MINNESOTA FRONTLINE WORKER PAY

Legislative Report

DEPARTMENT OF LABOR AND INDUSTRY

March 2023

Minnesota Frontline Worker Pay program Legislative Report

March 2023

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This Frontline Worker Pay program legislative report is required by Minnesota Session Laws 2022, Chapter 50, Article 2, section 2, subdivision 9.

As requested by Minnesota Statutes 3.197, the cost to prepare this report was approximately $14,598.

Information in this report can be obtained in alternative formats by calling the Department of Labor and Industry at 651-284-5025 or 800-342-5354.

Executive summary

About

To thank those Minnesotans who worked on the frontlines during the COVID-19 peacetime emergency, Gov. Tim Walz signed the Frontline Worker Pay program into law April 29, 2022, enabling workers to apply for a share of $500 million set aside for Frontline Worker Pay (FWP). The Department of Labor and Industry (DLI) was responsible for the administration of the application, appeals, eligibility determinations and applicant support aspects of the program and worked in partnership with the Department of Employment and Economic Development (DEED), the Department of Revenue (DOR) and Minnesota IT Services (MNIT), as well as an application technology vendor to carry out these duties. DOR, in coordination with DLI and DEED, was tasked with making payments to eligible individuals. This report is a required component of the law.

Eligibility criteria for FWP included: employment in at least one of the 15 identified frontline sectors for at least 120 hours between March 15, 2020, and June 30, 2021; the inability to telework and the need to work in close proximity to people outside the individual's household; not exceeding an adjusted gross income threshold; and not exceeding an unemployment insurance benefit threshold.

The FWP application was open June 8 through July 22, 2022. The FWP program law limited the application period to 45 days. This was followed by the application processing and verification period, the 15-day appeals period, the appeal review period, determination of the payment amount and commencement of payment processing Oct. 5, 2022.

Required information

A total of 1,210,008 applications were received for the Frontline Worker Pay program; 10,687 applications were withdrawn by the applicant; 1,025,619 applications were determined to be eligible for the program; and 173,702 applications were denied.

It was initially determined 1,025,655 applications were eligible. However, during payment processing, additional applications were determined to be ineligible after additional fraud prevention checks, leading to the final 1,025,619 eligible applicants who were paid $487.45 each, via either ACH direct deposit or prepaid debit card as chosen by the applicant during the application process.

This report provides statistics about the eligible applicant group, including job sector, county, race, ethnicity, gender and age.

A total of 173,702 applications to the Frontline Worker Pay program were denied. The reasons for denial were: the applicant did not meet one of more of the eligibility requirements; the applicant's identity could not be

verified; or the applicant did not submit a required appeal form or forms after being notified of an initial denial. Some applicants failed for more than one reason; some were eliminated as duplicates.

Supplementary information

Eligibility

Application eligibility was verified through unemployment insurance benefits, adjusted gross income, employment and identity. Initial denials were eligible for appeal Aug. 16 through 31, 2022, via online appeal forms. The FWP program law limited the appeal period to 15 days. The commissioner of the Department of Labor and Industry's decision on an appeal was final.

Additional fraud prevention

As part of the Frontline Worker Pay program, DLI and MNIT developed a fraud prevention protocol. The goal was to reduce incidents of fraud by developing protocols that made fraud attempts difficult and fraud success unlikely while providing administrative ease for legitimate applicants. Fraud prevention occurred in the design of the application, initial eligibility verification, appeals and identity verification processes, as well as through active review of potential fraud indicators.

Communications, outreach, engagement

In February 2022, as the Frontline Worker Pay legislation moved toward passage, DLI mapped out an action plan to reach out to other state agencies, frontline workers, the public and DLI staff members, and to develop specific application content for the application technology vendor, Submittable. DLI launched an informational website (frontlinepay.mn.gov) when the legislation was signed into law April 29, and the site had more than 90,000 views in its first three days.

DLI quickly set up a cross-agency group to develop a branded marketing and outreach campaign focused on frontline workers, which encompassed a logo, graphics, video, a statewide social media campaign, informational materials, development of promotional materials for external stakeholders to use and more. The FWP toolkit site, which included resources translated into multiple languages, received more than 1.8 million visits during the application process. Additionally, there were more than 80 news stories published statewide about the Frontline Worker Pay program. DLI also worked to provide information to community groups, legislators and organizations to learn how to best help them reach their audiences and empower their members to relay the Frontline Worker Pay message. Between May 10 and Sept. 30, 2022, DLI participated in 70 outreach events in various formats and partnered with the Frontline Worker Coalition to conduct 10 training sessions, with 433 participants.

Employers

Employers of individuals in identified frontline sectors played a key role in informing employees about Frontline Worker Pay and helping them apply. These employers were required to provide notice advising all current

workers who may be eligible for Frontline Worker Pay about the program and how to apply for benefits. Additionally, many employers arranged sign-up events on site during regularly scheduled work hours.

Applicant support

The Department of Labor and Industry, together with a contracted partner, offered substantial applicant support during and following the Frontline Worker Pay application and appeals processes. Support was available through multiple avenues and in multiple languages.

As soon as Frontline Worker Pay was signed into law, DLI began hiring individuals who would manage the program, provide support to applicants, help with appeals processing, support more complex cases and offer additional support. The seven FWP representatives began their work June 2 through 22. Each individual came with extensive customer service experience. This group proved critical to the success of the program.

Budget and payment processing

The Legislature appropriated $500 million from the general fund in fiscal-year 2022 to be split equally across all eligible frontline workers. Additionally, $11,650,000 was allocated to the DLI commissioner for administrative costs to implement the program and distribute the payments to eligible frontline workers. DLI was also able to transfer these funds as needed to the commissioners of the Department of Employment and Economic Development or the Department of Revenue to cover their administrative costs. These funds are available until June 30, 2023.

Recoup process

Part of the Frontline Worker Pay law provided the Department of Revenue with the authority to create a process to recoup payments determined to be made to ineligible individuals. The Department of Revenue developed a Frontline Worker Tip Intake Form and associated procedures to investigate and recoup funds where appropriate.

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About Frontline Worker Pay

To thank those Minnesotans who worked on the frontlines during the COVID-19 peacetime emergency, Gov. Tim Walz signed the Frontline Worker Pay program into law April 29, 2022, enabling eligible workers to apply for Frontline Worker Pay (FWP).

Eligibility criteria

Eligibility criteria for Frontline Worker Pay are set forth in the Frontline Worker Pay law (Appendix A: Laws of Minnesota 2022, chapter 50, article 2). To be eligible for Frontline Worker Pay, the applicant**:**

- must have been employed at least 120 hours in Minnesota in one or more frontline sectors between March 15, 2020, and June 30, 2021;
- for the hours worked during this time period the applicant –
    - was not able to telework due to the nature of the individual's work and
    - worked in close proximity to people outside of the individual's household;
- must meet the income requirements for at least one year between Dec. 31, 2019, and Jan. 1, 2022 –
    - workers with direct COVID-19 patient care responsibilities must have had an adjusted gross income of less than $350,000 for married taxpayers filing jointly or less than $175,000 for other filers and
    - for workers in occupations without direct COVID-19 patient care responsibilities, the adjusted gross income limit is $185,000 for married taxpayers filing jointly or $85,000 for other filers; and
- must not have received an unemployment insurance benefit payment for more than 20 weeks on a cumulative basis for weeks between March 15, 2020, and June 26, 2021.

Sectors

The frontline sectors include**:**

- long-term care and home care;
- health care;
- emergency responders;
- public health, social service and regulatory service;
- courts and corrections;
- child care;
- schools, including charter schools, state schools and higher education;
- food service, including production, processing, preparation, sale and delivery;
- retail, including sales, fulfillment, distribution and delivery;
- temporary shelters and hotels;
- building services, including maintenance, janitorial and security;
- public transit;

- ground and air transportation services;
- manufacturing; and
- vocational rehabilitation.

Application process and assistance

The Frontline Worker Pay application was open June 8 through July 22, 2022 (Appendix B: Frontline Worker Pay application). Eligible workers had 45 days to apply for Frontline Worker Pay. The money set aside for this program was to be divided equally among all approved applicants after the 45-day application period, the application processing and verification period, the 15-day appeals period and the appeals review period. Every individual who submitted an application for Frontline Worker Pay was notified that all communication would take place via email and was reminded to check their account in the application platform regularly for programmatic updates. Applicant support was available to assist applicants in multiple languages. Additionally, frequently asked questions, informational handouts in multiple languages and other resources were provided online. Further detail is provided about the application, communications, outreach and applicant support in the supplementary information portion of this report.

Appeals

Submitted applications were processed and verified by the Department of Labor and Industry (DLI), Department of Employment and Economic Development (DEED) and Department of Revenue (DOR). Following processing and verification, all applicants were notified via email either that no further action was required or that their application was denied and they were eligible to submit an appeal in the following 15-day appeals period, Tuesday, Aug. 16, through Wednesday, Aug. 31, at 5 p.m. (CT).

Applications may have been denied, with eligibility for appeal, for five reasons:

- the application has been deemed a duplicate;
- the applicant exceeded the unemployment insurance benefit threshold established in the law;
- the applicant exceeded the adjusted gross income threshold established in the law;
- the applicant's employment eligibility could not be verified; and/or
- the applicant's identity could not be verified.

The final number of eligible applicants was determined after the appeals period ended and all appeals were processed. Further detail is provided about the appeal process in the supplementary information portion of this report.

Payments

After the application processing and verification period, the 15-day appeals period for denied applicants to contest those decisions and time for processing of the appeals, the final number of eligible applicants and

payments were determined and announced Oct. 3, 2022. Minnesota workers who worked on the frontlines during the COVID-19 peacetime emergency, and who applied for and met all eligibility requirements of the Frontline Worker Pay program, were approved to receive a payment of $487.45, beginning Wednesday, Oct. 5, 2022. During the application process, applicants chose to receive payment either via automated clearing house (ACH) direct deposit or prepaid debit card. The money dedicated to Frontline Worker Pay was divided among the final eligible applicants and those receiving payment were notified. All applications moved through the process at the same time and payments were forwarded for processing together. The overall program timeline is summarized in Figure 1 below.

Figure 1

Required information

Program data

Applicants and eligible frontline workers

A total of 1,210,008 applications were received for the Frontline Worker Pay program. Of those applications: 10,687 were withdrawn by the applicant; 1,025,619 were determined to be eligible for the program; and 173,702 were denied.

Payment amount

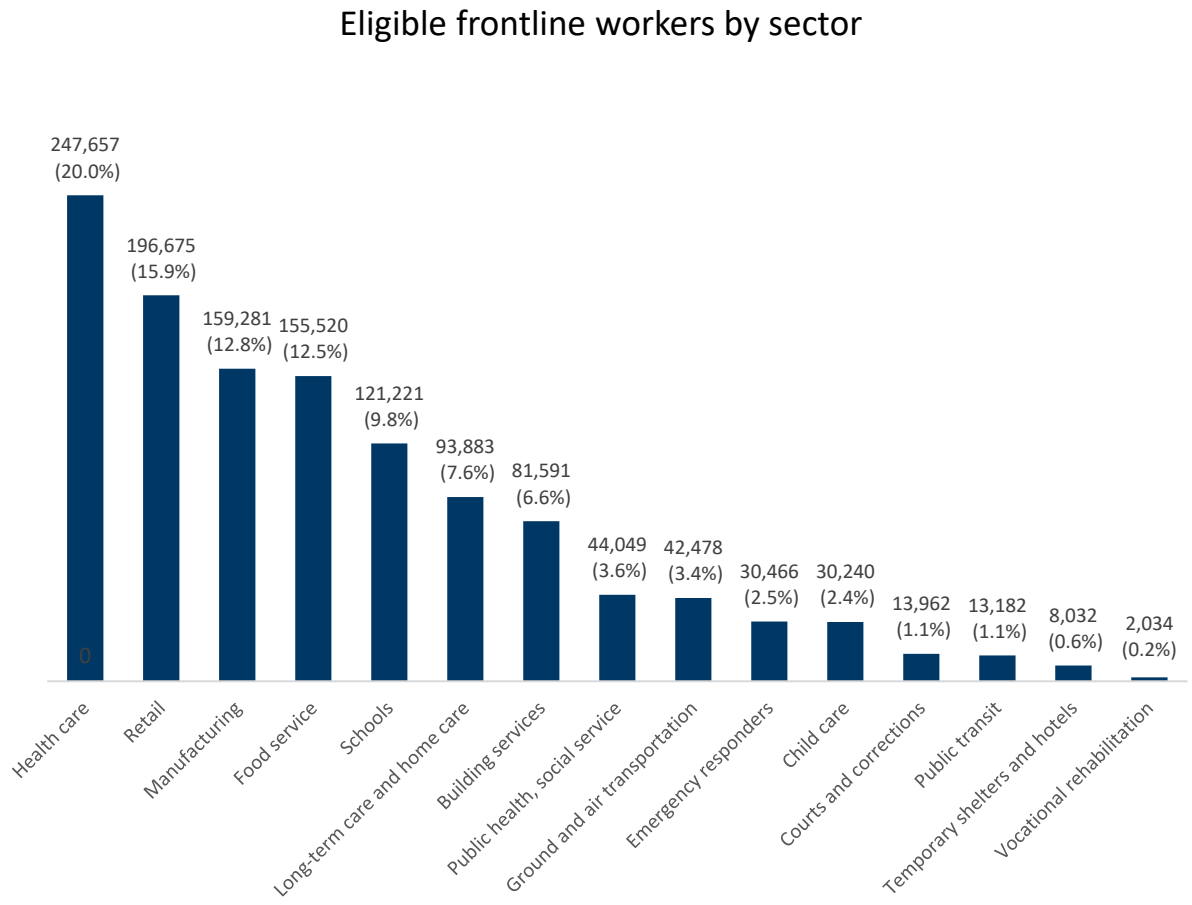
After processing and verification of the applications, as well as the 15-day period for denied applicants to contest those decisions, the list of eligible applicants was be determined to be 1,025,655. Each eligible applicant was to be provided with an equal payment, not to exceed $1,500. The total pool of funds, $500,000,000, was divided by the count of eligible applicants. The figure was rounded down to the nearest five cents for a payment of $487.45 going to each eligible applicant.

During payment processing, when insufficient or incorrect payment information was submitted on the application, applicants were provided an opportunity to submit corrected payment information. The newly provided information was reviewed for potential fraud or duplicate payments as part of the program's fraud prevention protocols. As part of that review, 36 additional applications were determined to be ineligible. A final count of 1,025,619 applicants were paid $487.45 each.

Sector

The program received applications from eligible frontline workers in all sectors, as detailed in Figure 2. The sectors with the largest number of applicants were health care (247,657), followed by retail distribution (196,675) and manufacturing (159,281). Because applicants could select more than one sector in their application for Frontline Worker Pay, the total is greater than the number of Frontline Worker Pay applicants. Because sectors are duplicated, percentages displayed in the figure below represent the percentage of all sectors indicated on the applications of eligible frontline workers.

Figure 2



County

The program received applications from eligible frontline workers in all Minnesota counties. County population data was used to calculate eligible frontline workers as a percentage of county population.[1] Table 1 displays the count of eligible frontline workers from each Minnesota county, as well as the percent of the county's population that represents and the percent of all eligible frontline workers. Figure 3 displays eligible frontline workers as a percentage of the county population.

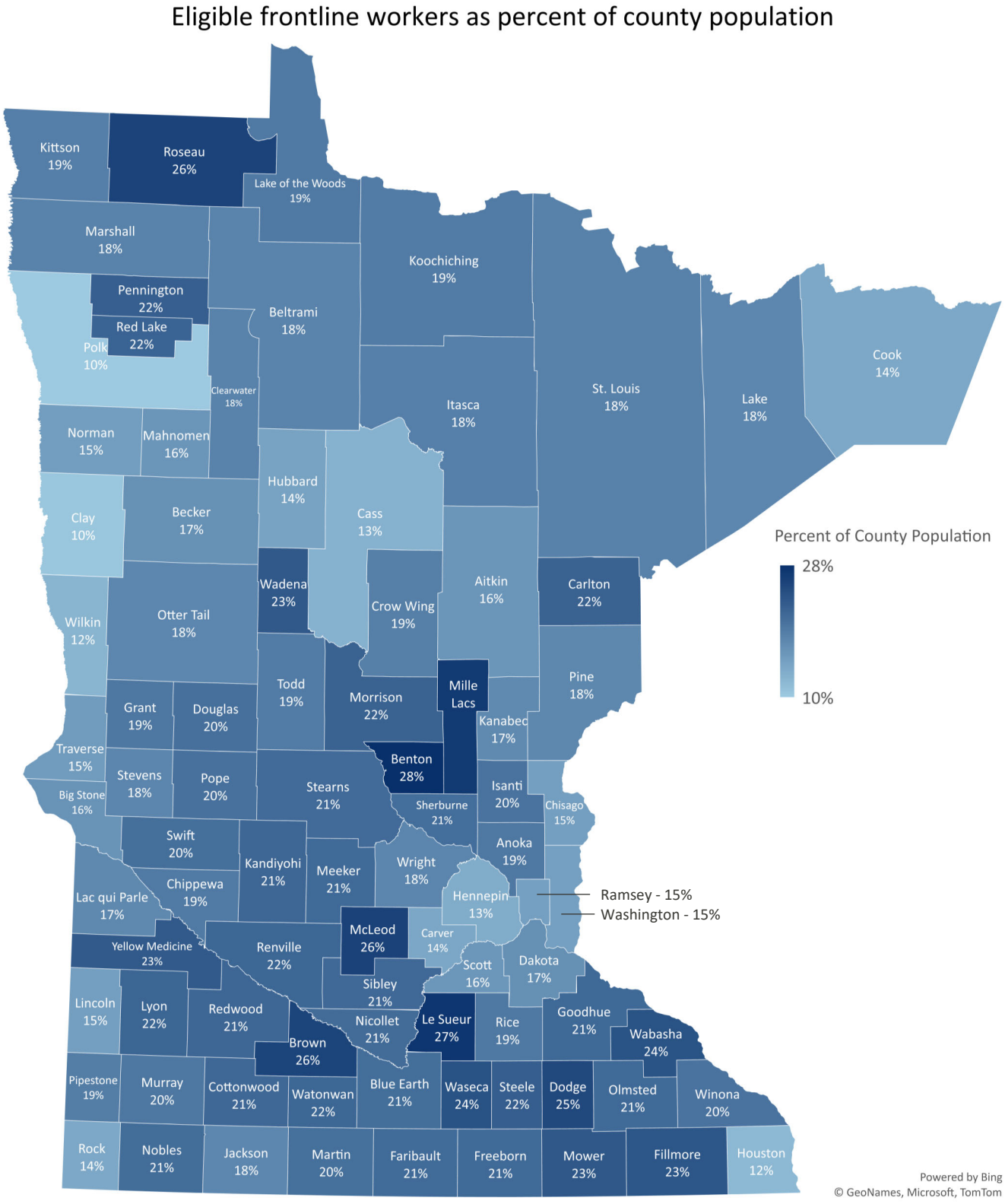
[1] County population data was retrieved from Minnesota State Demographic Center, Metropolitan Council, and U.S. Census Bureau (Released May 2022) at https://mn.gov/admin/demography/data-by-topic/population-data/our-estimates/ on 12/21/22.

Table 1

County name	Eligible workers	Percent of population	Percent of eligible workers
Aitkin	2,567	16%	0.3%
Anoka	71,201	19%	6.9%
Becker	5,837	17%	0.6%
Beltrami	8,392	18%	0.8%
Benton	11,504	28%	1.1%
Big Stone	847	16%	0.1%
Blue Earth	14,253	21%	1.4%
Brown	6,578	26%	0.6%
Carlton	8,011	22%	0.8%
Carver	15,153	14%	1.5%
Cass	3,885	13%	0.4%
Chippewa	2,390	19%	0.2%
Chisago	8,534	15%	0.8%
Clay	6,723	10%	0.7%
Clearwater	1,565	18%	0.2%
Cook	779	14%	0.1%
Cottonwood	2,491	21%	0.2%
Crow Wing	12,602	19%	1.2%
Dakota	73,669	17%	7.2%
Dodge	5,227	25%	0.5%
Douglas	8,071	20%	0.8%
Faribault	2,899	21%	0.3%
Fillmore	4,986	23%	0.5%
Freeborn	6,478	21%	0.6%
Goodhue	10,164	21%	1.0%
Grant	1,198	19%	0.1%
Hennepin	171,906	13%	16.8%
Houston	2,235	12%	0.2%
Hubbard	3,152	14%	0.3%
Isanti	8,344	20%	0.8%
Itasca	8,359	18%	0.8%
Jackson	1,770	18%	0.2%
Kanabec	2,829	17%	0.3%
Kandiyohi	9,402	21%	0.9%
Kittson	774	19%	0.1%
Koochiching	2,271	19%	0.2%
Lac qui Parle	1,167	17%	0.1%
Lake	1,946	18%	0.2%
Lake of the Woods	737	19%	0.1%
Le Sueur	7,861	27%	0.8%
Lincoln	829	15%	0.1%
Lyon	5,446	22%	0.5%
Mahnomen	860	16%	0.1%
Marshall	1,635	18%	0.2%
Martin	4,040	20%	0.4%

County name	Eligible workers	Percent of population	Percent of eligible workers
McLeod	9,480	26%	0.9%
Meeker	4,968	21%	0.5%
Mille Lacs	7,138	27%	0.7%
Morrison	7,453	22%	0.7%
Mower	9,338	23%	0.9%
Murray	1,579	20%	0.2%
Nicollet	7,246	21%	0.7%
Nobles	4,586	21%	0.4%
Norman	958	15%	0.1%
Olmsted	34,761	21%	3.4%
Otter Tail	10,670	18%	1.0%
Pennington	3,061	22%	0.3%
Pine	5,122	18%	0.5%
Pipestone	1,747	19%	0.2%
Polk	3,042	10%	0.3%
Pope	2,305	20%	0.2%
Ramsey	81,611	15%	8.0%
Red Lake	862	22%	0.1%
Redwood	3,289	21%	0.3%
Renville	3,142	22%	0.3%
Rice	12,987	19%	1.3%
Rock	1,339	14%	0.1%
Roseau	3,896	26%	0.4%
Scott	24,187	16%	2.4%
Sherburne	20,422	21%	2.0%
Sibley	3,176	21%	0.3%
St. Louis	36,322	18%	3.5%
Stearns	33,383	21%	3.3%
Steele	8,416	22%	0.8%
Stevens	1,669	18%	0.2%
Swift	2,038	20%	0.2%
Todd	4,790	19%	0.5%
Traverse	504	15%	0.0%
Wabasha	5,149	24%	0.5%
Wadena	3,241	23%	0.3%
Waseca	4,552	24%	0.4%
Washington	40,117	15%	3.9%
Watonwan	2,403	22%	0.2%
Wilkin	784	12%	0.1%
Winona	9,818	20%	1.0%
Wright	25,890	18%	2.5%
Yellow Medicine	2,132	23%	0.2%
Out of State	43,871	n/a	4.3%
Invalid Zip Code	608	n/a	0.1%

Figure 3


Eligible frontline workers as percent of county population
Kittson 19%
Roseau 26%
Lake of the Woods 19%
Marshall 18%
Koochiching 19%
Pennington 22%
Red Lake 22%
Polk 10%
Beltrami 18%
Clearwater 18%
Itasca 18%
St. Louis 18%
Lake 18%
Cook 14%
Norman 15%
Mahnomen 16%
Hubbard 14%
Cass 13%
Clay 10%
Becker 17%
Wadena 23%
Crow Wing 19%
Aitkin 16%
Carlton 22%
Wilkin 12%
Otter Tail 18%
Todd 19%
Morrison 22%
Mille Lacs
Pine 18%
Grant 19%
Douglas 20%
Kanabec 17%
Traverse 15%
Stevens 18%
Pope 20%
Stearns 21%
Benton 28%
Isanti 20%
Big Stone 16%
Sherburne 21%
Chisago 15%
Swift 20%
Kandiyohi 21%
Meeker 21%
Wright 18%
Anoka 19%
Chippewa 19%
Lac qui Parle 17%
Hennepin 13%
Ramsey - 15%
Washington - 15%
McLeod 26%
Carver 14%
Yellow Medicine 23%
Renville 22%
Scott 16%
Dakota 17%
Sibley 21%
Lincoln 15%
Lyon 22%
Redwood 21%
Nicollet 21%
Le Sueur 27%
Rice 19%
Goodhue 21%
Wabasha 24%
Brown 26%
Pipestone 19%
Murray 20%
Cottonwood 21%
Watonwan 22%
Blue Earth 21%
Waseca 24%
Steele 22%
Dodge 25%
Olmsted 21%
Winona 20%
Rock 14%
Nobles 21%
Jackson 18%
Martin 20%
Faribault 21%
Freeborn 21%
Mower 23%
Fillmore 23%
Houston 12%
Percent of County Population
28%
10%
Powered by Bing
© GeoNames, Microsoft, TomTom

Race and ethnicity

Race and ethnicity were optional questions on the program application. The program received applications from a diverse group of frontline workers. Figure 4 displays the count and percentage of eligible frontline workers by race. For the largest responses to this question, 72.7% of eligible frontline workers identified as White, 11.0% preferred not to answer and 7.3% identified as Black or African American.

Figure 4

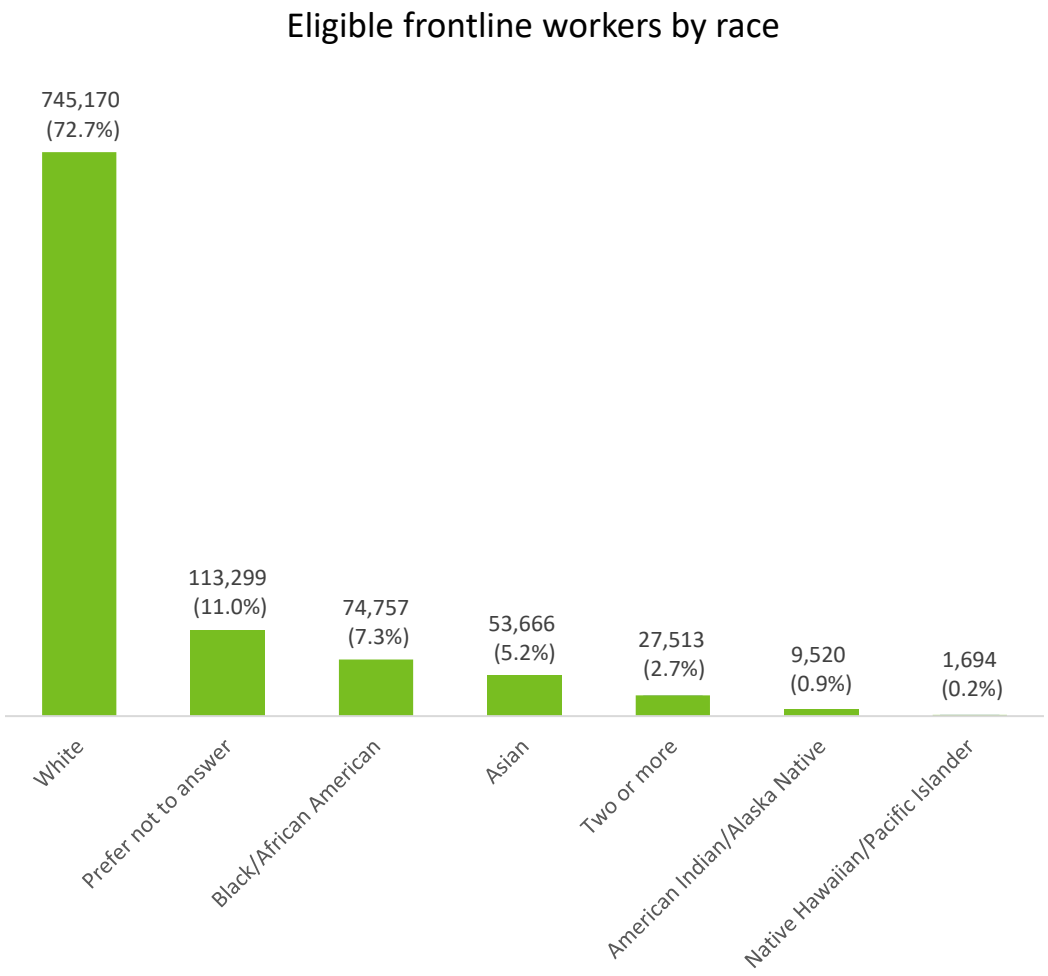
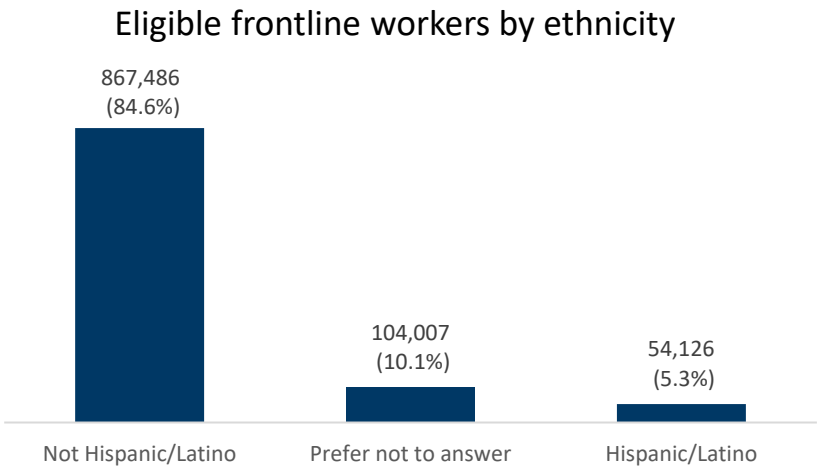


Figure 5 displays the count and percentage of eligible frontline workers by ethnicity. Of those: 5.3% of the eligible frontline workers identified as Hispanic/Latino; 10.1% preferred not to answer; and 84.6% identified as not Hispanic/Latino.

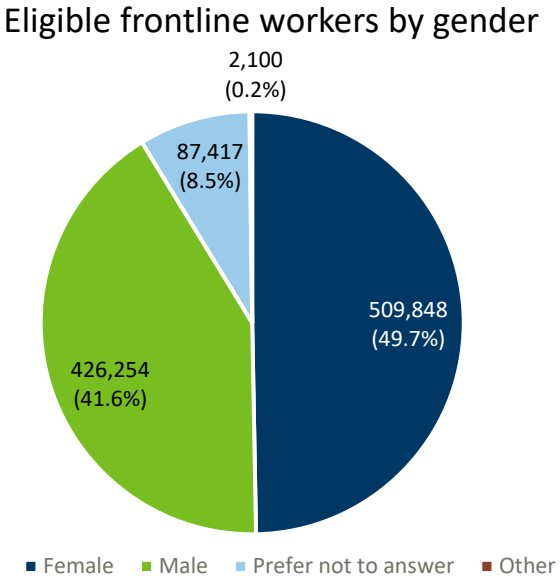
Figure 5



Gender

Gender was an optional question on the program application. Figure 6 displays the count and percentage of eligible frontline workers by gender. Of eligible Frontline Worker Pay recipients: 49.7% identified as female; 41.6% identified as male; 8.5% preferred not to answer; and 0.2% identified as other.

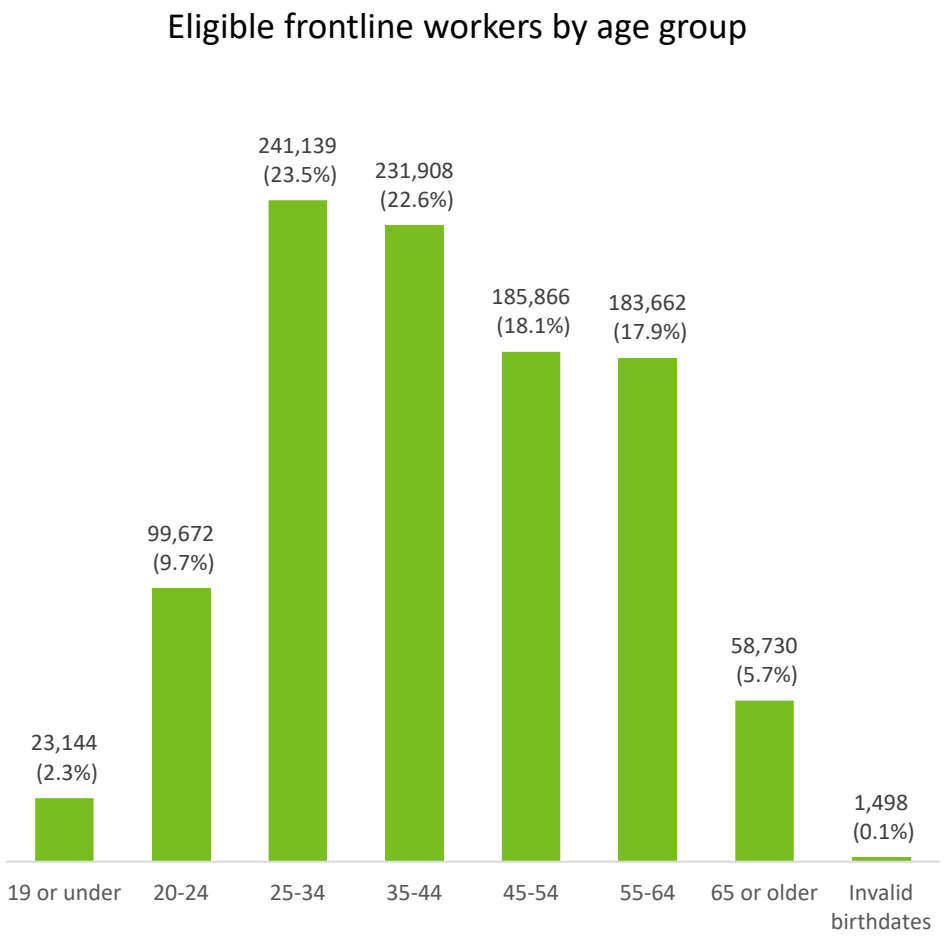
Figure 6



Age

Using applicant date of birth provided on the application, the age of eligible frontline workers was calculated as of the day the application opened, June 8, 2022. The median age of eligible frontline workers was 41 years. The largest age group of recipients was 25 to 34 years at 23.5%, followed by 35 to 44 years at 22.6%, as displayed in Figure 7. Fifty-eight percent of the eligible frontline workers were under the age of 45 years.

Figure 7



Denials

A total of 173,702 applications to the Frontline Worker Pay program were denied. The reasons for denial were: not meeting one or more of the eligibility criteria; not being able to verify the applicant's identity; and not submitting a required appeal form(s). Denied application counts by denial reason are in Tables 2 and 3. Some applicants failed for more than one reason, so the counts in Table 2 do not sum to the total number of denials. Table 3 provides an unduplicated count of fail reasons by counting fails at the step that an applicant stopped moving through the appeals review process.

Table 2

Fail reasons Duplicated	**Count**
Unemployment insurance	55,481
Employment	45,640
Adjusted gross income	37,733
Identity verification	113,602

Table 3

Final fail reason Unduplicated	**Count**
Refused appeal	157,135
Unemployment insurance	6,563
Employment	1,021
Adjusted gross income	582
Identity verification	8,401
Total	**173,702**

Additional appropriation calculation

As stated by the FWP law, this report is required to provide the amount of an additional appropriation that would be needed to equal the difference between $1,500 and the initial payment amount.

($1,500 - $487.45) * 1,025,619) = $1,038,490,518.45

Given the initial payment amount of $487.45 and the number of eligible frontline workers (1,025,619), an additional $1,038,490,518.45 would be required to provide an additional payment of $1,012.55 to all eligible frontline workers. Additional administrative funds would also be required to distribute additional payments.

Supplementary information

Application eligibility verification

Online applications were accepted for 45 days, June 8 through July 22, 2022, followed by time to process and verify the applications submitted. Submitted applications were verified by DLI, DEED and DOR. Submittable is the application technology vendor the state worked with for the Frontline Worker Pay program that was involved in processing application, appeal and payment data. The following sections describe the verification processes to which each application was subject.

Unemployment insurance benefits

The FWP application stated the requirement that "To be eligible for Frontline Worker Pay, the applicant ... must not have received an unemployment insurance benefit payment for more than 20 weeks on a cumulative basis for weeks between March 15, 2020, and June 26, 2021." The application also required applicants to affirm the following: "I hereby certify and affirm I did not receive an unemployment insurance benefit payment for more than 20 weeks on a cumulative basis for weeks between March 15, 2020, and June 26, 2021."

If the applicant wanted more information, the application further explained, "Unemployment insurance benefit payments include payments made by the state of Minnesota under Minnesota Statutes, sections 268.001 to 268.23, pandemic emergency unemployment compensation, extended benefits, pandemic unemployment assistance, federal pandemic unemployment compensation, lost wages assistance, mixed earnings unemployment compensation, and trade readjustment allowance. Unemployment insurance benefit payments shall include the amounts withheld from an unemployment insurance benefit payment for income tax, deducted for a child support obligation or an offset from unemployment benefits under Minnesota Statutes, section 268.18, subdivision 3a. Unemployment insurance benefit payments shall include amounts found to be overpaid under Minnesota Statutes, section 268.18."

DEED reviewed applications to determine whether applicants' affirmation regarding unemployment insurance (UI) benefits matched the UI benefits received. DEED used its UI data system to verify whether applicants received more than 20 cumulative weeks between March 15, 2020, and June 26, 2021. Laws of Minnesota Chapter 50, Article 2, Sec. 2, Subdivision 3(a)(4) specified how the payments would be calculated and that "the calculations under this clause shall be made based exclusively on data held by DEED as of the effective date of this act."

Weekly applicant data files were transmitted from Submittable to the partner agencies. DEED used the Social Security number (SSN) provided by the applicant to verify UI benefits from the UI data system. If the SSN on the application had received more than 20 cumulative weeks of UI benefits between March 15, 2020, and June 26, 2021, the verification process returned a denial. If the SSN on the application was not in the UI benefits system or had received 20 or fewer weeks of UI benefits, the verification process returned an approval. A file of

decisions was produced and returned to Submittable. Verification decisions were compiled and updated in the frontline worker application review system with associated labels.

Adjusted gross income

The FWP application stated the requirement that "To be eligible for Frontline Worker Pay, the applicant ... must meet the income requirements for at least one year between Dec. 31, 2019, and Jan. 1, 2022 –

- workers with direct COVID-19 patient care responsibilities must have had an adjusted gross income of less than $350,000 for married taxpayers filing jointly, or less than $175,000 for other filers and
- for workers in occupations without direct COVID-19 patient care responsibilities, the adjusted gross income limit is $185,000 for married taxpayers filing jointly, or $85,000 for other filers."

The application also required applicants to affirm their filing status, COVID-19 patient care responsibilities and whether they were under the associated adjusted gross income threshold. If the applicant wanted more information about COVID-19 patient care, the application further explained, "An employee had direct COVID-19 patient care responsibilities if they, as part of their assigned job duties, were responsible for providing direct care to a patient, resident or individual who was diagnosed with COVID-19."

Weekly applicant data files were transmitted from Submittable to the partner agencies. DOR used the SSN or Individual Taxpayer Identification Number (ITIN) provided by the applicant to verify adjusted gross income (AGI) against the state tax system. The verification process returned a denial if:

- DOR was unable to verify the customer based on Minnesota income tax (M1) and withholding (W2) records in 2020 and 2021;
- 2020 income was over the AGI limit based on M1 filing and unable to verify income in 2021;
- 2021 income was over the AGI limit based on M1 filing and unable to verify income in 2020;
- the applicant was not qualified for payment based on filing status, COVID-19 contact and income threshold based on both 2021 M1 AGI and 2020 M1 AGI;
- no SSN or ITIN was provided or the format was invalid; or
- the application was a duplicate entry.

If the SSN or ITIN on the application met the filing status and AGI threshold or DOR was able to verify the customer exists based on W-2 records, the verification process returned an approval. A file of decisions was produced and returned to Submittable. Verification decisions were compiled and updated in the frontline worker application review system.

Employment

The FWP application stated the requirement that "To be eligible for Frontline Worker Pay, the applicant ... must have been employed at least 120 hours in Minnesota in one or more frontline sectors between March 15, 2020, and June 30, 2021 [and] for the hours worked during this time period the applicant was not able to telework due to the nature of the individual's work and worked in close proximity to people outside of the individual's household."

The application also required applicants to affirm the following:

- "I hereby certify and affirm I was employed in the previously identified frontline sector(s) in Minnesota during the period beginning March 15, 2020, and ending June 30, 2021, for at least 120 hours."
- "I hereby certify and affirm that, for at least 120 hours of my employment in the previously identified frontline sector(s) and during the identified time frame, I was unable to telework due to the nature of my work."
- "I hereby certify and affirm that, for at least 120 hours of my employment in the previously identified frontline sector(s) and during the identified time frame, I worked in close proximity to individuals outside of my household."

If the applicant wanted more information, the application further explained the following.

- "'Employed' means time working as an employee in an employer-employee relationship and does not include work as an independent contractor or sole proprietor."
- "'Not able to telework' means the applicant must not have had an option to perform work remotely or in telework status."
- "'Close proximity to individuals outside of the individual's household' means within six feet of individuals with whom the applicant does not live."

The application also required applicants to agree to employment verification by affirming the following statement.

> "I authorize my current and former employers to orally, or in writing, make available to representatives of the Minnesota Department of Labor and Industry the following job-related data: dates of employment; hours worked; telework eligibility; job title(s) and responsibilities; and other job-related data that may be maintained by my current and former employers. I understand the purpose of permitting the Minnesota Department of Labor and Industry to obtain job-related information about me is to determine my eligibility for Frontline Worker Pay. I understand any data received by the Minnesota Department of Labor and Industry will be treated as private data and, therefore, access to the data will be limited to individuals within the Department of Labor and Industry and their representatives whose job duties reasonably require access, to myself and to any individuals authorized by me to receive the data. I understand I may withdraw my authorization at any time, but that if I do withdraw my authorization, it will not affect any data that was released prior to my withdrawal. I authorize my current and former employers to make the above information available to the Minnesota Department of Labor and Industry."

There is not a universal data source for verifying employment in Minnesota according to the parameters of the Frontline Worker Pay program. To verify employment to the extent possible, DLI conducted two sampling procedures.

Statistical sampling and employer verification

Weekly applicant data files were transmitted from Submittable to the partner agencies. Applications were randomly selected from the data file for employment verification. Statistically sampled applications were verified using the SSN or ITIN provided by the applicant to check for employment records in the required timeframe in two data systems: UI Wage Detail records and W-2 wage records. If neither employment verification record was found, DLI staff members contacted the employer(s) listed on the application to verify:

- dates of employment;
- location of employment;
- hours working in the workplace or unable to telework;
- proximity to individuals outside of their household when working; and
- employment status, including employee, independent contractor and/or owner.

If the SSN or ITIN on the application was not found in UI Wage Detail records or W-2 wage records, UI Wage Detail records reflected fewer than 120 hours worked or the employers were unable to verify the applicant's employment, the verification process returned a denial. If the SSN or ITIN on the application was found in UI Wage Detail records with sufficient hours or in W-2 wage records, or the applicant's employment was verified by the employers listed on the application, the verification process returned an approval. A file of decisions was produced and returned to Submittable. Verification decisions were compiled and updated in the frontline worker application review system.

Targeted sampling

In addition to the weekly random sampling, DLI conducted targeted employment verification at the close of the application period. The purpose of the targeted sampling was to identify additional applications not already marked as a denial that had questionable employment information based on patterns seen in the statistical sampling. By conducting both statistical and targeted sampling, DLI had the opportunity to learn from weekly applicant data and identify application patterns indicative of potentially fraudulent employment records. The process included all applications and used consistent parameters for sampling. The targeted sampling was conducted before the approval or denial notification to allow denied applicants an opportunity to appeal and prove their employment. Lastly, this process helped to ensure DLI was verifying employment "to the extent possible" as required by the program.

The parameters used in the targeted sampling included identifying: employers not in Minnesota; self-employed applicants who do not meet the criteria of being an employee; conflicting information provided within the application, such as direct COVID-19 patient care but not in a health-care-related sector; and payment information provided on the application matching multiple other applications. Sampled applications were verified using the SSN or ITIN provided by the applicant to check for employment records in UI Wage Detail records and W-2 wage records.

If the SSN or ITIN on the application was not found in UI Wage Detail records or W-2 wage records, or UI Wage Detail records reflected fewer than 120 hours worked, the verification process returned a denial. If the SSN or

ITIN on the application was found in UI Wage Detail records with sufficient hours or in W-2 wage records, the verification process returned an approval. A file of decisions was produced and returned to Submittable. Verification decisions were updated in the frontline worker application review system.

Identity verification

To ensure the applicants submitting an FWP application were who they represented themselves to be on the application, applicants were required to verify their identity. The application provided the following options.

> "We need to confirm your information. How will you verify your identity?
>
> - Answer questions about myself [knowledge-based authentication].
> - Take a photo of my ID card and take a selfie (smart phone with working camera is required) [ID verification]."

The application also required applicants to affirm the following and provide a digital signature: "I certify and affirm the above information is true and accurate to the best of my knowledge. I understand that if I submit a false claim for payment, I may be charged with an attempt to commit theft of public funds. I understand there may be other penalties for not telling the truth on this application."

Applicants had to complete either the knowledge-based authentication (KBA) or identity verification (IDV) process to submit a Frontline Worker Pay application. Both the KBA and IDV were completed within the application process through third-party systems.

- The KBA process required basic information factors, such as name, address, SSN and date of birth, which were used to generate knowledge questions based on the applicant's credit history. To pass the initial KBA process, the applicant needed to accurately respond to 80% of the questions.
- The IDV process required applicants to scan an image of an eligible identifying document, such as a passport, an ID card, a driver's license or a residence permit, and then compare the ID picture to the applicant's face through a live webcam or phone camera. Applicants passed the IDV process if the program requirements for matching images were met.

After the application was submitted, the result of the applicant's KBA or IDV process was reviewed in Submittable. For applicants who completed the KBA or IDV process and their identity was unable to be verified, an email message was sent to the applicant for a second identity verification opportunity using IDV. Applicants who failed or did not complete the second verification were denied for identity purposes.

The overarching intention of identity verification is to balance the considerations of fraud prevention and timely payments, while not creating insurmountable obstacles for eligible applicants to receive the payment. As such, a manual identity verification process was also developed. People who received a second ID verification email message and were unable to complete the IDV process because they lacked a valid ID were given opportunity to complete a manual identity verification with a DLI staff member. Applicants who were unable to complete the KBA or IDV process and were, therefore, unable to submit an application, were also provided with the manual identity verification opportunity. The outcome was recorded in Submittable.

Appeal forms and review process

Following application verification, all applicants were notified via email either that no further action was required or that their application was denied and they were eligible to submit an appeal in the following 15-day appeals period, Tuesday, Aug. 16, through Wednesday, Aug. 31, at 5 p.m. (CT). Applications may have been denied with eligibility for appeal for five reasons:

- the applicant exceeded the UI benefit threshold established in the law;
- the applicant exceeded the adjusted gross income threshold established in the law;
- the applicant's employment eligibility could not be verified;
- the application was deemed a duplicate; and/or
- the applicant's identity could not be verified.

All denials were communicated by email. The email messages informing applicants their application was denied were sent Aug. 16. The email message informing the applicant of a denial was sent to the email address used to set up the applicant's account and apply for Frontline Worker Pay. The email message communicating the denial contained a link to sign into the applicant's Submittable account, where they could access the required appeal forms. A reminder message was sent Aug. 24 to individuals with one or more outstanding appeal forms in their Submittable portal.

Appeal forms were online forms that had to be submitted to appeal a denial decision. The information required in the appeal form depended on the reason for the denial. Each denial reason had a corresponding appeal form that could be accessed from the applicant's Submittable account. If the applicant did not complete and successfully submit all appeal forms during the appeals period, within 15 days of the date of the denial email message, the denial was final.

Successfully submitted appeal forms were reviewed and a final decision was communicated to the applicant by email. The commissioner of the Department of Labor and Industry's decision on an appeal was final, as stated in the law. The following sections describe the appeal form and review process for each of the appeal reasons.

Unemployment insurance benefits appeals

DEED reviewed Frontline Worker Pay UI benefits appeals to determine whether appellants received UI benefits for more than 20 cumulative weeks during the time period specified in Minnesota Chapter 50, Article 2, Sec. 2, subd. 3(a)(4). The unemployment insurance benefit appeals review was conducted according to the following process.

To process FWP UI benefits appeals, Submittable provided a file of UI appeal records to DEED. The SSNs in the file were re-run against DEED UI data. The explanations provided by applicants were reviewed for new information. DEED reviewed to determine whether there was sufficient evidence that the weeks of UI benefits paid to that SSN were actually requested by and paid to someone other than the genuine SSN owner. This included reviewing banking information and the time when a potential imposter may have been detected on the UI account. A successful FWP UI benefits appeal required that the appeal had a basis in facts that were both

plausible and independently confirmable, primarily an assertion that their identity had been compromised prior to or during the period when UI benefits were requested and paid, and that the individual did not request the benefits. Successful appeals also required dissimilar banking information between the UI benefits payments and the FWP application, as well as other data in the application and UI weekly request processes consistent with an imposter's involvement. Appeal determinations were made and a file was sent to Submittable. Submittable updated the data in the system and submissions were moved on to the next appropriate stage.

DEED conducted additional appeals review for some AGI appeals, specifically when the original AGI fail reason was "Unable to verify customer based on M1 and W-2 records in 2020 and 2021" and the SSN submitted in their AGI appeal was different from the original submission. If DOR approved the AGI appeal, then a file was produced for DEED to validate whether the newly submitted SSN met the FWP criteria for UI benefits. DEED conducted its check, determinations were made and a file was sent to Submittable. Submittable updated the data in the system and submissions were moved on to the next appropriate stage.

Adjusted gross income appeals

The Department of Revenue reviewed FWP AGI appeals to determine whether appellants met the AGI requirements specified in Minnesota Chapter 50, Article 2, Sec. 2, subd. 3(a)(3); (b). The AGI appeals review was conducted according to the following process.

To process FWP AGI appeals, Submittable provided a daily file of AGI appeal records to DOR. Lead workers assigned work to generalists. DOR created a tiered list of 150 employees to scale up or down depending on workload. DOR staff members reviewed appeals daily within the Submittable system.

Data used to make AGI appeal determinations included data from the state tax system and applicant-provided documentation, such as IRS 1040 forms, IRS transcripts and other supplemental documentation. A successful FWP AGI appeal required the following:

- the applicant provided the appropriate AGI appeal form in Submittable;
- the applicant provided the appropriate AGI appeal documentation;
- the AGI appeal documentation demonstrated eligibility based on FWP AGI criteria;

AGI standard	Must be less than
With direct COVID-19 patient care responsibilities	$350,000 for married filing jointly $175,000 for other filers
Without direct COVID-19 patient care responsibilities	$185,000 for married filing jointly $85,000 for other filers

- applicant-provided documentation was reviewed for authenticity and potential fraudulent submission indicators;
- supplemental applicant-provided information was manually reviewed by DOR staff members; and
- DOR staff members used data from the Gen Tax system to assist in making appeal determinations.

Staff members updated appeal results in the Submittable system. Results were scored as a 1 = passed appeal, -1 = failed appeal and 0 = needs clarification. AGI lead workers reviewed appeals scored as failed and as needs

clarification. Fraudulent trends and suspicious submissions were reported to DLI for further consideration. DOR staff members documented determinations in the system and moved submissions to the next appropriate stage.

Employment appeals

DLI reviewed FWP employment appeals to determine whether appellants met the employment requirements specified in Minnesota Chapter 50, Article 2, Sec. 2, subd. 3(a)(1). The employment verification appeals review was conducted according to the following process.

To process FWP employment appeals, Submittable ran a daily script that moved appeals into the employment appeal review stage. DLI lead workers assigned work to the reviewers and DLI staff members reviewed appeals daily within the Submittable system.

Data used to make employment appeal determinations included: UI Wage Detail records; W-2 wage records; applicant-provided documentation and comments detailing their circumstances; and employer-provided documentation. A successful FWP employment appeal required documentation of employment in Minnesota and documentation of more than 120 hours worked in Minnesota in the March 15, 2020, to June 30, 2021, timeframe.

After a determination was made, the reviewers scored the appeal. For passed appeals, reviewers scored the appeal as +1 in the Submittable system. For failed appeals, reviewers scored the appeal as -1 and assigned it to a lead worker for additional review. A lead worker reviewed all failed employment appeals and scored failed appeals as -1 to confirm, resulting in a score of -2 in the Submittable system. If documents or other information appeared fraudulent, reviewers applied the "potential fraud" label in Submittable, scored the appeal as -1, documented why it was suspected fraud and assigned it to a lead worker for further review and scoring. After DLI staff members documented determinations in the Submittable system, submissions were moved to the next appropriate stage.

Identity verification appeals

DLI reviewed applications and appeals to verify applicants' identities, which included identity appeals and duplicate application appeals. If the applicant's identity could not be verified or the applicant submitted potentially fraudulent information requiring re-verifying identity, applicants were required to submit the identity appeal form. If the application was deemed a duplicate based on SSN or ITIN, applicants were required to submit the duplicate appeal form. These reviews were conducted according to the following processes.

Identity appeals

For identity appeals, appellants submitted the ID appeal form with their SSN or ITIN and completed either the KBA or IDV process. Both KBA and IDV were completed within the appeal process through third-party systems.

- The KBA process required basic information factors, such as name, address, SSN and date of birth, which were used to generate knowledge-based questions based on the appellants credit history. To pass the initial KBA process, the appellant needed to accurately respond to 60% of the questions.

- The IDV process required applicants to scan an image of an eligible identifying document, such as a passport, ID card, driver's license or residence permit, and then compare the ID picture to the applicant's face through a live webcam or phone camera. Appellants passed the IDV process if the program requirements for matching images were met.

Appeals were processed daily by Submittable based on the above criteria. Additional follow-up was conducted by DLI staff members to attempt to verify applicant identity manually, through other data sources or through outreach to applicants. A successful FWP identity appeal required a completed identity appeal form and one of the following:

- completed the identity appeal KBA process with a score of 60% or higher;
- completed the identity appeal IDV process with an ID match;
- appellants' ACH bank information and SSN or ITIN matched DOR records;
- appellants' verified information with an FWP representative during manual review; or
- appellants' application information matched information provided via the KBA process or the IDV process.

For failed appeals: the applicant did not complete the appeal form before the appeal period closed; the appellant's KBA scores were less than 60%; the appellant's IDV result was not an identity match; or the applicant information was determined not to match identity information.

Duplicate appeals

For duplicate appeals, appellants submitted the ID appeal form with their SSN or ITIN and had to complete either the KBA or IDV process, as described in the identity appeals section above. Appeals were processed daily by Submittable based on the same criteria. A successful FWP duplicate appeal required a completed duplicate appeal form and the appellant's information was determined to be the true duplicate.

Additional review was conducted by DLI staff members to attempt to verify applicant identity manually or through other data sources. A duplicate appeal failed if the applicant did not complete the appeal form before the appeal period closed or the appellant's information was determined to be the false duplicate.

Additional fraud prevention strategies

As part of the Frontline Worker Pay program, a fraud prevention protocol was developed (see Appendix C: Fraud prevention plan). The goal was to reduce incidents of fraud by developing protocols that made fraud attempts difficult and fraud success unlikely, while providing administrative ease for legitimate applicants. Fraud prevention occurred in the design of the application, the appeals process and the identity verification process, as well as through active review of potential fraud indicators.

Program design fraud prevention strategies

The program was designed from the outset incorporating fraud prevention strategies. The 45-day application and 15-day appeals periods created wait time for money, potentially deterring fraudulent activity. Similarly, limiting the application and appeals period to 45 and 15 days, respectively, placed limitations on bad actors capable of developing programs ("bots") to submit large numbers of automated applications with false data in the hopes of some fraudulent applications being approved and in cluttering up the system enough to reduce the ability to pay close attention to the details of application content. The equal payment provision of the program supports strategies to move applicants through the process in a single large batch.

The IT platform contained several built-in protocols that reduced opportunities for fraudulent behavior, including the requirement to create an account with a unique user identifier to start an application and the limitation that each account could only submit one application per project. In addition, once submitted, the individual's application was locked for editing; the only way to revise an item in the application was to withdraw the submission and submit a separate application.

The application itself was designed with multiple layers to prevent fraudulent submissions. Before submitting an application, an individual needed to complete and pass an eligibility quiz, creating a step to deter fraudulent actors. Similarly, the application contained multiple required fields, adding a level of complexity that could further deter bad actors. The application required self-certification that applicants met each of the eligibility criteria. The application also notified applicants that false claims for payment may result in applicants being charged with an attempt to commit theft of public funds or other penalties.

The application verification and appeals review processes for UI benefits, AGI and employment described above also allowed DLI, DEED and DOR to identify fraudulent submissions that did not meet the requirements established for the program. The appeal process for AGI and employment required appellants to submit relevant documentation. Review of these documents incorporated fraud prevention as processes were established to identify and review fraudulent documents. Submissions with potential fraud were routed to DLI lead workers for review and appropriate routing.

To submit an application, all applicants were required to complete and pass one of the identity verification processes, described in the application eligibility verification section above. The overarching intention of identity verification, in both the application and appeal processes, was to balance the considerations of fraud prevention and timely payments, while not creating insurmountable obstacles for eligible applicants to receive payment.

The program also conducted a thorough review of duplicate applications based on an SSN or ITIN being used by more than one application. Scenarios in which the application was deemed a duplicate required applicants to submit the duplicate appeal form and verify their identity. Any duplicates remaining after appeals were manually reviewed by DLI lead workers who made determinations about the true and false duplicate applications.

The payment process offered additional opportunities to prevent payment of fraudulent applications, including: verification of mailing address with the U.S. Postal Service; review of bank account information to limit the

number of payments going to a single account; validation of bank account information; review of any direct deposit failures and updates; and prepaid debit card activation requiring additional pieces of information.

Review for potential fraud indicators

Frontline worker applications, appeals and payment information were reviewed proactively to identify incidents of fraud throughout the application, appeals and payment processing timeframes. The FWP database was queried for potential fraud indicators. Data sources that were used to identify potential fraud indicators included: applications submitted by applicants; appeal forms submitted; KBA information and results; IDV information and results; and UI Wage Detail records.

Fraud indicators included: high-risk email domains; suspicious patterns in email addresses; high-risk bank routing numbers; UI imposter or hijacked codes; duplicate bank accounts; unusual address patterns within applications and appeals; duplicate prepaid debit card addresses; out-of-state prepaid debit card addresses; KBA address matching the employer address listed on the application; the volume of submissions arriving in a short amount of time; and suspicious patterns in the application data.

Records with a combination of potential fraud indicators were routed to DLI lead workers for review, who made fraud decisions. Decisions were recorded in the Submittable system and labels were assigned to the associated submission(s). Fraudulent submissions were routed to decline or failed appeal stage as appropriate.

Information for employers

Within 15 days after the application period opened, employers in the identified frontline sector were required to provide notice to all current workers who may be eligible for payments of the assistance available to them and how to apply for payments. DLI developed an employer notice form that could be used by employers to meet this obligation and made the form available to the public online.

Communications

As the Frontline Worker Pay legislation moved toward passage during the 2022 Legislative Session, the DLI Communications unit created a plan of action in February 2022, mapping out what it would need and when it would need it to reach out to other state agencies, the frontline workers, the public and DLI staff members, and to develop specific application content for the project vendor, Submittable.

DLI quickly set up a cross-agency group to develop a branded marketing and outreach campaign focused on frontline workers, which encompassed a logo, graphics, video, a statewide social media campaign, informational materials, development of promotional materials for external stakeholders to use and more. Since the web application vendor was not yet available, DLI rapidly set up and launched an informational website (frontlinepay.mn.gov) with Minnesota IT Services when the legislation was signed into law April 29. The site had more than 90,000 views in its first three days. Statewide social media posts began April 30.

DLI created a dedicated Frontline Worker Pay updates email list, open to anyone who wanted to subscribe, through which messages about the program were sent. Within three days, the list had 22,000 subscribers; by the end of the campaign, there were 406,000 subscribers. DLI sent 12 bulletins to the subscriber list and another eight bulletins to media, industry and employer associations, and organizations connected to frontline workers.

Multiple versions of webpage text were created for both the DLI website and the Submittable website, to be used as the program moved from stage to stage with more than a million visits in a few short weeks. An online toolkit of resource documents, webpages and graphics were created and translated (into, at least, Hmong, Somali and Spanish), including frequently asked questions documents, sample newsletter text, sample social media posts, an informational sheet (translated into 20 languages), an application fact sheet, the employer notice – which was required by the law – and more. The toolkit site received more than 1.8 million visits during the application process. A brief video about the program was also created, translated and posted on the DLI website. Nine frontline worker profiles were researched, created and posted on the DLI website.

A high number of statewide media inquiries, responses and interviews were addressed and conducted from before the legislation was signed into law through the processing and verifying stages for applications and appeals, through the announcement of the payment amount and continued through the payment and reporting stages. There were more than 80 news stories published statewide about the Frontline Worker Pay program.

DLI's social media posts and ads were featured on multiple platforms, including Facebook, Google, LinkedIn and Twitter, and used for reposting by other state agencies. DLI partnered with DEED to run a paid statewide advertisement and social media Frontline Worker Pay campaign, which included Hmong, Somali and Spanish outlets. DEED created ads on Facebook, Twitter, Google and Instagram, promoting the Frontline Worker Pay program to anyone in Minnesota who might be eligible for the pay. The ads reached hundreds of thousands of people statewide.

Outreach and engagement

DLI Communications also worked with DLI staff members to provide information to community groups, legislators and organizations to learn how to best help them reach their audiences and empower their members to relay the Frontline Worker Pay message.

Between May 10 and Sept. 30, 2022, DLI attended and participated in 70 outreach events, including webinar presentations, in-person events and meetings with organizations.

DLI worked closely with the Frontline Worker Coalition, which included approximately 30 worker organizations and unions from throughout the state. These groups relied on trusted community relationships, membership lists and specific industry expertise to reach workers, especially those from historically marginalized communities. Coalition organizations helped build awareness about Frontline Worker Pay through frontline worksite visits, online postings, community events, radio advertisements, faith-based gatherings, schools, newsletters and media events. In addition to building awareness, coalition groups directly assisted thousands of frontline workers to understand program requirements, fill in applications, complete appeals and secure needed appeal documents.

To assist coalition efforts, DLI helped create a navigator training series, walking organizations through program requirements and each step of the application and appeal submission process. DLI partnered with the coalition and conducted 10 training sessions, with 433 participants.

Employers of individuals in the identified frontline sectors played a key role in informing employees about Frontline Worker Pay and helping them apply. Many employers arranged sign-up events on site during regularly scheduled work hours. DLI conducted 17 events with employer associations, chambers of commerce and human resources groups. These included events with the Minnesota Hospital Association, the Minnesota Grocers Association, the Minnesota Farmers Union and Dakota County Chambers of Commerce, as well as information distribution at community events for Asian-American and Black businesses. Additional focus was made to reach agricultural and food service employees, with DLI partnering with the Minnesota Department of Agriculture to schedule a specific outreach event to reach stakeholders in that industry, in addition to dedicated mailings and outreach to industry employer associations. Employer events emphasized employer program obligations, a required employer posting and how employers could assist workers applying for the program.

In addition, DLI met with state lawmakers to discuss Frontline Worker Pay. From June to October 2022, then-Commissioner Roslyn Robertson and Temporary Commissioner Nicole Blissenbach participated in two legislative briefings to provide detailed information about the application and appeals processes, as well as contacting key lawmakers on committees that focus on labor, jobs and economic growth to provide updates.

Applicant support

DLI, together with a contracted partner, offered substantial applicant support during and following the application and appeals processes. Support was available through multiple avenues and in multiple languages. As directed in the statute, “The commissioner of labor and industry must assist applicants in submitting an application under this section, including but not limited to: establishing a multilingual temporary help line for applicants; and offering multilingual applications and multilingual instructions.”

Frequently asked questions

To provide applicant support as efficiently as possible, administering agencies and Submittable worked extensively to develop comprehensive documents of frequently asked questions. Designed by anticipating questions and written concisely, these documents were translated into Hmong, Somali and Spanish, and made available on both the DLI and Submittable websites to provide as much information as possible.

Partner Hero, contracted with Submittable

To administer the Frontline Worker Pay program, Minnesota contracted with Submittable to offer comprehensive support for individuals to apply. This included a subcontract with Partner Hero, a company that specializes in offering call center and email support in multiple languages.

When the application opened at 9 a.m., Wednesday, June 8, Submittable also started providing applicant support. Available by phone 12 hours a day and seven days a week, up to 70 agents a day were available to take

phone calls on a rolling basis. Any calls that could not be answered live went to voicemail. Immediate applicant support was available in English, Hmong, Somali and Spanish. Any other languages could be supported through a third-party language translation service. Similarly, email applicant support was available in English, Hmong, Somali and Spanish, with additional languages available. Both methods of reaching applicant support were published widely, with email encouraged as a faster means of receiving a response.

All applicant support handled by Partner Hero channeled through a client relationship management (CRM) tool called Salesforce, which allowed cases to be escalated and monitored to ensure seamless response. The CRM nature allowed agents to track the series of exchanges with an individual applicant as a back-and-forth rather than multiple unique "cases" for each applicant. Submittable provided Salesforce administrator support to create the Salesforce instance and provided licenses to the 10 DLI staff members who most closely interacted with applicants. Partner Hero call center agents used the same platform, allowing seamless transfer of complex cases for escalation and response.

Voicemail messages (collected and distributed through a platform called Grasshopper) were included as attachments to case records in Salesforce. Voicemail messages were also transcribed for faster response time.

Frontline Worker Pay representatives

Upon the program being signed into law April 29, DLI took immediate action to begin hiring individuals who would focus on providing support to applicants, help with appeals processing, support more complex cases and offer additional support when and where needed. Notably, DLI was in the process of hiring a permanent project manager to support various continuous improvement and project implementation efforts for the agency. This individual started with DLI May 11 to support the Frontline Worker Pay representative team.

Hiring temporary positions can be challenging in state government, so DLI explored all possibilities, including asking existing staff members to take temporary assignments or to simply offer temporary positions to anywhere from four to eight individuals. In the end, DLI hired seven full-time temporary customer services support specialist seniors to focus on providing support to frontline workers applying for the benefit. Possibly due to the intriguing nature of the program, DLI received a strong response from applicants and built a strong team of highly skilled individuals who were eager to learn and flexible with changing work assignments during each phase of the program.

The seven Frontline Worker Pay representatives began their work at DLI ranging from June 2 to June 22. Each individual came with extensive customer service experience. All were eager to learn new processes. This group proved critical to the success of the program.

When the application opened June 8, DLI received a significant volume of calls directly to the agency. Similarly, individuals began walking into DLI's headquarters office seeking support to apply. The FWP representatives learned the details of the application – inside and out. Many of them helped test the application before it went live and provided input to make the application more intuitive. They reviewed and revised frequently asked questions to help make these communications clearer.

Most importantly, this group of DLI staff members was available and excited to help fellow Minnesotans apply for Frontline Worker Pay. The application required creation of a Submittable account to begin the application and then required multiple steps, including providing basic demographic information, contact information, identity verification and certification of the key eligibility criteria. Every representative supported multiple individuals every day, on the phone and in-person, as they applied for Frontline Worker Pay.

Volume of applicant support requests

Applicant support requests came in at a high volume throughout the application, appeals and payment periods, as detailed in Table 4.

Table 4

	First week *June 8 to 14*	**End of application period** *June 8 to July 22*	**End of appeals period** *June 8 to Aug. 31*	**End of applicant support campaign** *June 8 to Oct. 31*
Phone requests	17,241	52,796	44,654	84,428
Email requests	20,576	112,477	146,958	132,499
Total applicant support requests	**37,817**	**165,273**	**191,612**	**216,927**

Throughout the entire campaign, Partner Hero and Submittable had the ability to escalate cases to the FWP representatives. A total of 1,337 cases were escalated.

Live, immediate applicant support was available in English, Hmong, Somali and Spanish. The majority of support requests were in English. During the program there were 20 requests for support in Somali and 280 requests for support in Spanish; no support requests were received in Hmong or any other language.

Throughout the entire application, appeals and payment periods, and all windows in between, the Minnesota Frontline Worker Pay team provided deeper, more personalized applicant support. Individuals who reached out to DLI, to their elected representatives or to any other state agency were channeled to the FWP representatives.

Support with identity verification

To ensure the applicant submitting the FWP application was who they represented themself to be on the application, applicants were required to verify their identity. As described above, applicants had to complete either the KBA process or IDV process to submit a Frontline Worker Pay application. To address situations where an applicant was unable to complete the KBA or IDV process, DLI's Frontline Worker Pay representatives developed a process whereby a person's identity could be manually verified with an expired driver's license or other form of identification via video call or in-person meeting. During the application period (June 8 to July 22), FWP representatives completed 490 meetings for manual identity verification. During the appeals period (Aug. 16 to 31), the representatives completed 53 meetings for manual identity verification.

Other requests for applicant support

During the application period (June 8 to July 22), 49 individuals reached out for applicant support through their elected officials. During the appeals period (Aug. 16 to 31), 46 individuals reached out to their elected officials for applicant support. These individuals were channeled to the FWP representatives.

Payment period support

At the beginning of the payment period (Oct. 3 and onward), the FWP representatives and the Partner Hero applicant support team began receiving calls and email messages specifically related to locating payments and determination of eligibility. More often than not, the application was approved and payment was in transit. Until the end of October, most calls and email messages revolved around helping applicants verify receipt of payment. Contracted applicant support with Partner Hero ended at 5 p.m., Monday, Oct. 31.

Applicant support continues

DLI has chosen to reach out to the 2,345 individuals whose prepaid debit cards were returned to U.S. Bank. DLI and U.S. Bank will continue to monitor prepaid debit card activation rates and may take additional action to reach out to those individuals who have not yet activated their card. Calls and email messages coming to DLI continue to gradually decline.

Budget and payment processing

The Legislature appropriated $500 million from the general fund in fiscal-year 2022 to be split equally across all eligible frontline workers. Additionally, $11,650,000 was allocated to the DLI commissioner for administrative costs to implement the program and distribute the payments to eligible frontline workers. DLI also may transfer these funds to the commissioners of DEED or DOR to cover their administrative costs. These funds are available until June 30, 2023.

Payment details

The state of Minnesota partnered with external vendors Submittable and U.S. Bank to issue the FWP payments. During the application process, applicants had the option of an ACH payment (direct deposit) or a prepaid debit card payment from U.S. Bank.

The fees for the ACH payment option were included in the vendor contract with Submittable. These fees included the actual cost to initiate the ACH transaction with U.S. Bank and a fraud prevention measure to verify the account. The fees for the prepaid debit card option were $4 a card.

Payment calculation

After the application and appeals periods closed, the Department of Revenue was tasked with determining the payment for each eligible applicant. As required in the law, the payment amount must be the same for each eligible frontline worker and must not exceed $1,500.

On Sept. 29, 2022, DLI determined there were 1,025,655 approved applicants for the program. The Department of Revenue determined the payment below.

- Frontline Worker Pay appropriation: $500 million
- Total approved applicants: 1,025,655
- Payment for each eligible applicant: $487.45

Payments were rounded down to the nearest $.05 to create a reserve account to address any unexpected contingencies that arose during the payment process. During payment processing, additional applications were determined to be ineligible due to fraud prevention checks, leading to the final 1,025,619 eligible applicants who were paid $487.45 each.

Payment distribution schedule

Payments to eligible frontline workers began Oct. 5, 2022, when the first round of ACH payments were processed in the system. At about the same time, the first round of prepaid debit cards was processed for mailing.

First round of payments

During the application period, 943,563 applicants selected ACH payments and were successfully paid in the first round. Other transactions were returned to U.S. Bank because the first payment attempt was unsuccessful. Of the 28,664 unsuccessful payments, 28,500 had incorrect ACH information and 164 had incorrect prepaid debit card information.

First round payment clean-up

On Oct. 17, 2022, Submittable reopened the 28,664 applications with unsuccessful payments and allowed the applicants to update their information in the Submittable system. The applicants had until 5 p.m. CT, Oct. 21, to update their information. Any applicant who successfully updated their ACH information in the system would receive their payment via ACH. Any applicant who did not update their information or provided incorrect ACH payment information again would receive a prepaid debit card, sent via the U.S. Postal Service to the mailing address listed in the FWP application.

Second round of ACH payments

On Oct. 26, if the applicant successfully updated their ACH information in the system, a second attempt was made to initiate an ACH payment. Of the 28,664 unsuccessful applications, 15,993 successfully updated their

ACH information in the system and received their payment via direct deposit. The remaining applicants were defaulted to prepaid debit card payments in the system or were removed due to the team's fraud prevention checks.

Second round of prepaid debit card payments

On Nov. 2, the remaining 12,591 eligible prepaid debit card payments were processed. A total of 66,063 applicants were sent prepaid debit card payments for the FWP program.

Second round payment clean-up

After the remaining prepaid debit card payments were processed, DOR actively worked with a small number of applicants and U.S. Bank to address payment-related questions or issues.

Administrative costs

DLI was allocated $11,650,000 in administrative funds to distribute payments to eligible frontline workers. The largest expense, $8,630,600, was for the vendor contract with Submittable to build the application, appeals and processing system for the FWP program, as well as provide additional applicant support. The second largest expense was for DLI compensation for the staff members necessary to administer the program. Because the program continues to receive applicant inquiries, DLI temporary staff members will continue until the volume of requests can be absorbed by permanent DLI staff members, so the DLI compensation expense is not final. DOR did not request reimbursement of staff member time as program costs were able to be absorbed in their normal operations. The unobligated balance remaining as of June 30, 2023, will be returned to the state general fund.

Recoup process

As part of the Frontline Worker Pay law, DOR has the authority to create a process to recoup payments determined to be made to ineligible individuals. The law states:

> "If the commissioner of revenue determines that a payment was made under this section to an ineligible individual, the commissioner may issue an order of assessment to the individual receiving the payment for the amount of the payment. The order must be made within two years after the date of the payment or six years after the date of the payment in the case of fraud. The audit, assessment, appeal, collection, enforcement, and administrative provisions of Minnesota Statutes, chapters 270C and 289A, apply to the orders issued under this section." (6.8 – 6.14)

As part of the contract with the vendor Submittable, the state received a full data set containing all information collected through the process including application data, appeal data and payment data. The Department of Revenue obtained all of this information and created a data warehouse to store and retrieve the data when needed.

Recoup investigations start with receiving a tip from a citizen who believes an applicant received payment in error. DOR developed a Frontline Worker Tip Intake Form using its current Tax Evasion or Tax Fraud Report Form as a guide. The form is the first intake point for new information and begins the formal recoup process. If the tip accused the recipient of not meeting the AGI criteria of eligibility, DOR investigates those tips. If the tip described the suspect as not meeting some of the employment criteria, DOR established a process to share information with DLI to conduct an investigation. After DLI completes the investigation, outcome details of the investigation are provided in a document to DOR through a secure online portal dedicated to transferring this information between the agencies. Depending on the investigation outcome, a determination is made whether recoup actions are needed. While DOR completes normal day-to-day operations, there could be an instance of an individual being audited and the outcome of the audit impacting the FWP applicant's AGI eligibility. DOR established additional process and procedure updates to account for needed recoup actions.

If a determination is made that recoup actions are needed, the Order of Assessment Process begins. Through this process, DOR can add a debt in the amount of the FWP payment ($487.45) on the taxpayer's account into the state tax system. The law states, "The audit, assessment, appeal, collection, enforcement, and administrative provisions of Minnesota Statutes, chapters 270C and 289A, apply to the orders issued under this section." DOR will follow its working procedures for FWP recoup. If an individual has their frontline worker payment recouped and believes it was done in error, they have the right to appeal the decision. DOR will follow similar appeal procedures for the FWP appeal of recoup, as done with normal working procedures. Much like its existing Appeal and Order of Assessment procedures, DOR will conduct the collection of the FWP payment similarly to the standard working collections procedures.

Frontline Worker Pay program conclusion

This report summarizes the design, development and execution of the Frontline Worker Pay program and the joint efforts of the partner agencies contributing to its implementation. After the close of the program, DLI continued to receive inquiries about the program, payments and denials, so the temporary staff continued to field and respond to those calls and email messages. DLI and its partner agencies expect primary program activities to conclude in spring 2023, with recoup and record retention responsibilities continuing as required by the law.

Appendices

Appendix A: Laws of Minnesota 2022, chapter 50, article 2

Article 2 – Frontline Worker Payments

Section 1. Frontline worker payments; public purpose

This act is intended to provide payments to frontline workers whose work put them at risk of contracting COVID-19 during the peacetime emergency declared by the governor in Executive Order 20-01. The legislature finds that payments under this section specifically, and under the premium pay provisions of the American Rescue Plan Act of 2021 generally, have a public purpose and benefit the people of Minnesota by:

(1) responding to the extraordinary circumstances of the COVID-19 pandemic which resulted in the peacetime emergency; and
(2) compensating workers for working in conditions that, in many cases, exceeded what was originally contemplated in their employment agreement to ensure our state was able to continue functioning during the pandemic.

Sec. 2. Frontline worker payments

Subdivision 1. Program established; payments authorized

To the extent feasible, the commissioner of revenue, in coordination with the commissioners of labor and industry and employment and economic development, must make payments to eligible frontline workers as provided in this section.

Subd. 2. Frontline sector defined

"Frontline sector" means the following sectors:

(1) long-term care and home care;
(2) health care;
(3) emergency responders;
(4) public health, social service, and regulatory service;
(5) courts and corrections;
(6) child care;
(7) schools, including charter schools, state schools, and higher education;
(8) food service, including production, processing, preparation, sale, and delivery;
(9) retail, including sales, fulfillment, distribution, and delivery;
(10) temporary shelters and hotels;
(11) building services, including maintenance, janitorial, and security;

(12) public transit;
(13) ground and air transportation services;
(14) manufacturing; and
(15) vocational rehabilitation.

Subd. 3. Eligible frontline workers

(a) An individual is eligible to receive a payment under this section if the individual:
    (1) was employed for at least 120 hours in Minnesota in one or more frontline sectors during the time period beginning March 15, 2020, and ending June 30, 2021;
    (2) for the hours worked under clause (1), was not able to telework due to the nature of the individual's work and worked in close proximity to individuals outside of the individual's household;
    (3) meets the income requirement in paragraph (b); and
    (4) did not receive an unemployment insurance benefit payment or serve a nonpayable week under Minnesota Statutes, section 268.085, subdivision 1, clause (6), for more than 20 weeks on a cumulative basis for weeks between March 15, 2020, and June 26, 2021. An unemployment insurance benefit payment shall include payments made by the state of Minnesota under Minnesota Statutes, sections 268.001 to 268.23, pandemic emergency unemployment compensation, extended benefits, pandemic unemployment assistance, federal pandemic unemployment compensation, lost wages assistance, mixed earnings unemployment compensation, and trade readjustment allowance. Unemployment insurance benefit payments shall include the amounts withheld from an unemployment insurance benefit payment for income tax, deducted for a child support obligation or an offset from unemployment benefits under Minnesota Statutes, section 268.18, subdivision 3a. Unemployment insurance benefit payments shall include amounts found to be overpaid under Minnesota Statutes, section 268.18. The calculations under this clause shall be made based exclusively on data held by DEED as of the effective date of this act.

(b) To qualify for a payment, an individual's adjusted gross income, as defined in Minnesota Statutes, section 290.01, subdivision 21a, as amended to April 1, 2022, must be less than the following amounts for at least one of the taxable years beginning after December 31, 2019, and before January 1, 2022:
    (1) for an individual who was employed in an occupation with direct COVID-19 patient care responsibilities, $350,000 for a married taxpayer filing a joint return and $175,000 for all other filers; or
    (2) for all other individuals, $185,000 for a married taxpayer filing a joint return and $85,000 for all other filers.

Subd. 4. Application; verification of eligibility

(a) To qualify for a payment under this section, an individual must apply to the commissioner of labor and industry in the form and manner specified by the commissioner. As part of the application, an individual must certify to the commissioner of labor and industry that the individual meets the eligibility requirements in subdivision 3.

(b) As soon as practicable after final enactment of this act, the commissioner of labor and industry must establish a process for accepting applications for payments under this section and begin accepting applications. The commissioner must not accept an application submitted more than 45 days after opening the application period.

(c) The commissioner of labor and industry must assist applicants in submitting an application under this section, including but not limited to:

    (1) establishing a multilingual temporary help line for applicants; and

    (2) offering multilingual applications and multilingual instructions.

(d) To the extent possible, the commissioners of revenue, employment and economic development, and labor and industry must verify applicant eligibility for a payment under this section.

(e) An applicant for a payment under this section may appeal a denial of eligibility under this subdivision to the commissioner of labor and industry within 15 days of notice of denial. The commissioner of labor and industry's decision on an appeal is final.

(f) The commissioner of labor and industry may contract with a third party to implement part or all of the application process and assistance required under this subdivision.

Subd. 5. Eligibility; payments

(a) After the deadline for applications under subdivision 4 has elapsed, the commissioner of revenue must determine the payment amount based on available appropriations and the number of applications received from eligible frontline workers. The payment amount must be the same for each eligible frontline worker and must not exceed $1,500.

(b) As soon as practicable, the commissioner of revenue must make payments of the amount determined under paragraph (a) to all eligible frontline workers who applied in accordance with subdivision 4.

(c) The commissioner of revenue may contract with a third party to implement part or all of the payment process required under this subdivision.

(d) If the commissioner of revenue determines that a payment was made under this section to an ineligible individual, the commissioner may issue an order of assessment to the individual receiving the payment for the amount of the payment. The order must be made within two years after the date of the payment or six years after the date of the payment in the case of fraud. The audit, assessment, appeal, collection, enforcement, and administrative provisions of Minnesota Statutes, chapters 270C and 289A, apply to the orders issued under this section.

Subd. 6. Data practices

(a) Data collected or created by the commissioners of revenue, labor and industry, and employment and economic development because an individual has sought information about, applied for, been denied, or received a payment under this section are classified as nonpublic data or private data on individuals, as defined in Minnesota Statutes, section 13.02, subdivisions 9 and 12.

(b) Data classified as nonpublic data or private data on individuals, including return information, as defined in Minnesota Statutes, section 270B.01, subdivision 3, may be shared or disclosed between the commissioners of revenue, employment and economic development, and labor and industry, and any

third-party vendor contracted with under subdivision 4, to the extent necessary to verify eligibility and administer payments under this section.

Subd. 7. Notice requirement

(a) No later than 15 days after the application period is opened under subdivision 4, employers in a frontline sector must provide notice, in a form approved by the commissioner of labor and industry, advising all current workers who may be eligible for payments under this section of the assistance potentially available to them and how to apply for benefits. An employer must provide notice using the same means the employer uses to provide other work-related notices to employees.

(b) Notice provided under paragraph (a) must be at least as conspicuous as:

(1) posting a copy of the notice at each work site where workers work and where the notice may be readily observed and reviewed by all workers working at the site; or

(2) providing a paper or electronic copy of the notice to all workers.

Subd. 8. Payments not to be considered income

(a) For the purposes of this subdivision, "subtraction" has the meaning given in Minnesota Statutes, section 290.0132, subdivision 1, and the rules in that subdivision apply for this subdivision. The definitions in Minnesota Statutes, section 290.01, apply to this subdivision.

(b) The amount of frontline worker payments received under this section is a subtraction.

(c) Frontline worker payments under this section are excluded from income, as defined in Minnesota Statutes, sections 290.0674, subdivision 2a, and 290A.03, subdivision 3.

(d) Notwithstanding any law to the contrary, payments under this section must not be considered income, assets, or personal property for purposes of determining eligibility or recertifying eligibility for:

(1) child care assistance programs under Minnesota Statutes, chapter 119B;

(2) general assistance, Minnesota supplemental aid, and food support under Minnesota Statutes, chapter 256D;

(3) housing support under Minnesota Statutes, chapter 256I;

(4) Minnesota family investment program and diversionary work program under Minnesota Statutes, chapter 256J; and

(5) economic assistance programs under Minnesota Statutes, chapter 256P.

(e) The commissioner of human services must not consider frontline worker payments under this section as income or assets under Minnesota Statutes, section 256B.056, subdivision 1a, paragraph (a); 3; or 3c, or for persons with eligibility determined under Minnesota Statutes, section 256B.057, subdivision 3, 3a, or 3b.

Subd. 9. Report

No later than 90 days following the end of the payments to eligible frontline workers under subdivision 5, the commissioners of revenue and labor and industry shall report to the legislative committees with jurisdiction over economic development policy and finance about the program established under this section. The report must include:

(1) the number of eligible frontline workers who applied, including the number in each sector and county, and the payment each worker received;
(2) if the initial payment to frontline workers under subdivision 5 was less than $1,500, the additional appropriation needed to provide an additional payment equal to the difference between $1,500 and the payment amount under subdivision 5; and
(3) the number of applications that were denied and the reason for denial.

Subd. 10. Procurement

The commissioners of labor and industry and revenue are exempt from the requirements of Minnesota Statutes, sections 16A.15, subdivision 3; 16B.97; and 16B.98, subdivisions 5, 7, and 8; and chapter 16C, and any other state procurement laws and procedures in administering the program under this section.

Subd. 11. Appropriations

(a) $500,000,000 in fiscal year 2022 is appropriated from the general fund to the commissioner of revenue for payments under this section. This is a onetime appropriation.
(b) $11,650,000 in fiscal year 2022 is appropriated from the general fund to the commissioner of labor and industry for administrative costs to implement the payments under this section.
(c) The commissioner of labor and industry may transfer money from this appropriation to the commissioner of revenue or the commissioner of employment and economic development for administrative costs to implement the program and payments under this section.
(d) The appropriations in this subdivision are available until June 30, 2023.

Subd. 12. Audit

The Office of the Legislative Auditor is encouraged to begin work on an audit of the use of all funds appropriated under subdivision 11 no later than February 1, 2023.

Effective date

(a) Unless otherwise specified, this section is effective the day following final enactment.
(b) Subdivision 8, paragraphs (a), (b), and (c), are effective for taxable years beginning after December 31, 2021, and before January 1, 2024, for property tax refunds based on rent paid in 2021 or 2022, and for property tax refunds based on property taxes payable in 2022 or 2023. Subdivision 8, paragraphs (d) and (e), are effective the day following final enactment, except for a program for which federal approval is required, changes affecting the program are effective upon federal approval.

Sec. 3. Appropriations given effect once

If an appropriation in this act is enacted more than once during the 2022 regular session, the appropriation is to be given effect only once.

Effective date

This section is effective the day following final enactment.

Appendix B: Frontline Worker Pay application

Apply now: Application is open June 8 through July 22, 2022.

Thank you for stepping up and working during the COVID-19 peacetime emergency, when Minnesota needed you most. The required fields in the application below will determine if you meet the eligibility requirements to receive Frontline Worker Pay. Payments to verified applicants are anticipated in late fall.

For help completing the application, contact mnfrontlinepay@submittable.com or [phone number].

To be eligible for Frontline Worker Pay, the applicant:

- must have been employed at least 120 hours in Minnesota in one or more frontline sectors between March 15, 2020, and June 30, 2021;
- for the hours worked during this time period the applicant –
  - was not able to telework due to the nature of the individual's work and
  - worked in close proximity to people outside of the individual's household;
- must meet the income requirements for at least one year between Dec. 31, 2019, and Jan. 1, 2022 –
  - workers with direct COVID-19 patient care responsibilities must have had an adjusted gross income of less than $350,000 for married taxpayers filing jointly, or less than $175,000 for other filers and
  - for workers in occupations without direct COVID-19 patient care responsibilities, the adjusted gross income limit is $185,000 for married taxpayers filing jointly, or $85,000 for other filers; and
- must not have received an unemployment insurance benefit payment for more than 20 weeks on a cumulative basis for weeks between March 15, 2020, and June 26, 2021.

Tennessen warning

The information requested below includes private information. The Department of Labor and Industry is collecting this data to determine your eligibility for Frontline Worker Pay and to issue your pay, if eligible. The Department of Labor and Industry is also requesting your Social Security number or individual tax identification number for the administration of and compliance with state and federal tax law, as authorized by 42 U.S.C. § 405(c)(2)(C)(i). You are not legally required to provide us with the requested information, but if you refuse to provide it, your application cannot be processed and you may not receive Frontline Worker Pay. The private data you provide may be shared upon court order and provided to the state or legislative auditor and other agencies and entities as allowed by law. The data may also be accessed by the Minnesota Department of Revenue and the Minnesota Department of Employment and Economic Development, as well as their third-party vendors and contractors who need the data to complete their duties. If you are a minor, you have the right to request that parental access to your private data be denied. By filling out this application, you are acknowledging that you have read and understand this notice and the intended use of the data and information you provide.

Applicant information

- First name (required)*
- Middle name
- Last name (required)*
- Suffix
- Current mailing address (required)*
- Country
- Address*
- Address line 2 (optional)
- City*
- State, province or region*
- ZIP or postal code*

Email communications

Email will be used for all communication related to this program, including confirmation of application submission, eligibility determination, information related to appeal rights, if applicable, and notice of payment processing.

Email communication will come from notifications@email.submittable.com. Please save this email address to your contacts so these messages are not sent to junk mail.

- Email address (required)*
- Phone number (required)*
- Date of birth (please type as MM/DD/YYYY) (required)*
  Navigate forward to interact with the calendar and select a date. Press the question mark key to get the keyboard shortcuts for changing dates.

We need your Social Security number (SSN) or Individual Taxpayer Identification Number (ITIN) to proceed.

Social Security number (SSN): SSNs are nine digits and are used by U.S. citizens and authorized residents.

Individual Tax Identification Number (ITIN): An ITIN is a tax processing number only available for certain nonresident and resident aliens, their spouses, and dependents who cannot get a Social Security number (SSN). It is a nine-digit number, beginning with the number "9," formatted like an SSN.

- What will you be using as your tax identification number? (required)*
  - Social Security number (SSN)
  - Individual Tax Identification Number (ITIN)

Please ensure that the SSN or ITIN you are providing is entered accurately. An accurate SSN or ITIN is necessary to process your application and determine eligibility.

- Please enter your SSN or ITIN number (required)*
  SSN/EIN Example: 123456789
  Do not use dashes while entering in your number.
- We need to confirm your information. How will you verify your identity? (required)*
  - Answer questions about myself
  - Take a photo of my ID card and take a selfie (Smart Phone with working camera is required)
- Gender
  - Male
  - Female
  - Other
  - Prefer not to answer
- Are you of Hispanic or Latino origin?
  - Yes
  - No
  - Prefer not to answer
- How would you describe your race?
  - American Indian and Alaska Native
  - Asian
  - Black or African American
  - Native Hawaiian and Other Pacific Islander
  - White
  - Two or more
  - Prefer not to answer

Eligibility certification

You are required to have worked in a frontline sector. If you are unsure which sector you belong to, please click this link to view a description of sectors.

- I hereby certify and affirm I was employed in one or more of the following frontline sectors during the period beginning March 15, 2020, and ending June 30, 2021, in Minnesota (check all that apply) (required): *
  - Building services, including maintenance, janitorial, and security
  - Child care
  - Courts and corrections
  - Emergency responder
  - Food service, including production, processing, preparation, sale, and delivery
  - Ground and air transportation services

- Health care
- Long-term care and home care
- Manufacturing
- Public health, social service, and regulatory service
- Public transit
- Retail, including sales, fulfillment, distribution, and delivery
- Schools, including charter schools, state schools, and higher education
- Temporary shelters and hotels
- Vocational rehabilitation

- I hereby certify and affirm I was employed in the previously identified frontline sector(s) in Minnesota during the period beginning March 15, 2020, and ending June 30, 2021, for at least 120 hours. (required)*
  "Employed" means time working as an employee in an employer-employee relationship and does not include work as an independent contractor or sole proprietor.

- I hereby certify and affirm that, for at least 120 hours of my employment in the previously identified frontline sector(s) and during the identified time frame, I was unable to telework due to the nature of my work. (required)*
  "Not able to telework" means the applicant must not have had an option to perform work remotely or in telework status.

- I hereby certify and affirm that, for at least 120 hours of my employment in the previously identified frontline sector(s) and during the identified time frame, I worked in close proximity to individuals outside of my household. (required)*
  "Close proximity to individuals outside of the individual's household" means within six feet of individuals with whom the applicant does not live.

- I hereby certify and affirm I did not receive an unemployment insurance benefit payment for more than 20 weeks on a cumulative basis for weeks between March 15, 2020, and June 26, 2021. (required)*

  Unemployment insurance benefit payments include payments made by the state of Minnesota under Minnesota Statutes, sections 268.001 to 268.23, pandemic emergency unemployment compensation, extended benefits, pandemic unemployment assistance, federal pandemic unemployment compensation, lost wages assistance, mixed earnings unemployment compensation, and trade readjustment allowance. Unemployment insurance benefit payments shall include the amounts withheld from an unemployment insurance benefit payment for income tax, deducted for a child support obligation or an offset from unemployment benefits under Minnesota Statutes, section 268.18, subdivision 3a. Unemployment insurance benefit payments shall include amounts found to be overpaid under Minnesota Statutes, section 268.18.

- Were you employed in an occupation with direct COVID-19 patient care responsibilities? (required)*
    - Yes
    - No

  An employee had direct COVID-19 patient care responsibilities if they, as part of their assigned job duties, were responsible for providing direct care to a patient, resident or individual who was diagnosed with COVID-19.

- Are you married and file a joint tax return? (required)*
    - Yes
    - No
- I hereby certify and affirm my adjusted gross income for tax year 2020 or 2021 was less than $350,000 (married taxpayer filing a joint return). (required)

- Are you married and file a joint tax return? (required)*
    - Yes
    - No

- I hereby certify and affirm my adjusted gross income for tax year 2020 or 2021 was less than $175,000. (required)

- Are you married and file a joint tax return? (required)*
    - Yes
    - No

- I hereby certify and affirm my adjusted gross income for tax year 2020 or 2021 was less than $185,000 (married taxpayer filing a joint return). (required)

- Are you married and file a joint tax return? (required)*
    - Yes
    - No

- I hereby certify and affirm my adjusted gross income for tax year 2020 or 2021 was less than $85,000. (required)

Employer information

To qualify for this opportunity, you must have worked at least 120 hours in a frontline sector. Please enter your information for all employers that you worked in during the time period of March 15, 2020 through June 30, 2021.

- Employer 1: Name (required)*
- Employer 1: Primary address or address where your work was performed (required)*
- Country
- Address
- Address line 2
- City
- State, province or region
- ZIP or postal code
- Employer 1: Telephone number (required)*
  Please list the information for a supervisor, HR department, or another contact who can verify your employment
- Employer 1: Email address, if known
- Employer 1: Please check all time frames that you worked for this employer, including partial dates (required)*
  - 1/1/2020 - 3/31/2020
  - 4/1/2020 - 6/30/2020
  - 7/1/2020 - 9/30/2020
  - 10/1/2020 - 12/31/2021
  - 1/1/2021 - 3/31/2021
  - 4/1/2021 - 6/30/2021
- Employer 1: Position title (required)*
- Add another employer? (required)*
  - Yes
  - No
- Employer 2: Name (required)*
- Employer 2: Primary address or address where your work was performed (required)*
- Country
- Address
- Address line 2 (optional)
- City
- State, province or region
- ZIP or postal code
- Employer 2: Phone number (required)*
  Please list the information for a supervisor, HR department, or another contact who can verify your employment.
- Employer 2: Email address, if known
- Employer 2: Please check all time frames that you worked for this employer, including partial dates (required)*
  - 1/1/2020 - 3/31/2020

    - 4/1/2020 - 6/30/2020
    - 7/1/2020 - 9/30/2020
    - 10/1/2020 - 12/31/2021
    - 1/1/2021 - 3/31/2021
    - 4/1/2021 - 6/30/2021
- Employer 2: Position title (required)*
- Add another employer? (required)*
    - Yes
    - No
- Employer 3: Employer name (required)*
- Employer 3: Primary address or address where your work was performed (required)*
- Country
- Address
- Address line 2 (optional)
- City
- State, province or region
- ZIP or postal code
- Employer 3: Telephone number (required)*
  Please list the information for a supervisor, HR department, or another contact who can verify your employment.
- Employer 3: Email address, if known
- Employer 3: Please check all time frames that you worked for this employer, including partial dates (required)*
    - 1/1/2020 - 3/31/2020
    - 4/1/2020 - 6/30/2020
    - 7/1/2020 - 9/30/2020
    - 10/1/2020 - 12/31/2021
    - 1/1/2021 - 3/31/2021
    - 4/1/2021 - 6/30/2021
- Employer 3: Position title (required)*

Employment authorization

- I authorize my current and former employers to orally, or in writing, make available to representatives of the Minnesota Department of Labor and Industry the following job-related data: dates of employment; hours worked; telework eligibility; job title(s) and responsibilities; and other job-related data that may be maintained by my current and former employers. I understand the purpose of permitting the Minnesota Department of Labor and Industry to obtain job-related information about me is to determine my eligibility for Frontline Worker Pay. I understand any data received by the Minnesota Department of Labor and Industry will be treated as private data and, therefore, access to the data will

be limited to individuals within the Department of Labor and Industry and their representatives whose job duties reasonably require access, to myself and to any individuals authorized by me to receive the data. I understand I may withdraw my authorization at any time, but that if I do withdraw my authorization, it will not affect any data that was released prior to my withdrawal.

- I authorize my current and former employers to make the above information available to the Minnesota Department of Labor and Industry. (required)*

Payment options

If you are deemed eligible for Frontline Worker Pay, you must select one of the following forms of payment.

- **ACH transfer (preferred):** ACH transfers are electronic, bank-to-bank money transfers processed through the Automated Clearing House (ACH) Network. Your money will be transferred directly to your bank account, which may be the fastest way to receive money to your account.
- **Other payment option:** Click "Other" below to learn about an alternate payment option.
- If you are deemed eligible, how would you like to receive your payment? (required)*
    - ACH (preferred)
    - Other payment option (click this option to learn more)

ACH selected

Name on bank account/name to be printed on card (required)*

- First name (required)*
- Last name (required)*
- Bank name (required)*
- Bank account type (required)*
    - Checking
    - Savings
- Is this an individual or business bank account? (required)*
    - Individual
    - Business

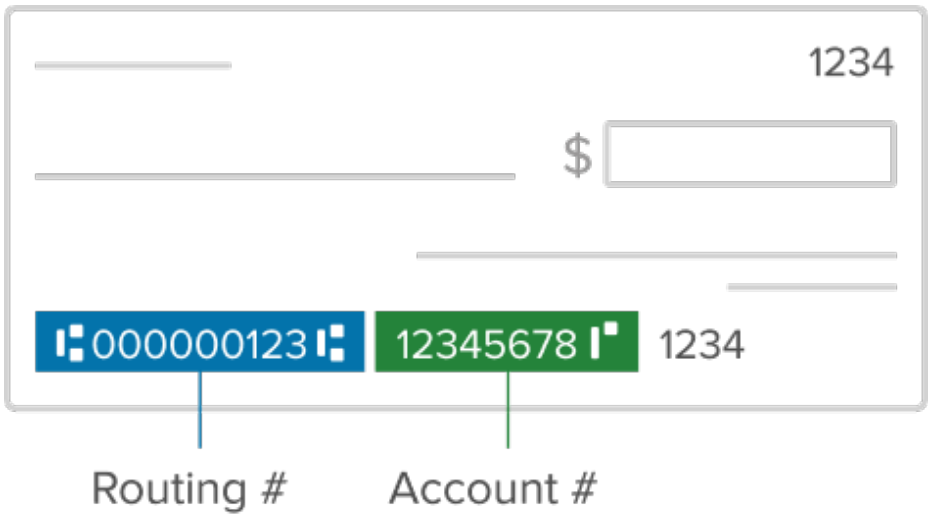
We need to collect your bank routing number and bank account number.

For the fields below:

- Bank routing number is a nine-digit code that's based on the U.S. Bank location where your account was opened. It's the first set of numbers printed on the bottom of your checks, on the left side.
- Bank account number (usually 10 to 12 digits) is specific to your personal account. It's the second set of numbers printed on the bottom of your checks, just to the right of the bank routing number.

If you don't have a check available, please contact your bank for help finding this information.

- Bank details*
    - Routing number
    - Confirm routing number
    - Account number
    - Confirm account number



Other payment option selected

- Name on bank account/name to be printed on card (required)*
- First name (required)*
- Last name (required)*

U.S. Bank ReliaCard® Pre-Acquisition Disclosure
Program Name: ReliaCard

You have options as to how you receive your payments, including direct deposit to your bank account or this prepaid card. Ask your agency for available options and select your option.

Monthly fee	Per purchase	ATM withdrawal	Cash reload
$0	**$0**	**$3.00*** in-network **$3.00** out-of-network	**N/A**

ATM Balance Inquiry (in-network or out-of-network)	$0 or $1.00
Customer Service (automated or live agent)	$0 per call
Inactivity (after 90 days with no transactions)	$2.00 per month
We charge 4 other types of fees. Here are some of them:	
International Transaction	3%
Card Replacement (standard or expedited delivery)	$5.00* or $20.00*

* This fee can be lower depending on how and where this card is used.
See the accompanying Fee Schedule for free ways to access your funds and balance information.

No overdraft/credit feature.
Your funds are eligible for FDIC insurance.

For general information about prepaid accounts, visit *cfpb.gov/prepaid*.
Find details and conditions for all fees and services inside the card package or call **1-855-282-6161** or visit **usbankreliacard.com**.

CR-21201658

U.S. Bank ReliaCard® Fee Schedule

Program Name: ReliaCard

All fees	Amount	Details
Get cash		
ATM Withdrawal (in-network)	$3.00	This is our fee per withdrawal. This fee is waived for your first ATM withdrawal per month. "In-network" refers to the U.S. Bank or MoneyPass® ATM networks. Locations can be found at *usbank.com/locations* or *moneypass.com/atm-locator.html*.
ATM Withdrawal (out-of-network)	$3.00	This is our fee per withdrawal. "Out-of-network" refers to all the ATMs outside of the U.S. Bank or MoneyPass ATM networks. You may also be charged a fee by the ATM operator even if you do not complete a transaction.
Teller Cash Withdrawal	$0	This is our fee for when you withdraw cash off your card from a teller at a bank or credit union that accepts Visa®.
Information		
ATM Balance Inquiry (in-network)	$0	This is our fee per inquiry. "In-network" refers to the U.S. Bank or MoneyPass ATM networks. Locations can be found at *usbank.com/locations* or *moneypass.com/atm-locator.html*.
ATM Balance Inquiry (out-of-network)	$1.00	This is our fee per inquiry. "Out-of-network" refers to all the ATMs outside of the U.S. Bank or MoneyPass ATM networks. You may also be charged a fee by the ATM operator.
Using your card outside the U.S.		
International Transaction	3%	This is our fee which applies when you use your card for purchases at foreign merchants and for cash withdrawals from foreign ATMs and is a percentage of the transaction dollar amount, after any currency conversion. Some merchant and ATM transactions, even if you and/or the merchant or ATM are located in the United States, are considered foreign transactions under the applicable network rules, and we do not control how these merchants, ATMs and transactions are classified for this purpose.
International ATM Withdrawal	$3.00	This is our fee per withdrawal. You may also be charged a fee by the ATM operator even if you do not complete a transaction.
International ATM Balance Inquiry	$2.00	This is our fee per inquiry. You may also be charged a fee by the ATM operator.
Other		
Card Replacement	$5.00	This is our fee per replacement of a lost card mailed to you with standard delivery (up to 10 business days). This fee is waived for your first card replacement in a 12-month period.
Card Replacement Expedited Delivery	$15.00	This is our fee for expedited delivery (up to 3 business days) charged in addition to any Card Replacement fee.
Inactivity	$2.00	This is our fee charged each month after you have not completed a transaction using your card for 90 consecutive days.

Your funds are eligible for FDIC insurance. Your funds will be held at U.S. Bank National Association, an FDIC-insured institution, and are insured up to $250,000 by the FDIC in the event U.S. Bank fails. See *fdic.gov/deposit/deposits/prepaid.html* for details.

No overdraft/credit feature.
Contact Cardholder Services by calling **1-855-282-6161**, by mail at P.O. Box 551617, Jacksonville, FL 32255 or visit ***usbankreliacard.com***.

For general information about prepaid accounts, visit *cfpb.gov/prepaid*. If you have a complaint about a prepaid account, call the Consumer Financial Protection Bureau at 1-855-411-2372 or visit *cfpb.gov/complaint*.

CR-19394066

The ReliaCard is issued by U.S. Bank National Association pursuant to a license from Visa U.S.A. Inc. ©2020 U.S. Bank. Member FDIC.

Click here to download or print the full disclosure statement.

- Did you read the prepaid debit card disclosures?*
    - Yes, I have read the disclosure statement above.
    - No, I did not read or do not agree with the disclosure statement above.

Final certification

- I certify and affirm the above information is true and accurate to the best of my knowledge. I understand that if I submit a false claim for payment, I may be charged with an attempt to commit theft of public funds. I understand there may be other penalties for not telling the truth on this application. (required)*
- Digital signature of applicant*

You are about to submit your application.

Please review or double check that your answers are accurate before you submit your application.

When your application has been received, you will receive an email confirmation.

If you do not receive a confirmation email, you may not receive other communications about the status of your application. Be sure to check the following information.

- Check the junk/spam filters for your email account. Emails are sent from notifications@email.submittable.com.
- Check which email address you used to set up your Submittable account and make sure it was entered correctly.

Make sure your application is not still saved as a draft (see FAQs for more information).

- Save draft
- Apply now

Success!

You'll receive updates from Submittable by email — to ensure you receive all notifications, follow these steps. You can also check on the status anytime in your Submittable account.

Return to Minnesota Frontline Worker Pay Program

Appendix C: Fraud prevention plan

Version: 1.1
Effective date: June 8, 2022
Approval: Signature on file

Overview

On April 29, 2022, Gov. Tim Walz signed a bill passed by the Minnesota Legislature providing bonus pay for eligible COVID-19 frontline workers. Workers within the state of Minnesota who meet the eligibility requirements will be paid a portion of the $500 million for stepping up when Minnesota needed them most. Due to the high profile and large amount of money for Frontline Worker Pay, the Minnesota Department of Labor and Industry (DLI), as the agency tasked with leading the administration of the program, incorporated fraud prevention strategies into multiple layers and phases of the program. DLI kept balancing the prevention of payments to fraudulent applicants with administrative ease for legitimate eligible applicants at the forefront of every decision when taking action to address fraudulent behavior.

Overarching program intention

The overarching program intention is to balance the considerations of fraud prevention and timely payments, while not creating insurmountable obstacles for eligible employees to receive the payments. This plan will evolve as new situations and conditions are identified.

Plan goals

The goals are to reduce incidents of fraud by developing protocols that will make fraud attempts difficult and fraud success unlikely. These protocols will focus on internal (state employees), external (applicants) and partners (IT vendors and their partners) strategies.

Agency and vendor roles

The Department of Labor and Industry, the Department of Employment and Economic Development (DEED), the Department of Revenue (DOR) and Minnesota IT Services (MNIT) are jointly responsible for administering the Frontline Worker Pay program. The group has contracted with an IT vendor for processing the Frontline Worker Pay program.

Responsible parties

DLI, DEED, DOR, MNIT and the IT vendor have shared responsibilities in implementing and managing the processes outlined in this plan.

State recourse on substantiated fraud

If it is determined that a payment was made to an ineligible individual, the frontline worker law (Laws 2022, Chapter 50, Article 2, Section 2, Subd. 5(d)) allows the commissioner of the Department of Revenue to issue an order of assessment for the payment amount.

Fraud prevention strategies

Application platform design

Partnering with Submittable, an information technology company that offers software as a service, allows DLI to leverage all the built-in platform protocols for effective program administration that, by design, reduce opportunities for fraudulent behavior. These platform design protocols include the following.

1. Submittable account creation: Applicants are required to create an account to submit an application, which is tied to the email address used for all program-related correspondence and requires a unique password.
2. Unique submission identification number: A unique eight-digit submission identification number is generated for each application.
3. Each user account can submit only one application per project.
4. All phases of the program are tracked in the individual's Submittable account. This allows an applicant to log in at any point to check on the status of the application, look for any denials and appeal forms, review any correspondence and watch for payment updates.
5. Once submitted, the individual's application is locked for editing. The only way to revise an item in the application is to withdraw the original application and resubmit an entirely separate application.

Program design

1. The 45-day application period creates wait-time for money, potentially deterring fraudulent activity.
2. Alternatively, limiting the application to 45 days reduces the window of time for bad actors to develop programming ("bots") to submit copious applications for funding, cluttering the process and increasing their chances of being awarded the benefit.
3. The 15-day appeals period creates wait-time for money, potentially deterring fraudulent activity.
4. Similarly, limiting the appeals period to 15 days reduces the window of time for bad actors to develop programming and false documentation to appeal denials and thereby cluttering the process and increasing their chances of being awarded the benefit.
5. The equal payment provision in the law supports strategies to move applicants through the process in a single large batch, which increases accountability and allows for more control over review of application information to catch such items as duplicate submissions and duplicate bank account information.

Application content

The application is designed to minimize successful fraudulent behavior through three key activities: a successfully approved eligibility quiz; providing all information required to submit the application; and self-certification for the eligibility criteria to submit the application.

Eligibility quiz
Every application begins with an eligibility quiz containing straightforward questions about the eligibility criteria laid out in the law. The applicant is required to complete the eligibility quiz and be deemed eligible prior to completing the application.

Required information
The application itself contains required fields. These fields allow verification of the information individuals were providing in the application, which included: name; contact information (phone number and mailing address); Social Security number (SSN) or Individual Tax Identification Number (ITIN); names and contact information of employer(s); duration worked by quarter; and payment information, which included a verified mailing address or bank account information for ACH direct deposit. If a required field was not completed, the individual was not able to submit the application.

Eligibility self-certification
The application required self-certification of each eligibility criteria and a final certification that the individual was answering questions truthfully.

Identity verification

Identity verification is a critical component of the application process to ensure that the individual applying is who they say they are.

Each application had two options for identity verification.

- **Knowledge-based authentication (KBA):** The KBA process requires basic information factors, such as name, address, SSN or ITIN, and date of birth, which are used to generate multiple choice knowledge questions. To pass the initial KBA process the applicant needs to respond correctly to 80% of the questions.
- **Identity verification (IDV):** Applicants will be asked to verify their identification by scanning an image of an eligible identifying document, such as a passport, ID card, driver's license or residence permit, and then comparing the ID picture to the applicant's face through a live webcam or phone camera. Requiring these two items at the same time proves the individual is who they say they are. Applicants pass the IDV process if program requirements are met.

In a separate identity verification review referred to as "fuzzy match," the application content is compared to the information provided in the identity verification portion of the application (KBA or IDV) to ensure individuals are not completing these steps with different identities and trying to tie them to the same application.

For applicants who complete the KBA or IDV process, but for whom their identity remains unverifiable, the following takes place.

- An email message is sent to the applicant, directing them to complete a second ID verification through IDV. The applicant needs to login to their Submittable account to complete the IDV, which is presented as a separate form in the account.
- Applicants who fail or do not complete the second verification are denied for failure to verify their identity, with the opportunity to appeal during the appeals period.
- Applicants who receive the second IDV email message and are unable to complete the IDV process because of lack of valid or expired ID, are given the opportunity to complete a manual ID verification with a Frontline Worker Pay representative.
- Applicants who are unable to complete the KBA or IDV process and are, therefore, unable to submit an application, are provided the opportunity for manual identity verification with a Frontline Worker Pay representative.

Eligibility verification

DLI, along with the other program administering agencies – and DEED and DOR – were responsible for verifying eligibility criteria.

- To verify the unemployment insurance (UI) benefit eligibility criterion, DEED reviews the application information against the UI administration benefits database.
- The Department of Revenue verifies the adjusted gross income eligibility criterion using the tax system and verifies the existence of an applicant in the tax system by reviewing tax records using the provided SSN or ITIN.
- DLI verifies the employment eligibility criterion, performing statistical sampling using random sampling to verify the SSN and ITIN produced employment records in the UI Wage Detail records or W-2 wage records. If neither employment verification record is found, DLI contacts the employer(s) listed on the application to verify: the date and location of employment; the hours worked in the workplace and the lack of ability to telework; the proximity to other individuals; and the employment status of the individual.

Application review with emphasis on fraud indicators

Frontline Worker applications, appeals and payment information are reviewed proactively to identify incidents of fraud throughout the application, appeals and payment processing timeframes. The FWP database was queried for potential fraud indicators. Data sources used to identify potential fraud indicators during the application review process include applications submitted by applicants, KBA information and results, IDV information and results, and UI Wage Detail records.

Fraud indicators include: high-risk email domains; suspicious patterns in email addresses; high-risk bank routing numbers; UI imposter or hijacked codes; duplicate bank accounts; unusual address patterns within applications and appeals; duplicate prepaid debit card addresses; out-of-state prepaid debit card addresses; KBA address

matching the employer address listed on the application; the volume of submissions arriving in a short amount of time; and suspicious patterns in the application data.

Submissions meeting certain fraud indicator thresholds were routed to the decline or failed stage as appropriate.

Deduplication

To ensure only a single application was submitted for each applicant, the entire data set was reviewed for duplicate SSNs and duplicate ITINs. In the event more than one application was found with a given SSN, all applicants were denied with the opportunity to appeal, which required a simple verification of identity using IDV.

In a final review of data to resolve duplicate applications that may have surfaced during the appeals process, DLI staff reviewed the file to determine the source of the duplicate applications. Using UI wage data as a verification factor, DLI was able to determine a duplicate if the match was clearly a fraudulent submission (including a set of identifying factors such as high-risk bank account information or high-risk email domain).

Appeals process and review

Those whose application was denied had the right to file an appeal during a 15-day appeal period. The appeal period was followed by an appeal processing period.

- DEED reviews appeals, including the provided explanation and required information, to determine whether applicants received unemployment insurance benefits for more than 20 cumulative weeks during the relevant time period.
- DOR reviews appeals, including the provided explanation and required information, to determine whether appellants met the adjusted gross income requirements.
    - Appellants were required to submit tax return documents to verify their income eligibility.
    - DOR reviewed appeals for fabricated documents.
- DLI reviews appeals to verify appellants' employment eligibility.
    - Appellants were required to submit a W-2 or paystubs showing the individual worked for at least 120 hours as an employee (not an independent contractor or sole proprietor) in Minnesota during the designated time period.
    - DLI watched for trends in fabricated documentation.
    - Any appeal denial was reviewed by a lead team member who could more easily spot fraudulently prepared and submitted documentation, resulting in a firm denial of the appeal and, therefore, the application.
- DLI reviews appeals to verify applicants' identities through identity verification, application deduplication and fraud review.

Final checks for fraud

The final dataset from the FLW application database was queried for potential fraud indicators. The indicators were:

- high-risk email domains;
- suspicious patterns in email addresses;
- high-risk bank routing numbers;
- UI imposter or hijacked codes;
- duplicate bank accounts;
- unusual address patterns within applications and appeals;
- duplicate mailing addresses for prepaid debit card delivery;
- out-of-state (and, outside of Minnesota, neighboring states) prepaid debit card addresses;
- KBA address matching employer address;
- volume of submissions arriving in a short amount of time; and
- suspicious patterns in the application data.

Submissions with combinations of potential fraud indicators were routed to DLI FWP representatives for review and decisions.

Payment process

- Address verification: The application requires mailing address verification through the U.S. Postal Service API if the applicant selects a pre-paid debit card for payment.
- Bank accounts used multiple times: The IT vendor flags for further review any bank account used more than four times.
- Addresses used multiple times: The IT vendor flags for further review any address used multiple times for the pre-paid debit card for payment.
- Account validation: The payment vendor provides a service that verifies if a bank account number is registered and if there is a link between the routing number and the account number. If the account cannot be validated, the payment will not be processed.
- ACH failure update review: If the first ACH direct deposit attempt fails, the IT vendor opens the affected applications for five days for individuals to make updates to their bank account information to increase the rate of successful direct deposits. Following the window to make the updates, DLI Frontline Worker Pay representatives review the updated information for any high-risk account information, along with other fraud indicators set forth in “Final checks for fraud” section.
- ACH failure update to prepaid debit card review: If the second ACH direct deposit attempt fails, a prepaid debit card was sent to the mailing address in the individual’s application; this collection of mailing addresses was reviewed for locations outside of Minnesota and its neighboring states.
- Pre-paid debit card activation: The U.S. Bank pre-paid debit card activation process requires the cardholder to enter the last four digits of the SSN or ITIN entered on the application and the three-digit CV2 code on the card.

- Pre-paid debit card changes of delivery address: For a prepaid debit card recipient to change the delivery address on their account, they need to take two separate steps. The first step is to change the address on file with U.S. Bank, initiating a five-day waiting period. A letter is sent to both the address on the Frontline Worker Pay application and the new address, allowing the true recipient to act. After five waiting days, the individual must then request a replacement prepaid debit card. The two-step process deters fraud because bad actors are less likely to follow through on a multi-step process.

Recoup process

If it is determined a payment was made to an ineligible individual, the frontline worker law allows the commissioner of the Department of Revenue to issue an order of assessment for the payment amount.

The order must be made within two years after the date of the payment of six years after the date of the payment in the case of fraud. The audit, assessment, appeal, collection, enforcement and administrative provisions apply to these orders, tying into DOR's existing authority and procedure.

Fraud tips and follow-up

DLI's Frontline Worker Pay representative team received some complaints of fraudulent behavior during the program. DLI followed up with every report of fraudulent behavior and used information to inform and supplement fraud prevention protocols throughout the process.

Data access control

Internal and partner user security will be achieved through role-based access control.

Data protection

Data is encrypted at rest and in transit. A small group of staff members from each agency and the IT vendor are given access to a secure file transfer program, ensuring additional security of sending large files of data containing personally identifiable information.

History

Version	Description	Date
1.0	Initial release of document	June 2, 2022
1.1	Update based on program experience	Jan. 10, 2023