REQUEST FOR OMB APPROVAL
UNDER THE PAPERWORK REDUCTION ACT

PART A. JUSTIFICATION.

This is a justification for the Department of Labor's (Department) request for an extension of the Benefit Accuracy Measurement (BAM) program, which generates estimates of Unemployment Insurance (UI) payment or denial of benefit accuracy. It is authorized by regulation at 20 CFR 602. Attachment A contains the relevant sections of the Social Security Act on which the regulation is based. Furthermore, the Improper Payments Elimination and Recovery Act of 2010 (31 U.S.C. 3321 note) mandates federal agencies to employ data collection activities, such as the BAM program, to produce a statistically valid estimate of the improper payments. The BAM program, which has been approved by the Director of the Office of Management and Budget (OMB), is the Department's process for generating improper payment estimates.

A-1. Reasons for Data Collection

The BAM program consists of two comprehensive reviews: Paid Claims Accuracy (PCA) and Denied Claims Accuracy (DCA). States conduct intensive audits of statewide random samples of UI payments and denials to determine their accuracy. The Department provides State Workforce Agency (SWAs) with software to edit the sampling frame files and select the weekly PCA and DCA samples.

One purpose of BAM is to reduce waste, fraud, and abuse in the UI program. By investigating small representative weekly samples of paid and denied UI claims, it enables each State Workforce Agency (SWA) to estimate reliably the number of proper and improper payments (i.e., overpayments and underpayments) and denials, their rates of occurrence, and their types, causes, and responsibilities. For paid claims, BAM also estimates the dollar value and rate of improper payments. BAM PCA and DCA audits also provide information that can be used for program improvement, including the type of payment error, error cause, responsible party, point of detection within the system, and the actions of the claimant, employer, and agency prior to the BAM investigation.

In order to ensure uniformly thorough findings, all jurisdictions are required to apply the same BAM investigative methodology and coding instructions and to compile and report their data through the same automated data system. These are specified in Employment and Training (ET) Handbook 395, Benefits Accuracy Measurement State Operations Handbook, 5th edition[1]. The process includes the use of standardized claimant and employer questionnaires. All areas of eligibility are explored that could directly affect the randomly selected payment (known as a key week) or a denial of benefits. The investigator must conduct new and original fact-finding on newly arising issues or on previous issues not adequately adjudicated. Additionally, the investigator must independently verify established facts in instances where previously resolved issues or payment adjustments appear to have been handled properly. This includes the entire period between the benefit year begin date and the Key Week end date. States' written laws and policies are the bases for all determinations.   All conclusions pertaining to the Key Week or denial, that are drawn from the BAM process, must be formalized in official agency actions if errors are found, except where prohibited by SWA provisions such as finality.

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[1] http://wdr.doleta.gov/directives/attach/ETHandbook_395_Ch5_acc.pdf

The BAM program has undergone many changes over the years. The original BQC program was the outgrowth of the Random Audit (RA) program, which operated from 1981 to 1985. The BQC program was implemented voluntarily in 1986 and became mandatory for 52 SWAs -- all but the Virgin Islands -- on October 5, 1987.

Originally, all case investigations were required to be conducted in person. In July 1993, SWAs were allowed to conduct certain portions of a case investigation by mail, telephone or fax. Beginning in 1997, they could exercise complete discretion in how case investigations were conducted. Also in 1997, to give states increased ability to conduct program improvement activities, the Department reduced minimum allocated paid claims sample sizes to 360 in the 10 states with the smallest UI workload (in terms of UI weeks paid) and 480 cases in other states. States can choose to select and investigate larger samples, and some do so. In 1996, the Department removed its requirement that SWAs release their BAM data to the public independently of the Department's public release of the data, based on the recommendation of the Federal-State workgroup that produced a framework for the Department's performance management system, UI Performs. Beginning in August 2001, BAM was modified to include the sampling and investigation of UI claims denied for monetary, separation, or nonseparation issues. Effective January 2008, states were required to match BAM paid claims with the National Directory of New Hires (NDNH).

Paid Claims Accuracy

BAM paid claims accuracy is the means by which the UI system assesses the accuracy of UI benefit payments. Each week a random sample is selected of both intrastate and interstate original payments (including combined wage claims) made for a week of unemployment under the State UI, Unemployment Compensation for Federal Employees (UCFE), and Unemployment Compensation for Ex-servicemembers (UCX) programs. A sample of 360 cases per year is pulled in the ten states with the smallest UI program workloads (in terms of average annual UI weeks paid for the most recent five-year period) and 480 cases per year in the other states. State BAM staff audit each selected claim, examining all aspects of a claimant's eligibility to receive unemployment compensation (UC) during the sampled week. In their investigation, staff verify wages used to establish monetary entitlements, the claimant's reason for being unemployed, efforts to find work during the week and any other factors which would have affected the claimant's entitlement to a benefit during the sampled week or the amount of the benefit paid.

Denied Claims Accuracy

States investigate BAM denied claims cases to determine claimant eligibility for UI payments in three broad areas: monetary determinations, separation determinations, and nonseparation determinations.

- A monetary determination is made when a claim is initially filed (or when a claim is made to establish a new benefit year) to verify that the claimant has sufficient wage credits in the base period and has satisfied other monetary requirements to demonstrate attachment to the labor force.

- A separation determination is made when the claim is initially filed or when an additional claim is filed in the claimant's benefit year after a period of intervening employment.

Separation determinations evaluate whether the claimant's unemployment is involuntary and through no fault of the claimant.

- A nonseparation determination verifies that the claimant is meeting the eligibility requirements of state law for a specific week of unemployment: the claimant was able to work, available for work, actively sought work, and received sufficiently little income in the week to be considered "unemployed".

Investigation of BAM denied claims follows the paid claims case investigation methodology. It evaluates denials accuracy by investigating random samples of each of the three types of denials. The Department has supplied each SWA with software that performs quality assurance edits of the sampling frames and randomly selects the BAM denied claims samples. The information on which the decision to deny benefits was made is verified by reviewing agency records, interviewing the claimant and contacting employers and other involved parties. All states sample a minimum of 150 cases of each type of denial in each calendar year. State BAM staff review agency records and contact claimants, employers, and all other relevant parties to verify information in agency records or obtain additional information pertinent to the determination that denies eligibility. Unlike the investigation of paid claims, in which all prior determinations affecting claimant eligibility for the compensated week selected for the sample are evaluated, the investigation of denied claims is limited to the issue upon which the denial determination is based.

States code the findings of their PCA and DCA investigations in a database that is maintained on a computer located in each SWA. The Department stores copies of these state databases (excluding personally identifiable information) in a database maintained by the ETA Office of Unemployment Insurance (OUI). The Department publishes annual performance results on the ETA Web site. The most recent report is for the calendar year 2010 results: http://oui.doleta.gov/unemploy/bam/2010/bam-cy2010.pdf.

A-2. Users, Purposes, and Consequences of Failure to Collect the Information

The Department uses BAM data to measure state performance with respect to UI payment integrity and to meet the Department's reporting requirements of the Improper Payments Information Act (IPIA), Improper Payments Elimination and Recovery Act (IPERA), and the Government Performance and Results Act (GPRA). SWAs use both paid claims and denied claims data to evaluate the quality of their existing UC claims processes. It enables a SWA to meet its primary objective of strengthening the controls that prevent errors and/or fraud and abuse in the payment and denial of UI benefits.

The data collected in accordance with prescribed BAM methodology provides national and SWA administrators with accurate measurements of the rate of proper and improper payments and denials, the reasons for improper payments and denials, and who is responsible for them. Identification of specific types, causes, and responsibility for errors provides information about the effectiveness of state programs and the quality of their underlying policies, thereby serving as a basis to improve and strengthen program operations. BAM data can lead state and national program managers to make significant program improvements resulting in dollar savings, and continuing benefit payment integrity.

The Department's National and Regional Office UI staff use the BAM data to provide technical assistance to state UI programs. The data are also used as part of the Department's policy

analysis and policy formulation functions, and are an essential component of UI Performs, the Department's performance management system.

UI Performs promotes continuous improvement in UI performance through the establishment of core performance measures and acceptable levels of performance (ALPs). One of these core measures, Overpayment Detection, includes BAM data. Under UI Performs, state and Federal staff work cooperatively to identify areas of UI programs that need improvement and develop appropriate plans through the annual State Quality Service Plan (SQSP). The Department believes that the SQSP mechanism is the most effective method for drawing attention to all performance deficiencies and providing opportunities to plan for improvements.

In September 2011, the Department established a new performance measure for states to meet reduction targets for overpayments attributable to claimants continuing to claim UI benefits after they have returned to work. BAM data will be used to measure state performance for this measure. In February 2012, the Department proposed an additional performance measure for states to meet the IPERA integrity rate target of less than10 percent. The Department plans to issue final guidance for this measure during the third quarter of FY 2012. BAM data will be used to measure state performance for this measure.

A-3. Technology and Obstacles Affecting Reporting Burden

In order to comply with the Government Paperwork Elimination Act, the BAM program uses an automated system for data collection, transmission, and retrieval that utilizes state-of-the-art information processing technology. This system was designed to maximize the use of data elements that are already collected by the SWAs for processing UC claims thus minimizing the amount of additional effort required to collect this information. Therefore, as part of the automation process, the SWA may import many of the "before audit fields" used in evaluating payment or denial accuracy.

The Department has provided each SWA with a Sun computer and recently upgrading state systems with a Sun T2000 computer. The Department also provides states with an Informix relational database and applications software to enter, store, transmit, and retrieve BAM paid claims and denied claims data. Personal identifiers such as Social Security numbers (SSNs) are stored in the SWAs' databases but are not transmitted to the Department.

The Department knows of no technical obstacles to operating the BAM program.

A-4. Duplication.

The BAM program does not duplicate any other UI reporting system. No other program involves the intensive case investigation of information for a sample of paid and denied claims through contacts with claimants, employers and third parties. The Department is not aware of any alternative to selecting samples of payments using a standard sample selection program, and validating information for measuring payment accuracy.

A-5. Burden on Small Business or Other Small Entities

There is a minor impact on small businesses. Although the formal respondents are SWAs, many of the employers contacted in the course of BAM case investigations are small businesses. Most contacts require less than an hour of an employer's time. Because the number of both paid and denied claims cases investigated average from 810 cases per year for

the ten states with the smallest claims loads to 930 cases per year for the remaining 42 states, the likelihood that any small employer will be contacted more than once in a year is very small.

A-6.   Consequences of Less Frequent Data Collection

To reflect the unemployment insurance program which makes an initial eligibility determination and then verifies continuing eligibility through a weekly certification process, BAM samples are drawn weekly and investigated on an on-going basis. The data are entered into the database as case investigations are completed. The Department runs a program each night to pick up any changes in the SWAs' databases. The current frequency of the data collection is necessary to ensure the quality and integrity of the data for several reasons.

First, because sampling frames (populations) are assembled and samples are drawn weekly, sample and population characteristics can be compared to determine the representativeness of the samples and the integrity of the sampling frames. The Department has developed software which the Department and the SWAs use as a quality assurance tool. If flaws in the sampling procedure or population files are discovered, action can be taken immediately. If data were collected less frequently, any problems related to the collection process could compromise the integrity of the data. Useable information for the period affected would be lost, and important program management information would not be available until the next data collection period.

Second, experience in the BAM program has demonstrated that the review of completed cases is more accurate and efficient the sooner it occurs. State staff recall on questioned points is better, as is the quality of data derived from field investigations. Confidence in the use of BAM data depends in part on knowing the data have been reviewed promptly and thoroughly. The Department has established case completion standards (ET Handbook 395, chapter VI, p. 11, and chapter VIII, p. 2), requiring states to complete 70 percent of their paid claims cases (and 60 percent of their denied claims cases) within 60 days of the week ending date of the sampling week and to complete 95 percent of their paid claims cases (85 percent of denied claims cases) within 90 days.

As noted above, BAM paid claims and denied claims are important parts of the UI Performs management system, which promotes continuous improvement in UI operational performance. The value of quality assessment information is directly related to its timeliness. Quality assessment systems must provide immediate feedback about problems that have been detected in order for system administrators to respond with corrective actions. Continuous data collection also enables program managers to evaluate the effectiveness of continuous improvement initiatives. The Department believes that because the UC system functions continuously, management information systems such as BAM, which monitor system quality, must reflect the characteristics of the operations they are evaluating. Sporadic or periodic collection of quality data will not meet these program management requirements.

A-7. Special Circumstances Involved in Collection of BAM Data

• In addition to the circumstances noted in A-6 above, it should be noted that weekly sampling and continuous data collection impose no added reporting burden on the states, since the states' ADP systems are accessed overnight by the ETA OUI computer through automated data pick-up procedures.

• There is no requirement in the program to prepare written responses to a collection of information in fewer than 30 days; submit multiple copies of documents; or retain records for more than three years.

• The program is intended to produce statistical results that can be generalized (projected) to the population.

• All data classifications have been approved by OMB.

• Individuals and businesses contacted through the BAM program are not required to submit proprietary information or trade secrets.

A-8.   Preclearance Notice and Responses.

The Department's preclearance notice was published in the Federal Register on September 6, 12012, for a 60-day comment public comment period (Vol. 77, p. 54927). No comments were received.

A-9.   Payments to Respondents.

Because the BAM program is a mandated data collection program, the Department provides funding to the participating states, which are the primary respondents.   Persons contacted in the course of the case investigation, which are secondary respondents, do not receive payments or gifts.

A-10.   Confidentiality

All states' laws must conform to 20 CFR 603 (Federal-State Unemployment Compensation (UC) Program; Confidentiality and Disclosure of State UC Information). The BAM State Operations Handbook (ET Handbook No. 395, chapter VI) requires that, "States' written laws and policies are the bases for all determinations. Written policy is that policy that is distributed SWA-wide and, upon request, may be made available to the public." Questionnaires supplied to the claimant include the following statement:
"Your responses are subject to state confidentiality statutes, which must conform to Federal regulations (20 CFR Part 603). State and Federal agencies safeguard the confidentiality of the BAM information by:
       1) using the information only for purposes of verifying claimant eligibility for UC and
       identifying general descriptive characteristics about the Unemployment Insurance
       program;
       2) permitting access to the information by only authorized persons;
       3) ensuring that the physical and electronic storage of the information is secure; and
       4) publishing the results of the BAM audits in a format that precludes the identification of
       any individual providing the information."

Respondents to the BAM data collection are informed that their responses are subject to state confidentiality statutes and that the Department will publish or disseminate data at a level of aggregation that will preclude the identification of individual respondents.

The Department maintains strict controls over the data gathered through the BAM program. The Department cannot identify an individual claimant from the BAM case in its database; the Federal BAM case record does not contain either the claimant's name or SSN. Although the

state data record contains the SSN, this field is not included when the case is uploaded to the Federal database. Users outside the state thus cannot identify individual claimants.

BAM data are published at the state and national level of aggregation. Statistics for population subgroups and characteristics are published for broad categories of UI program characteristics, such as the types of erroneous payments and improper denials, and the causes, responsible parties, and detection points of erroneous payments and denied claims.

A-11. Questions of a Sensitive Nature

The data collection instrument includes no questions of a sensitive nature.

A-12. Respondents' Burden and Cost of Collecting Information

The total burden comprises activities related to collecting and reporting the BAM paid and denied claims data. It is calculated as the sum of time spent by state staff to prepare for each case, review pertinent records, set up and conduct interviews and other fact finding efforts, review and record the data, and to report the findings within the state agency. Although there is no payment made to these individuals, it also includes the time the claimants, employers and third parties spend providing information to the state investigators. Each SWA will select and investigate an average sample of 457 paid claims and 150 each of denied monetary, separation and nonseparation claims.

The investigation of BAM paid and denied claims involves 3,445 respondents and a total of 9,154.1 burden hours, for each state, as shown below.

BAM PCA / DCA Data Collection Burden Per State

	Paid Claims	Monetary Denied Claims	Separation Denied Claims	Non-separation Denied Claims	Total
Cases	457*	150	150	150	907
Respondents/Case	4.65	3.10	3.10	2.6	3.80
Hours/Case	12.59	7.85	7.85	6.97	10.09
Total Respondents	2125.1	465	465	390	3445.10
Total Hours	5753.6	1177.5	1177.5	1045. 5	9154.1

* Average for all 52 states. The 10 smallest states in terms of UI weeks paid sample at the rate of 360 cases per year; the other 42 states sample at the rate of 480 cases per year.

The total response burden for both paid and denied claims and the 52 SWAs is:

52 SWAs X 3,445.1 respondents = 179,145.2 respondents
52 SWAs X 9,154.1 hours = 476,013.2 hours

These estimates are based on the following data:

Respondents/ Case

For paid claims, based on FY 2011 BAM paid claims data, each case involves one state investigator, one claimant, 1.51 base period employers, 1.13 work search contacts, and occasionally a third party such as a school or labor union (average contacts: 0.1).

All denied claims investigations involve one state investigator and one claimant. Based on FY 2011 BAM paid claims data, each monetary denial investigation involves approximately 1 base period employer; there is usually one separating employer; and nonseparation eligibility issues usually involve one employer and occasionally a third party such as a school or labor union (average contacts: 1.1).

Hours/Case

For paid claims, SWA investigators spend 6.63 hours[2], on average, to complete a BAM paid claims investigation, with an additional 3.56 hours for coding and entering data into a computerized database, reviewing completed cases, communicating findings within the state, and transmitting the data to the Department, for a total of 10.2 hours per investigation.

For denied claims, the average time of completion and transmitting data by type of denial are: monetary denials - 6.85 hours; separation denials - 6.85 hours; and nonseparation denials - 6.47 hours.

Claimant, employer, and third party responses are approximately 1.0 hours per response per paid claim and approximately 0.50 hours per response per denied case.

The Department estimates that the total cost of data collection and reporting for BAM paid and denied claims is $295,196 per state. It is computed as follows:

SWA staff

For paid claims, the Department estimates that the net burden investigating, collecting and transmitting the BAM information requested in this justification will be approximately 10.2 hours per case per year based on an allocated sample 23,764 cases, or an average of 457 cases per SWA. At the average rate of $43.16 per hour (based on the $75,774.62[3] and 1,755.71 hours per year the Department uses to compute UI state agency staff costs in FY 2012), the annual per state cost of the BAM paid claims burden for investigating, record keeping and reporting costs is:

> 10.2 hrs. X $43.16 X 457 = $201,186.02.

For denied claims, the Department estimates that the net burden will be approximately 6.72 hours per case for 450 cases at the average rate of $43.16 per hour the Department uses to compute UI staff costs (based on $75,774.62 and 1,755.71 hours per year):

> 6.72 hrs. X $43.16 X 450 = $130,515.84

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[2] 41.3% of claimant and employer interviews are conducted over the phone, therefore involve investigator time
[3] Includes Personal Services/Personnel Benefits

The cost for SWA staff for BAM paid and denied claims is $331,701.86 per state. Total cost for 52 SWAs is $17,248,496.93. Federal budget allocations cover these costs, as they cover the costs of other UI operations.

Claimants

For paid claims, the per-claimant cost estimate is based on the current federal minimum wage of $7.25 and an estimated 0.5 hours to complete the claimant interview. The estimated claimant cost is:

1 hr. X $7.25 X 457 cases = $3,313.25 (per state) x 52 states = $172,289.

Based on the 1987 and 1997-98 DCA pilots, it is assumed that half of the claimants denied UC would be employed by the time they are contacted by the DCA investigator; an hourly rate of $14.64 was estimated from the FY 2011 BAM data. The minimum wage of $7.25 was used for the other half of the claimants, who were assumed to be still unemployed at the time of the DCA interview:

0.5 hrs. X $14.64 X 225 = $1,647
0.5 hrs. X $7.25 X 225 = $816

The cost for denied claimant response is: 52 X ($1,647 + $816) = $128,076. The total cost for claimants responding for both paid and denied claims is $300,365.

Employers and Third Parties

For paid and denied claims, an average hourly rate for employer and third party respondents is estimated to be $25.33[4], based on the Bureau of Labor Statistics Occupational Employment Statistics survey (2010 Median Pay) for Human Resources and Labor Relations occupations. On average, 1.2 employers, 1.1 work search contacts, and 0.1 third parties respond per BAM paid claims case (estimated response time of 1.0 hours for base period and initial separation, 0.55 hours for benefit year separation/benefit year earnings and work search verification, 0.05 hours not an interested party/No info.):

1.0	hrs. X	$25.33	X	1.2	X	457	$13,890.97	Per state X 52	$722,330.54
0.55	hrs. X	$25.33	X	1	X	457	$6,366.70	Per state X 52	$331,068.17
.05	hrs. X	$25.33	X	0.44	X	457	$144.70	Per state X 52	$7,524.28

On average, 1.2 employers respond per BAM denied monetary claims cases; one employer per BAM denied separation cases, and 0.44[5] employers and third parties respond per BAM nonseparation cases:

0.5	hrs. X	$25.33	X	1.2	X	150	$2,735.64	Per state X 52	$118,544.40
0.5	hrs. X	$25.33	X	1	X	150	$1,899.75	Per state X 52	$98,787.00
0.5	hrs. X	$25.33	X	0.44	X	150	$835.89	Per state X 52	$43,466.28

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[4] Does not include Personnel Benefits
[5] Many nonseparation cases are single party issues (e.g. the employer is not involved, although he may be an interested party.

Total cost for employers and third parties is $1,321,720.67.

Costs are summarized in the following table.

Cost Summary	Paid Claims	Denied Claims	Cost Per State	Cost - All States
SWA Staff	$201,186.02	$130,515.84	$331,701.86	$17,248,497
Claimants	$3,313.25	$2,463	$128,076	$300,365
Employers + 3rd Parties	$20,402.67	5,015.34	$25,418.01	$1,321,720.67
Total All Costs	$224,901.94	$137,994.18	$485,195.87	$18,870,582.59

A-13. Annual Cost to Respondents

No major equipment purchases or similar start-up costs are required for respondents, because federal UI administrative grants underwrite respondents' costs.

A-14. Annualized Federal Cost

Federal costs include the staff required to manage the BAM data collection and analyze the data and the maintenance the National Office computer system and database. The staff costs are summarized in the following table:

Federal Oversight GS-12 Grade step1	Locality Pay adjustment based on regional office location		Current 75% of time oversight (40% benefit package)
$60,274	24.80%	Boston	$78,983.05
$60,274	21.79%	Philadelphia	$77,078.09
$60,274	19.29%	Atlanta	$75,495.90
$60,274	20.67%	Dallas	$76,369.27
$60,274	25.10%	Chicago	$79,172.91
$60,274	35.15%	San Francisco	$85,533.33
$60,274	24.22%	National Office	$314,463.92
		Total	$787,096.47
Federal Oversight GS-15 Grade step 1		Management	Current 15% of time oversight (40% benefit package)
$99,628	24.80%	Boston	$26,110.51
$99,628	21.79%	Philadelphia	$25,480.76
$99,628	19.29%	Atlanta	$24,957.71
$99,628	20.67%	Dallas	$25,246.43
$99,628	25.10%	Chicago	$26,173.27
$99,628	35.15%	San Francisco	$28,275.92
$99,628	24.22%	National Office	$77,967.48
		Total	$234,212.08
		Grand Total	$1,142,908.55

Federal ADP costs to maintain the National Office computer and database are estimated to be approximately $130,000 annually.

Federal allocations to the SWAs also cover the costs in A-12 and A-13. There are no costs to the Federal government for the response time of claimants, employers, and third parties for the BAM case investigations.

A-15. Reasons for Change in Burden

The current total hour burden for both paid and denied claims and the 52 SWAs is:

52 SWAs X 3,445.1 responses = 179,145.2 responses averaged among 52 respondents
52 SWAs X 9,154.1 hours = 476,013.2 hours

This contrasts with the 2009 estimated burden for both paid and denied claims and the 52 SWAs which was:

52 SWAs X 3,634.3 responses = 188,983.6 responses averaged among 52 respondents
52 SWAs X 8,267.25 hours = 429,897 hours

The change reflects increased emphasis placed on gathering, verifying, and reporting payment accuracy information as mandated by law and regulation. Seventeen states provided information and feedback which was used in the revised burden estimates. The slightly downward change in the number of participants is based on calendar year 2011 data.

The Improper Payments Elimination and Recovery Act (IPERA) of 2010 (signed into law on July 22, 2010) require agencies to examine the risk of erroneous payments in all programs and activities they administer. IPERA defines "significant erroneous payments" as annual erroneous payments exceeding both 2.5 percent of program payments and $10 million. The UI program meets both of these criteria. Additionally, IPERA codifies the requirement for valid statistical estimates of improper payments such as those generated by BAM and compels actions to reduce improper payments. Furthermore, the "Revised Parts I and II to Appendix C of OMB Circular A-123" (issued April 14, 2011) requires additional efforts on the part of the states to obtain complete and accurate information used for estimation purposes. SWAs make all UI payment decisions. Therefore, the Department of Labor (DOL) is requiring SWAs to review their BAM improper payment data and report their planned activities to prevent, detect, reduce, and recover improper payments in an UI Integrity Action Plan.

A-16. Publication Information

The Department publishes an annual summary of results and analyses of BAM paid and denied claims findings for each state and nationally. This publication is available to the public on the ETA Web site http://oui.doleta.gov/unemploy/. The most recent BAM data available are for calendar year 2010 at http://oui.doleta.gov/unemploy/bam/2010/bam-cy2010.pdf.

A-17.   <u>Reasons for Not Displaying Date OMB Approval Expires.</u>

The Department intends to display approval information.

A-18.   <u>Exceptions to Certification.</u>

There are no exceptions to the certification statement in 83-I.