



MICHIGAN DEPARTMENT OF  
**LABOR & ECONOMIC  
OPPORTUNITY**

# What is the Michigan UIA Doing – A Summary

1

**Identity Verification Procedures allow due process and quick resolution of any false positives**

Michigan’s approach is built around **communication with all interested parties** and resolution for victims. Fraud prevention, mitigation, and identification tools on the front-end and elsewhere throughout claim filing and certification identify fraudulent claims. Resolution for victims and valid claimants through proper notices is fundamental to our approach **working to resolution.**

2

**Constant approach to identifying suspicious behavior of insiders with continued look-back**

As reported by the United States Secret Service, and confirmed by banking executives, **domestic and international crime rings are targeting UI programs.** Bad actors will continue to attempt imposter fraud until sufficient controls and detection mechanisms are deployed. Biggest threat to Michigan after June 2020 was insiders.

3

**Support has formalized our long-standing approach with a Fraud Task Force**

While rapid response can help to immediately reduce the payment of fraudulent applications, **bad actors will continue to evolve in their approach to evade controls.** UIPL 16-20, Change 5 urges states to “have aggressive strategies and tools in place to prevent, detect, and recover fraudulent payments, with a particular emphasis on imposter fraud.” **Executive Order by Michigan Governor formalized our Fraud Task Force and secured additional funding.**

# UIPL NO. 16-21

<b>EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210</b>	<b>CLASSIFICATION</b> Unemployment Insurance
	<b>CORRESPONDENCE SYMBOL</b> OUI/DUIO
	<b>DATE</b> April 13, 2021

**ADVISORY:** UNEMPLOYMENT INSURANCE PROGRAM LETTER NO. 16-21

**TO:** STATE WORKFORCE AGENCIES

**FROM:** SUZAN G. LEVINE /s/  
Principal Deputy Assistant Secretary

**SUBJECT:** Identity Verification for Unemployment Insurance (UI) Claims

1. **Purpose.** To highlight the importance of identity verification in ensuring the proper payment of unemployment benefits and to provide guidance to states on required administrative procedures when processing claims and determining UI eligibility in cases where an individual's identity (ID) is questionable.

## **4. Claims Determination Processes Related to ID Verification.**

When a state obtains information through automated systems or other sources that question whether the name and/or SSN used to file a claim belong to the individual who is filing the claim, the state must act quickly to: i) provide the individual with proper notice and an opportunity to provide information to resolve the issue; ii) decide whether or not sufficient information has been provided to verify the individual's ID; and iii) issue a written determination. The notice must also include information that failure to respond could result in a determination denying benefits and establishing an overpayment of any benefits previously paid. These processes must be consistent with the adjudication standards of sections 303(a)(1) and 303(a)(3) of the SSA (42 U.S.C. 503(a)(1) and (3)), and the CD (20 C.F.R. Part 614, Appendix B).

# UIPL NO. 16-21 – Michigan Implementation

UIA 6347  
(Rev. 7-21)  
GRETCHEN WHITMER  
GOVERNOR



STATE OF MICHIGAN  
DEPARTMENT OF LABOR AND ECONOMIC OPPORTUNITY  
UNEMPLOYMENT INSURANCE AGENCY

Authorized By  
MCL 421.1 et seq.  
SUSAN R. CORBIN  
DIRECTOR

UIA 6347  
(Rev. 7-21)

Letter ID: [Redacted]

Mail Date: June 23, 2022  
Letter ID: [Redacted]  
CLM: [Redacted]  
Name: [Redacted]

## Request for Information: Verification of Identity

### CLAIMANT AND CLAIM INFORMATION

Claimant Name: [Redacted] Benefit Year Begin: March 01, 2020

### NOTICE INFORMATION

#### Why you are receiving this?

Due to high levels of fraud across the country, all individuals must establish their identity to receive unemployment benefits. Some activity on your account was flagged and the Unemployment Insurance Agency (UIA) cannot verify your identity. **We need to verify your identity for you to receive unemployment insurance benefits.**

### ACTION REQUIRED

#### What you need to do

By July 05, 2022, we need you to submit the following documents (separately):

1. Signed and dated Form UIA 6347 (this form)
2. Identification document(s) (front and back copies required), see page 2 for details.

For faster service, submit these documents by logging in to your Michigan Web Account Manager (MIWAM) and clicking on the "Verify Identity" link located under Alerts. You can also submit the documents via mail or fax.

Late or incomplete submissions can lead to delayed payments. **Additional guidelines of which documents to submit and how to submit them are on the next page.**

#### Next steps

After submitting the identity documentation, your documents will be reviewed. Once your identity is verified, the "Stop Payment" notice will be removed. If your identity cannot be verified based on the documents submitted, you will receive a determination that you are not eligible for benefits because your identity could not be verified. Instruction on how to protest the determination will also be provided.

### CERTIFICATION

**Certification:** I certify that the information I have reported is true and correct. I understand that if I intentionally make a false statement, misrepresent facts or conceal material information to obtain benefits, I may be required to repay benefits, charged penalties and could be subject to criminal prosecution.

Did you file this claim for unemployment benefits?  YES  NO

Signature \_\_\_\_\_ Date \_\_\_\_\_ Telephone Number \_\_\_\_\_

Print Name \_\_\_\_\_

If you have questions, you may contact us through your MIWAM account or by calling 1-866-500-0017. For telephone or Local Office hours of operating, visit [www.michigan.gov/uia](http://www.michigan.gov/uia). TTY service is available at 1-866-366-0004.

#### Identification documents (ID) to submit

In addition to signed copy of this form, we need you to submit one document from List A (Option 1) or one document from List B and one from List C (Option 2), see a list of documents below. For a complete list of acceptable documents, refer to the Employment Eligibility Verification Document (Form I-9) at <https://www.uscis.gov/i-9>. If the name on the unemployment claim does not match the name on your ID documents, you must provide proof of your name change (e.g., marriage license, divorce decree, or court order document).

OPTION 1	OR	OPTION 2	
LIST A		List B	List C
• US Passport (photo and signature pages)		• Driver's license or State ID card	• Social Security card
• US Passport Card			• Birth certificate (original or certified copy)
• Permanent Resident Card			
• Alien Registration Receipt Card			

**Submit a photo of yourself holding your ID documents.** This can be a selfie of yourself holding the identification documentation or someone can take the photo of you. Your full face and the full ID must be visible. This will help UIA review your claim quicker.

#### How to submit the required documents

##### Option 1: Web (preferred)

1. Go online at [www.michigan.gov/uia](http://www.michigan.gov/uia)
2. Log into your Michigan Web Account Manager (MIWAM)
3. Click on the "Verify Identity" link located under "Alerts." DO NOT upload using the "Send Unemployment a Message" link on MIWAM as this may delay processing.
4. Upload a copy of: (1) this completed form (scan or photo), with your signature on the first page, (2) ID documents front and back (scan or photo) from Option 1 or Option 2, and if you choose, (3) photo of yourself holding up the ID documents.

##### Option 2: Mail

1. Mail documents to the Unemployment Insurance Agency, PO Box 169, Grand Rapids MI 49501-0169
2. Mail the following documents: (1) this completed form with your signature on the first page, (2) a copy of your ID documents front and back from Option 1 or Option 2, and if you choose (3) a printed photo of yourself holding up the ID documents.

##### Option 3: Fax

1. Fax documents to 1-517-636-0427
2. Fax documents and include: (1) this completed form with your signature on the first page, (2) a copy of your ID documents from Option 1 or Option 2, and if you choose, (3) a printed photo of yourself holding up the ID documents.

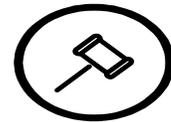
# UIPL NO. 16-21 – Michigan Implementation



IDV Portal using unique letter ID from request for information mailed



Filtering and **sorting of issues by creation type and risk score** used for remediation and mitigation\*



Highly effective for **intentional misrepresentation and prosecution**

*\*UIA has also instituted measures to **reduce burden on legitimate claimants** such as: revisiting analyses / rules to understand impact, rapidly reviewing cases to get legitimate claimants paid quickly, and utilizing analytics to prioritize case review to continue helping legitimate claimants get paid while working to stop those most likely to be criminals*

# UIPL NO. 16-21 – Michigan Implementation

UIA 1302  
(Rev. 12-19)  
GRETCHEN WHITMER  
GOVERNOR



STATE OF MICHIGAN  
DEPARTMENT OF LABOR AND ECONOMIC OPPORTUNITY  
UNEMPLOYMENT INSURANCE AGENCY

Authorized By  
MCL 421.1 et seq.  
SUSAN R. CORBIN  
DIRECTOR

UIA 1302  
(Rev. 12-19)  
GRETCHEN WHITMER  
GOVERNOR



STATE OF MICHIGAN  
DEPARTMENT OF LABOR AND ECONOMIC OPPORTUNITY  
UNEMPLOYMENT INSURANCE AGENCY

Authorized By  
MCL 421.1 et seq.  
SUSAN R. CORBIN  
DIRECTOR



Mail Date: June 8, 2022  
Letter ID: [REDACTED]  
CLM: [REDACTED]  
Name: [REDACTED]

## Notice of Determination

Case Number: [REDACTED] BYB: May 08, 2022  
Claimant: [REDACTED] Claimant XXX-XX [REDACTED]  
Employer: [REDACTED] SSN: [REDACTED]  
EAN: [REDACTED]

Issue: Identity Verification Request Section of the Act: 28(1)(c)

### Eligibility for Unemployment Benefits

Issues and Sections of Michigan Employment Security (MES) Act involved: Identity Verification Request and 28(1)(c). You were required to report by mail, fax or via your MIWAM-Verify Your Identity link and provide the requested documentation to establish your identity.

You failed to report as directed.

You are not eligible for benefits under MES Act, Sec. 28(1)(c) and 32(a) beginning May 14, 2022 and continuing until you provide required documentation verifying your identity. You will not receive benefit payments during this period.

If applicable, principal and penalty amounts are shown on Form UIA 1301, Weeks of Overpayments. If you disagree with this Determination, refer to "Protest Rights" on the reverse side of this form. The protest must be received no later than 7/8/2022.



Mail Date: May 27, 2022  
Letter ID: [REDACTED]  
CLM: [REDACTED]  
Name: [REDACTED]

## Notice of Determination

Case Number: [REDACTED] BYB: April 17, 2022  
Claimant: [REDACTED] Claimant XXX-XX [REDACTED]  
Employer: [REDACTED] SSN: [REDACTED]  
EAN: [REDACTED] 000

Issue: Identity Verification Request Section of the Act: 28(1)(c)

### Eligibility for Unemployment Benefits

Issues and Sections of Michigan Employment Security (MES) Act involved: Identity Verification Request and 28(1)(c). You were required to report by mail, fax or via your MIWAM-Verify Your Identity link and provide the requested documentation to establish your identity.

You reported with the requested documentation to establish your identity.

You are eligible for benefits under MES Act, Sec. 28(1)(c).

If applicable, principal and penalty amounts are shown on Form UIA 1301, Weeks of Overpayments. If you disagree with this Determination, refer to "Protest Rights" on the reverse side of this form. The protest must be received no later than 6/27/2022.

# UIPL NO. 16-21 – Michigan Implementation

UIA 6348  
(Rev. 03-18)  
GRETCHEN WHITMER  
GOVERNOR



STATE OF MICHIGAN  
DEPARTMENT OF LABOR AND ECONOMIC OPPORTUNITY  
UNEMPLOYMENT INSURANCE AGENCY

Authorized By  
MCL 421.1 et seq.  
SUSAN R. CORBIN  
ACTING DIRECTOR

— [Redacted]

Mail Date: January 14, 2021  
Letter ID: [Redacted]  
CLM: [Redacted]  
Name: [Redacted]

## DETERMINATION

The Claim Id referenced above was not filed by [Redacted] This claim has been canceled and is null and void.

If unemployment benefits were charged to the employer on this claim, the charges have been credited to the employer's account.

If you disagree with this determination, you can protest in writing by completing Form UIA 1733, *Protest of a Determination*. This form is located on the website under the Forms link. Be sure to include your name, social security number or employer account number (EAN) on documents submitted with your protest. Fax the completed form UIA 1733 to 1-1-517-636-0427 or mail to Unemployment Insurance Agency, P.O. Box 169, Grand Rapids, MI 49501-0169.

**Your protest must be received no later than 16-Feb-2021 or this determination becomes final.**

If you have questions, contact the Fraud Investigation Unit at 1-866-500-0017. TTY customers use 1-866-366-0004.

## FOCUS ON RESOLUTION:

- Mailed to physical address from initial claim filing
- Mailed to updated physical address based on victim responses
- Mailed to employer(s) who received notice of monetary determination

# Michigan Approach to Insider Threat Monitoring

## LOCAL NEWS

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**Derick Hutchinson**, Lead Digital Editor

Published: May 20, 2022, 6:36 AM

Updated: May 20, 2022, 8:58 AM

Tags: **Detroit, Wayne County, Romulus, Macomb County, Local, Crime, Detroit Crime, Romulus Crime, UIA, Unemployment, Michigan Unemployment, Cherokee Drive, Ilene Street, Unemployment Fraud, PUA, Pandemic Unemployment Assistance, Antonia Brown, Kiannia Mitchell, Angela Johnson, Chronicled**

## Longtime Michigan unemployment worker helps 2 friends who stole \$1.6 million with 123 false claims

UIA employee Antonia Brown accused of working with Kiannia Mitchell, Angela Johnson in scheme

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# Michigan Approach to Insider Threat Monitoring

## LOCAL NEWS

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**Derick Hutchinson**, Lead Digital Editor

Published: April 14, 2022, 9:39 AM

Tags: **Detroit, Wayne County, Local, Detroit Crime, Crime, COVID, Coronavirus, Michigan Coronavirus, Michigan COVID, UIA, Unemployment Insurance Agency, Michigan UIA, Johnny Richardson, Micahia Taylor, Brandi Hawkins**

## **2 sentenced for conspiring with Michigan unemployment worker to steal thousands in pandemic relief**

Johnny Richardson, Micahia Taylor sentenced

# Michigan Approach to Insider Threat Monitoring

MICHIGAN

## 18 Michigan unemployment aid workers fired, suspended pending investigations



**Beth LeBlanc**

The Detroit News

Published 10:05 a.m. ET March 3, 2022 | Updated 10:56 a.m. ET March 3, 2022

# Michigan Approach to Insider Threat Monitoring

## Insider Threat Monitoring

Analyzed weekly claims against internal IP addresses, account touches, and discarded cases to identify potential insider threats

Developed a three-pronged approach to **proactively identify potential insider threats**



**IP Address Matches:** Analyzed claimant web activity against IP addresses utilized by internal users

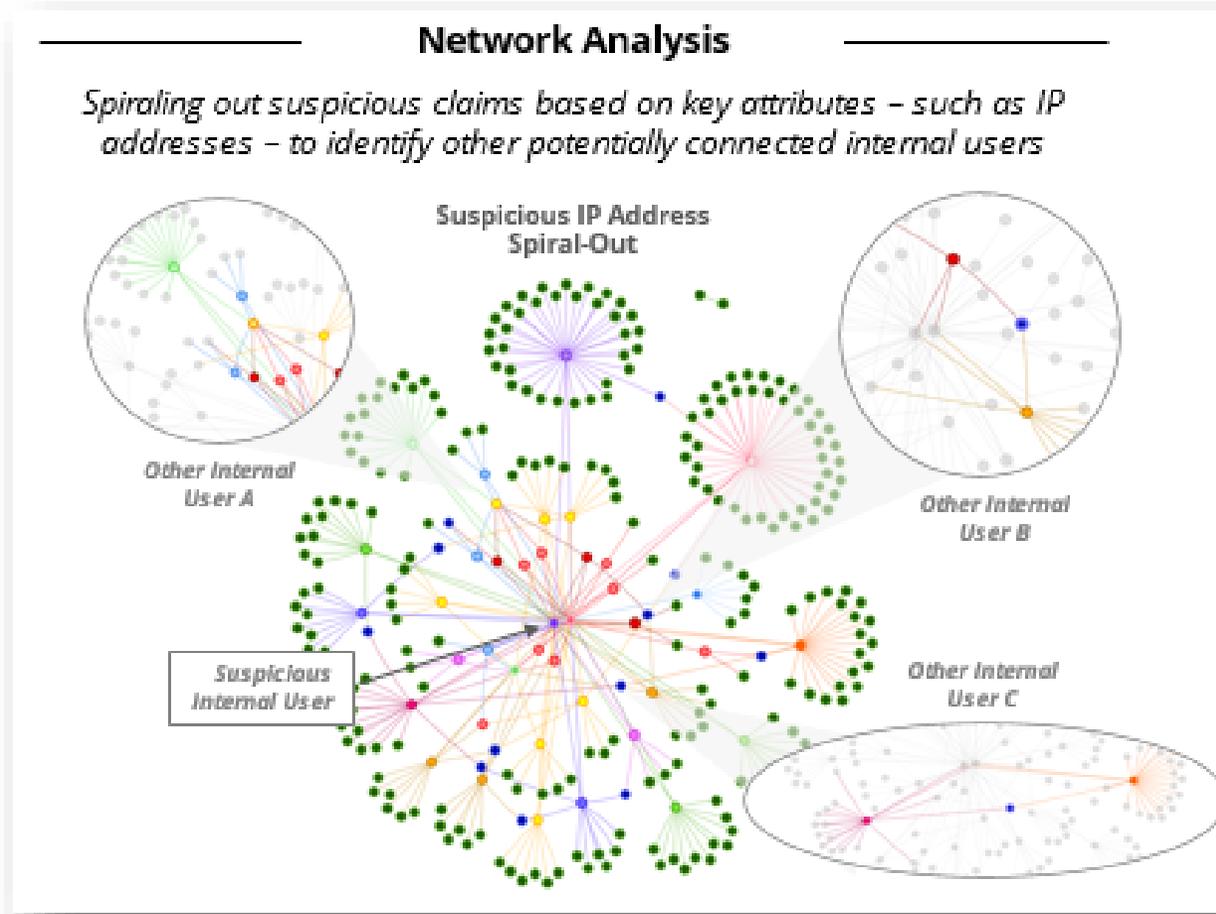


**Account Touches:** Examined occurrences of internal users touching the claim(s); matched data to our in-contact call center data; utilized account notes; time spent performing activity on claim



**Discarded Cases:** Compiled the number of discarded cases each internal user has performed; number of adjudications performed on claims with similar attributes

# Michigan Approach to Insider Threat Monitoring



# Michigan Approach to Insider Threat Monitoring

## Discarded Cases Note Tracking

*Tracked notes left on discarded cases by internal users to identify additional potentially fraudulent claims*

Discarded Cases for Suspicious  
Internal User (3/1-Present)

Date	Number of Discarded Cases	Number of Discarded Cases With No Notes
1-Mar	1	0
2-Mar	6	1
3-Mar	2	2
4-Mar	5	3
5-Mar	5	3
8-Mar	5	3
9-Mar	4	3
10-Mar	10	9
11-Mar	4	4
12-Mar	5	3
13-Mar	7	7
15-Mar	12	9
16-Mar	6	2

# Roadmap to Success – Insider Threat Monitoring

## Business Processes

Policies, communications, and training that govern the mitigation of insider risks, set behavioral expectations, and ensure consistent enforcement:

 Define roles and map access to given roles and responsibilities

 Develop a framework based on roles, unique threats, and risk tolerance to proactively stop or disrupt emerging insider threats

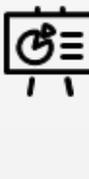
 Create a roadmap that highlights phases to develop an insider threat program as part of the state workforce agency's risk mitigation strategy

## Analytics

Leverage advanced analytics to identify anomalies, analyze networks, and apply a risk-based approach:

 Leverage existing analyses (anomaly detection, network analysis) to provide a foundation for more advanced techniques

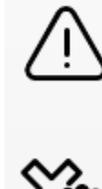
 Develop predictive models to proactively identify and mitigate fraud

 Build reporting dashboards to review high-risk internal users and provide tactical and strategic views to address challenges

## Technology

Technological landscape and software tools that operate the program as well as house the data:

 Review and enhance the state workforce agencies current access and identity management policies and practices

 Establish a well-defined third-party risk management program to proactively manage third party security risks

 Implement technology and controls to harden the network, detect potential insiders and respond to threats

# Michigan Fraud Task Force



STATE OF MICHIGAN  
OFFICE OF THE GOVERNOR  
LANSING

GRETCHEN WHITMER  
GOVERNOR

GARLIN GILCHRIST II  
LT. GOVERNOR

GRETCHEN WHITMER  
GOVERNOR



STATE OF MICHIGAN  
OFFICE OF THE GOVERNOR  
LANSING

GARLIN GILCHRIST II  
LT. GOVERNOR

## EXECUTIVE DIRECTIVE

2021-14

To: State Department Directors and Autonomous Agency Heads  
From: Governor Gretchen Whitmer  
Date: December 29, 2021  
Re: Preventing unemployment insurance fraud

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Unemployment insurance (“UI”) helps Michigan families get through tough times. UI keeps food on the table even when a steady source of income dries up. And it ensures that no child goes hungry simply because their parent has the misfortune to lose their job.

Even as UI provides a lifeline for working families to get back on their feet, it can also be a target for criminal enterprises. Over the last 18 months, states across the nation have seen UI fraud of unprecedented scope. UI fraud not only costs taxpayers money, it can deprive Michiganders of economic assistance just when they need it most. It is our duty as a state to do all we can to stop UI fraud, even as we ensure that valid claims are paid accurately and promptly.

## EXECUTIVE ORDER

No. 2021-16

### Unemployment Insurance Fraud Response Team

Unemployment insurance (“UI”) helps Michigan families get through tough times. UI keeps food on the table even when a steady source of income dries up. And it ensures that no child goes hungry simply because their parent has the misfortune to lose their job.

Even as UI provides a lifeline for working families to get back on their feet, it can also be a target for criminal enterprises. Over the last 18 months, states across the nation have seen UI fraud of unprecedented scope. UI fraud not only costs taxpayers money, it can deprive Michiganders of economic assistance just when they need it most. It is our duty as a state to do all we can to stop UI fraud, even as we ensure that valid claims are paid accurately and promptly.

Effective enforcement is an important tool to stop UI fraud. Michigan will benefit from a coordinated approach, leveraging the capacities of state, local, and federal law enforcement to efficiently identify, investigate, and prosecute individuals who steal UI benefits.

# Michigan Fraud Task Force

*UIA maintains long-standing relationships with DOL-OIG and federal enforcement agencies; providing critical support in the federal prosecution of approximately 60 individuals to-date (more cases pending)*

## INVESTIGATIVE SUPPORT



### INVESTIGATION ACCELERATORS

**Accelerate investigations and increase time efficiency:**

- Conducting weekly meetings with federal law enforcement and US Attorney's Office to share findings and provide case updates
- Standardized reporting template
- Automating previously manual processes



### INVESTIGATION ENHANCERS

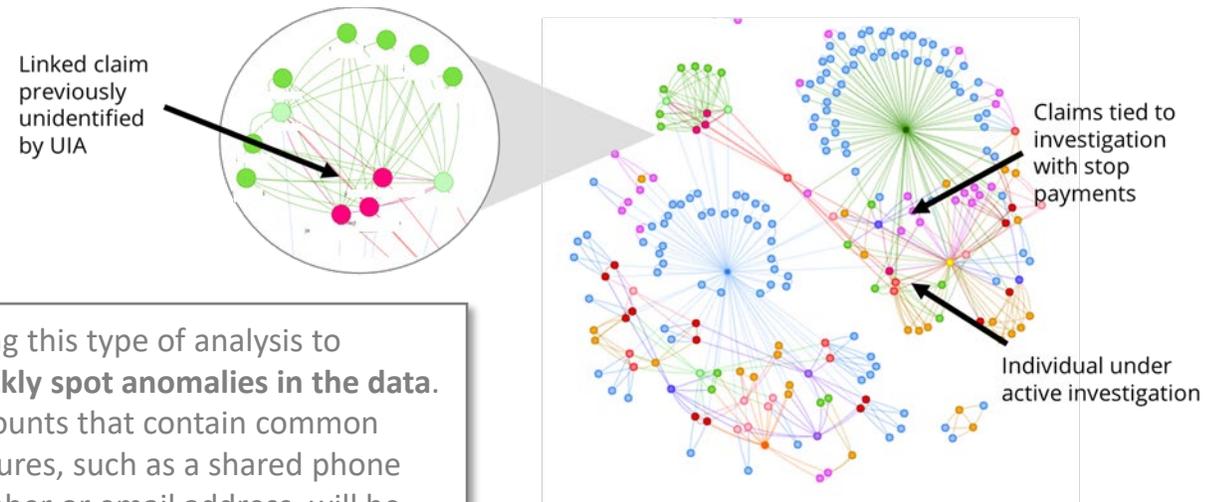
**Assist in pulling vital and timely information:**

- Assisting in ad hoc requests
- Spiraling out cases using network analysis
- Providing weekly investigative reports

## EXAMPLE FORENSIC ANALYSIS

*We utilize network techniques to **enhance our analysis and prioritize review of key attributes:***

*Illustrative example*



Using this type of analysis to **quickly spot anomalies in the data.** Accounts that contain common features, such as a shared phone number or email address, will be visually clustered together.

**Thank you.**  
**Michigan.gov/LEO**



**MiDeptLEO**



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