

LEGISLATIVE REPORT

ESSB 5193

Quarterly Report



October 2022

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INTRODUCTION

[ESSB 5193](#), regarding unemployment insurance claim adjudicators and system enhancements, requires the Employment Security Department (ESD) to provide a quarterly report. This covers the progress implementing the bill. The report is given to the House Labor and Workplace Standards Committee and the Senate Committee on Labor, Commerce, and Tribal Affairs. The bill also requires the department to produce a quarterly report on selected performance statistics.

After passage of ESSB 5193, members of the Joint Legislative Audit and Review Committee (JLARC) requested ESD report additional information quarterly. Narrative responses to the JLARC request are included in Part I. The statistical information is presented in Part II.

This report covers implementation and statistics for calendar quarter two, 2022.

Q2 2022 HIGHLIGHTS

- ESD eliminated a total of 720 non-permanent positions as pandemic funding expired. An additional 161 permanent staff who were on temporary assignments reverted to their permanent jobs.
- Average wait time for phone service was 13 minutes in June.

PART I

Implementation of ESSB 5193

ESD is making many changes and improvements to the unemployment insurance (UI) system to comply with [ESSB 5193](#). The department has divided implementation into five distinct projects:

- Reserve adjudicators
- Letters

- Advisory committee
- Phone lines
- Online data dashboard

This section contains a summary of ESD's progress on each of these projects.

Reserve adjudicators project

Section 2 of the bill requires ESD to “create a training program to prepare a reserve force of skilled unemployment insurance claims adjudicators who can be available quickly when claims volume demands.”

Q2 2022 update

ESD identified non-permanent staff hired during the COVID-19 pandemic as good candidates to receive nationally-recognized National Association of State Workforce Agencies (NASWA) adjudication certification training. Those staff will form the core of the reserve adjudicator pool.

As of June 30, 449 total staff completed full certification training and are eligible for the adjudicator pool. The total includes temporary employees who have left state service and are now private citizens, staff who have transitioned to other state agencies, and some permanent employees of ESD who could be assigned to adjudication duties.

ESD training staff started contract talks with the Health Care Authority (HCA) to train 50 staff in FY 23. Training will occur in phases with small groups. This allows HCA to maintain their own priority workloads as staff participate in training.

Letters project

Sections 3(1) and (2) of the bill require ESD to revise all materials related to specific claimant cases and perform user testing. The overall goal is to:

- Make materials easier for claimants to understand, and
- Meet legal requirements to provide claimants information about unemployment insurance eligibility decisions.

Q2 2022 update

UTAB, the UI benefits computer system, uses letter templates to provide customized letters. They give details on UI benefit eligibility decisions to every claimant. UTAB monetary determination and redetermination letter templates provide customized letters that explain:

- The total UI benefits available to a claimant.
- How much claimants will receive each week.
- Details about what wages are included in benefit calculations.

Revisions incorporating the results of stakeholder feedback and user testing were completed. They went into production as scheduled in April 2022. A second round of refinements is underway.

Text revisions and stakeholder review were completed on 105 monetary determination paragraphs. They hold customizable details about monetary determinations. User testing is the next step. Non-monetary determination template revisions were completed last quarter.

The letter revision team is now working on drop-in paragraphs that populate the template. Paragraphs provide detailed information about why a claimant is found eligible or ineligible to receive UI benefits.

The reevaluate claim content was revised and put into production in April 2022. The team received existing language and technical information on nine eligibility determination issues. Two are actively being revised:

- The weekly claim transfer issue, which is awaiting user testing.
- The separations issue, which covers complicated law around eligibility for claimants who quit or are discharged from employment.

There are over 300 paragraph variations for review and possible revision.

Advisory committee project – complete

Section 3(3) requires ESD to work with an unemployment insurance advisory committee comprising business and worker advocates to explore:

- Trigger thresholds to adjust staff for assignments and phones.
- A pilot for having caseworkers help claimants with their claims and re-employment services.
- Identifying next steps for translating written UI materials into other languages.
- Frequency of the initial and continuing adjudicator training.

ESD completed legislatively required consultations with the:

- Equity, diversity and inclusion subcommittee of the Employment Security Advisory Committee (ESAC).

- Unemployment Insurance Advisory Committee (UIAC) in previous quarters.

Consultation with stakeholders and community-based organizations will continue through a reconstituted UIAC and ESD's Pro-Equity Anti-Racism (PEAR) committee. This will be essential to our ongoing engagement with stakeholders. Consultation with the new UIAC include discussions on the frequency of adjudication training, which was omitted in error from previous agendas.

Phone lines project

Section 3(4) of the bill requires ESD to establish dedicated toll-free phone lines for claimants with:

- A lack computer skills or without access to computers.
- Disabilities.
- Limited English proficiency (LEP).

Q2 2022 update

Work on dedicated phone lines for claimants with disabilities and claimants with limited English proficiency was completed in fourth quarter 2021.

The implementation team continues to identify options to assist claimants who lack computer skills or access. ESD ran a pilot project with a select group of claimants who told us that they struggle with technology. ESD interviewed them, monitor their experience and provide proactive assistance with accessing benefits. It was completed in the second quarter.

Data analysis on the pilot group was completed. The pilot review team requested additional data on a comparison group of claimants who successfully use technology. This will help ESD identify differences in UI eligibility issues and time to resolve the issues. Both data sets will inform interim solutions to help these claimants. They will also help with feature design in ESD's major phone replacement project scheduled for implementation in March 2023.

Online data dashboard project - complete

Section 4 of the bill required ESD to create an online data dashboard and provide a quarterly written report on specific performance metrics. The agency included additional metrics on the dashboard in response to a request from the Joint Legislative Audit and Review Committee (JLARC).

The [dashboard](#) was completed in Q4 2021.

Program and funding update

Section 5(b) requires ESD to provide updates on any new federal programs or funds received by the department for unemployment compensation and administration. Updates must cover the use of such funds.

Q2 2022 update

As previously reported, ESD completed phased staffing reductions through a combination of attrition and layoffs by April 30 as supplemental funding ended from the United States Department of Labor (USDOL). A total of 720 non-permanent positions were eliminated. An additional 161 permanent staff who were on temporary assignments reverted to their permanent jobs.

ESD receives a federal fiscal year base funding grant to cover administrative costs of the UI program. In the second quarter, USDOL informed all states that it was revising its previously published funding targets, resulting in a roughly ten percent reduction from expected levels. For ESD, this was a reduction of \$8.6 million from the previously announced base funding amount. USDOL uses a workload funding formula to allocate additional quarterly funding over base funding levels. The state saw significantly reduced above base earnings in federal fiscal years Q1 and Q2. In Q3, the state did not generate enough workload to earn above base funding except for \$156,310 for Trade and Additional Benefit activities. Based upon the low national unemployment rate and the funding formula, further above base funding is not likely to be received in future quarters.

Despite the reduction in federal funding and returning staffing to pre-pandemic levels, ESD continues to work on pandemic-related claims maintenance. Tasks include:

- Manually processing overpayment waiver requests that could not be completed automatically.
- Moving weeks to correct entitlements.
- Correcting claims based on tax and wage report corrections.
- A small number of requests to retroactively backdate Pandemic Unemployment Assistance (PUA) claims.

New CARES Act work implementing additional federal requirements includes the Mixed Earners Unemployment Compensation (MEUC) which launched in April. MEUC retroactively provides supplemental benefits for claimants who worked for employers and had self-employment income. Through the end of the second quarter, ESD sent out nearly 21,000 applications to prospective claimants and has received over 2,600 applications back, a 13% response rate. Approximately 8% of applicants have been approved eligible for benefits.

Future work includes presenting revised PUA initial claims questions and revised weekly claims questions to past claimants. Claimants who answer the new questions differently will require new eligibility determinations.

Software and technology

Section 5(c) requires reporting on any software or technology issues related to claims processing, including any issues causing claim delays or inaccurate automated notifications.

Q2 2022 update

Implementation and administration of requirements for federally funded programs is ongoing. ESD also completed multiple technology tasks to transition to a new unemployment insurance banking vendor. Completed technology system enhancements, corrections and implementation of state and federal requirements include:

- Nine tasks in support of the bank transition project.
- Information requests to identify claims for follow-up processing and extra customer outreach on their claims.
- Thirty-four issues touching claims processing, including ten individual corrections to claims that were allowed a PUA backdate per federal regulations.
- Eleven corrections to claimant notifications.
- Six requests regarding payment delays.

Protecting sensitive data

Section 5(d) requires updates on the department's protocols and process for protecting sensitive data.

ESD continues to evaluate its options for updating unemployment claimant identity verification processes. The agency continues stakeholder discussions on options and mitigation strategies. Should the department decide to move ahead with a proposal that uses facial recognition technology in any form, the department will engage the statutory requirements described in RCW 43.386. Implementation of the identity verification project remains on hold as stakeholder engagement is underway.

Other unemployment reporting

Section 5(e) requires reporting other relevant unemployment issues or information related to enhancing the unemployment insurance system, as determined by the department.

ESD kicked off a new effort this quarter to address the large quantity of overpayments generated during the COVID-19 pandemic period. We are implementing federal guidance on

equity and good conscience determinations to waive as many overpayments as possible for individuals who would be severely impacted.

ESD will continue to address its workload on claims requiring corrections to past federal entitlements: processing MEUC claims and implementing federal requirements that PUA participants from 2020 respond to additional weekly eligibility questions.

JLARC-requested performance improvement plan

Improving adjudication timeliness and quality

JLARC requested details on steps taken to improve timeliness and quality of the adjudication decisions that allow or deny access to benefits.

Q2 2022 update

As noted in the Q1 2022 report, the pandemic-related backlog of cases awaiting adjudication was eliminated. As of July 1, a total of 5,143 cases were awaiting adjudication. Cases available to be addressed in the top five work queues with the most open cases – quits, school attendance, discharges, able and available for work, and work search – averaged less than a week to be completed.

A backlog remains in fraud-related work. As of July 1, the Fraud Division had 22,692 cases for investigation. There is an additional 5,392 work tasks to process that could potentially lead to investigations. Approximately 75% of that workload is pandemic related. The percentage of pandemic-related work increased from Q1 to Q2 because staff completed a large number of wage verification tasks. That resulted in new earnings cases covering date ranges during the pandemic. When ESD discovers claimants with unreported or under-reported earnings during weeks they claim UI benefits, a fraud investigation is started.

The Office of Administrative Hearings (OAH), the independent state agency that reviews UI eligibility, also continues to work through its large backlog of pandemic-related appeals. As of July 1, 34,000 appeals were awaiting scheduling for hearing.

See Part II, Adjudication timeliness and quality for further discussion on meeting federal standards.

PART II

ESSB 5193 Section 4(2) requires ESD to provide quarterly reports on selected unemployment insurance performance metrics. At the request of JLARC, ESD included additional performance metrics. The following tables contain data for April, May and June 2022.

Unemployment rate

The U.S. Bureau of Labor Statistics defines the total unemployment rate as the average number of unemployed workers 16 years of age or older actively seeking work divided by the total civilian labor force.

Table 1: Seasonally adjusted unemployment rates (2022)

Month	April	May	June
Unemployment rate	4.1%	3.9%	3.9%

Source: Employment Security Department, Labor Market & Economic Analysis/U.S. Bureau of Labor Statistics, local area unemployment statistics

Reciency rate

The unemployment insurance reciency rate is the number of individuals receiving unemployment compensation divided by the total number of people who are unemployed. These data come from the monthly seasonally adjusted local area unemployment statistics gathered in the federal Bureau of Labor Statistics survey. Unemployment compensation includes state unemployment compensation, unemployment compensation for federal employees, and unemployment compensation for ex-service members. The reciency rate does not include claimants receiving federally funded benefits in our calculation of total benefit recipients. As of Q1 2022, Washington's reciency rate for regular benefit programs ranked 23rd nationally. Q2 2022 comparison ranking was not available at the time of publication.

Table 2: Unemployment insurance reciprocity rates (2022)

Month	April	May	June
Reciprocity rate	21.1%	20.5%	21.9%

Source: ETA Report 5159 Claims and Payment Activities and Labor Market & Economic Analysis/U.S. Bureau of Labor Statistics, monthly seasonally adjusted local area unemployment statistics

Individuals and benefits paid

The following table counts the total number of unduplicated individuals paid per month and the total benefit they received from all unemployment insurance compensation sources. Most benefits paid were state-funded regular unemployment Benefits. The statistics also include some federal benefits paid for weeks claimed in previous periods that were allowed for backdated claims or for weeks paid on redetermined or appeals denials that were changed to allow benefits. Federal benefits include:

- Pandemic Emergency Unemployment Compensation (PEUC) - Allowed additional weeks of benefits for recipients.
- Pandemic Unemployment Assistance (PUA) - Provided benefits to workers not covered by traditional unemployment benefits.
- Federal Pandemic Unemployment Compensation (FPUC) - Provided weekly stimulus payments to all receiving benefits.

Table 3: Individuals paid and total benefits paid (2022)

Month	April	May	June	Q2 2022 Total
Individuals paid	45,049	38,732	36,938	
Benefits paid	\$84,286,485	\$73,155,039	\$76,298,182	\$233,739,707

Source: ESD operational data query

Initial eligibility. Unemployment insurance claimants file an initial application to establish eligibility for or disqualification from receiving benefits based on why they are no longer working. They then file a claim every week they seek benefits. Claimants found initially eligible will receive payment. If ESD questions a claimant's initial eligibility for benefits, the claimant receives no weekly payments until the eligibility issue is decided. Claimants ultimately found eligible will receive back payments for weeks filed while awaiting their adjudication decisions.

Conditional payments. In addition to establishing their initial eligibility, claimants must stay eligible while they're claiming. To do this, they must be able to work, available for work, actively seeking work, and following other program requirements, such as participating in eligibility reviews. Claimants certify in their claim each week that they continue to meet eligibility requirements. If ESD questions their eligibility, they continue to receive benefits (conditional payments) until the issue is decided. If ESD determines they were not eligible, claimants must pay back benefits received.

The table below shows the status of weekly claims filed by month. Because eligibility is determined each week and not for the entire benefit year, people may have weeks in all three categories. Aggregate totals for the quarter of April, May and June 2022:

- 68% of weeks claimed were paid.
- 31% of weeks claimed were not paid because the claimant was determined ineligible.
- 1% of weeks claimed were still pending a decision.

Table 4: Total weekly claims paid, pending and not paid (2022)

Month	April	May	June	Q2 2022 Total
Weekly claims paid	123,591	130,873	103,646	358,110
Weekly claims pending	500	847	3,431	4,778
Weekly claims not paid	56,488	58,202	48,497	163,187
Total	180,579	189,922	155,574	526,075

Source: ESD operational data query

Overpayments are established when ESD determines that a claimant received benefits when they shouldn't have, either because they were ineligible or paid an incorrect weekly benefit amount. Overpayments may be waived if all three of the following conditions are met:

- The claimant was not at fault for creating the overpayment.
- The payment was not "conditional" as ESD was determining eligibility.
- Collecting the overpayment would create a financial hardship.

When claimants are potentially eligible for a waiver, ESD offers a waiver request form that requests financial information from the claimant to determine their ability to pay. When ESD receives that completed form, an adjudication staff member determines if the claimant is eligible for a waiver. Under certain conditions, ESD may also automatically waive some overpayments without adjudication if the overpayment is not the claimant's fault. In response to specific federal authorization, ESD also automatically waives some overpayments created

when federal law required that claimants be moved between state and federal benefit entitlements that have lower weekly benefit amounts.

ESD created overpayments and waivers in second quarter 2022 as it continued enforcing federal requirements to move claimants to regular unemployment insurance claims and off federal entitlements. Table 5 shows overpayments established. For a variety of reasons, this total may overstate actual overpayments. Some of these overpayments were later reversed when claim weeks were moved back to other entitlements. Many claimants did not respond to requests to file a new claim (potential new claim issue) or provide PUA-required documents until after they received large overpayment notices. The totals established do not reflect overpayments that were later reversed after claimants complied and filed a new claim or submitted required documents, allowing ESD to redetermine their denials. There were also many overpayments created when claimants failed to respond to requests for information on other claim issues. These overpayments would be reversed if the claimant later provides information verifying eligibility for benefits.

A workgroup convened May 2022 to create and operationalize policies and procedures to address overpayments that occurred during the pandemic. Tasks for the workgroup include implementing waivers for CARES Act federal benefit overpayments that were authorized by USDOL, and updating Washington’s policies and rules on waivers. Overpayment waiver project work is ongoing.

Table 5: Overpayments by benefit entitlement (second quarter 2022)

Benefit type	Cases	Overpayments
Regular	11,099	\$18,542,476
FPUC	5,167	\$19,093,592
PEUC	2,122	\$4,920,275
PUA	2,794	\$7,197,228
Total	21,182	\$49,753,571

Sources: ETA Report 227 (Regular, FPUC, and PEUC), ETA Report 902P (PUA)

Table 6: Overpayment waiver requests and outcomes (2022)

Month	April	May	June	Q2 2022 Total
Approved	301	218	240	759
Denied	377	471	334	1,182
Total	678	689	574	1,941
Approval rate	44%	32%	42%	39%

Source: ESD operational data

Adjudication timeliness and quality

The USDOL requires that 80% of nonmonetary issues with the potential to affect a claimant's benefit rights be determined within 21 days of when the issue was detected. Timeliness is calculated for separation issues (quits and discharges from employment) and for all other non-separation issues that could potentially prevent benefit payments.

ESD exceeded federal targets for non-separation eligibility determinations in all three months of second quarter 2022, averaging 85% of determinations completed within 21 days.

ESD continues to fall short of targets on separation timeliness. ESD analyzed data from the previous two quarters to better understand the reasons for the shortfall, testing the idea that the identity verification process may be a primary factor for not meeting separation timeliness targets after the pandemic-related backlog in adjudication cases was completed.

ESD adjudicated 60,933 separation cases in Q4 2021 and Q1 2022. From October through January, staff were still working to clear the pandemic backlog. About one-third (33%) of separation cases were affected by an identity verification case. In 21% of those cases, adjudication received the case to work with no possibility of meeting the timeliness deadline because the eligibility issue was identified well before the identity issue was resolved. However, the impact of the backlog was the most important factor in low timeliness results for the period of October 2021 to January 2022. As the backlog was completed, identity delays had a stronger effect on overall timeliness. In February, 18% of cases completed had no possibility of being timely, increasing to 24% in March. Absent these effects, ESD would have met targets for March.

The same analysis was conducted for Q2 2022. Again, about a third (32%) of separation cases determined had an identity issue associated with the claim that could affect timeliness. The percent of cases with no possibility of being timely fell to 11% for the quarter. Absent identity

delays, ESD would have met timeliness targets in April. Layoff of temporary pandemic hires was complete in April and overall timeliness results were lower in May as staffing levels returned to pre-pandemic levels. Even factoring in the effects of identity delays, ESD would have missed targets by about 6% in May. Results for June were 38% below target. 12% of cases had no chance of being timely due to identity delays. The bulk of the remaining shortfalls is attributed to 17% of staff in mandatory training and lower productivity from trainees.

States across the country continue to fall well below targets. The U.S. national averages for adjudication timeliness in Q2 2022 were 40.3% for separations and 60.3% for non-separations. ESD exceeded the national average by 19 percentage points for separations, and 25 percentage points for non-separations in the second quarter.

Table 7: Timeliness of adjudication decisions – separations (2022)

Month	April	May	June	Q2 2022 Total
Total workload	5,357	4,894	5,067	15,318
Determined within 21 days	71.1%	64.8%	42.2%	

Source: ETA Report 9052

Table 8: Timeliness of adjudication decisions – non-separations (2022)

Month	April	May	June	Q2 2022 Total
Total workload	15,832	14,106	13,889	43,827
Determined within 21 days	84.8%	87.7%	83.9%	

Source: ETA Report 9052

Benefit timeliness and quality (BTQ)

The USDOL Benefit Timeliness and Quality (BTQ) program estimates overall quality of adjudication by reviewing a statistically representative sample of UI benefit eligibility determinations against 100-point scoring criteria. The standard requires that at least 75% of determinations reviewed receive a score of 95 or higher. Normally, ESD would enter a corrective action plan (CAP) with USDOL through our State Quality Service Plan (SQSP) if we did not meet the standard. However, because Washington (as well as many other states) was allowed to bypass BTQ for certain quarters during the pandemic, there is insufficient data to properly administer a CAP. All states were given an exception this year for SQSP and were not required to write new CAPs for any area that did not meet performance during the period of April 1, 2020, to March 31, 2021, used to measure SQSP baseline performance. BTQ has

resumed and we are tracking performance internally to ensure success of the program and that federal performance targets are met and maintained.

Separation and non-separation samples are scored separately. ESD met quality standards for adjudications completed in the quarter ending December 2019. BTQ reviews are typically done quarterly but were suspended for much of the pandemic. BTQ resumed for the quarter ending June 2021. Most recent results available are for the quarter ending March 2022.

Table 9: Quality of adjudication decisions

BTQ sample quarter ending March 2022	Separations	Non-separations
Sample size	50	50
Case material not found	0	0
Invalid cases*	5	7
Scored cases	45	43
Score	40.0%	79.1%

Source: USDOL Benefit, Timeliness and Quality

*Cases should not have been included in the sample for review.

Appeals

A claimant or employer can make a written request for a hearing to appeal an ESD determination. The Office of Administrative Hearings (OAH), an independent state agency, hears unemployment benefits appeals. ESD can transmit only one appeal to OAH per determination of an issue, although a claimant may submit multiple appeal requests on the same issue. ESD staff review appeal requests received via U.S. mail, fax, or eServices. Appeal requests have one of three outcomes:

Redetermined. The eligibility issue case associated with the appeal request has been reviewed by staff prior to being sent to OAH. The outcome has been redetermined to allow benefits based on new information.

No action taken. The request has been reviewed by staff who close the work item with no further action because the request is a duplicate, the request is moot because the requested relief has already been granted, or because the claimant is not an aggrieved party.

Sent to OAH. A formal request for an appeal hearing is sent by ESD staff to OAH after a staff review determines that the denial of benefits still stands or any of the relief requested in the appeal was not granted and thus the claimant is an aggrieved party.

The following table shows the status of appeal requests as of the date of the data extract. The requests are grouped by the month in which the request was received. For the quarter, 91% of the appeal requests have been resolved and 9% were pending resolution.

Table 10: Disposition of appeal requests (2022)

Month	April	May	June	Q2 2022 Total
Pending	482	526	513	1,521
Submitted to OAH	4,189	3,433	3,055	10,677
Redetermined	1,668	1,370	1,021	4,059
No action taken	209	158	116	483
Total	6,548	5,487	4,705	16,740

Source: ESD operational data

Claims center phone services and staffing

Claims centers track the number of calls answered by staff after the calls enter the phone system, the number of calls abandoned by customers after they enter the system, and the number of calls that are not connected because there is no capacity to handle the call. Because one person may make repeated calls, the number of individuals attempting to be served via the phone is also tracked. The tables below show:

Answered. Count of calls answered by an agent from queues for the following claims center units: intake, adjudication and SecureAccess Washington (SAW) portal help desk.

Abandoned. Count of calls abandoned by a customer from queues before being answered by an agent for the following claim center units: intake, adjudication and SAW portal help desk.

High call-volume messages. Count of calls (not customers) that are played a high-volume message asking the caller to try again later.

Total calls. High call-volume messages played + answered + abandoned.

Individuals. Individual callers (by count of unique Social Security number) attempting to speak with an agent during the day. This count includes both callers who received a high-volume message and callers who entered the phone system. Individuals are counted once each day they attempt to call, and multiple times if they call over several days.

Average wait. For all calls answered in all call queues, the average time a call remains in queue until answered by a claims center staff member.

Staffing reductions due to the expiration of federal funding resulted in far fewer staff available to answer calls. However, lower overall call volumes helped keep wait times down.

Table 11: Calls to claims centers (2022)

Month	April	May	June	Q2 2022 Total	Percent of Total
High call-volume messages	6,494	1,894	2,858	11,246	9%
Answered	29,420	28,881	29,299	87,600	72%
Abandoned	10,332	6,227	6,301	22,860	19%
Total calls	46,246	37,002	38,458	121,706	100%
Average wait time	0:23:55	0:13:40	0:13:16		

Source: ESD operational data

Table 12: Individuals calling claims centers (2022)

Month	April	May	June	Q2 2022 Total
Individuals	37,757	26,681	29,563	94,001

Source: ESD operational data

ESSB 5193 asked ESD to calculate the ratio of staff phone agents to employers and ratio of staff phone agents to claimants. ESD does not have FTE counts of phone agents because no staff members are assigned exclusively to answering phone inquiries. As of July 5, 2022, the Unemployment Insurance Customer Support Division in total had:

- 367 UI benefits permanent and non-permanent staff positions to serve an average of 40,240 claimants who received payment in the second quarter.
- 172 UI tax and wage permanent and non-permanent staff positions to serve 264,009 active employers.