

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION Unemployment Insurance
	CORRESPONDENCE SYMBOL OUI/Performance Management
	DATE July 16, 2020

ADVISORY: **UNEMPLOYMENT INSURANCE PROGRAM LETTER NO. 11-18
CHANGE 1**

TO: STATE WORKFORCE AGENCIES

FROM: JOHN PALLASCH /s/
Assistant Secretary

SUBJECT: Employment and Training Administration (ETA) 9177 Report - Pre-Implementation Planning Checklist Report for State Unemployment Insurance (UI) Information Technology (IT) Modernization Projects – Additional Updates to the ETA 9177 Report and Reporting Instructions

1. **Purpose.** To announce the availability of ETA 9177 Report - Pre-Implementation Planning Checklist Report Version 1, revising the original version provided with Unemployment Insurance Program Letter (UIPL) No. 11-18, to assist state UI agencies in preparing to launch modernized UI IT systems that support administration of UI benefits and/or tax systems.
2. **Action Requested.** ETA requests that state administrators provide this guidance, including the attached ETA 9177 - Pre-Implementation Planning Checklist Report Version 1, and the accompanying Reporting Instructions, to the appropriate staff, including UI Directors and Chief Information Officers.
3. **Summary and Background.**
 - a. Summary - This guidance announces the availability of the enhanced ETA 9177 Report for states to use. This updated version of the ETA 9177 Report improves the document's structure; provides additional clarity on the verification steps for the ten existing project categories; and adds a new category to address verification steps for labor market information (LMI) Federal reporting functions. Additionally, the reporting instructions have been modified to address comments received from state agencies and other entities.
 - b. Background - UIPL No. 11-18, issued on August 17, 2018, announced the availability of the ETA 9177 Report - Pre-Implementation Planning Checklist Report and its associated Reporting Instructions. The ETA 9177 Report is a comprehensive checklist denoting critical functional areas that states should verify prior to launching a new IT system including, but not limited to, technical IT functions and UI business processes that interface with the new system. States are required to submit the completed ETA 9177 Report, with any supporting documentation, to ETA approximately 180 days (6 months) prior to the state's projected implementation date. With this information, ETA will be

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able to identify any needed technical assistance, as states prepare for the implementation of a modernized system, and have an assurance that the state's implementation will have a significant likelihood of being successful.

Following the issuance of UIPL No. 11-18, ETA received comments from state agencies and other entities recommending additional items to be included in the checklist and seeking clarification on the instructions for using the Report. In addition, the Bureau of Labor Statistics recommended an eleventh project category to address LMI Federal reporting functions prior to launching a new IT system. ETA has enhanced the ETA 9177 Report and accompanying instructions to address the comments received.

The list of critical areas identified in the enhanced ETA 9177 Report is now comprised of the following eleven (11) Project Categories:

1. Functionality and Workarounds
2. External Alternate Access Options and Usability Issues
3. Policies/Procedures Development and Dissemination
4. Technical Preparation
5. Call Center/Customer Service Operations
6. Staffing/Staff Training on New System Operations
7. Staff and Customer Help Desk Support
8. Management Oversight
9. Vendor Support
10. Communications
11. LMI Federal Reporting Functions

4. **Reporting.** The information gathered in the ETA 9177 Report must be used by states to prepare for the implementation of new UI IT systems and to ensure the availability of mission critical functions. The ETA 9177 Report is required when a state is modernizing a major component of a UI IT system or systems. A major component can be a full benefits or tax system or it can be a significant component subset, such as continued claims certification or adjudication. States may decide to do all systems at one time or use a modular approach to modernize. Any state that is preparing to launch a modernized system must certify that it has reviewed and accomplished the items detailed in the ETA 9177 Report, or has a timely plan for doing so. If a section(s) of the ETA 9177 report is not applicable to the modernization project, states must indicate that it is not applicable. If a section is left blank, then it is deemed missing during ETA's review, and the report will be regarded as incomplete. ETA will provide comments back to the state, and will request the state to revise and resubmit the report.

An ETA 9177 Report submission is not necessary when a state is merely upgrading sub-components of a system, such as enhancing the front-end interface for claims intake. Other instances where a state is not required to submit an ETA 9177 Report include ongoing maintenance activities: database upgrade, IT server upgrades, replacing any obsolete hardware/software, etc.

As specified previously in UIPL No. 11-18, the ETA 9177 Report information must include a cover page; state general information (state name, date of submission, UI IT Modernization project name [e.g., Consortium name], contact information, and a summary of the project); and include the report on each of the UI IT Modernization Pre-Implementation Planning

Checklist Project Categories. Each Project Category has associated sub-elements. For every sub-element in the revised ETA 9177, the state must provide supporting content to demonstrate that it has addressed the specific sub-element. A Certification is required at the end of the report.

For each sub-element, the state must address issues including, but not limited to, the following:

- An overall status report;
- A brief report explaining the status of the project as it relates to the particular sub-element;
- Explanations of any workaround solutions of the processes in the sub-element;
- Explanations if implementation of the new system concerning processes for the sub-element will be delayed or deferred;
- Explanations for added clarity and/or to support a narrative;
- Mitigation proposals for addressing any problems;
- New project timelines if applicable; and/or
- Any discussion of identified technical assistance needs for the successful completion of the project.

This report is a narrative, not a statistical submission; therefore, states will use an ETA provided simple form template (a Microsoft Word 2010 “.doc”) found in Attachment I to prepare the ETA 9177 Report. Once completed, the ETA 9177 Report must be e-mailed to the appropriate ETA regional office.

The ETA 9177 - Pre-Implementation Planning Checklist Report for State Unemployment Insurance (UI) Information Technology (IT) Modernization Projects, has been approved by the Office of Management and Budget (OMB) in accordance with the Paperwork Reduction Act of 1995. The OMB Control Number is 1205-0527 with an expiration date of 06/30/2023.

5. **Inquiries.** Questions should be directed to the appropriate ETA Regional Office.

6. **References.**

- Section 303(a)(6), Social Security Act, 42 U.S.C. 503(a)(6);
- Section 911(a), Social Security Act, 42 U.S.C. 1111(a);
- 5 CFR 1320.5;
- UIPL No. 11-18, *ETA 9177 Report - Pre-Implementation Planning Checklist Report for State Unemployment Insurance (UI) Information Technology (IT) Modernization Projects*, August 17, 2018;
- UIPL No. 22-17, *Unemployment Insurance (UI) Supplemental Funding Opportunity for State Consortia to Modernize Tax and Benefit Systems*, September 8, 2017;
- UIPL No. 19-16, *Unemployment Insurance (UI) Supplemental Funding Opportunity for Improved Operations*, August 2, 2016;
- UIPL No. 16-15, *Unemployment Insurance (UI) Supplemental Funding Opportunity for Program Integrity and Performance and System Improvements*, June 15, 2015;
- Training and Employment Notice (TEN) No. 28-14, *Pre-Implementation Planning Checklist for State Unemployment Insurance (UI) Information Technology (IT) Modernization Projects*, March 27, 2015;

- UIPL No. 13-14, *Unemployment Insurance (UI) Supplemental Funding Opportunity for Program Integrity and Performance and System Improvements*, June 16, 2014;
- UIPL No. 24-13, *Unemployment Insurance (UI) Supplemental Funding Opportunity for Program Integrity and Performance and System Improvements*, July 25, 2013;
- UIPL No. 18-12, *Unemployment Insurance (UI) Supplemental Funding Opportunity for Program Integrity, Performance, and System Improvements*, May 11, 2012; and
- UIPL No. 26-11, *Unemployment Insurance (UI) Supplemental Funding Opportunity for Program Integrity and Performance and System Improvements*, July 18, 2011.

7. Attachments.

Attachment I: Unemployment Insurance (UI) Information Technology (IT)
Modernization Pre-Implementation Planning Checklist Report Version 1

Attachment II: Unemployment Insurance (UI) Information Technology (IT)
Modernization Pre-Implementation Planning Checklist Report Instructions