

STATE OF OHIO
OFFICE OF THE INSPECTOR GENERAL

RANDALL J. MEYER, INSPECTOR GENERAL

**REPORT OF
INVESTIGATION**



**AGENCY: OHIO DEPARTMENT OF JOB & FAMILY SERVICES
FILE ID NO.: 2022-CA00027
DATE OF REPORT: AUGUST 22, 2023**

The Office of the Ohio Inspector General ... The State Watchdog

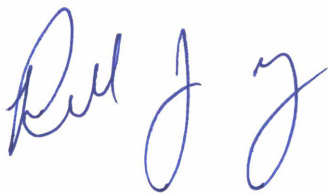
“Safeguarding integrity in state government”

The Office of the Ohio Inspector General is authorized by state law to investigate alleged wrongful acts or omissions committed by state officers or state employees involved in the management and operation of state agencies. We at the Inspector General’s Office recognize that the majority of state employees and public officials are hardworking, honest, and trustworthy individuals. However, we also believe that the responsibilities of this Office are critical in ensuring that state government and those doing or seeking to do business with the State of Ohio act with the highest of standards. It is the commitment of the Inspector General’s Office to fulfill its mission of safeguarding integrity in state government. We strive to restore trust in government by conducting impartial investigations in matters referred for investigation and offering objective conclusions based upon those investigations.

Statutory authority for conducting such investigations is defined in *Ohio Revised Code §121.41* through *121.50*. A *Report of Investigation* is issued based on the findings of the Office, and copies are delivered to the Governor of Ohio and the director of the agency subject to the investigation. At the discretion of the Inspector General, copies of the report may also be forwarded to law enforcement agencies or other state agencies responsible for investigating, auditing, reviewing, or evaluating the management and operation of state agencies. The *Report of Investigation* by the Ohio Inspector General is a public record under *Ohio Revised Code §149.43* and related sections of *Chapter 149*. It is available to the public for a fee that does not exceed the cost of reproducing and delivering the report.

The Office of the Inspector General does not serve as an advocate for either the complainant or the agency involved in a particular case. The role of the Office is to ensure that the process of investigating state agencies is conducted completely, fairly, and impartially. The Inspector General’s Office may or may not find wrongdoing associated with a particular investigation. However, the Office always reserves the right to make administrative recommendations for improving the operation of state government or referring a matter to the appropriate agency for review.

The Inspector General’s Office remains dedicated to the principle that no public servant, regardless of rank or position, is above the law, and the strength of our government is built on the solid character of the individuals who hold the public trust.



Randall J. Meyer
Ohio Inspector General



STATE OF OHIO
OFFICE OF THE INSPECTOR GENERAL
RANDALL J. MEYER, INSPECTOR GENERAL

REPORT OF INVESTIGATION

FILE ID NUMBER: 2022-CA00027

SUBJECT NAME: Maria Ford

POSITION: Employment Professional
Office of Workforce Development

AGENCY: Ohio Department of Job and Family Services

BASIS FOR INVESTIGATION: Agency Referral

ALLEGATIONS: Failure to Comply with State Law and/or Regulations;
Failure to Comply with State or Departmental Rules,
Procedures or Policies;
Misuse or Abuse of State Property or Equipment; and
Abuse of Office/Position.

INITIATED: December 21, 2022

DATE OF REPORT: August 22, 2023

INITIAL ALLEGATION AND COMPLAINT SUMMARY

On December 7, 2022, the Office of the Ohio Inspector General received a referral from the Ohio Department of Job and Family Services (ODJFS) of suspected illegal or improper activity conducted by ODJFS Office of Workforce Development (OWD) Employment Professional Maria Ford. ODJFS reported concerns regarding Ford's job performance and suspicions that Ford, "... may be spending time during her workday [sic] on her outside advocacy pursuits associated with a nonprofit organization she operates."

ODJFS conducted a review of Ford's activities during her scheduled workdays and her use of State of Ohio resources and found that Ford:

- Had spent a significant amount of time during her workdays performing "tasks/activities" associated with her various outside advocacy activities.
- Had stored records on her state-issued computer that were related to a nonprofit corporation called The Healing, Empowering, Loving, and Preparing Center (The H.E.L.P. Center)
- Had stored records on her state-issued computer that were related to grants that were awarded from the Ohio Department of Rehabilitation and Correction (ODRC) to The H.E.L.P. Center and the Central Ohio Restored Citizens Collaborative (CORCC).
- Had used her ODJFS email account and signature for communications related to her outside advocacy activities.

On December 21, 2022, the Office of the Ohio Inspector General opened an investigation to examine Ford's activities.

During the review of records obtained from ODJFS, investigators found that Ford had accessed unemployment claims multiple times. Given her job duties did not include managing a group of unemployment claims, ODJFS investigators and the Office of the Ohio Inspector General determined the frequency Ford accessed several claims was unusual. Investigators examined those claims Ford had accessed more than four times and found that Ford had accessed two claims belonging to her relatives a total of 37 times. Based on these findings, in February 2023, the investigation was expanded to include a review of these accesses.

BACKGROUND

The Ohio Department of Job and Family Services

The Ohio Department of Job and Family Services (ODJFS) improves the well-being of Ohio's workforce and families by promoting economic self-sufficiency and ensuring the safety of Ohio's most vulnerable citizens. The department administers programs that provide public assistance, protects child welfare, ensures payment of child support, assists individuals with employment and in preparing for the workforce, provides benefits to the unemployed, and supervises the administration of federal programs and funding at the local level. The direct delivery of services is administered by ODJFS, a combination of joint and individual county departments of job and family services, and local agencies.¹

ODJFS Office of Workforce Development

The Ohio Department of Job and Family Services Office of Workforce Development (OWD) administers federal programs received by ODJFS to create a "... comprehensive statewide workforce system of employment services, hiring support and tax credits; and labor market information to employers and workers." As part of this system, OWD provides support to the Ohio Workforce Development Boards to operate the OhioMeansJobs centers and operates the Employment Services program which is funded by the Wagner-Peyser Act of 1933 to bring qualified job seekers together with employers. For those wanting to participate in and/or receive services from the Employment Services program, these services are, "... provided and reported through the OhioMeansJobs centers as mandated in the Workforce Innovation and Opportunity Act (WIOA) that establishes the public workforce system."²

OhioMeansJobs Center

The ODJFS Office of Workforce Development supports the Ohio Workforce Investment Associations who operate the OhioMeansJobs centers throughout Ohio in partnership with local and state agencies. Each OhioMeansJobs Center location, "... assist job seekers, employers and youth with job search assistance, employee recruitment, job training, and more." According to

¹ Source: Biennial budget documents.

² Source is Workforce Program Policy Letters No. 20-03 which can be found on the ODJFS website at: <https://emanuals.jfs.ohio.gov/Workforce/WorkforceProgram/WPPL/WPPL-20-03.stm>.

its website,³ OhioMeansJobs of Franklin County is the local (Area 11) Job Center for Central Ohio.

ODJFS Office of Unemployment Insurance Operations

The Ohio Department of Job and Family Services (ODJFS) Office of Unemployment Insurance Operations (OUIO) is responsible for administering the State of Ohio's Unemployment Insurance Program for workers and businesses. In addition to unemployment benefits paid to workers, OUIO operates a call center to respond to phone calls from workers seeking to file or inquire about their unemployment benefits. During 2020, OWD staff assisted OUIO call center staff to assist in processing PIN⁴ reset requests, the filing of claims, and in responding to certain questions from workers about their unemployment benefits.

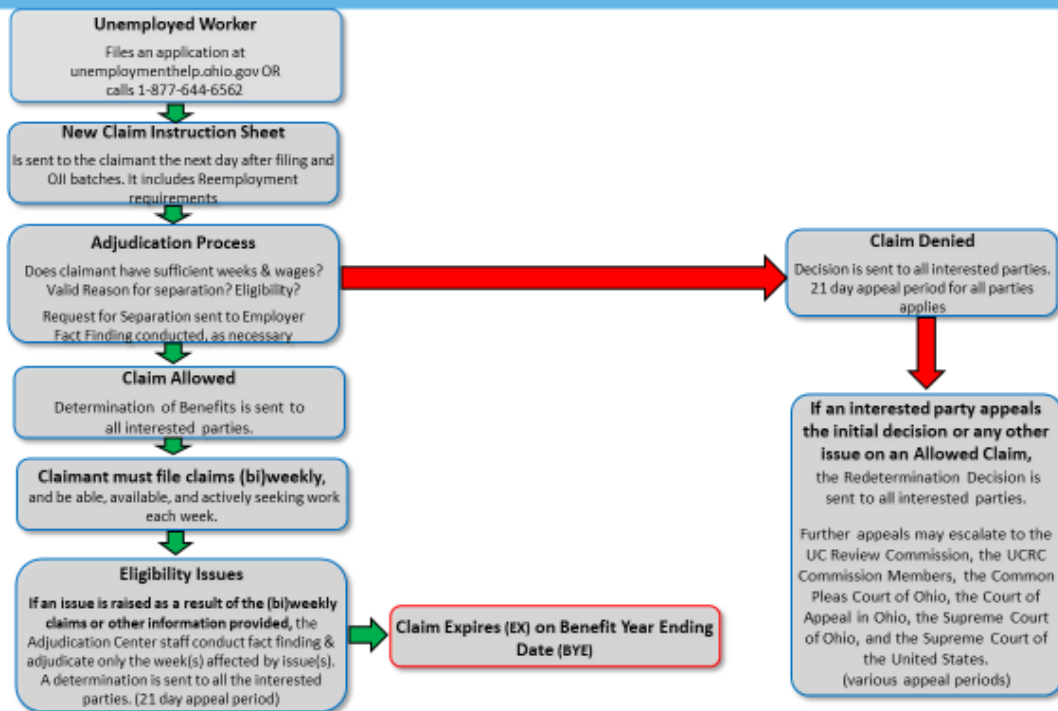
Unemployment Income Benefits

ODJFS processes regular unemployment claims, and processed claims that utilized portions of the COVID-19 pandemic funding Ohio received in 2020 through 2021, by using the Ohio Jobs Insurance (OJI) Benefit system. This system, used by Ohio since 2004, administers the following: accepting and processing unemployment claims, maintaining records of employment, determining eligibility for monetary and non-monetary benefits, requesting separation information from the worker and employer, issuing benefit determinations, processing appeals, and issuing re-determinations. The following chart provided by ODJFS staff to investigators shows the lifecycle of an unemployment claim:

³ Source is [OMJC-FC \(omjfc.org\)](http://omjfc.org).

⁴ PIN – Personal Identification Number.

THE LIFE CYCLE OF AN OHIO UNEMPLOYMENT CLAIM OVERVIEW



Upon completion of the filing of the claim by the unemployed worker for benefits, the adjudication process, and resolution of any eligibility issues, ODJFS issued benefit payments to the claimant.

During 2020,⁵ the following unemployment programs were available for unemployed workers:

- Regular Unemployment Insurance – A program paid to individuals who lost their job through no fault of their own. Should the unemployed worker meet the eligibility requirements, the worker was eligible to receive benefits for up to 26 weeks.
- Pandemic Emergency Unemployment Compensation (PEUC) – This program provided up to 13 additional weeks of this benefit that the individuals could receive provided they met the eligibility requirements. This program was initially available for the period of March 29, 2020, through December 31, 2020.

⁵ Source: Ohio Department of Job and Family Services Unemployment Fraud audit released on October 28, 2021, by the Ohio Auditor of State.

- Federal Pandemic Unemployment Compensation (FPUC) – This program provided \$600 per week in addition to the unemployed worker’s other weekly benefit amount. This program was available from March 29, 2020 – July 31, 2020, was initially extended through March 14, 2021, and was extended a second time through June 26, 2021.

On December 27, 2020, the Consolidated Appropriations Act, 2021⁶ was signed into law and extended the December 31, 2020, expiration date set by the Coronavirus Aid, Relief, and Economic Security (CARES) Act⁷ for the payment of PEUC and FPUC benefits to qualified applicants to March 14, 2020. The Act further extended the number of weeks an eligible applicant could receive PEUC benefits from 13 weeks to 24 weeks and reduced the weekly FPUC benefit to \$300.

On March 11, 2021, the American Rescue Plan Act of 2021⁸ was signed into law and extended the payment of PEUC and FPUC benefits to qualified individuals through September 6, 2021, and extended the eligible number of weeks the individual could receive PEUC benefits from 24 to 53 weeks.

Maria Ford

ODJFS hired Maria Ford on July 6, 2010, as a customer service representative⁹ and since 2016, has been assigned to work in the Local Operations Center located at the OhioMeansJobs Center of Franklin County. As specified by her position description, Ford’s job duties included providing services under the Wagner-Peyser Act to Ohioans seeking reemployment services; providing partner assistance at the OhioMeansJobs Center; serving as an ODJFS Office of Workforce Development (OWD) team member conducting various in-person and virtual reemployment activities; providing unemployment insurance (UI) and reemployment services to

⁶ The text of this legislation can be found at: [H.R.133 - 116th Congress \(2019-2020\): Consolidated Appropriations Act, 2021 | Congress.gov | Library of Congress](#)

⁷ The Coronavirus Aid, Relief, and Economic Security (CARES) Act was a \$2.2 trillion economic stimulus bill passed by Congress in response to the economic fallout of the COVID-19 pandemic, which authorized direct payments to individuals, monthly rebates to families with children, and extended unemployment benefits for laid-off workers.

⁸ The text of this legislation can be found at: [H.R.1319 - 117th Congress \(2021-2022\): American Rescue Plan Act of 2021 | Congress.gov | Library of Congress](#).

⁹ This position is also referred to as an employment professional within the ODJFS Office of Workforce Development.

UI claimants; and assisting individuals with obtaining new employment. In addition, Ford was responsible for conducting work and/or job hiring events and providing general orientation and OhioMeansJobs Center Resource Room services to individuals.

From March 26, 2020, through October 31, 2020, Ford was reassigned from OWD to the Office of Unemployment Insurance Operations (OUIO) to assist the OUIO Call Center with helping unemployed workers reset their PIN numbers, file initial or subsequent benefits claims, or file for extensions of their benefits claims. Ford was also responsible for responding to questions or requests made by the unemployed workers, when within her authority. Prior to her position with ODJFS OWD, Ford was employed as a ODJFS customer service representative as an intermittent¹⁰ employee assigned to OUIO and was responsible for answering phone calls for initial and continued unemployment claims. To fulfill her job responsibilities, Ford had access to the Ohio Workforce Case Management System (OWCMS) and its successor, ARIES. These systems are used by ODJFS employees to enter and store customers' personal, demographic, referral, and job seeking information and customer records received from other ODJFS computer systems.

The Healing, Empowering, Loving and Preparing (H.E.L.P.) Center

According to the Ohio Secretary of State, The H.E.L.P. Center was incorporated by Ford on March 4, 2021, as a nonprofit corporation and Ford was listed as the nonprofit's director. The nonprofit's business address listed in the Articles of Incorporation is the same address as Ford's residence. According to the Articles of Incorporation, The H.E.L.P. Center's purpose is:

To assist individuals who are in or returning from incarceration, transitional housing, probation/parole or those with justice and/or traumatic involvement with spiritual, emotional and financial support and needs of daily living to include but not limited to: food, housing, clothing, transportation, employment, counseling and resources of any kind in order that they may receive another chance at successful living.

¹⁰ Intermittent employees are temporary employees hired for a limited number of hours and/or a limited timeframe.

Central Ohio Restored Citizens Collaborative (CORCC)

Formed in 2010, the Central Ohio Restored Citizens Collaborative (CORCC) is a network of community resource providers, citizens, and stakeholders to help, "... ease the transition from conviction to restoration." CORCC is involved in various activities including sponsoring community resource events where participants are provided assistance in obtaining benefits, birth certificates, and State of Ohio IDs. Investigators learned that Ford had served in different positions with CORCC, including administrator, Sponsorship Committee chair, and outreach coordinator.

APPLICABLE LAWS, RULES, AND POLICIES

The following rules, policies and procedures were reviewed as part of this investigation:

Misuse of Public Resources

The Ohio Ethics Commission (OEC) issues advisory opinions which elaborate on the interpretation of the Ohio Revised Code. OEC Advisory Opinion 96-004, interpreting ORC 102.03(D), prohibits a public official or employee who engages in private outside employment or business activity from:

- (a) using public time, facilities, personnel, or resources in conducting a private business or while engaging in private outside employment including conducting demonstrations for clients using public equipment.

Confidentiality of ODJFS Information

Ohio Revised Code (ORC) §4141.21 states that, except as provided in ORC §4141.162 and subject to ORC §4141.43, "... the information maintained by the director of job and family services or furnished to the director by employers or employees pursuant to this chapter is for the exclusive use and information of the department of job and family services in the discharge of its duties and shall not be open to the public" As such, the Office of the Ohio Inspector General will not include in this report any of the information obtained during the investigation received by ODJFS in accordance with Ohio Revised Code §4141.21.

Confidential Personal Information

In response to a report of investigation¹¹ issued by the Office of the Ohio Inspector General, the Ohio General Assembly passed House Bill 648, establishing §1347.15 of the Ohio Revised Code. This section defines “Confidential Personal Information” and identifies what personal information is not to be considered as a public record. Common examples of confidential personal information (CPI) protected by this section include an individual’s Social Security number, driver’s license number, medical records, and records whose release is prohibited by state or federal law. Possible ramifications for an employee violating this code section range from administrative action to criminal charges and being permanently prohibited from state employment.

This section also mandates that all state agencies, excluding the judiciary and state-assisted institutions of higher learning, develop and adopt agency rules regarding the access of CPI that is maintained by the agency. The law specifies several requirements that agencies must incorporate into their rules concerning the handling of CPI including but not limited to: a defined criteria used to determine an employee’s level of access to CPI and a list of the valid reasons as to when employees are permitted to access CPI; a procedure for logging and recording employee access to CPI and the requirement that a password or other authentication must be used to access CPI stored electronically; that agencies designate an employee to serve as the data privacy point-of-contact who ensures that CPI is properly protected; the requirement that agencies must provide on demand to an individual, a detailed listing of all CPI maintained by that agency concerning that individual, unless the CPI relates to an investigation; and a policy that requires agencies to notify individuals whose CPI has been accessed for an invalid reason.

Ohio Revised Code §1347.15 requires all applicable state agencies to establish a training program for all employees who access, or who supervise employees who access, or who authorize employees to access, confidential personal information, so that all employees are made aware of all statutes, rules, and policies governing access to such information.

¹¹ Report of Investigation #2008299.

Release of Personal Information Held by ODJFS

Ohio Administrative Code §5101:9-22-15(A)(1)(a)(ii), created by ODJFS, defines personal information to include but is not limited to:

Identifying information about applicants for or recipients of ODJFS-administered benefits or services, including, but not limited to, their names, addresses, social security numbers, phone numbers, and social and economic status.

ODJFS Policies and Procedures

Employees of the Ohio Department of Job and Family Services must comply with the following agency policies determined by investigators to be relevant to this investigation:

- *IPP.5003 – Outside Employment Section V*, defines outside employment as,
Any form of non-Agency employment or business relationship involving the provision of personal services by the employee. It does not include participating in the activities of a nonprofit, charitable, religious, public service, or civic organization, unless such activities involve the provision of professional services or are for compensation.
- *IPP.5003 – Outside Employment Section V*, states,
Employment with certain nonprofit organizations could present an ethics law violation or a conflict of interest ... If the ODJFS employee is in a fiduciary role with or otherwise benefits from the nonprofit that does business with ODJFS, there could still be a conflict and ethics violation.
- *IPP.5003 – Outside Employment, Section VI.A*, states,
The work of the Agency takes precedence over other occupational interests. No ODJFS employee shall accept or continue outside employment that in any manner conflicts with the employee's approved work schedule or duties at ODJFS. This includes conflicting work hours ... Any employee seeking or involved in outside employment shall notify ODJFS in writing of such outside employment ...

- *IPP.5003 – Outside Employment Section VII(A)(1)*, provides that employees seeking, or who are involved with, outside employment are to notify ODJFS in writing of said employment by “completing and submitting a JFS 01793 Notification of Outside Employment form.”
- *IPP.10002 – Computer and Information Systems Usage, Section VI.C*, states that ODJFS employees are prohibited from using any computer system for illegal purposes. This section further prohibits the following usage:

Subsection	Provision
5	Using [ODJFS] computers or information systems in association with the operation of any for-profit business activities or for personal gain.
12	Disseminating unauthorized confidential or proprietary ODJFS or client documents or information or data restricted by government laws or regulations (See <i>ODJFS-IPP 8501</i> and <i>ODJFS-IPP 3922</i>);
25	Storing non-work, personal documents on any drive of a state-owned computer or network.

- *IPP.3100 – ODJFS Telephone Usage, Section VI.F*, states, “Personal business, which involves an activity undertaken for profit or gain of any kind, shall not be conducted using state telephone service.” Additionally, *Section VI.G* of this policy states,
Employees are prohibited from using state equipment or circulating any state telephone number as a telephone number at which they can be reached for personal business (personal business cards and other personal materials shall not have a State of Ohio telephone number or cellular telephone number listed as an option for contact).
- *IPP.3942 – Local, Network and Cloud Storage, Section VI.A(4)*, states, “the personal cloud storage is not intended for the backup of local drives (C:, D:, etc.), copies of CDs, installation files of applications, or any type of personal data (i.e., music files, images, etc.).”
- *IPP.0003 – Standards of Employee Conduct*. This policy states that ODJFS employees shall only use government property, including computer systems, for official purposes

and are not to conduct illegal activities during working hours. This policy also contains the following procedures in *Section VI.B*:

Section	Category	Procedure
2(a)	Government Property	All government property, including but not limited, to automobiles, supplies, equipment, telephones, computer hardware, computer software, electronic mail, ODJFS information systems, internet usage, and facilities are to be used for official purposes only, unless otherwise stated ...
5	Outside Employment	Employees shall not have a direct or indirect financial interest or other interest that conflicts or appears to conflict with their government duties and responsibilities.
7	Confidentiality	... Each employee may only disclose or release information consistent with applicable law and agency policy.
8(b)	Nepotism	Employees will not authorize or use their authority or influence of his or her position to secure the authorization of employment or benefit (including a promotion or preferential treatment) for a person closely related by blood, marriage or other significant relationship including business association.

- *IPP.0005 – Processing of ODJFS Work Actions*,¹² *Section IV.B*, states, “ODJFS employees shall not, on a normal basis, process any ODJFS work actions [including claims] for themselves, relatives, co-workers, or friends.”
- *IPP.3922 – Code of Responsibility, Section VI.B*, of this policy states,
Any access to information about recipients of ODJFS benefits or services that is collected or maintained on an ODJFS or state computer system is strictly limited to those purposes authorized by ODJFS and directly related to the user’s official ODJFS job duties or work assignments for or on behalf of ODJFS and or a federal agency overseeing ODJFS.
- *IPP.3925 – Data Access Policy*, contains guidance on what is considered to be, “... business appropriate uses of ODJFS Confidential Personal Information (CPI) stored in ODJFS maintained computer systems.” In addition, *Section VI(A)* states confidential personal information for ODJFS includes,
... any non-public information about ODJFS employees, contractors and service providers (such as Social Security numbers and non-work-related addresses), as

¹² This policy was retired by ODJFS on May 11, 2023.

well as any information identifying applicants for, recipients of, and participants in, ODJFS-administered programs that fall under the category of ... unemployment compensation, and workforce development. [\(Exhibit 1\)](#)

According to records provided by ODJFS, Ford acknowledged the above ODJFS policies on the following dates:

Policy No. and Title	Dates Policy was Acknowledged by Ford
<i>IPP.5003 – Outside Employment</i>	2/9/16
<i>IPP.10002 – Computer and Information Systems Usage</i>	10/13/17
<i>IPP.3100 – ODJFS Telephone Usage</i>	7/18/18
<i>IPP.3942 – Local, Network and Cloud Storage</i>	11/29/18 & 1/19/22
<i>IPP.0003 – Standards of Employee Conduct</i>	2/19/16 & 8/19/21
<i>IPP.0005 – Processing of ODJFS Work Actions</i>	3/28/13
<i>IPP.3922 – Code of Responsibility</i>	3/28/13 & 1/8/20
<i>IPP.3925 – Data Access Policy</i>	9/10/14 & 8/17/20

According to training records provided by ODJFS, Ford completed the following relevant training and attestations during calendar years 2019 through February 2023:

Training Topics	Date Completed
Ethics Law Related Trainings	5/22/19, 11/9/20, 11/17/21, 7/12/22
Computer, Data, and Information Security	3/21/19, 4/30/20, 12/27/21, 2/24/23
Code of Responsibility Attestation	3/2/20, 1/4/21, 1/29/21, 2/1/22, and 1/26/23

INVESTIGATIVE SUMMARY

On December 7, 2022, the Office of the Ohio Inspector General received a referral from the Ohio Department of Job and Family Services (ODJFS) of suspected illegal or improper activity conducted by ODJFS Office of Workforce Development (OWD) Employment Professional Maria Ford. ODJFS reported concerns with Ford’s job performance and suspicions that Ford, “... may be spending time during her workday [sic] on her outside advocacy pursuits associated with a nonprofit organization she operates.” Additionally, ODJFS reported Ford allegedly stored records related to a nonprofit she had incorporated, and grants received by the nonprofit, on her ODJFS computer.

The Office of the Ohio Inspector General requested and obtained from ODJFS a copy of Ford's personnel file including her performance evaluations. From their review of these documents, investigators discovered comments written by Ford's supervisor, Aprille Kisner¹³ in Ford's performance evaluation for the period October 1, 2019, through September 30, 2020. In this evaluation, Kisner stated that Ford, "... tried to assist claimants and cleared issues that were not allowable for her work group which resulted in over-payments on several claims."

Investigators obtained and analyzed Ford's confidential personal information access log for ODJFS' Ohio Jobs Insurance (OJI) computer system. From this review of records, investigators found that Ford had accessed in several instances the same unemployment claim multiple times. Given her job duties did not include managing a group of unemployment claims, ODJFS investigators and the Office of the Ohio Inspector General determined the frequency Ford accessed several claims was unusual. Investigators examined the claims Ford had accessed more than four times and found that Ford had accessed two claims belonging to her relatives a total of 37 times. Based on these findings, in February 2023, the investigation was expanded to include a review of these accesses.

Outside Employment and Compensation

ODJFS reported to the Office of the Ohio Inspector General that ODJFS OWD leadership was concerned that Ford, "... may be spending time during her workday [sic] on her outside advocacy pursuits associated with a nonprofit organization that she operates." ODJFS also reported that they had conducted a review of Ford's activities during her scheduled workdays and her use of State of Ohio resources and found that Ford:

- Had spent a significant amount of time during her workdays performing tasks associated with her various outside advocacy activities.
- Had stored records on her state-issued computer that were related to a nonprofit corporation called The Healing, Empowering, Loving, and Preparing Center (The H.E.L.P. Center)

¹³ Kisner supervised Ford from 2016 – 2021 before transferring to another department within ODJFS.

- Had stored records on her state-issued computer that were related to grants that were awarded from the Ohio Department of Rehabilitation and Correction (ODRC) to The H.E.L.P. Center and the Central Ohio Restored Citizens Collaborative.
- Had used her ODJFS email account and signature for communications related to her outside advocacy activities.

ODJFS also provided to investigators a copy of the Articles of Incorporation for The Healing, Empowering, Loving and Preparing Center (The H.E.L.P. Center) for their review.

From their examination of records, investigators learned:

- The Central Ohio Restored Citizens Collaborative (CORCC) and The H.E.L.P. Center had received an expansion grant from the Ohio Department of Rehabilitation and Correction (ODRC). The budget for this grant stated that these services included, but were not limited to, assisting restored citizens in obtaining birth certificates, drivers licenses, housing, and rental assistance.
- The H.E.L.P. Center in conjunction with two other nonprofits and the City of Columbus (the City) agreed to operate a pilot program to assist people with criminal convictions in obtaining emergency rental assistance using federal funds received by the City. The H.E.L.P. Center was awarded \$20,000 by the City of Columbus' 2022 Stable Housing Initiative pilot program.
- The H.E.L.P. Center entered into master lease agreements with businesses for properties to sublet to clients who needed housing.
- Prior to the receipt of ODRC grant funds and the incorporation of The H.E.L.P. Center, CORCC used donations received to provide services (e.g.: clothing, jobs, housing) to individuals who were released from correctional facilities.

On April 6, 2023, the Office of the Ohio Inspector General interviewed Maria Ford. During the interview, Ford told investigators that The H.E.L.P. Center began as a group ministry within her church and involved providing food and clothing to "... people on the street." When asked, Ford explained to investigators that The H.E.L.P. Center:

- Used ODRC grant monies to fund community events in both Union and Madison Counties, to work with the Union County Community Based Corrections Facility (known as West Central).
- Assisted those in need with obtaining their birth certificates and state identification cards.
- Assisted applicants for the City of Columbus Emergency Rental Assistance (ERA2) in the OhioMeansJobs Center Resource Room. This assistance was provided by Ford or a volunteer from The H.E.L.P. Center.
- Entered into three master lease agreements with property owners and into lease agreements with individuals who had been incarcerated.
- Assisted individuals who had entered a lease with The H.E.L.P. Center to apply for rental assistance from the City of Columbus. If approved, the funds received were used to pay the rent due in accordance with the lease agreement with The H.E.L.P. Center.

Investigators discovered that the City of Columbus 2022 Stable Housing Initiative budget allocated \$11,200 of the \$20,000 awarded to The H.E.L.P. Center for salaries and related fringe benefits. When asked, Ford told investigators that The H.E.L.P. Center does not have paid employees. Ford explained that only volunteers worked for The H.E.L.P. Center and that on occasion, she would give them money for gas “every now and then.”

The Office of the Ohio Inspector General issued subpoenas to financial institutions holding accounts either in the name of Ford or her nonprofit, The H.E.L.P. Center. Investigators examined The H.E.L.P. Center’s bank statements, deposit records, and checks issued for activity related with these services. From this review of records, investigators learned funds were deposited into The H.E.L.P. Center’s bank account for the ODRC grant, the City of Columbus Stable Housing Initiative pilot program,¹⁴ and rent payments received. Additionally, investigators learned The H.E.L.P. Center issued checks to pay for activities funded by the ODRC grant, for the master lease agreements, and to various individuals, including Ford. The seven checks issued to Ford by The H.E.L.P. Center totaled \$1,157.47.¹⁵

¹⁴ This program was funded using federal Emergency Rental Assistance (ERA 2) program funds approved in the Consolidated Appropriations Act of 2021. Source: City of Columbus Ordinance 1658-2022.

¹⁵ The memo line for two of the seven checks totaling \$302.47 indicated Ford was being reimbursed.

From an analysis of cash deposits into accounts held solely in Ford's name, investigators found:

- Ford made 132 cash deposits totaling \$29,062 into her personal Fifth Third Bank account during the period from January 1, 2020, through January 9, 2023.
- Ford reloaded a Green Dot[®] debit card 62 times totaling \$12,735.52 during the period from January 1, 2020, through February 1, 2023. Once reloaded, Ford's personal Customer's Bank¹⁶ account reported a deposit on the bank statement.

Investigators were unable to determine the source of the cash deposits or debit card reloads posted to Ford's accounts in this analysis. Subsequently, to determine whether Ford had received compensation or a monetary benefit from The H.E.L.P. Center, investigators conducted a secondary analysis that compared The H.E.L.P. Center's bank account withdrawal activity to the cash deposits into Ford's personal accounts at Fifth Third Bank and Customers Bank. For the period from February 7, 2022, through January 9, 2023, investigators identified 23 cash withdrawals¹⁷ from The H.E.L.P. Center's bank account that corresponded to cash deposits into Ford's personal bank accounts totaling \$9,225. These withdrawals/deposits matched dollar for dollar and were deposited either the same day or within 24 hours of each other.¹⁸

Investigators concluded Ford violated *ODJFS Policy IPP.5003 – Outside Employment, Section V(A)*, when she accepted compensation for work performed for a nonprofit, charitable, religious, public service, or civic organization.

¹⁶ Customers Bank is the parent bank for accounts held by BancCorp. This was determined by identifying the bank associated with the routing number associated with the direct deposit of her payroll check.

¹⁷ Of these 23 withdrawal transactions from The H.E.L.P. Center bank account, 21 deposits were made into Ford's Fifth Third Bank account and the remaining two deposits were cash reloads on a Green Dot[®] card that were subsequently deposited into Ford's Customers Bank account.

¹⁸ For the remaining 61 cash withdrawals totaling \$20,536.50 from The H.E.L.P. Center bank account, investigators determined from available bank records there were 115 additional cash deposits into all accounts associated with Ford totaling \$25,035.64 during the period of January 1, 2020, through February 9, 2023. However, the 61 withdrawals from The H.E.L.P. Center bank account did not match dollar for dollar with deposits or cash reloads into these accounts. These cash withdrawals from the Center bank account and unknown source cash deposits along with the 23 withdrawals identified in this report are being referred to the Ohio Department of Taxation and the Ohio Attorney General's Charitable Law Section for review and consideration.

Outside Employment and Proper Approval

During her interview, investigators asked Ford what discussions she recalled having with her supervisors about outside employment. These supervisors included her immediate supervisor ODJFS Program Delivery Supervisor Angela Odom and Odom's supervisor ODJFS Program Delivery Manager Steve Carson. Ford said she had notified Carson that she performed a lot of volunteer work for the CORCC and that she also volunteered or worked for no money with ODRC by visiting the prisons. During this conversation, Ford recalled sending an email with this information to both Odom and Carson. Ford told investigators that she believed this notification occurred shortly after Angela Odom became her supervisor.

Carson confirmed to investigators that Ford had mentioned to him in July of 2022 that she was, "... doing volunteer work and wondered if she needed to do [an] Outside Employment form." Carson explained to investigators that after being told by Ford that it was for a nonprofit and volunteer work, Carson informed Ford she was not required to complete the ODJFS Outside Employment form. Carson noted to investigators that Ford had failed to disclose to him that she was the owner/founder/executive director of the nonprofit, The H.E.L.P. Center.¹⁹

Odom, however, told investigators that she did not recall any discussions with Ford regarding her volunteer work. Investigators also contacted Ford's previous supervisor, Aprille Kisner, who supervised Ford during calendar year 2021, when Ford incorporated her nonprofit. Kisner recalled Ford notifying her that she [Ford], "... worked with some reentry groups to provide various services to ex-offenders." Kisner told investigators that she approved Ford's involvement with these activities and noted that Ford used personal leave for any activities that occurred during her workday. In a subsequent email to investigators, Kisner stated she was unaware that The H.E.L.P. Center, incorporated in March 2021, was operational during the time she supervised Ford.

¹⁹ Investigators learned that on October 27, 2022, Carson was issued a counseling by ODJFS management for his failure to, "... provide your team proper direction on following IPP.5003 Outside Employment and IPP.0003 Standards of Employee Conduct." The counseling memo further stated that Carson had, "... failed to ensure her [Ford's] activities would have no possible negative impact of [sic] ODJFS or OWDs reputation."

Investigators contacted ODJFS and learned that Ford had not submitted a JFS 01793 Notification of Outside Employment form requesting approval for outside employment. ODJFS also confirmed to investigators that Ford had completed her trainings on the Ohio Ethics Law.

Investigators concluded Ford violated *ODJFS Policy IPP.5003 – Section VII(A)(1)* when she failed to notify ODJFS in writing that she was seeking or was involved with outside employment by completing and submitting a JFS 01793 Notification of Outside Employment form.

Volunteer Activities, Overlap of Service, and Conflict of Interest

In the complaint submitted to the Office of the Ohio Inspector General, ODJFS OWD leadership expressed concerns that Ford was, “... spending a significant amount of time during her workday [sic] performing tasks or activities associated with various outside advocacy activities.”

Additionally, OWD leadership stated that:

- It was believed that an “... overlap exists between the services Ford provided through the Ohio Means Jobs Centers and the work being performed by Ford outside and apart from her assigned [ODJFS] duties.”
- As part of the Wagner-Peyser grant, OWD staff provides job search assistance and supportive service referrals to OhioMeansJobs centers. ODJFS staff stated that it had, “... become an understanding that Ms. Ford’s companies/grants are one of the OMJ [OhioMeansJobs Center] partners in which customers are referred to for supportive services.”
- Ford had “blurred the lines” between her ODJFS job duties and outside activities by invoking, “... her ODJFS employment when generating communications around these outside activities by using her ODJFS email account and signature.”

Ford’s position description specified her ODJFS job duties included providing services to Ohioans seeking reemployment services; providing partner assistance at the OMJ [OhioMeansJobs] Center; serving as an OWD team member conducting various in-person and virtual reemployment activities; providing unemployment insurance (UI) and reemployment services to UI claimants; and assisting individuals with obtaining new employment. In addition,

Ford was responsible for conducting work and/or job hiring events and providing general orientation and OMJ Resource Room services to individuals.

Investigators examined emails sent and received by Ford to/from her ODJFS email account to identify any instances supporting that Ford’s outside-of-work activities involving CORCC and The H.E.L.P. Center overlapped with those services being provided by Ford in her position with ODJFS and those provided by the OhioMeansJobs Center. Investigators found the following examples of overlap:

Email Date	From	To	The H.E.L.P. Center or CORCC Assistance Request/Activity	Ford ODJFS Job Duty
4/8/2020	Zach Ruppel of CORCC	Maria Ford	Email requested her to call the identified gentleman and stated, “... you will need to explain who you are calling with (the Collaborative).” Ruppel further stated the individual was in need a job.”	Job Assistance
7/21/2020	CORCC	Maria Ford	Email requested her to call the Center for Employment Opportunities to discuss an individual needing assistance.	Job Assistance
7/14/2022	Maria Ford	StateofOhio@service-now.com	Email requested access to webpage to allow applicants to complete the required City of Columbus self-certification of landlord-tenant relationship when applying for emergency rental assistance from the City of Columbus Stable Housing Initiative.	Referral for Supportive Services
8/1/2022	City of Columbus	Maria Ford	Email stated The H.E.L.P. Center’s tenant had successfully submitted an application and that it was pending Ford’s acceptance, as the landlord, of the amount requested and of the terms.	Referral for Supportive Services

During her interview, investigators informed Ford that records were found on her ODJFS OneDrive,²⁰ in her ODJFS email box, and at her desk related to The H.E.L.P. Center providing rental assistance²¹ to applicants. When asked, Ford explained to investigators that emergency rental assistance was a typical service offered by some of the partners of the OhioMeansJobs Center with available funds, and Ford identified specific partners who offered rental assistance programs within the OhioMeansJobs Center.

²⁰ ODJFS uses OneDrive to provide personal cloud storage to backup files stored by their employees.

²¹ This assistance included but was not limited to assisting in the completion of an application and obtaining records from the landlord for the applicant, of which certain applicants later became a customer at the OhioMeansJobs Center.

Investigators asked Ford to explain how, during her workday as an employment professional²² at ODJFS, she was able to assist clients in completing applications for rental assistance and calling landlords to obtain rental payment records. Ford responded that she did not complete those activities, and that there was a volunteer from The H.E.L.P. Center assigned to the Resource Room at the OhioMeansJobs Center who was responsible for completing those activities. However, investigators found Ford emailed landlords using her ODJFS email to obtain this information in certain instances.

Investigators noted to Ford that there seemed to be some overlap in the types of services provided by CORCC, The H.E.L.P. Center, and ODJFS, based on her descriptions of the services they provided. Specifically, investigators identified to Ford apparent conflicts between the work she was performing on behalf of The H.E.L.P. Center and the work she was performing for ODJFS:

- 1) The H.E.L.P. Center had received grants from governmental agencies or nonprofits who may have also received ODJFS funding for similar services; and
- 2) The services she provided on behalf of ODJFS or other OhioMeansJobs Center partners, such as rental and employment assistance, were similar to those being provided by either The H.E.L.P. Center or CORCC.

Ford replied that there will, "... always be overlap. There's no competition."

Investigators asked Ford whether she had communicated with anyone at the ODJFS Legal department or the Ohio Ethics Commission to determine whether a conflict existed between the work she was performing on behalf of The H.E.L.P. Center and the work she was performing for ODJFS. Ford replied to investigators, "I didn't." Ford then explained that she had talked to Carson who told her that she, "did the right thing by telling me." ODJFS Legal and the Ohio Ethics Commission both informed investigators that they had no records related to Ford making an inquiry about any possible conflicts between her ODJFS-assigned duties and the work she was performing for either The H.E.L.P. Center or CORCC.

²² Ford's job duties included, but were not limited to, providing services to Ohioans seeking reemployment services; conducting various reemployment activities; providing unemployment insurance (UI) and reemployment services to UI claimants; and assisting individuals with obtaining new employment.

Investigators concluded Ford violated *ODJFS Policy IPP.5003 – Section VII(A)(1)*, when she failed to complete and submit a JFS 01793 Notification of Outside Employment form notifying ODJFS in writing that she was seeking or was involved with outside employment. Additionally, investigators concluded Ford violated *ODJFS Policy IPP.5003* when she performed duties for outside employment in a manner that conflicted with her approved work schedule and/or assigned duties at ODJFS.

Performing Non-ODJFS Activities While Serving as an ODJFS Staff Member

In the complaint, ODJFS expressed concerns about time Ford spent on tasks or activities associated with her various outside advocacy activities, including Ford's references to her ODJFS employment in correspondence for those activities. Investigators examined Ford's email correspondence, records found in her assigned workspace, and those stored by Ford on her ODJFS network drive and found the following:

- Receipts from the Columbus Board of Health for the purchase of birth certificates. Investigators determined that 18 of the 23 receipts were issued for purchases that were not related to Ford's ODJFS job duties and the transactions occurred during Ford's ODJFS workday.
- Receipts from the State of Ohio Bureau of Motor Vehicles for three purchases of state identification cards that were not related to Ford's ODJFS job duties and the transactions occurred during Ford's ODJFS workday.
- Email referrals from Pathway Home Re-Entry Navigator Chinara Duckworth²³ to Ford requesting assistance for customers in obtaining a birth certificate and/or state identification card.

During her interview, Ford explained to investigators the process followed at a CORCC event when a participant needed a birth certificate. Ford explained that at times, her involvement with the obtaining of birth certificates as a result of these events, included dropping off the forms for the participant and/or picking up the participant's birth certificates from the Columbus Health Department. These purchases were often paid using The H.E.L.P. Center's debit card. Ford

²³ Duckworth is employed by the Jefferson County CAC Inc. who has a contract with the ODJFS to provide these services at the OhioMeansJobs Center at Franklin County.

stated that if the purchases occurred during her lunch break, she made the purchases; otherwise, someone else used her debit card to make the purchase.

Investigators examined documentation obtained for the \$53,850 ODRC grant awarded to CORCC and The H.E.L.P. Center and identified the following relevant budget allocations:

Budgeted Line Item	Description	Amount Budgeted
11. Shelter (temporary)	Short-Term Hotel and AirBnB stays	\$ 5,000.00
12. State of Ohio ID	State ID Vouchers	\$ 7,500.00
18. Birth Certificate	Birth Certificate Replacements	\$ 15,000.00

Investigators learned through inquiries with three ODJFS OWD employment professionals that obtaining the actual birth certificate for the customer was not part of their ODFJFS job duties. According to two ODJFS OWD employment professionals, when a birth certificate was needed by a customer, the employment professional would provide the customer with the resource contacts to obtain the documents and funding assistance themselves.

Investigators contacted Pathway Home Re-Entry Navigator Chinara Duckworth to explain her job duties and characterize her interactions with Ford. Duckworth informed investigators that as a Pathways navigator, she was responsible for guiding clients who needed services to the appropriate resources. At one point, Duckworth recalled being told that Reentry Assistance was available to assist participants in obtaining birth certificates or state identification cards. In her response to investigators, Duckworth explained that Ford was initially introduced to her by another staff member at the OhioMeansJobs Center. During these conversations, Duckworth recalled Ford telling her that she (Ford) could obtain the participant's birth certificate free of charge. According to Duckworth, Ford instructed her to send her an email (to Ford's ODJFS email address) with the participant's name, date of birth, and telephone number for Ford to contact the participant. After the email had been sent to Ford, Duckworth stated she had no further involvement with the process.

From their examination of Ford's ODJFS email box and files stored in her ODJFS network storage, investigators also found the following documents in which Ford referenced her ODJFS employment in some capacity ([Exhibit 2](#)):

Date of Letter	Whose Letterhead	For	Comment
12/13/2021	CORCC letterhead	Support of TAPP project	Ford references being an employment professional for the state.
8/25/2022	The H.E.L.P. Center	The H.E.L.P. Center and CORCC had secured funding for TAPP 2 project	Letterhead contains reference to ODJFS and a statement that ODJFS is “an agent of Central Ohio Restored Citizen Collaborative.”
10/18/2022	CORCC letterhead	Referral letter for CORCC client	Ford stated she worked as an ODJFS employment professional.
11/17/2022	The H.E.L.P. Center	Advocating on behalf of an individual scheduled for a probation hearing	Letterhead uses OhioMeansJobs Center’s address, Ford’s personal cellphone number, and Ford referred to working with the individual as a state employment professional.
1/20/2023	No letterhead	Support of Action for Children by CORCC and OhioMeansJobs Center of Columbus, who partnered with them for the fatherhood program	Letter has Ford’s OhioMeansJobs Center signature block and the CORCC logo.

During this review, investigators found an ODJFS Applicant/Recipient Authorization for Release of Information form completed on July 12, 2022, from an individual. The following is an excerpt of this document:

Ohio Department of Job and Family Services APPLICANT/RECIPIENT AUTHORIZATION FOR RELEASE OF INFORMATION		Office Use Only Applicant/Recipient Name Case Number <div style="background-color: black; width: 100px; height: 15px; margin: 2px 0;"></div>	
		Name of ODJFS Representative/Unique Identifier/Date Maria D Ford	
I, <div style="background-color: black; width: 100px; height: 15px; display: inline-block;"></div> , hereby authorize <u>ODJFS / Maria Ford / The HELP Center</u> to disclose <small>(Name of Individual)</small> <small>(Name of covered entity, such as ODJFS, employer, etc.)</small> the information listed below to <u>COMPASS</u> for the purpose of determining <small>(Who will receive the information?)</small> eligibility for cash assistance, medical assistance and/or Supplemental Nutrition Assistance Program (SNAP) benefits; or for the following reason(s): <u>application for Emergency Rental Assistance</u> <hr/> Information to be released: <u>Benefits, pay, lease and rental information and any other information needed</u>			

Investigators learned the applicant for rental assistance had entered into a lease with The H.E.L.P. Center on April 1, 2022, and Ford had signed the lease agreement on behalf of The H.E.L.P. Center. From their review of Ford’s records, investigators discovered that the purpose for the rental assistance application was to pay the rent the applicant owed to The H.E.L.P.

Center. These activities were not related to Ford’s ODJFS job duties as an employment professional.

Lastly, investigators identified email correspondence between Ford and her ODJFS supervisor Angela Odom on May 3rd and May 4th of 2022 discussing Ford’s use of her ODJFS employment in her bio that was to be submitted to the Franklin County Reentry Advisory Board (the Board). [\(Exhibit 3\)](#) Ford stated in the email to Odom that she was not requesting approval to participate on the Board since she was not being “... asked because of my position with JFS [ODJFS].” Because Ford asserted to Odom that her Board membership was volunteer work and that she was participating on her own time, Odom responded to Ford’s request to include where she worked as part of her bio, stating,

... I think it would be okay to include in your BIO that you are employed at JFS, as that is information about you. However, please make sure that your BIO does not make assumptions that you are sitting on the board as representation of JFS.

Investigators discovered that, after receiving Odom’s response, Ford used her ODJFS email account to send an email during her ODJFS workday to the Board, containing her bio, on May 4, 2022, at 8:10 a.m.

Additionally, ODJFS provided investigators with a letter dated May 11, 2023, that was sent to Ford at ODJFS OWD from the Franklin County Board of Commissioners. The letter provided a copy of the Franklin County Commission Resolution approving her reappointment to the Franklin County Reentry Advisory Board expiring on December 31, 2024. The resolution document included Ford’s ODJFS contact information:

Maria Ford Employment Professional, Office of Workforce Development OhioMeansJobs Franklin County maria.ford@jfs.ohio.gov 614-559-4788

Investigators determined that Ford provided to the Franklin County Board of Commissioners her ODJFS email address and phone number for use in her volunteer appointment even though the appointment was not related to her ODJFS job duties.

Investigators concluded Ford violated ODJFS *Policy IPP.003 Section IV(B)(5)*, by using her ODJFS email as a point of contact for her appointment for non-ODJFS activities; receiving referrals for CORCC using her ODJFS email; and drafting letters during the workday which referenced her ODJFS employment or contact information.

Referral of a Family Member for an Open Position

During the review of Ford's ODJFS emails, investigators discovered the following email sent to Ford from a representative of Minute Man Staffing Services on November 24, 2021:

Hi Maria 😊

I know this is short notice but by chance would you happen to have some folks that would be able to come in and apply for a short term assignment that pays \$18 an hour . We need about 5 associates to work disassembling and packing up equipment weighing approximately 50 pounds . Start date of 11/30/ 21 until 12/10/21

Investigators also found an email response from Ford responding to this request on November 29, 2021, which stated she was sending a relative of hers (Relative #1) over that day.

Investigators asked Ford whether it was allowable per ODJFS policies to send names of close relatives to employers who have open positions. Ford replied, "I don't think so." Ford stated she did not believe she had sent any close relatives to employers with open positions. After informing her about the email correspondence between herself and the representative from Minute Man Staffing Services, Ford commented that she did not know if she had done so, but that it was possible. Further review of ODJFS records did not find evidence that Minute Man Staffing Services reported paying wages to Relative #1.

Investigators concluded Ford violated ODJFS *Policy IPP.0003 – Standards of Employee Conduct, Section VI.B(8)(b)*, by attempting to use her authority or influence of her position to secure the authorization of employment for a family member.

Improper Use of State Resources and the OhioMeansJobs Center Space

In the complaint referral, ODJFS provided investigators with screen shots from Ford's state-issued computer which showed that she often had her personal Gmail email account open on one of her screens during the workday. Additionally, ODJFS provided screenshots showing Ford:

- Drafted a letter during her workday on CORCC letterhead that was not related to her ODJFS job duties.
- Maintained folders within her ODJFS email account for emails regarding non-ODJFS activities such as the City of Columbus ERA2 pilot program, CORCC, and the Restored Citizens Summit that is overseen by CORCC.
- Updated a rental ledger for one of the tenants at a property leased by The H.E.L.P. Center.
- Exchanged emails and worked on an application for a client for rental assistance from the City of Columbus.

Investigators obtained and examined Ford's ODJFS email box and a copy of the files saved to her ODJFS OneDrive (personal cloud storage). Investigators also examined Ford's usage of her ODJFS-assigned desk phone number at the OhioMeansJobs Center. From their analysis of these records, investigators found:

Category	Activity Related to			
	H.E.L.P. Center	CORCC	Personal	Total
For the Period: 1/1/21 - 1/17/23				
Number of Emails Sent/ Received by Ford	307	466	87	860
Number of Attachments Ford scanned and sent to her ODJFS Email	108	36	3	147
Number of Files Stored on Ford's One Drive	194	397	38	629
For the Period 1/1/20 - 12/31/23				
Phone Calls Made/Received Using OhioMeansJob assigned desk phone line (hh:mm:ss)	3:48:53	14:37:37	2:28:22	20:54:52

Investigators questioned Ford about her use of her ODJFS email account, the scanner located at the OhioMeansJobs Center to scan documents to her ODJFS email account, and her storing of files on her ODJFS network drive. Ford admitted the following to investigators:

- Receiving and replying to emails on her ODJFS email account regarding an ODRC grant awarded to CORCC.
- Scanning and sending a signed grant agreement to ODRC using her ODJFS email account.

- Sending emails from her ODJFS email account to landlords requesting records, and to two organizations that were part of a pilot project involving City of Columbus Emergency Rental Assistance funds.
- Storing ledgers and files that were not related to her ODJFS job duties on her ODJFS network drive.

Investigators presented to Ford for her review a spreadsheet listing emails obtained from her ODJFS email account that were related to CORCC or the City of Columbus Emergency Rental Assistance pilot program. Investigators noted to Ford that the emails appear unrelated to her ODJFS job duties. Ford told investigators that she had asked people not to email her at her ODJFS email address. Ford noted that some people did not comply with her request. Ford added that if the persons were listed in the state email system, she did not ask them to not email her at ODJFS.

From their analysis of calls to/from Ford's ODJFS desk phone, investigators found a significant number of calls that were either made to or received from three specific individuals, totaling 4 hours 26 minutes, that were categorized as CORCC activities. When asked about these calls, Ford explained one individual worked with TAPP, a OhioMeansJobs Center partner, and the other two individuals were associated with the operation of a café, which often hired people. Ford admitted to investigators that she would often personally call to locate a job for a customer rather than following the normal process to register the customer in the ODJFS OWD computer system. By not recording the information or registering the customer in the OWD computer system, investigators were unable to verify whether the calls between Ford and these three individuals were related to Ford's ODJFS job duties or her CORCC activities.

ODJFS told investigators that there had been complaints from staff at the OhioMeansJobs Center and from ODJFS staff assigned to the OhioMeansJobs Center about customers arriving at the OhioMeansJobs Center and asking to speak directly to Ford about bus passes, birth certificates, and rental assistance. ODJFS provided documentation summarizing the following instances:

Date	Event Synopsis
10/4/2022	OhioMeansJobs Center Operator Scott Johnson was called to the receptionist area to speak with an individual. Johnson was told Ford had advised the individual to come to the OhioMeansJobs Center to pick up birth certificates for two individuals.
10/10/2022	An OhioMeansJobs Center talent engagement specialist stated she had received a call from a female asking for Ford. The female stated she was from a rental office and was wanting to check the status of her renter's application.
10/19/2022	Odom approached Ford's desk and noted another individual was there asking Ford a question. Odom learned this individual volunteered for Ford and worked with the Compass program offered by the Broad Street Presbyterian Church. Compass is a rental assistance program.
12/28/2022	Odom was contacted by the OhioMeansJobs Center receptionist about a customer asking to meet with Ford regarding housing assistance. Odom stated in the documentation that on the same date, she learned during a conversation with OhioMeansJobs Center Operator Scott Johnson that Ford had customers come to the OhioMeansJobs Center to work with them on housing assistance.
1/3/2023	Odom had previously seen a woman with Ford at her desk. On this date, Odom observed the person she had seen in the past going through Ford's desk drawers. This activity occurred on a date that Ford was off work. The individual told Odom that Ford was aware she was there and that she was filing and pulling residential packets. Odom indicated Johnson confirmed the female worked for Ford.
2/2/2023	Odom spoke with a customer who had come to the OhioMeansJobs Center to meet with Ford. The customer stated Ford had told her to come to the OhioMeansJobs Center that day to discuss obtaining an apartment.

Investigators contacted two OhioMeansJobs Center staff members who were responsible for managing the front desk and asked them if they believed individuals had met with Ford at the OhioMeansJobs Center for non-employment services. In response, the two staff members stated:

- Individuals had met with Ford at the OhioMeansJobs Center for services including UI claim assistance, rental assistance, birth certificates, and bus passes.
- Individuals had left rental assistance applications for Ford at the OhioMeansJobs Center's front desk.
- Ford had left birth certificates and bus passes for individuals to pick-up at the OhioMeansJobs Center's front desk and one staff member noted that Ford had left these items for individuals to pick-up for the past five years.

Investigators learned that there were other partners at the OhioMeansJobs Center that were able to provide rental assistance to customers. Ford confirmed to investigators that this was true, but noted only when there were funds available to provide the rental assistance. When asked whether The H.E.L.P. Center was providing emergency rental assistance at the OhioMeansJobs Center, Ford replied, “No because we weren’t working in the OMJ [OhioMeansJobs] Center.” Investigators then reminded Ford of her earlier comments during her interview when she stated customers meet The H.E.L.P. Center volunteer in the OhioMeansJobs Center’s Resource Room. Ford agreed with the summary of her early statement, but then commented that the customer meetings with The H.E.L.P. Center volunteers occurred there, “... because the Resource Room is free and open.”

Investigators learned during the investigation that:

- The OhioMeansJobs Center website indicates the only activities that occur in the Resource Room are related to seeking employment or completing educational tasks.
- Only specified ODJFS or OhioMeansJobs Center individuals were permitted to work in the Resource Room and that other OhioMeansJobs Center partners may meet with customers there. The H.E.L.P. Center was not a partner of the OhioMeansJobs Center.
- Visitors are required to sign in to access the Resource Room; however, during busy times, investigators learned it was possible for visitors to enter the Resource Room without signing in.
- Those assigned to work in the Resource Room were to only provide, “basic over-the-shoulder guidance on accessing websites and completing basic tasks. All other services provided by partner staff should be documented as required by their specific funding streams.”

Investigators were provided, for their review, email correspondence sent by Odom to her ODJFS Supervisor Steve Carson, which summarized a conversation she had with OhioMeansJobs Center Operator Scott Johnson involving a volunteer who was working for Ford out of the Resource Room. Johnson stated the volunteer, who “... does a lot of work for Maria,” was not employed by the OhioMeansJobs Center or its partners. In response to investigative inquiries, Johnson recalled there were instances in which a volunteer for The H.E.L.P. Center and/or CORCC

worked in the Resource Room. Johnson recalled he had discussed with Ford and Zach Ruppel [of CORCC] that the volunteer, "... was not allowed to work out of the Resource Lab doing CORCC tasks on multiple occasions. The activity would stop for awhile and then she [the volunteer] would creep back in again." Additionally, Johnson stated that he had also advised Ford and Ruppel that, "... because CORCC was not a formal member of the Memorandum of Understanding we use to operate the Job Center, the activities were not allowed."

Investigators obtained the FY 23²⁴ Memorandum of Understanding (MOU) for the Local Workforce Area 11 Workforce Development System. The MOU documents the roles, responsibilities, and funding commitments negotiated for the operation and funding of the local workforce development system and the OhioMeansJobs Center. Additionally, the MOU states, ... Management of the local workforce development system is to be shared among states, local workforce development boards, core Workforce Innovation and Opportunity Act (WIOA) programs, required partners, additional partners, and OhioMeansJobs center operators.

Investigators examined the list of partners and funding contributions and found that neither CORCC nor Ford's nonprofit (The H.E.L.P. Center) contributed monies to pay for the costs to operate the OhioMeansJobs Center in Franklin County. During her interview, Ford admitted to investigators that The H.E.L.P. Center does not pay for a share of the costs to operate the OhioMeansJobs Center.

Investigators concluded Ford violated ODJFS *Policy IPP.0003 – Standards of Employee Conduct, Section VI(B)(2a)*; ODJFS *Policy IPP.10002 – Computer and Information Systems Usage, Section VI(C)(25) and (D)(2)*; ODJFS *Policy IPP.3942 – Local, Network and Cloud Storage, Section VI.A(4)*; and ODJFS *Policy IPP.3100 – ODJFS Telephone Usage, Section VI.F.*

²⁴ This agreement was in effect for the period July 1, 2022, through June 30, 2023.

Improper Access of Confidential Personal Information

From a review of emails and discussions with ODJFS staff, investigators ascertained the following timeline regarding Ford's work at the ODJFS Office of Unemployment Insurance Operations (OUIO) Call Center providing intermittent assistance:

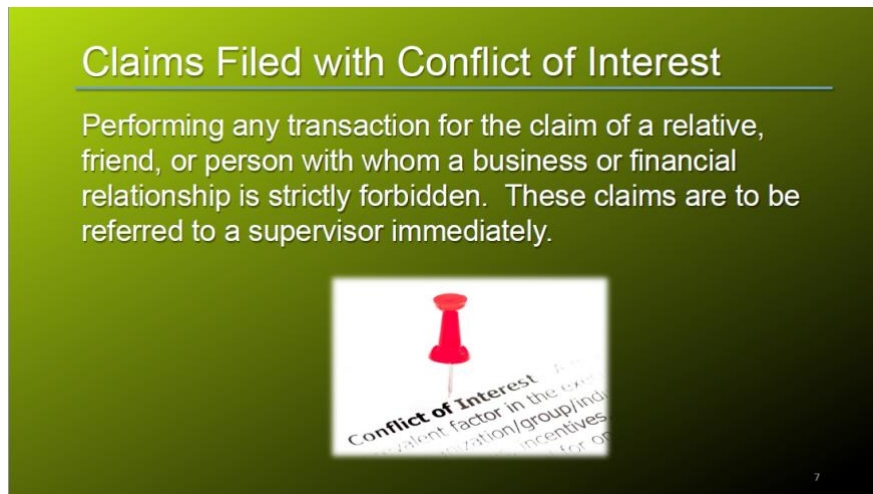
- March 20, 2020 – Ford was referred by her supervisor to assist OUIO with PIN resets.
- March 23, 2020 – Ford was identified by OUIO as the individual providing assistance in Phase 1, to assist with PIN resets.
- March 25, 2020 – This was the first day OWD staff assisted OUIO staff with PIN resets, and when OWD staff began receiving phone calls from the OUIO Call Center to complete PIN Resets.
- March 26, 2020 – Ford received training on the PIN reset process for claims and began accepting phone calls to reset PINs. Shortly thereafter, Ford was selected to transition to the Intake Team to providing assistance.
- April 10, 2020 – Ford received an Intake Refresher Training which provided a refresher on the basics of her involvement in the filing of an initial claim, filing of continued weeks, how to recognize liability assignments and what to do with them, additional claims, and the reopening of a claim. Training materials were emailed to the participating staff after the training. See [Exhibit 4](#) for the Intake Process flow when filing a claim.
- November 1, 2020 – Ford transitioned back to her ODJFS Office of Workforce Development duties.²⁵

ODJFS provided to investigators for their review a copy of Ford's personnel file including her performance evaluations. From their review of these records, investigators discovered a comment written by Ford's then-supervisor Aprille Kisner²⁶ for Ford's performance evaluation for the period from October 1, 2019, through September 30, 2020. In the evaluation, Kisner stated Ford had, "... tried to assist claimants and cleared issues that were not allowable for her work group which resulted in over-payments on several claims."

²⁵ These duties involved providing meaningful assistance to OWD customers involving their UI claims; contacting claimants nearing the end of their benefits to offer services; and perform other activities as directed by management.

²⁶ Kisner supervised Ford from 2016 – 2021 before transferring to another department within ODJFS.

Investigators reviewed applicable ODJFS policies regarding the access and dissemination of confidential personal information. Investigators also obtained and reviewed copies of ODJFS PowerPoint presentations that were provided to staff, including Ford. Investigators found the following guidance involving accessing claims that was presented to participants in the PowerPoint Presentation titled “5 Perform Claimant Search”:



During her interview with investigators, Ford stated that while assisting OUIO, she also would help answer phone calls from claimants regarding their claims. Once she hung up with one claimant, Ford stated that the phone rang with a call from another claimant. Ford stated that initially she was responsible for resetting claimants' PINs, but shortly thereafter, she began taking initial claims and responding to questions from claimants. Ford confirmed to investigators that she received training on both the PIN reset process and her responsibilities when filing an initial or additional claim. Ford explained that when she processed PIN resets, she would often go into the claim the next day to confirm that the PIN had been reset, and would then call the claimant back to ask them to review their claim.

Ford told investigators that there was a time when she was making these calls using both her OUIO-assigned phone and her own personal cellphone because the OUIO phone call quality through the computer was occasionally “shaky” and did not work. When asked whether she was permitted to use her personal cellphone to make these calls, Ford recalled ODJFS providing a way to block her personal cellphone number. Ford stated she stopped making calls from her personal cellphone when she received headphones to use with her OUIO computer, improving

the call quality. Investigators learned through inquiries that the headphones were sent to staff in mid-April 2020.

ODJFS provided to investigators Ford's CPI Access log which documented the instances Ford accessed confidential personal information (CPI) using ODJFS' Ohio Jobs Insurance (OJI) computer system. Ford's Access log showed 6,544 accesses to CPI between the period from March 23, 2020, through January 19, 2022, involving 5,591 UI claims. ODJFS and the Office of the Ohio Inspector General examined the 6,544 accesses and determined that Ford had accessed 90 UI claims more than four times during the time period she provided PIN reset and Intake Services for the Ohio Unemployment Income Operations (OUIO) Call Center. In discussions with ODJFS, investigators learned that multiple claim accesses were considered unusual, given Ford should have received a phone call forwarded from the OUIO Call Center when accessing the claim.

Investigators selected 1,075²⁷ claim accesses by Ford to determine whether Ford's accesses were for valid business reasons. To make this determination, investigators obtained the following records for review: OJI claim screen shots, documents received by ODJFS for the claim; Ford's ODJFS phone records, ODJFS email correspondence for the identified claimants, and when applicable, records maintained in computer systems used by ODJFS Office of Workforce Development and OhioMeansJobs Center Visitor Logs.

From their analysis of these 1,075 claim accesses by Ford, investigators found:

- Ford accessed UI claims in 154 instances in which investigators were unable to determine a valid business reason for the access.
- Ford accessed UI claims in 115 instances and did not perform any action within the claim. However, the access was the first access after Ford or another ODJFS staff member had requested a PIN reset, Ford cleared an issue, or Ford had sent an email to another ODJFS department requesting action be taken.

²⁷ Accesses were based on when they occurred during the day, based on Ford's responses during her interview, and those that occurred after Ford returned to her OWD duties.

- Ford accessed and performed an action in a UI claim in 136²⁸ instances for a valid business reason. However, no evidence was found by investigators supporting how the claimant contacted Ford and made a request which led to the action taken by Ford.

Based on this information and information learned as the investigation progressed, investigators selected 45 UI claims accessed by Ford and reviewed activity associated with the selected 181 accesses involving the 45 claims. This activity was reviewed in conjunction with claim file documentation, emails received and sent by Ford, phone calls received from the OUIO Call Center and on her OhioMeansJobs assigned desk phone.

From this review of records, investigators determined Ford improperly accessed confidential personal information and violated ODJFS policies when she worked on the following UI claims:

Claim Review – Ford’s Relative #1

Ford accessed a UI claim belonging her relative (Relative #1) a total of 13 times during the period April 22, 2020, through July 29, 2021. Investigators examined the UI claim file maintained in OJI and other related records and found:

- Relative #1’s OJI Personal Information screen contact information included only Ford’s personal cellphone number and her personal email address.
- Relative #1 received \$37,302 of traditional and pandemic-related unemployment funds. These funds were deposited into an account held jointly by Relative #1 and Ford.
- Investigators compared wages recorded in OJI, to those wages reported to ODJFS by Relative #1’s employer, and determined wages in OJI appear to have been under-reported by \$16,360.

During an interview with investigators, Ford confirmed Relative #1 was her relative.

Investigators questioned Ford why she accessed Relative #1’s claim multiple times, and inquired whether these accesses were allowable per ODJFS policy. Ford responded, “I believe I was filing his weekly claim.” Investigators asked Ford why she would access OJI to file Relative

²⁸ These accesses included 33 instances where Ford performed an action within the claim while speaking on the phone with a different claimant.

#1's weekly claim rather than letting Relative #1 file his own weekly claim using his own login. Ford responded that Relative #1 did not have a computer, but admitted, "that was clearly wrong." Investigators followed up by asking Ford whether her comment that her action was "wrong" was based on the ODJFS policy which stated she was not permitted to access claims belonging to relatives. Ford replied, "Yes."

Investigators then told Ford the comparison between the wages Relative #1 reported in OJI were less than those reported to ODJFS by Relative #1's employer. Ford explained the information she entered in OJI for Relative #1 was based on what Relative #1 provided to her and that she believed the information was obtained from Relative #1's paystub.

Because of Ford's relationship with Relative #1, investigators determined that Ford's accesses of these claims were a conflict of interest and were contrary to ODJFS policies and to the ODJFS training provided to her.

Investigators discussed with Ford ODJFS *Policy IPP.0005 – Processing of ODJFS Work Actions*. This policy states, "ODJFS employees shall not, on a normal basis, process any ODJFS work actions [including claims] for themselves, relatives, co-workers, or friends." Additionally, this policy states that as a state employee, she should not authorize or use her the authority or influence of their position to secure the authorization of employment or benefit for a person closely related by blood, marriage, or other significant relationship, including business association. In response to this discussion with Ford regarding ODJFS *Policy IPP.0005*, Ford commented to investigators, "... to be clear, I did not process his claim. I just entered his weekly benefit."

Claim Review – Ford's Relative #2

Ford accessed a UI claim belonging to another relative (Relative #2) a total of 24 times during the period of April 3, 2020, through September 21, 2020. Investigators examined the UI claim file maintained in OJI and other related records and found:

- Relative #2's OJI Personal Information active screen contact information included Ford's personal cellphone number and Ford's personal email address.²⁹
- Relative #2 received \$14,997 of traditional and pandemic-related unemployment funds.
- Investigators compared wages recorded in OJI to those reported to ODJFS by Relative #2's employer and determined wages in OJI appear to have been under-reported by \$209.

During an interview, investigators provided Ford with a spreadsheet identifying each of her accesses of Relative #2's claim in the OJI computer system. When asked why she accessed the claim in these instances, Ford commented that Relative #2, "... must have had a lot of problems," because "I was checking his claim." Ford noted she did not believe she had filed the weekly claims for Relative #2, and noted that she believed this to be the case because, "... they were consecutive, they were continuous days ... So, he must have had something wrong that I was either just checking to see if things went through"

Investigators further learned during the interview with Ford that Relative #2:

- Did not have a computer to access his claim.
- Used Ford's cellphone number and email address in his OJI claim because he did not have a phone number or email address at that time.

When discussing the wage reporting discrepancy, Ford told investigators that she did not believe that she filed his wages and thought Relative #2 had used her personal home computer to file the wage information.

Because of Ford's relationship with Relative #2, investigators determined that Ford's accesses of these claims were a conflict of interest and were contrary to ODJFS policies and to the ODJFS training provided to her.

²⁹ OJI reported a change to the home phone number was made by Relative #2 on March 20, 2020.

Claims Review – Ford’s Friends

Ford accessed two UI claims belonging to friends (Friend #1 and Friend #2) during the period from April 14, 2020, through March 5, 2021. Investigators discovered Ford’s Friend #1 worked for the same employer as Relative #1, and that Friend #2 resided with Friend #1. Additionally, Friend #1 began residing at the same address as Relative #1 in May 2021. A review of Ford’s CPI Access log identified the following UI claim accesses by Ford for these individuals:

Claimant	Number of CPI Accesses	Period Accesses Occurred	Benefits Paid to Claimant Per ODJFS
Friend #1	12	May 27, 2020, to March 5, 2021	\$24,852
Friend #2	2	April 14, 2020, to May 19, 2020	\$7,203

From their examination of UI claim activity for Friend #1, investigators discovered Ford had cleared a system-generated issue³⁰ which may or may not have held up payments for the claim on May 27, 2020. From their examination of UI claim activity for Friend #2, investigators found Ford updated the email address in the claim and cleared two issues on May 19, 2020, which may or may not have been holding up payments being issued for this claim.

Investigators found no evidence of contact by Friend #1 or #2 to Ford’s ODJFS-assigned phone numbers, or email correspondence supporting a request from the claimants. However, investigators determined five of the 12 accesses by Ford in Friend #1’s claim occurred after a management request was made for another ODJFS employee (who was not Ford) to contact the claimant. Because of Ford’s relationship with Friend #1 and Friend #2, investigators determined that Ford’s accesses of these two claims were a conflict of interest and were contrary to ODJFS policies and to the ODJFS training provided to her.

Ford also accessed another UI claim belonging to a third friend (Friend #3) three times during the period from June 24, 2020, through July 20, 2020. On June 24, 2020, and June 25 2020, investigators discovered Ford had entered a note or taken action in the claim which may have impacted the issuance of a payment. ODJFS records indicate Friend #3 received a total of

³⁰ An issue was defined in ODJFS training materials as “... an act, circumstance, or condition that could disqualify a claim under Ohio unemployment law. Issues can affect a claimant’s eligibility and can hold payment of benefits.”

\$42,444 of UI benefits. Investigators also discovered a voicemail from Friend #3 left for Ford on her ODJFS-assigned phone on June 23, 2020, the day before Ford first accessed her Friend #3's claim. In this voicemail, Friend #3 asked Ford to give her a call when she had a chance and stated, "... they gave me until tomorrow morning at eight a. m. to come up with 10,000 dollar, and um, I need some assistance with my unemployment" Investigators further found Ford accessed Friend #3's claim on July 29, 2020, after receiving an email on July 20, 2020, asking Ford why their claim had been denied, and a phone call on July 29, 2020, from Friend #3.

Because of Ford's relationship with Friend #3, investigators determined that Ford's accesses of these claims were a conflict of interest and were contrary to ODJFS policies and to the ODJFS training provided to her.

Claims Review – Other Relationships

Investigators examined emails sent and received in Ford's ODJFS email box during calendar years 2020 – 2022 and identified other types of relationships between Ford and claimants whose claims she accessed. The following table summarizes the nature of the claimant's relationship with Ford, number of CPI accesses, and the amounts of UI benefits paid to each claimant:

Claimant	Relationship	Number of CPI Accesses	Period Accesses Occurred	Benefits Paid to Claimant Per ODJFS
CORCC #1	Received Assistance from CORCC	20	4/20/2020 – 4/16/2021	\$24,088
CORCC #2	CORCC Partner Referral	2	6/1/2020 – 11/18/2020	\$24,998
CORCC #3	Volunteer	2	1/8/21 – 1/28/21	\$6,194
CORCC #4	Volunteer	1	3/29/21	\$11,178
Taxes #1	Prepared Taxes	2	4/19/20 and 5/7/20	\$45,216

For each of the above listed claims, investigators compared the dates and times of Ford's accesses and to the dates and times of Ford's phone and email activity. From this analysis, investigators found:

- No phone activity between Ford and the identified claimants on Ford's assigned ODJFS phone.

- Emails supported interactions between the claimant and members of CORCC about volunteering or receiving assistance which occurred prior to Ford accessing the claimant's UI claim for CORCC#1, CORCC#3 and CORCC #4.
- Records provided by ODJFS identified that the employer for CORCC #2 was also the employer of one of the CORCC associates with which Ford frequently interacted. Additionally, emails indicated both Ford and CORCC #2 served on the same committee of the Franklin County Reentry Advisory Board around the time of Ford's second access into their claim.
- Emails between Ford and Taxes #1 discussed Ford's preparation of the claimant's federal income taxes prior to accessing her claim in 2020.

Because of Ford's relationship with CORCC #1, CORCC #2, CORCC #3, CORCC #4, and Taxes #1, investigators determined that Ford's accesses of these claims were a conflict of interest and were contrary to ODJFS policies and to the ODJFS training provided to her.

Investigators concluded Ford improperly accessed CPI in 235³¹ instances and violated ODJFS Policies *IPP.0003 – Standards of Employee Conduct*; *ODJFS Policy IPP.3000 – Data Access Policy*; *ODJFS Policy IPP.3922 – Code of Responsibility*, and *IPP.0005 – Processing of ODJFS Work Actions*.

Improperly Clearing of Unemployment Claim Issues

During the initial stages of record gathering, investigators received a copy of Ford's personnel file containing her annual evaluations. During a review of Ford's performance evaluation for the period October 1, 2019, through September 30, 2020, investigators discovered the following comment by Ford's then-supervisor Aprille Kisner:

... In March [2020], Maria was transitioned to a work from-home environment working in a customer service role within the Office of Unemployment Insurance. Maria has continued to try and provide top notch service but was reminded to follow the

³¹ This consists of 154 instances in which investigators could not locate a valid business reason for the access plus the 81 instances that Ford accessed claims in which the claimant was a relative, friend, or there was some type of relationship between Ford and the claimant.

instructions about required services. Maria tried to assist claimants and cleared issues that were not allowable for her work group which resulted in over-payments on several claims. This can create a negative impact on claimant finances. I reminded Maria that although she has good intentions when serving clients, that she must follow agency rules at all times, whether she agrees with them or not.

Investigators learned from ODJFS and their review of ODJFS training materials that an “issue” is defined as, “... an act, circumstance, or condition that could disqualify a claim under Ohio unemployment law. Issues can affect a claimant’s eligibility and can hold payment of benefits.”

Investigators learned that claim issues are mostly system-generated and are produced by system parameters that evaluates the information entered into the claim by ODJFS staff, the claimant, and other agencies. In certain instances, an ODJFS employee may create an issue on a claim based on information they had received from outside of OJI. For certain issues, OJI requires answering or providing information for fact-finding questions, which may result in correspondence being sent to the claimant, their employer, or both. Responses to this correspondence are used to determine whether a claim should be allowed or denied. Once the additional information is obtained, the adjudicator renders a decision of “clear,”³² “allowed,” or “disallowed.”

Guidance Provided

From their review of ODJFS emails and records, investigators learned Ford’s then-supervisor Aprille Kisner and in some instances, other ODJFS staff provided the following guidance to Ford and other ODJFS staff members assigned to Intake while assisting the OUIO Call Center:

- On April 17, 2020, an email was sent that provided documents that had not been provided in their earlier training, including a PowerPoint training on *Entering Fact Finding and Clearing Alerts*.

³² The clear decision selected for an issue will close the issue. Once cleared, the issue no longer alerts the assigned work unit/office or staff that the issue exists. Additionally, the issue will no longer appear on the unassigned/assigned work queues in OJI. Depending upon the type of issue cleared, this action could cause ODJFS to make determinations on the claim and or payments to be released to the claimant.

- On April 18, 2020, an email was sent that identified steps to be taken to clear certain issues and provided additional instructions/information on how to handle other issues requiring adjudication by others.
- On April 20, 2020, *OWD Memorandum 23-20 Intake Eligibility Notices* was distributed, which provided guidance on when fact-finding was to be completed; when issues could be cleared; and steps to be taken on how to resolve certain issues.
- On April 22, 2020, an email was sent providing the job aid *Processing Instruction Sheet for Tiers* which identified certain issues and the steps needed to be taken to clear them.
- On May 4, 2020, an email was sent providing information about Tier 1 proxy emails. The attached guidance identified when a claim should be transferred to Intake or Adjudication staff; the contact information for identified claim groupings for use by ODJFS staff; and a list of email addresses to be shared with claimants when submitting SSN verification documents, appeal questions, backdating of a claim, and other items.
- On May 12, 2020, an email was sent with the attachment titled *Processing Instruction Sheet for Tiers updated*, and directed staff to, “Please only clear the issues that were allowable for tier 2.”
- On May 19, 2020, an email chain was sent with attached PowerPoint presentations providing information about clearing issues, break-in claims, and end-date guidance.
- On June 12, 2020, an email was sent stating that OUIO was noticing issues were being cleared by OWD-assigned Tier 2 staff that should not have been cleared. The email advised that issues assigned to Benefit Payment Control should not be cleared by OWD-assigned Tier 2 staff.
- On June 24, 2020, an email was sent with an attached document providing guidance found on the OUIO Teams webpage³³ identifying what issues they were permitted to clear; what issues they were not permitted to clear; and direction to not clear issues assigned to Benefit Payment Control.³⁴ [\(Exhibit 5\)](#)

³³ On June 25, 2020, ODJFS OWD Program Delivery Supervisor Kate Lindsey sent an email to Ford and other Tier 2 staff containing a chart in a different format with the same information.

³⁴ An excerpt of this sheet was also attached to a June 25, 2020, email sent by ODJFS Program Delivery Supervisor Kate Lindsey to staff which included Ford.

In addition to the above guidance, investigators found an email sent to Ford and others on April 14, 2020, instructing the staff to register for an Intake Training. Additional emails provided by ODJFS showed Ford was emailed about the additional intake trainings to be held on April 20 and 21, 2020. The email also stated that these trainings would provide guidance on how to search for a claimant, enter a new claim, the filing of an additional or continued claim, enter a note, completion of fact-finding questions, and how to access the OUIO Resource Portal.

Issues Improperly Cleared by Ford

Investigators requested and obtained a report containing data extracted from OJI identifying issues processed by Ford, and found Ford processed 2,623 issues.³⁵ As shown below, this report reviewed by investigators provided information about each issue's source, type, subtype, which unit it was assigned to, and the individual it was to:

Source	Type	Subtype	Employer	Assigned To	Unit
Continued Claim	Earnings	Earnings expected but not reported			Akron UI Delivery Center

Authorization to Process Issues

During the investigation, ODJFS provided investigators with an April 25, 2020, email which stated ODJFS management had determined that Ford had cleared a “monetary alert” on a Combined Wage Claim. According to the email, outside of Ability and Availability issue types,³⁶ Ford was to be instructed that, “... she does not touch any issue outside of those.” In addition, investigators learned through a review of documents and inquiries, that Ford had to be reminded of what issues she was permitted to clear and the proper way to complete the fact-finding and how to document the reasons for clearing an issue.

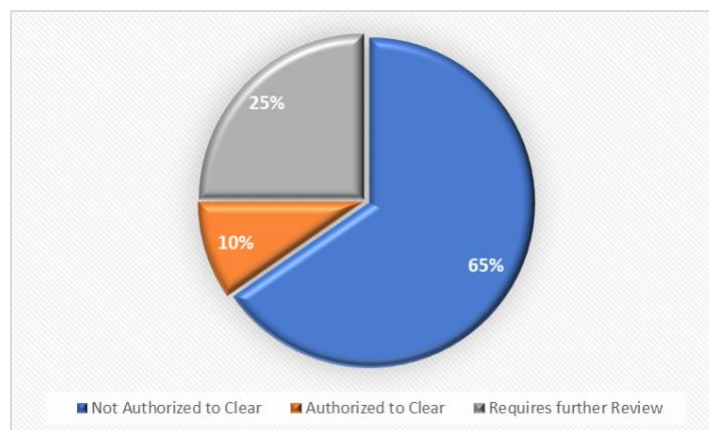
Investigators emailed Ford's former ODJFS supervisor Aprille Kisner and asked her about what recollections she may have regarding her discussions with, or emails sent to OUIO staff, Kisner, and Ford about the subject of clearing issues. Kisner stated,

³⁵ Ford either cleared (2,422) issues, allowed (6), disallowed (12), or the issue was deferred (183), based on the decision rendered on another related issue which per system parameters deferred lower-level issues.

³⁶ A draft version of the Issues Guide provided by ODJFS states, “Availability and ability for work are determined by the claimant's readiness and willingness to seek and accept full-time, suitable work.”

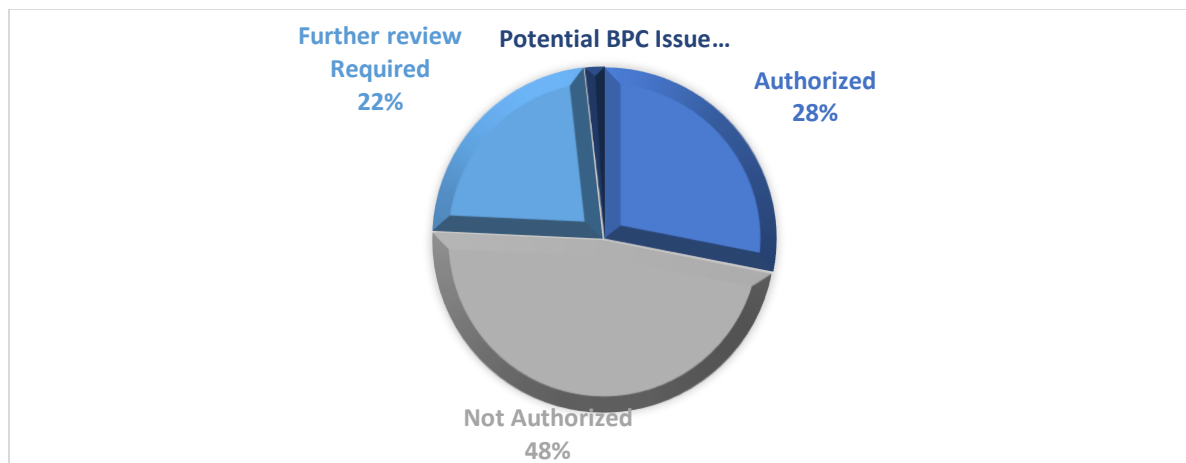
... Maria had the system ability to clear certain issues and previous UI work experience to know how to process claims. She said that she believed that the customer was unduly burdened by waiting for the UI processing center to clear an issue that would have allowed the customer to receive their unemployment payments. The centers were extremely backed up, so Maria adjudicated the issue which was outside of the responsibilities of her role at the time

Using the report provided by ODJFS listing issues cleared by Ford, investigators categorized the subtypes of the issues reviewed. Investigators then requested ODJFS identify which subtypes Ford was authorized to clear in her role as a Tier 2 Intake staff person. The following chart summarizes the results of ODJFS Program Administrator Gina Taylor's review of the 104 subtypes cleared by Ford:



Investigators then examined the subtypes for the 2,422³⁷ issues cleared by Ford to determine the number of claims associated with those that Ford may have not been authorized to clear. The following chart reflects the result of this review:

³⁷ The remainder of the 2,623 issues were either adjudicated as allowed (6), disallowed (12), or deferred (183).



Investigators determined Ford cleared 100 issues and did not record a response why the issue was cleared in the Reasoning Statement Given By Adjudicator box. ODJFS staff reviewed these issues in conjunction with the facts in the claim and determined Ford was not authorized to clear 80 of the 100 issue types and subtypes that she had cleared. In addition, ODJFS staff determined Ford's unauthorized actions led to the claim moving forward in the process for payment of claim benefits for 74 of the 100 issues cleared by Ford.

From a review of guidance provided to Ford and other Intake staff, investigators learned that the May 5, 2020, Break In Claim PowerPoint presentation sent to Tier 2 staff on May 19, 2020, contained the following guidance:

Break In Claim Issues That We Can Clear

03/27/2021 Continued Claim Late Filing/Break in claim Break in claim-must file reopen/additional Action US Delivery Center 04/19/2020

As a general rule, it is OK to clear Break in claim issues with the subtype 'Break in claim-must file reopen/additional' *(as long as corresponding reopen/additional claim filed)*

We are not authorized to clear any other Late Filing/Break in claim issues.

05/11/2012 Continued Claim Late Filing/Break in claim Late Filing (of CC) Canton Processing Center 06/03/2012 06/16/2012

Break in claim issues with the subtype **Late filing (of CC)** will be handled only by processing centers.

Investigators examined the ODJFS report of issue subtypes cleared by Ford and determined Ford had cleared 160 issues with the subtype Late Filing (of CC). However, the guidance that was

provided to Ford stated specifically that these subtypes of issues should have been adjudicated by the processing centers.

Of the 2,422 issues cleared by Ford, the Office of the Ohio Inspector General has identified and referred 1,741 issues to ODJFS for further review to determine whether the issues were cleared appropriately, whether an improper payment of benefits occurred; and if so, whether those benefits should be recovered:

Further Review Required Due to Ford was:	Issues Cleared	Claims Involved³⁸
Ford was Not Authorized to Clear the Issue	1,153	708
Further review of the Issue Needed to Determine Whether Appropriately cleared By Ford	545	391
Potential Benefit Payment Control Issue which Ford was not authorized to clear	43	34
	1,741	1,133

Investigators also learned through discussions with ODJFS staff that Ford was not considered an adjudicator and as such, she was not authorized to allow or disallow an issue. However, the ODJFS report of issues processed by Ford showed that she allowed six issues and disallowed 12 issues and her actions resulted in the deferral of 183 issues. The Office of the Ohio Inspector General has identified and referred 201 issues³⁹ to ODJFS for further review to determine whether the issues based on the claims' facts were properly cleared. Should it be determined those issues were incorrectly adjudicated by Ford and resulted in improper benefits being paid, ODJFS should evaluate whether those funds should be recovered.

Completion of Issue Fact-Finding

Investigators learned that certain issues required questions to be answered by the claimant and/or employer prior to the issue being adjudicated. While examining emails, investigators found Ford had been counseled on what issues she was authorized to clear or the appropriate way to document the clearing of an issue. Specifically, ODJFS Field Operations Coordinator Traci

³⁸ A claim can have more than one issue associated with the claim at one time.

³⁹ The 201 issues consist of the 12 issues Ford disallowed; the six issues Ford allowed, and the 183 issues which were deferred due to other claim actions.

Brown sent an email on April 17, 2020, to ODJFS OWD Program Delivery Manager Sheonkei Givner regarding Ford:

Maria cleared some issues and placed the reasoning for the clear in the wrong box. When clearing issues, after the issue is cleared, she will then need to go down to go to and select fact-finding. If there is nothing in the claimant questions, she needs to complete the fact-finding and if it was due to Covid-19 she needs to put her reasoning in the actual reasoning field. Please ask that she makes the corrections.

Shortly after receiving this email, Givner forwarded the email to Ford directing her to make a correction in the identified claim. In response, Ford stated that she had,

... been putting the reasoning in the box where the issue is cleared and not in the reasoning box after the claimant certifies fact-finding. I am so sorry. I must have misunderstood the process in the training

Givner replied to Ford that, “I think we should be good as long as you adopt this process going forward.” Investigators requested ODJFS review issues Ford cleared and had entered a response in either the Freeform Text Box and or Reasoning Statement Given by Adjudicator box on the fact-finding screens. ODJFS confirmed to investigators that all issues, “... adjudicated and/or cleared by the staff should have a reasoning statement entered to explain why the issue is being ruled or cleared.” Investigators examined the results of ODJFS’ review and found after receiving the April 17, 2020, additional guidance, Ford:

- Incorrectly entered text into the Freeform text box documenting the reasoning for clearing the issue for 142 of 151 issues examined.
- Failed to verify the claimant had certified or Ford certified the responses entered into the fact-finding screens prior to clearing the issue.
- Cleared 358 issues per the report obtained from ODJFS and did not enter a response in either the Freeform text box or the Reasoning Statement Given By Adjudicator field supporting the reason for clearing the issue.

Manual Issues Created by Ford

Investigators learned through inquiries that ODJFS staff had the ability to create a manual issue within a claim. However, ODJFS staff were not permitted to adjudicate the issue on the same day as it was created. This prohibition was supported by guidance sent to the Tier 2 staff on June 24, 2020, which stated that staff members were to “NEVER Clear” manually created issues.

(Exhibit 5)

Investigators obtained a report of issues manually created by Ford and found that Ford had manually created 42 issues, of which Ford cleared 36 issues on the same day the issue was created. As a result of Ford clearing the issue the same day it was created, OJI’s overnight processing did not generate correspondence that should have been sent to the claimant and/or employer requesting additional information to complete the fact-finding. Additionally, investigators determined 37 of the 42 issues created by Ford were Earnings issues. Investigators confirmed through inquiries with ODJFS staff that Ford and the Intake Tier 2 staff were not authorized to clear Earnings issues.

During her interview, investigators requested Ford review the Processing Instructions for Tiers document and place a checkmark beside those items that she believed she was permitted to clear.

(Exhibit 6) When discussing the issues Ford had cleared for certain claimants, investigators asked Ford to explain why she cleared those particular issues. Ford responded, “... ‘cause I’m sure that’s one we could clear... .” Investigators then reminded Ford of the ODJFS management guidance sent to her and Tier 2 staff on June 24, 2020, which contained a chart stating that they were not permitted to clear certain issues, including Earnings. Investigators again asked Ford why she disregarded the guidance and cleared issues she was not permitted to clear, and Ford explained that “this” (referring to the chart in the Bulletin (Exhibit 5)) was for Benefit Payment Control. Ford then clarified that they (Tier 2 Intake staff) could not clear “employer’s earnings.”

Investigators learned through inquiries with other staff assigned to provide Tier 2 Intake assistance that the staff was not permitted to clear earnings issues. These assertions were consistent with the guidance ODJFS management provided to Ford and others beginning April 18, 2020. The guidance directed the staff for instances in which the claimant forgot to enter their

earnings to complete the fact-finding. Once completed, the staff were to tell the “... claimant an email will be sent to the processing center.” The guidance did not direct the staff to clear these issues.

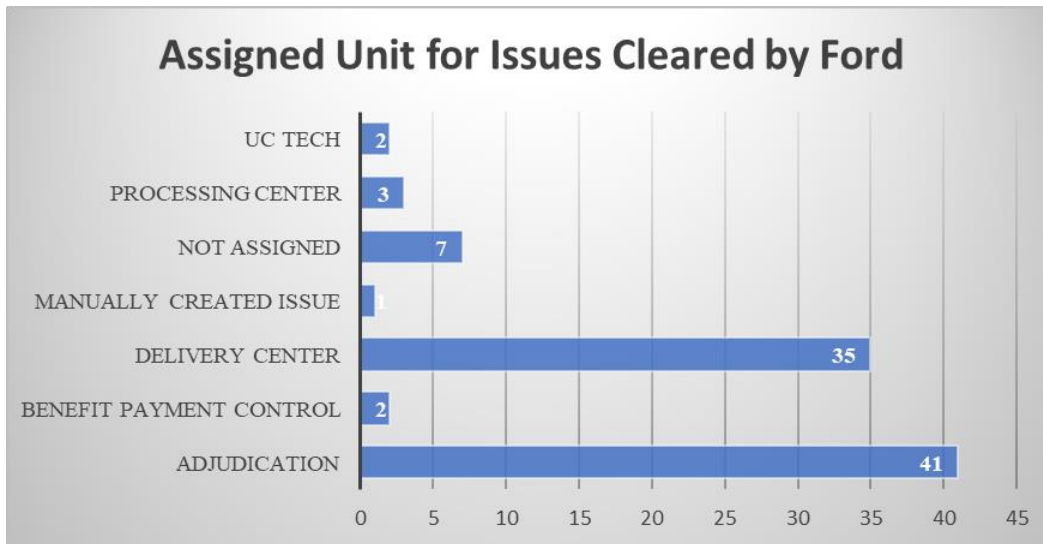
Clearing of Issues Assigned to Another Unit

ODJFS provided investigators with a copy of the guidance distributed to Ford and other Tier 2 staff on June 24, 2020, which contained a listing of issues the staff were not permitted to clear. This guidance specifically identified that when the staff was “... taking a continued claim, you may clear select Types/Subtypes.” The document [\(Exhibit 5\)](#) further contained the following guidance:



In response to an investigative inquiry, Kisner explained that Ford and the employment professionals were, “... only to make referrals to the processing centers for certain issues for them to adjudicate claims.” Kisner recalled that staff were specifically, “... instructed that even if they had experience, they were to stick to the support role they were given.” From their review of email records, investigators found emails sent by ODJFS Assistant Deputy Director Marcia Macon-Bruce to Ford on June 4, 2020, and June 22, 2020, regarding issues cleared by non-BPC (Benefit Payment Control) staff. In each email, Ford was instructed not to clear issues when they were assigned to the Benefit Payment Control Unit. Ford responded to both emails from Macon-Bruce, stating she would be more careful or more vigilant.

Investigators examined 91 issues cleared for the 31 claimants selected for further review and found the 91 issues were assigned to the following units:



During her interview, investigators asked Ford why she cleared certain issues when the issue screen indicated the particular issue was assigned to a specific unit, such as the Marietta Adjudication Center as shown below:

Source	Type	Subtype	Employer	Assigned To	Unit
MultiClaimant Issue	Expected return to work	Expected return to work (mass layoff)	NO LONGER VALID		Marietta Adjudication Center

Ford explained to investigators that whenever the screen said an issue was assigned to the adjudication center, that was where the claim was allocated based on the claimant's Social Security number and was not where the claim was assigned at that time. Investigators verified that UI claims were allocated by the last four digits of the claimant's Social Security number to either a delivery center or adjudication center. However, investigators learned from inquiries that the Tier 2 Intake staff were not permitted to clear those issues assigned to the Processing or Benefit Payment Control Centers. Additionally, ODJFS staff told investigators that Ford was not an adjudicator and should not have cleared issues requiring adjudication.

During her interview, Ford admitted to investigators that she was not permitted to clear issues assigned to the Benefit Payment Control (BPC) Unit. Investigators requested ODJFS staff to identify which of the issue subtypes were automatically assigned by OJI to the BPC Unit. After reviewing the issue subtypes, ODJFS determined an issue created for 17 subtypes was automatically assigned to ODJFS BPC for adjudication. Investigators examined the subtypes for

the issues and identified 35 issues involving 28 claims that ODJFS stated would be assigned to the BPC Unit but were cleared by Ford. The Office of the Ohio Inspector General has referred these 35 issues and related 28 claims to ODJFS to determine whether the issues should have been cleared, if overpayments exist, and if so, whether those funds should be recovered.

ODJFS Review of Issues Cleared for Select Claims

Based on information learned during the investigation, the Office of the Ohio Inspector General requested ODJFS perform a detailed review of the 109 issues cleared by Ford for 24 claimants⁴⁰ (known as a Tier 3 review) to determine whether: 1) Ford was authorized to clear the issue; 2) the issue was appropriately cleared based on the information in the claim; and 3) if not, whether ODJFS determined the funds were improperly paid to the claimant. Investigators examined the analysis completed by ODJFS and learned ODJFS had determined Ford was not authorized to clear 67 of the 109 issues cleared.

In examining the claim details, ODJFS also determined that Ford did not correctly work⁴¹ 14 of the 109 issues cleared. In addition, ODJFS identified eight issues that the agency needed to obtain additional information from either the claimant and/or employer to determine whether the issue was properly cleared by Ford or whether an overpayment of benefits occurred.

The following paragraphs summarize ODJFS' determination of claims which resulted in ODJFS preliminarily concluding that benefits were improperly paid.

Relative #2

From a review of ODJFS records, investigators learned that Relative #2 filed for and received unemployment benefits totaling \$14,997 for the period March 22, 2020, to October 3, 2020. For this claim, ODJFS records indicate there were six different issues created by OJI involving this claim. ODJFS reviewed each issue and determined Ford was not authorized to clear the six issues. Although not authorized to clear the issues, ODJFS

⁴⁰ One claim may have multiple issues associated with it.

⁴¹ ODJFS determination that Ford "did not correctly work" an issue may be the result, but is not limited to, Ford's failure to ensure responses were obtained to fact-finding questions, the required documents were provided, or certain required steps were not completed.

determined Ford had appropriately cleared three issues based on the facts in the claim. However, ODJFS determined the remaining three issues had been worked by Ford incorrectly.

One of the issues worked incorrectly was *SSN Verification Failed – Surname does not match one on file*. This issue was assigned to a specific individual within the Akron UI Delivery Center. According to ODJFS, the claimant fact-finding questions for this issue required responses to be provided to three questions and a copy of the Social Security card to be submitted to ODJFS. ODJFS determined that the fact-finding questions were not completed. Even though Ford had entered in the Freeform text box that, “claimant verified SS card,” ODJFS was unable to verify that the agency had received a copy of this card. ODJFS concluded that the “issue cleared improperly” and that the “issue should have been denied.”

The remaining two issues ODJFS determined Ford had worked incorrectly were categorized as *Earnings – Earnings Expected but not reported*. For these two situations, ODJFS determined the claimant should have filed an additional application because the claimant was laid off. However, ODJFS determined the agency, “was unable to request information about the reason for separation because the application was not filed.”

Based on a review of the six issues cleared, ODJFS concluded that the actions taken by Ford were improper. ODJFS preliminarily concluded that the claimant should not have received UI benefit payments totaling \$14,997. The Office of the Ohio Inspector General has referred this claim to ODJFS for further evaluation and determination on whether any funds should be recovered.

Claimant #1

From a review of ODJFS records, investigators learned that Claimant #1 filed for and was paid a total of \$39,675 in unemployment benefits⁴² for the period March 29, 2020, to September 4, 2021. For this claim, ODJFS records indicate there were 16 different issues

⁴² Claimant requested taxes to be withheld totaling \$4,005 and direct deposits totaling \$35,670 were issued to the claimant.

created by OJI involving this claim. ODJFS reviewed each issue and determined Ford was not authorized to clear three of the 16 issues. However, ODJFS determined even though Ford not authorized to clear the issue that Ford cleared two issues correctly.

The remaining issue, titled *SSN Verification Failed – Surname does not match one on file*, was cleared by Ford on April 21, 2020. The Reasoning box for the fact-finding portion of the issue stated, “Verified SS Card MF Clear.” ODJFS determined Ford was not authorized to adjudicate or clear this issue type. In addition, ODJFS could not locate documentation supporting that the claimant sent in the required copy of the Social Security (SSN) card at the time the issue was cleared.

Based on a review of the issues cleared, ODJFS concluded the action taken by Ford was improper. ODJFS preliminarily concluded the claimant should not have received UI benefit payments totaling \$39,675, of which the claimant received \$35,670 after taxes. The Office of the Ohio Inspector General has referred this claim to ODJFS for further evaluation and determination on whether any funds should be recovered.

Claimant #2

From a review of ODJFS records, investigators learned that Claimant #2 filed for and received unemployment benefits totaling \$8,640⁴³ during the period March 27, 2020, to May 9, 2020. For this claim, ODJFS records indicate three different issues created by OJI involving this claim. ODJFS reviewed each issue and determined Ford was not authorized to clear the three issues. Although not authorized to clear the issue, ODJFS concluded Ford only cleared one issue correctly and that the initial application for a second issue covered the separation period.

ODJFS identified that Ford had cleared an issue titled *SSN Verification Failed – Surname does not match one on file* on April 17, 2020. Ford entered in the Reasoning box for this

⁴³ This amount was calculated at eight weeks x \$480 for the weekly benefit amount plus eight weeks x \$600 in pandemic unemployment payments referred to as FAC for a total of \$8,640.

issue that, “claimant email copy of SS card.” ODJFS examined the claim file and was unable to locate the Social Security card being attached to the fact-finding portion of the issue or in ODJFS FileNet.

Based on a review of the issues cleared, ODJFS concluded the action taken by Ford was improper. ODJFS preliminarily concluded the claimant should not have received UI benefit payments totaling \$8,640. The Office of the Ohio Inspector General has referred this claim to ODJFS for further evaluation and determination on whether any funds should be recovered.

Claimant #3

From a review of ODJFS records, investigators learned that Claimant #3 filed for and received unemployment benefits totaling \$20,367⁴⁴ during the period of April 17, 2020, to October 31, 2020. For this claim, ODJFS records indicate there were four different issues created by OJI involving this claim. ODJFS reviewed each issue and determined Ford was not authorized to clear the four issues. Even though Ford was not authorized to clear the issue, ODJFS concluded Ford cleared one issue correctly.

ODJFS identified that Ford had cleared three issues titled *Earnings – Earnings Expected but not reported* on May 13, 2020, June 3, 2020, and June 12, 2020. ODJFS examined the claim file for each of these issues. For one issue, ODJFS determined the “initial application covers separation, and claimant reported earnings in first week.” For the remaining two issues, ODJFS determined the “issue should have been cleared and new issue, unable to obtain suitable work – failed to file an additional/reopen application should have been set and denied ...”

Based on a review of the issues cleared, ODJFS concluded the actions taken by Ford were improper. ODJFS preliminarily concluded the claimant should not have received UI benefit payments totaling \$20,367. The Office of the Ohio Inspector General has referred this claim

⁴⁴ This amount was calculated at 24 weeks x \$480 for the weekly benefit amount less earnings plus 16 weeks x \$600 (\$9,600) in pandemic unemployment payments referred to as FAC for a total of \$20,367.

to ODJFS for further evaluation and determination on whether any funds should be recovered.

Claimant # 4

From a review of ODJFS records, investigators learned that Claimant #4 filed for and received unemployment benefits totaling \$8,085. For this claim, ODJFS records indicate there were three different issues created by OJI involving this claim. ODJFS reviewed each issue and determined Ford was not authorized to clear the three issues. Although not authorized to clear the issues, ODJFS concluded Ford cleared two issues correctly.

ODJFS determined that for the third issue, which Ford did not clear correctly, Ford had created a manual *Earnings – Incorrectly Reported (Nonfraud)* issue within OJI and cleared the issue on the same day, May 4, 2020. ODJFS determined that Ford had “... set the wrong issue type and did not enter the earnings into the week.” As such, the \$167.83 emergency pay for the week ending April 11, 2020, entered in the Source box by Ford was not deducted from the Weekly Benefit Amount. ODJFS concluded that the earnings were more than the weekly benefit amount of \$135 and as such, the benefits totaling \$735⁴⁵ should not have been paid.

Based on a review of the issues cleared, ODJFS concluded the action taken by Ford was improper. ODJFS preliminarily concluded the claimant should not have received UI benefit payments totaling \$735. The Office of the Ohio Inspector General has referred this claim to ODJFS for further evaluation and determination on whether any funds should be recovered.

The following are claims identified by ODJFS that require additional review or require inquiries to the claimant/employer requesting additional information to determine whether improper benefits were paid by ODJFS.

⁴⁵ This amount was calculated at one week x \$135 for the weekly benefit amount less earnings plus one week x \$600 (\$9,600) in pandemic unemployment payments referred to as FAC for a total of \$735.

Claimant #5

From a review of ODJFS records, investigators learned that Claimant #5 filed for and received unemployment benefits totaling \$8,373. ODJFS records indicate Ford cleared two issues for Claimant #5 on May 29, 2020. Both issues were titled *No longer unemployed – not unemployed* and were assigned to the Marietta Adjudication Center. For both issues, Ford entered the reasoning for clearing the issue as, “Reduced hours. Clear. MF.”

ODJFS determined that Ford was not authorized to clear these issues. Additionally, ODJFS stated that there was no fact-finding provided by Claimant #5. As such, ODJFS was unable to determine how Ford knew the claimant was working reduced hours. ODJFS stated in its analysis that the claimant should have been contacted for responses to the fact-finding questions. If no response was received, ODJFS stated the issue should have been denied and that there could be a potential overpayment for this claim.

The Office of the Ohio Inspector General has referred these two issues and this claim to ODJFS for further evaluation to determine whether overpayments occurred, and if so, whether those funds should be recovered.

Claimant #6

From a review of ODJFS records, investigators learned that Claimant #6 filed for and received unemployment benefits totaling \$7,947. ODJFS records indicate Ford cleared five issues for Claimant #6 between May 29, 2020, and July 1, 2020. ODFJS determined Ford was not authorized to clear the following issues:

Issue Type	Issue Subtype	Date Cleared	Reasoning
Alien Verification	Initial Verification	5/1/20	Clear
Laid Off	Lack of Work	5/29/20	No issue. Clear
Late Filing/Break in Claim	Break in claim - must file reopen/additional	6/3/20	Earnings w/e 5/23/2020 Wages \$550. Reopen complete. Clear
Earnings	Earnings Expected but not reported	6/3/20	Earnings. Reopen complete. Clear
Still Employed	Hours Reduced	7/1/20	Working at same employer-reduced hours. Clear

From their review of these issues, ODJFS determined:

- Issue cleared on May 1, 2020: Ford should have created a case in another system and waited for a response, "... to verify a claim's authorization to work in the U.S." ODJFS stated that this was not done by Ford and the claimant was not verified.
- Issue cleared on May 29, 2020, and two issues cleared on June 3, 2020: Ford's incorrect processing of the issue or the failure to file an additional application resulted in the "... potential for a disqualifying separation that was not addressed."
- Issue cleared on July 1, 2020: Ford cleared this issue prior to the due date of the employer's response. However, this type of issue is only allowed or disallowed with certain exceptions unless the separation type is changed.

The Office of the Ohio Inspector General has referred these five issues and this claim to ODJFS for further evaluation to determine whether overpayments occurred, and if so, whether those funds should be recovered.

Claimant #7

From a review of records forwarded by the ODJFS Chief Inspector's Office, investigators learned that Claimant #7 filed for and received unemployment benefits totaling \$4,966. ODJFS records indicated Ford cleared two issues for Claimant #7. For the first issue, Ford cleared a manual issue on June 27, 2020, with the type of *Discharge/Fired* and subtype of *Dishonesty*. From their review of records provided by ODJFS, investigators determined:

- The manual issue was created by an employee assigned to the Columbus UI Delivery Center.
- Only one of the 14 claimant questions and one of the employer questions had a response in the fact-finding, and no attachments were provided.

The second issue cleared by Ford on June 27, 2020, was an initial claim application system-generated issue with a type of *Discharged/Fired* and a subtype of *Violation of Company Policy*. From their review of the second issue cleared by Ford in Claimant #7's claim, investigators found:

- Claimant #7 provided responses to the questions in the fact-finding and certified their responses.
- Additional information was entered into the Additional Claimant Information and to certain employer questions.
- The reasoning documented for resolving this issue indicated the issue should be denied with a date of June 25, 2020, with the initials of the person entering the reasoning, which was not Ford. However, Ford cleared this issue on June 27, 2020.

Ford was provided guidance on June 24, 2020, directed all Tier 2 Intake staff to “Never Clear” Separation: Discharge Types of issues. As such, Ford’s clearing of these two issues may have resulted in improper payment of benefits. The Office of the Ohio Inspector General has referred these 2 issues and this claim to ODJFS for further evaluation to determine whether overpayments occurred, and if so, whether those funds should be recovered.

Claimant #8

From a review of records forwarded by the ODJFS Chief Inspector’s Office, investigators learned that Claimant #8 filed for and received unemployment benefits totaling \$5,373. ODJFS records indicate Ford cleared a manual issue for Claimant #8 on May 21, 2020, titled *Leave of Absence – Leave of absence*. From their review of records provided by ODJFS, investigators determined:

- The manual issue was created by an employee assigned to the Lorain UI Delivery Center.
- The answers to the 14 claimant questions in the fact-finding had been completed, certified, and no attachments were noted.
- The response to the first employer question was a reference to FileNet.
- There were no attachments to support the employer response.

Investigators learned from ODJFS staff that Ford, as a Tier 2 Intake staff person, was not permitted to clear manual issues. As such, Ford’s action of clearing this issue may have resulted in improper payment of benefits. The Office of the Ohio Inspector General has

referred this issue and claim to ODJFS for further evaluation to determine whether overpayments occurred, and if so, whether those funds should be recovered.

CONCLUSION

On December 7, 2022, the Office of the Ohio Inspector General received a referral from the Ohio Department of Job and Family Services (ODJFS) of suspected illegal or improper activity conducted by ODJFS Office of Workforce Development (OWD) Employment Professional Maria Ford. In the referral, ODJFS reported concerns regarding Ford's job performance and suspicions that Ford, "... may be spending time during her workday [sic] on her outside advocacy pursuits associated with a nonprofit organization she operates." Additionally, ODJFS reported Ford allegedly stored records related to a nonprofit she had incorporated on her ODJFS computer. Lastly, ODJFS expressed concerns that Ford was providing non-work-related services that ODJFS questioned were overlapping with, "... her [Ford's] ODJFS employment when generating communications around these outside activities by using her ODJFS email account and signature."

The Office of the Ohio Inspector General received and reviewed and/or analyzed the following records from ODJFS:

- ODJFS policies and procedures
- Ford's personnel file and payroll records
- Files stored by Ford in her ODJFS network drive
- Ford's ODJFS state-issued email account
- Ford's ODJFS-assigned phone records
- Records stored in Ford's work area at the OhioMeansJobs Center

In addition, the Office of the Ohio Inspector General issued subpoenas to financial institutions holding accounts either in the name of, or associated with Ford or her nonprofit, The Healing, Empowering, Loving, and Preparing Center (The H.E.L.P. Center). Lastly, investigators interviewed Maria Ford and questioned ODJFS staff about Ford's activities.

Outside Employment

Investigators interviewed Ford about the establishment of her nonprofit (The H.E.L.P. Center), its activities, and her involvement with the Central Ohio Restored Citizens Collaborative (CORCC). Ford acknowledged that she had incorporated The H.E.L.P. Center to assist individuals being released from prison and those who were living in poverty. Ford explained The H.E.L.P. Center had received a grant from ODRC, participated in a pilot program with two other nonprofits and the City of Columbus to provide emergency rental assistance, and was involved in the subleasing of properties to those in need. When asked, Ford stated that The H.E.L.P. Center had no employees. Ford told investigators she had discussed her volunteer work with ODJFS Office of Workforce Development Program Delivery Manager Stephen Carson, and that she did not receive any compensation from The H.E.L.P. Center.

Investigators examined records obtained from ODJFS and those subpoenaed from financial institutions for accounts held in the name of or associated with Ford and determined:

- The H.E.L.P. Center was involved in obtaining birth certificates and state identification cards for individuals; assisting individuals in obtaining emergency rental assistance; and subletting rooms or properties leased by The H.E.L.P. Center to those in need.
- Ford made 23 cash withdrawals from The H.E.L.P. Center's bank account and deposited the cash totaling \$9,225 into her personal bank account the same day or within 24 hours of the withdrawal.
- Ford did not complete and submit a JFS 01793 Notification of Outside Employment form to ODJFS for her involvement with The H.E.L.P. Center.

Investigators learned through inquiries with both Carson and Ford's former supervisor, Aprille Kisner, that Ford had disclosed she volunteered with other organizations. However, Ford failed to disclose that she had incorporated the nonprofit (The H.E.L.P. Center) and served as its director.

The Office of the Ohio Inspector General concluded Ford violated ODJFS *Policy IPP.5003 – Outside Employment, Section V(A)*, when she accepted compensation for work performed for a nonprofit, charitable, religious, public service, or civic organization and *ODJFS Policy IPP.5003*

– *Section VII(A)(1)*, when she failed to notify ODJFS in writing that she was seeking or was involved with outside employment by completing and submitting a JFS 01793 Notification of Outside Employment form.

Accordingly, the Office of the Ohio Inspector General finds reasonable cause to believe a wrongful act or omission occurred in this instance.

Advocacy Activities

In its referral to the Ohio Inspector General’s Office, ODJFS expressed concerns about the time Ford spent on tasks or activities associated with her various outside advocacy activities, as well as concerns that Ford referenced her ODJFS employment in correspondence for those activities. In particular, ODJFS reported:

- An overlap was evident of services Ford provided, “... through the Ohio Means Jobs Centers and the work being performed by Ford outside and apart from her assigned [ODJFS] duties.”
- Ford’s written correspondence “blurred” the lines between her ODJFS-assigned job duties and her outside activities.
- Concerns that Ford’s, “... companies/grants are one of the OMJ [OhioMeansJobs Center] partners in which customers are referred to for supportive services.”

Investigators reviewed and/or analyzed ODJFS records and conducted interviews and inquiries with Ford and ODJFS staff. From the review and analysis of records and information obtained through interviews, investigators determined:

- Ford used her ODJFS email address as a point of contact for: the Central Ohio Restored Citizens Collaborative (CORCC) on the Relink.org website; her appointment to the Franklin County Reentry Advisory Board; and for the City of Columbus emergency rental assistance applications to accept benefits as a landlord.
- Ford received and sent emails using her ODJFS email account involving requests to contact CORCC customers who were not ODJFS customers or unemployment income claimants about job opportunities, which was part of her job duties as an ODJFS employment professional.

- During her ODJFS workday, Ford assisted The H.E.L.P. Center customers by using ODJFS resources to obtain records needed to file emergency rental assistance applications. Ford confirmed that other OhioMeansJobs Center partners offered emergency rental assistance when funds were available.
- After introducing herself and offering assistance to customers served by the Pathways Navigator (an ODJFS contractor), Ford received referrals from the Pathways Navigator (an ODJFS contractor) in her ODJFS email account which identified customers in need of birth certificates at no cost.⁴⁶
- Ford drafted letters using CORCC or The H.E.L.P. Center letterhead during her ODJFS workday that supported other organizations or individuals; referenced working as an ODJFS employee; listed the OhioMeansJobs Center mailing address; and/or included her ODJFS signature block.

During her interview, investigators noted to Ford that her description of the services provided by CORCC, The H.E.L.P. Center, and ODJFS appear to overlap between the three entities. Ford replied that there will, "... always be overlap. There's no competition." Investigators asked Ford whether she had communicated with anyone at the ODJFS Legal department or the Ohio Ethics Commission to determine whether a conflict existed between the work she was performing on behalf of The H.E.L.P. Center and the work she was performing for ODJFS. Ford replied to investigators, "I didn't."

The Office of the Ohio Inspector General determined Ford violated *ODJFS Policy IPP.0003, Section IV(B)(5) – Standards of Employee Conduct, Section VI.B(5)*, which states, "Employees shall not have a direct or indirect financial interest or other interest that conflicts or appears to conflict with their government duties and responsibilities."

Accordingly, the Office of the Ohio Inspector General finds reasonable cause to believe a wrongful act or omission occurred in this instance.

⁴⁶ These expenses were eligible for funding and were funded with a grant received by The H.E.L.P. Center and CORCC from the Ohio Department of Rehabilitation and Corrections.

Nepotism

During the review of Ford's ODJFS emails, investigators discovered an email sent to Ford from a representative of Minute Man Staffing Services on November 24, 2021. The email was requesting Ford provide them with candidates for an open position. Investigators determined Ford responded to this request on November 29, 2021, stating that she was sending a relative of hers (Relative #1) over to work that day. Further review of ODJFS records did not find evidence that Minute Man Staffing Services reported paying wages to Ford's relative.

The Office of the Ohio Inspector General determined Ford violated *ODJFS Policy IPP.0003 – Standards of Employee Conduct, Section VI.B(8)(b)*, which states that employees will not use their authority or influence to secure employment or benefits for, "... a person closely related by blood, marriage or other significant relationship including business association."

Accordingly, the Office of the Ohio Inspector General finds reasonable cause to believe a wrongful act or omission occurred in this instance.

Improper Use of State Resources

Investigators obtained and examined Ford's ODJFS email box and a copy of the files saved to her ODJFS OneDrive (personal cloud storage). Investigators also examined Ford's usage of her ODJFS-assigned desk phone number at the OhioMeansJobs Center. From their analysis of these records, investigators determined Ford:

- Sent or received, using her ODJFS email account, 307 emails associated with The H.E.L.P. Center and 466 emails associated with CORCC.
- Scanned 108 documents associated with The H.E.L.P. Center and 36 documents associated with CORCC, using the scanner located at the OhioMeansJobs Center, and sent the documents to her ODJFS email account.
- Stored 194 files associated with The H.E.L.P. Center's activities and 397 files associated with CORCC activities on her ODJFS network drive.
- Used her OhioMeansJobs Center desk phone during her ODJFS workday totaling more than 14 hours to speak with individuals associated with The H.E.L.P. Center and/or CORCC.

- Used space in the OhioMeansJobs Center Resource Room to meet with The H.E.L.P. Center's customers.
- Directed individuals to leave documents with, or pick up bus passes, birth certificates, or other items from the OhioMeansJobs Center front desk.

The Office of the Ohio Inspector General determined Ford violated ODJFS *Policy IPP.0003 – Standards of Employee Conduct, Section VI(B)(2a)*; ODJFS *Policy IPP.10002 – Computer and Information Systems Usage, Section VI(C)(25) and (D)(2)*; ODJFS *Policy IPP.3942 – Local, Network and Cloud Storage, Section VI.A(4)*; and ODJFS *Policy IPP.3100 – ODJFS Telephone Usage, Section VI.F*.

Accordingly, the Office of the Ohio Inspector General finds reasonable cause to believe a wrongful act or omission occurred in this instance.

Improper Access of Confidential Personal Information

ODJFS provided to investigators for their review a copy of Ford's personnel file including her performance evaluations. While reviewing these documents, investigators discovered a comment written by Ford's then-supervisor Aprille Kisner⁴⁷ in Ford's performance evaluation for the period from October 1, 2019, through September 30, 2020. In this evaluation, Kisner stated Ford had, "... tried to assist claimants and cleared issues that were not allowable for her work group which resulted in over-payments on several claims."

Investigators obtained and reviewed applicable ODJFS policies regarding the access and dissemination of confidential personal information and copies of ODJFS PowerPoint presentations that were provided to staff, including Ford. Investigators also obtained and analyzed Ford's confidential personal information access log for ODJFS' Ohio Jobs Insurance (OJI) computer system. From this analysis, investigators found that Ford had accessed in several instances the same unemployment claim multiple times. Given her job duties did not include managing a group of unemployment claims, ODJFS investigators and the Office of the Ohio Inspector General determined the frequency Ford accessed several claims was unusual. In

⁴⁷ Kisner supervised Ford from 2016 – 2021 before transferring to another department within ODJFS.

February 2023, the Office of the Ohio Inspector General expanded this investigation to include a review of Ford's accesses of UI claims.

Investigators selected 1,075 individual claim accesses and Ford's accesses of 45 UI claims during the period from March 23, 2020, and January 19, 2022, to evaluate whether Ford's accesses were for valid business reasons. To make this determination, investigators obtained the following records for review: OJI claim screen shots, documents received by ODJFS for the claim; Ford's ODJFS phone records, ODJFS email correspondence for the identified claimants, and when applicable, records maintained in computer systems used by the ODJFS Office of Workforce Development and the OhioMeansJobs Visitor Logs.

From this review of records, investigators determined Ford improperly accessed confidential personal information when:

- Ford accessed a UI claim in 154 instances in which investigators were unable to determine a valid business reason for the access.
- Ford accessed claims belonging to the following individuals whom she had a familial, personal, or business relationship:

Individual	Relationship	Number of	
		Accesses	Benefits Paid
Relative #1	Relative	13	\$ 37,302.00
Relative #2	Relative	24	\$ 14,997.00
Friend #1	Friend	12	\$ 24,852.00
Friend #2	Friend	2	\$ 7,203.00
Friend #3	Friend	3	\$ 42,444.00
CORCC #1	CORCC	20	\$ 24,088.00
CORCC #2	CORCC	2	\$ 24,998.00
CORCC #3	CORCC	2	\$ 6,194.00
CORCC #4	CORCC	1	\$ 11,178.00
Taxes #1	Business	2	\$ 45,216.00
		81	\$ 238,472.00

In examining these accesses, investigators discovered certain accesses by Ford resulted in the clearing of an issue within the claim. Investigators learned that claim issues are mostly system-generated and are produced by system parameters that evaluates the information entered into the claim by ODJFS staff, the claimant, and other agencies. In certain instances, an ODJFS

employee may create an issue on a claim, based on information they received from outside of OJI. For certain issues, OJI requires answering or providing information for fact-finding questions, which may result in correspondence being sent to the claimant, their employer, or both. Responses to this correspondence are used to determine whether a claim should be allowed or denied.

Investigators obtained and reviewed ODJFS training materials and email guidance provided to Ford which identified in what instances Ford was authorized to clear an issue and the steps to be taken to clear an issue. Investigators also obtained and analyzed an ODJFS report listing 2,623 claim issues cleared by Ford and 42 claim issues Ford manually created within OJI from April 15, 2020, through October 31, 2020. From this review and analysis of records, investigators determined Ford improperly cleared or adjudicated an issue in the following instances contrary to ODJFS guidance and procedures:

- Of the 2,422⁴⁸ claim issues Ford cleared; investigators determined Ford was not authorized and/or improperly cleared 1,153 issues. Investigators determined ODJFS had identified an additional 588⁴⁹ claim issues which require further review to determine whether Ford was authorized to clear the issues.
- Of the 2,422 claim issues Ford cleared, investigators determined Ford was not authorized and/or improperly cleared 35 issues with subtypes assigned to the ODJFS Benefit Payment Control Unit; 160 issues with the subtype “Late Filing (of CC) contrary to ODJFS training; and that in 80 of the 100 issues Ford cleared, she did not document the reason for clearing the issue.
- Though Ford’s duties as an Intake Tier 2 staff person did not permit her to adjudicate claim issues, investigators determined Ford had adjudicated and ruled on 18 claim issues with a decision of “allowed” (6) and “disallowed” (12).
- In 42 instances, Ford manually created an issue within a claim in OJI and improperly cleared 37 of those issues herself within the same day, contrary to ODJFS guidance.

⁴⁸ The remainder of the 2,623 issues were either adjudicated as allowed (6), disallowed (12), or deferred (183).

⁴⁹ This includes 545 issues ODJFS identified required further review and 43 issues that were potential benefit payment control issues that Ford should not clear.

The Office of the Ohio Inspector General identified and referred a total of 1,842 issues to ODJFS for further review to determine whether the issues based on the claims' facts were properly cleared. Should it be determined those issues were incorrectly adjudicated by Ford and resulted in improper benefits being paid, ODJFS should evaluate whether those funds should be recovered.

Based on information learned during the investigation, the Office of the Ohio Inspector General requested ODJFS perform a detailed review of the 109 issues cleared by Ford for 24 claimants (known as a Tier 3 review) to determine whether: 1) Ford was authorized to clear the issue; 2) the issue was appropriately cleared based on the information in the claim; and 3) if not, whether ODJFS determined the funds were improperly paid to the claimant. Investigators examined the analysis completed by ODJFS and learned ODJFS had determined:

- Ford was not authorized to clear 67 of the 109 issues examined and failed to complete the appropriate steps to clear 14 of the 109 issues. In addition, ODJFS determined that the agency needed to obtain additional information from either the claimant and/or employer to determine whether the 14 issues were properly cleared by Ford and whether an overpayment of benefits occurred.
- Ford improperly cleared the following issues in the identified claim which ODJFS preliminarily concluded ODJFS had improperly paid benefits to the claimant:

Individual	Number of Issues Cleared by Ford	Number of Issues	
		Identified by ODJFS as Improperly Cleared	Benefits Determined to Be Improperly Paid
Relative #2	6	3	\$ 14,997.00
Claimant #1	16	1	\$ 39,675.00
Claimant #2	3	1	\$ 8,640.00
Claimant #3	4	3	\$ 20,367.00
Claimant #4	3	1	\$ 735.00
	32	9	\$ 84,414.00

- Ford cleared the following issues, but ODJFS was unable to identify whether the paid benefits were proper. ODJFS determined that the agency needed to obtain additional information from either the claimant and/or employer to determine whether the 11 issues were properly cleared by Ford and whether an overpayment of benefits occurred.

Individual	Number of Issues Cleared by Ford	
	Requiring Further Review	Benefit Payments to Be Reviewed
Claimant #5	2	\$ 8,373.00
Claimant #6	5	\$ 7,947.00
Claimant #7	2	\$ 4,966.00
Claimant #8	2	\$ 5,373.00
	11	\$ 26,659.00

Ford's former supervisor Aprille Kisner, in response to an inquiry about her recollection of conversations with Ford regarding emails in which Ford was counseled about the appropriate way to clear issues, stated:

... Maria had the system ability to clear certain issues and previous UI work experience to know how to process claims. She said that she believed that the customer was unduly burdened by waiting for the UI processing center to clear an issue that would have allowed the customer to receive their unemployment payments. The centers were extremely backed up, so Maria adjudicated the issue which was outside of the responsibilities of her role at the time

The Office of the Ohio Inspector General determined Ford violated Ohio Revised Code §1347.15 and ODJFS Policy IPP.0003 – *Standards of Employee Conduct*; ODJFS Policy IPP.3000 – *Data Access Policy*; ODJFS Policy IPP.3922 – *Code of Responsibility*, and ODJFS Policy IPP.0005 – *Processing of ODJFS Work Actions*, when Ford:

- Improperly accessed claims in 154 instances without a valid business reason to do so;
- Improperly accessed claims in 81 instances in which the claimant had a familial, close personal, or business relationship to Ford;
- Improperly cleared six claim issues in which she had a familial relationship with the claimant; and
- Improperly cleared 1,783 claim issues, contrary to ODJFS guidance.

Additionally, ODJFS preliminarily concluded ODJFS had improperly paid benefits to five claimants totaling \$84,414. These claims are being referred to ODJFS for further analysis and determination of the final amount to be recouped from each claimant.

Accordingly, the Office of the Ohio Inspector General finds reasonable cause to believe a wrongful act or omission occurred in this instance.

RECOMMENDATION(S)

The Office of the Ohio Inspector General makes the following recommendations and asks the director of the Ohio Department of Job and Family Services to respond within 60 days with a plan detailing how these recommendations will be implemented. The Ohio Department of Job and Family Services should:

1. Review the conduct of the employee(s) discussed in this report and determine if administrative action is warranted.
2. Consider updating existing ODJFS *Policy IPP.5003 – Outside Employment* policies to clarify an employee's involvement in volunteer opportunities; when employees should obtain confirmation of whether a conflict exists between their volunteer work or appointments to nonprofit boards, and their ODJFS job duties; and specifically, to clarify the definition of a state resource and the appropriate use of those resources when volunteering.
3. Consider evaluating annually those entities using and maintaining a presence at the OhioMeansJobs Center and determine whether additional organizations should be incorporated into the Memorandum of Understanding used to allocate the Ohio MeansJobs Center's costs.
4. Consider, when upgrading the existing OJI system, whether it would be beneficial to limit access to claims based on an employee's assigned duties and to limit the ability to perform transactions outside the scope of an employee's employment.
5. Consider implementing a process requiring managers to obtain and review each assigned staff person's CPI log for accesses involving known family members, friends, or unusual access patterns for further review and determine whether those accesses were in compliance with ODJFS policies.

6. Review claims associated with the issues identified in this report as processed contrary to ODJFS guidance, the potential for improper benefit payments, and those deemed as improper payments by ODJFS and determine whether the issue was adjudicated appropriately, whether an overpayment exists, and if so, appropriate steps to be taken to recover those funds.
7. Consider the benefits of consolidating guidance for the access of confidential personal information and sensitive information into one ODJFS policy. It is also recommended a table be developed and incorporated into this policy identifying, by division, records considered to be confidential or sensitive and who can receive a copy of the identified information.
8. Consider requiring each ODJFS division to develop a training on what is considered confidential or sensitive information, incorporating this information into an ODJFS policy, and providing training to staff annually to remind them of what information is confidential, sensitive, and when and to whom it may be released.
9. Consider implementing a process to monitor OJI claim access by ODJFS employees outside of normal business hours. Should such accesses be identified, it is recommended a review be conducted to determine whether this access was related to ODJFS business.
10. Consider the benefits of implementing a comparison between wages paid by employers as reported to ODJFS by the claimants, to those wages reported to ODJFS by the employers for each claimant, and reviewing the accuracy of wage reporting for those variances deemed abnormal by the agency.

REFERRAL(S)

The Office of the Ohio Inspector General is referring this report of investigation to the Ohio Auditor of State, the Ohio Ethics Commission, the Ohio Department of Taxation, the Ohio Attorney General Charitable Law Section, the Franklin County Prosecutor's Office, and the City of Columbus Prosecuting Attorney.



STATE OF OHIO

OFFICE OF THE INSPECTOR GENERAL

RANDALL J. MEYER, INSPECTOR GENERAL

NAME OF REPORT: Ohio Department of Job & Family Services

FILE ID #: 2022-CA00027

KEEPER OF RECORDS CERTIFICATION

This is a true and correct copy of the report which is required to be prepared by the Office of the Ohio Inspector General pursuant to Section 121.42 of the Ohio Revised Code.

**Jill Jones
KEEPER OF RECORDS**

**CERTIFIED
August 22, 2023**

MAILING ADDRESS

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IPP.3000. OIS

[close print view](#)

IPP.3925 Data Access Policy

IPPMTL 0407

August 10, 2020 - Revised

October 8, 2010 - Original

[CLICK HERE](#) to acknowledge that you have read, understand, and will comply with this policy.

I. PURPOSE/REASON:

- A. To establish departmental requirements for what are considered business appropriate uses of ODJFS Confidential Personal Information (CPI) stored in ODJFS maintained computer systems. These expectations are based on federal and state statutory requirements for the multiple core Lines of Business within the Department and their supporting Offices.
- B. This IPP sets forth the process that all executive agencies shall follow to implement section 1347.15 of the Ohio Revised Code. Within the Management Directive is a requirement that each state agency develop access policies - the criteria, references, procedures and requirements identified in section 1347.15(B) of the Revised Code - for the state agency's confidential personal information systems.

II. REFERENCE/AUTHORITY:

A. REFERENCES

Note: Ohio Revised Code (ORC) and Ohio Administrative Code (OAC) references can be accessed at LAWriter's Ohio Revised Code (<http://codes.ohio.gov/>) website.

- 1. Ohio Revised Code (ORC) 1347.15
- 2. Ohio Administrative Code Rule [5101:9-22-16](#) ODJFS Employee Access to Confidential Personal Information
- 3. [IPP 3001](#) ODJFS Information Security Policy

B. AUTHORITY

- 1. This policy is established by order of the Director, ODJFS, hereinafter referred to as Director.
- 2. Per ORC 5101.02, all duties conferred on the various work units of the department by law or by order of the Director shall be performed under such rules as the Director prescribes and shall be under the Director's control.

III. SUPERSEDES:

IPP. 3925.Data Access Policy July 11, 2017

IV. SCOPE:

This policy applies to all state employees in the employment of ODJFS.

V. DEFINITIONS:

- A. "Access" as a noun means an opportunity to copy, view or otherwise perceive. As a verb, "access" means to copy, view or otherwise perceive.
- B. "Acquisition of a new computer system" means the purchase of a computer system, as defined in this chapter, which is not a computer system currently in place nor one for which the acquisition process has been started as of the effective date of the agency rule addressing ORC 1347.15 requirements.
- C. "Computer systems" means a "system," as defined by section 1347.01 of the Revised Code, that stores, maintains or retrieves personal information using electronic data processing equipment.
- D. "Confidential Personal Information (CPI)" has same meaning as it does in section 1347.15(A)(1) of the Revised code.
- E. "Employee of the state agency" means each employee of a state agency regardless of whether he or she holds an elected or appointed office or position within the state agency. "Employee of the state agency" is limited to the specific state agency that has the appointing authority for the employee.
- F. "Incidental contact" means contact with the information that is secondary or tangential to the primary purpose of the activity that resulted in the contact.
- G. "Individual", in the context used in ORC 1347.15(C)(1)(b) means the subject of the CPI or the subject of the CPI's authorized representative, legal counsel, legal custodian or legal guardian, and anyone as otherwise permitted under state or federal law acting on behalf of, or in furtherance of, the interests of the subject of the CPI. Individual does NOT include an opposing party in litigation, or the opposing party's legal counsel, or an investigator, auditor or any other party who is not acting on behalf of, or in furtherance of the interests of, the subject of the CPI, even if such individual has obtained a signed release from the subject of the CPI.
- H. "Information owner" is the one individual appointed in accordance with section 1347.05(A) of the Revised Code to be directly responsible for a system.
- I. "Person" means natural person.
- J. "Personal information" means "personal information" as that term is defined in section 1347.01(E) of the Revised Code.
- K. "Personal information system" means a "system" that "maintains" "personal information" as those terms are defined in section 1347.01 of the Revised Code. "Systems" includes manual and computer systems.
- L. "Research" means to explore, analyze, or examine data.
- M. "Routine" means common place, regular, habitual, or ordinary.
- N. "System" has the same meaning as it does in section 1347.01(F).
- O. "Upgrade" means a substantial redesign of an existing system for the purpose of providing a substantial amount of new application functionality, or application modifications which would involve substantial administrative or fiscal resources to implement. "Upgrade" does not include maintenance, minor updates and patches, or modifications that entail a limited addition of functionality due to changes in business or legal requirements. For the purposes of this policy ODJFS defines "substantial redesign" to mean any change that modifies greater than 50% of the code or functionality in an existing application.

- P. "Health Insurance Portability and Accountability Act (HIPAA)" refers to a federal law passed in 1996 that limits restrictions that a group health plan can place on benefits for preexisting conditions, while establishing national standards for electronic health care transactions and national identifiers for providers, health insurance plans, and employers. The Administration Simplification provisions of the act also added new standards for the security and privacy of health-related personal data.
- Q. "Protected Medicaid information" refers to data which is protected under the Federal Code of Regulations specific to the Medicaid Program.
- R. "Federal Tax Information (FTI)" is any information received from the Internal Revenue Service (IRS) that is considered protected under the statutes of the Federal Internal Revenue Code (IRC).
- S. "National Directory of New Hires (NDNH)" is a National Database that tracks wages and employment information containing:
1. New Hire (W-4)
 2. Quarterly Wage (QW)
 3. Unemployment Insurance (UI)
- Data Matching Services of NDNH data is used by several ODJFS program areas for program administration.
- T. "Public Record" means data that is subject to disclosure through Ohio public records law section 149.43 of the Revised Code.

VI. POLICY:

The ODJFS mission is to help Ohioans improve the quality of their lives as the nation's leading support and workforce development agency through accountability, compassion, integrity, respect and teamwork.

These values that form the core guiding principles that drive this agency in the performance of our mission cannot be achieved without access to the Confidential Personal Information with which our clients and business partners have entrusted us. It is in the interest of maintaining and ensuring this trust that this policy seeks to establish the valid reasons for accessing these key information assets. ODJFS is made up of multiple lines of business that provide unique yet integrated services to Ohio citizens and employers. The computer systems used in the delivery of these services are large and complex in nature, as are the back-end data repositories that drive these systems. This makes for an extremely large array of confidential information that we are responsible for maintaining and protecting within these systems. Without this data, we could not function as an organization. Thus, anything that represents a threat to the security of this data, represents a threat to ODJFS ability to provide services. For this reason, each employee must understand their vested interest in maintaining the security and privacy of the confidential information with which we have been entrusted. The purpose of the following is to provide clear guidance as to what is deemed valid access to ODJFS CPI and the legal basis for this guidance.

A. Criteria for accessing confidential personal information

The statutory definition of "CPI" is any personal information that is not considered public record under ORC 149.43. For ODJFS, CPI includes any non-public information about ODJFS employees, contractors and service providers (such as social security numbers and non-work-related addresses), as well as any information identifying applicants for, recipients of, and participants in, ODJFS-administered programs that fall under the category of public assistance (e.g. cash and

food assistance and child care subsidies) child support, child welfare (including adoption and foster care and child care), unemployment compensation, and workforce development.

ODJFS personal information systems are managed on a need to know basis, whereby each information owner determines the level of access required for an employee of the agency to fulfill his or her job duties. The determination of access to CPI must be approved by the employee's supervisor and the information owner prior to providing the employee with access to CPI within a personal information system. ODJFS has procedures for determining a revision to an employee's access to confidential personal information upon a change to that employee's job duties, including but not limited to a transfer or termination. Whenever an employee's job duties no longer require access to confidential personal information in a personal information system, then that employee's access to CPI shall be removed.

B. Valid Reasons for Accessing CPI

ODJFS is organized such that there are multiple core lines of business and several supporting offices that perform the management, administrative and technical functions that are common across these multiple core lines of business.

In general, any access to and use of CPI that is collected and maintained by ODJFS is strictly limited to those purposes authorized by ODJFS, and as directly related to the system user's official job duties and work assignments for, and on behalf of, ODJFS and/or a federal oversight agency. Some examples of when accessing CPI is prohibited include, but are not limited to, access that results in personal or political gain, and commercial use unrelated to official departmental business. Below is a list of valid reasons for accessing CPI (regardless of whether the CPI is maintained electronically or on paper) that are common across all lines of business.

1. In the course of administering or performing job duties related to the following processes, authorized employees of the agency would have valid reasons for accessing CPI:
 - a. Responding to (a) public records requests, when public records are comingled with CPI, or (b) records requests made by the individual for his/her own CPI;
 - b. Program administration, including (a) compliance with federal/state laws and regulations, (b) processing or payment of claims, (c) eligibility determinations (d) audits, investigations and oversight, (e) licensing and certification, and (f) administrative hearings;
 - c. Litigation (including discovery and responding to court orders and subpoenas);
 - d. Human Resource matters (hiring, promotion, demotion, discharge, salary/compensation issues, leave requests/issues, time card approvals/issues);
 - e. Complying with an Executive Order or policy;
 - f. Complying with an agency policy or a state administrative policy issued by the Department of Administrative Services, the Office of Budget and Management or other similar state agency;
 - g. Research in the furtherance of agency specific programs in so far as allowed by statute; or
 - h. Complying with a collective bargaining agreement provision.
2. In addition to the general processes described in paragraph (A) above, ODJFS must comply with numerous federal and state laws and regulations that limit its use and disclosure of CPI, including but not limited to:

- a. 45 CFR Parts 160 and 164 (HIPAA-45 CFR 164.501);
- b. 20 CFR Part 603;
- c. 7 CFR 272.1(c) (Food Assistance);
- d. Ohio Revised Code (ORC) sections:
 - (1) 5101.27 through 5101.30 (Public Assistance, Child Care, Foster Care, Medicaid),
 - (2) 5101.99 (penalties for disclosure),
 - (3) 3107.17 (adoption),
 - (4) 3107.99 (penalties for disclosure),
 - (5) 3121.894 (child support),
 - (6) 3121.899 (child support),
 - (7) 3121.99 (penalties for disclosure),
 - (8) 3125.08 (child support),
 - (9) 3125.50 (child support),
 - (10) 3125.99 (child support),
 - (11) 4141.21 (unemployment compensation),
 - (12) 4141.22 (unemployment compensation) and
 - (13) 4141.99 (penalties for disclosure);
- e. 29 USC 3245(a)(4) (workforce development), and
- f. OAC rules 4141-43-01 through 4141-43-03 (unemployment and workforce development).

Note that the citations listed above are not all-inclusive. For a more complete list of public records and confidentiality laws applicable to ODJFS-administered programs, please visit the Public Records and Confidentiality Laws e-manual available on-line.

- 3. Intentional violations of this policy shall result in disciplinary action up to and including removal in accordance with current disciplinary guidelines.

C. Other Data Privacy Concerns

- 1. Federal Tax Information (FTI)

The expectation for any state and/or local entity for protecting Federal Tax Information is identified in the latest IRS Publication 1075 "Tax Information Security Guidelines for Federal, State and Local Agencies and Entities – Safeguards for Protecting Federal Tax Returns and Return Information."

- 2. National Directory of New Hires (NDNH) data

It is prohibited for any ODJFS employee to access or transmit National Directory of New Hires (NDNH) Data using any means not prior authorized by OIS.

3. Work email versus personal email

Work emails containing CPI or privileged information must not be transmitted to non-work or personal accounts.

VII. PROCEDURES:

- A. Any upgrades to existing ODJFS computer systems, or the acquisition of any new computer systems, that stores, manages, or contains Confidential Personal Information (CPI), shall include a mechanism for recording specific access by users of the system to CPI contained within that system. System upgrades is defined as any update requiring over half of the lines of code to be modified;
- B. Until an upgrade or new acquisition of the type described above occurs, each Office within ODJFS is responsible for documenting a manual logging procedure for their staff. This procedure must be documented and forwarded for review to the ODJFS Chief Privacy Officer. Upon receipt of the documentation the ODJFS Chief Privacy Officer will call upon the ODJFS Chief Inspector and Chief Legal Counsel or designees to perform a joint review of the manual logging process to validate that it will meet the requirements as set forth in the legislation.

1. There are two exceptions to logging access to CPI:

- a. the access occurs as a result of research performed for official agency purposes, routine office procedures, or incidental contact with the information, unless the conduct resulting in the access is specifically directed toward a specifically named individual or a group of specifically named individuals. E.g., a helpdesk staff person is requested to assist in the resolution of a program or technical issue and in the course of resolving the issue they must access CPI.
- b. The access is to confidential personal information about an individual, and the access occurs as a result of a request by that individual or their legal representative for confidential personal information about that same individual. E.g., a child support obligee calls with an inquiry about his/her own payment history.

C. Information Requests

Upon the signed written request of any individual whose confidential personal information may be kept by the agency; the agency shall do all of the following:

1. Verify the identity of the individual by a method that provides safeguards commensurate with the risk associated with disclosure of the confidential personal information.
2. Provide to the individual the confidential personal information that does not relate to an investigation about the individual or is otherwise not excluded from the scope of chapter 1347 of the Ohio Revised Code.
3. During the pendency of an ongoing investigation about the individual, determine what, if any, records can be shared with that individual.

D. Notification of Invalid Access

1. Upon discovery or notification that CPI of a person has been accessed by an agency employee for an invalid reason, the agency shall take steps to notify the person whose information was invalidly accessed as soon as practical and to the extent known at the

time. The agency shall delay notification for a period of time necessary to ensure that the notification will not delay or impede an investigation or jeopardize homeland or national security. The agency may delay the notification consistent with any measures necessary to determine the scope of the invalid access, including which individuals' confidential personal information invalidly was accessed and to restore the reasonable integrity of the system. "Investigation" as used in this paragraph includes the investigation of the circumstances and involvement of employees surrounding the invalid access of the confidential personal information. Once the agency determines that notification will not delay or impede an investigation, the agency must disclose the access to confidential personal information made for an invalid reason to the subject of the CPI.

2. The notification given by the agency shall inform the person of the type of confidential personal information invalidly accessed and the date(s) of the invalid access (or as closely approximated as possible).
 3. Notification may be made by any method reasonably designed to accurately inform the person of the invalid access, including written, electronic, or telephone notice.
- E. The ODJFS Director shall designate an employee of the agency to serve as the Data Privacy Point of Contact under the working title of ODJFS Chief Privacy Officer. The Data Privacy Point of Contact shall work closely with the State of Ohio Chief Privacy Officer and State Chief Security Officer to assist the agency with both the implementation of privacy protections for the Confidential Personal Information that the agency maintains and compliance with Section 1347.15 of the Revised Code and the rules adopted thereunder.
- F. The ODJFS Chief Privacy Officer will ensure the timely completion of the Privacy Impact Assessment form developed by the Office of Information Technology.
- G. The ODJFS Chief Privacy Officer will ensure that all ODJFS computer systems containing CPI employs password or an equivalent form of authentication, and employ the usage of encryption, as deemed appropriate through a Privacy Impact Assessment so as to ensure access to CPI is kept secured.
- H. All ODJFS employees must take part in a departmental training program that will at a minimum include awareness of all applicable statutes, rules, and policies governing access to confidential personal information with which they may come into contact as part of their assigned job duties. It is the responsibility of the Business Office and Managing Supervisor to document and administer this required training to all direct report employees.
- I. An ODJFS poster referencing this policy will be posted in a conspicuous place in the main office of the agency and in all locations where the state agency has branch offices.
- J. Receipt of this policy must be acknowledged by all agency employees

VIII. APPENDIXES:

A. SUBJECT MATTER EXPERT(S)

Owning Entity	Address	Name (SME)	Phone/ E-mail
OIS	4200 E. 5th Ave. Columbus, OH 43219-2551	Corey Sines Chief Risk Officer	614-387-8284 Corey.Sines@jfs.ohio.gov

B. [ODJFS IPP 3001](#) Information Security



December 13, 2021

TCAP Support Letter
Attention: Melisa Pierson

Dear Melisa,

This letter is to show our overwhelming support of Vickie Miller and her TAPP project which assist people with criminal convictions secure careers that are long lasting and viable. As an Employment Professional for the state, I have referred dozens of people to TAPP with great success. Many have gone on to get advancement, rent apartment and purchase their own vehicles.

Central Ohio Restored Citizens Collaborative works to support people with criminal convictions to successfully reenter into our communities. We collaborate with TAPP as an employment resource because unlike many other job outlets who hire and release, Vickie maintains contact with the participants to assure they are getting the supports they need to be successful. Often times this means assisting with housing or food or simply giving encouragement when needed.

Most importantly Vickie begins by building relationships with employers by learning about their business and workforce needs. She discusses job seekers who have skills and strengths that match the needs of that employer and talks about the reasons they would be a good employee, and also to helps the job seeker explain their criminal history. Then she follows the hired employee through the probationary period to assure both employee and employer are fulfilling their commitments.

With the TAPP project employers can depend on the assessments and recommendations that Vickie can offer thus allowing them to not pass over potential job candidates simply because of a criminal background and creating any type of discrimination.

CORCC supports the work of the TAPP project and all that it represents. Sincerely,

Maria Ford

[Redacted Signature]
Outreach, CORCC

THE H.E.L.P. CENTER

Ohio Dept. of Job and Family Services

An agent of Central Ohio Restored Citizens Collaborative




Date 08/25/2022

Ohio DYS

To whom it concerns,

This letter is to verify that The HELP Center and Central Ohio Restored Citizen Collaborative has secured funding for housing for the TAPP2 project to commence in September 2022. The HELP Center will also carry the proper and necessary insurance for the home to be provided.

Should you have questions regarding this matter please contact me at 

Ver Sincerely,

Maria D. Ford

Maria D. Ford



October 18, 2022

Good morning, Skyla,

I am an Administrator for the Central Ohio Restored Citizens Collaborative (CORCC) and I work as an Employment Professional for the State of Ohio Dept. of Job and Family Services.

I met [REDACTED] before the pandemic when she reached out to my organization for help. At the time she was sleeping in a car with her 8-year-old son. I connected her with an agency call Healthy Families but then the pandemic happened, and all headway was lost.

Fast forward to this year and [REDACTED] son is staying temporarily with family because no housing was able to be secured. Even though she gets a monthly SSDI check, it is not enough to stand alone as income. She has migrated to Ross County in hopes that she would get some support from her family, although she remains homeless.

Any assistance you can offer [REDACTED] is greatly appreciated and if I can be of any help please feel free to call my cell phone [REDACTED]

Very Sincerely,

Maria Ford

CORCC

The H.E.L.P. Center

An agent of Central Ohio Restored Citizens Collaborative

Dr. Maria D. Ford
1111 E. Broad St, Columbus, OH 43205
[REDACTED]

November 17, 2022

Dear Judge Miller,

I am writing to advocate for a young man, [REDACTED] who comes before you today in a probation hearing. I am an Employment Professional for the state of Ohio and work with Mr. [REDACTED] through our Disabled Veterans Representative. I am hoping to make you aware of all the activities and accomplishments Mr. [REDACTED] is currently undertaking to become self sufficient and stable for himself and his children.

Mr. [REDACTED] is attending college at Columbus State Community College to become certified in HVAC while at the same time being the sole caretaker and provider for his two children. He is required to call his probation department daily to ready himself for possible urinary analysis and now may be required to attend an outpatient rehabilitation program for a traffic ticket that was dismissed.

Oh yes, and all the while he must also pick up and drop off kids at school/daycare, attend mandatory WIC appointments for his children, prepare meals and maintain a household, look for permeant work and keep other necessary appointment that may be assigned to him.

This young man is a great (single) father with his priorities in line for successful living. He is a productive member of our community and looking to do better every day for himself and mostly for his children. To say that his plate if full is an understatement and I wonder how we will be able to match him with full-time work will all his other responsibilities, however, he has been nothing but willing. I respect your decisions for him but wanted you to be aware of Mr. [REDACTED] current responsibilities and how he is sufficiently dealing with his daily life.

Respectfully,

Dr. Maria Ford

January 20, 2023

Office of Contracts and Acquisitions
Ohio Department of Job and Family Services
30 East Broad Street, 31st Floor
Columbus, Ohio 43215
ATTN: RFP/RLB Unit
RE: RFGA #JFSR2223178259

To Whom It May Concern:

Central Ohio Restored Citizens Collaborative (CORCC) along with the OhioMeansJobs Center of Columbus and Franklin County (OMJCFC) is pleased to present this letter of support for Action for Children (AFC) and to engage with its fatherhood program entitled The Art of Positive Parenting (TAPP): Father Factor.

CORCC and OMJCFC has partnered, and will continue to partner, with TAPP: Father Factor to help increase awareness regarding fatherhood issues and refer clients for fatherhood services to AFC. CORCC and OMJCFC joins AFC's commitment to help non-custodial parents who are: typically, below poverty level, at low-medium risk of criminal behavior, and have little or no work experience, to become more engaged in the lives of their children.

TAPP: Father Factor recognizes that fathers have unique qualities, strengths and talents that make them critical to their child's healthy growth and development. The TAPP: Father Factor program allows for group and individual exploration, engagement and experiences that will highlight and enhance the honor and joy of a father's role.

This program providing services to non-custodial parents early on in the history of their case could ultimately have a positive impact by reconnecting fathers with their children and providing the child with regular emotional, financial, spiritual and social support.

CORCC and OMJCFC looks forward to our continued partnership in serving fathers, their children, and families

Sincerely

Maria Ford

Employment Professional, Office of Workforce Development
OhioMeansJobs Franklin County
Columbus, OH
[614-559-4788](tel:614-559-4788)

BUILDING Ohio's Workforce
CREATING Innovative Solutions
PROMOTING Economic Independence and Growth



A proud partner of the American Job Center network

Central Ohio Restored Citizens Collaborative

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Odom, Angela
Sent: Wednesday, May 4, 2022 3:46 PM
To: Ford, Maria <Maria.Ford@jfs.ohio.gov>
Subject: RE: County board

Maria,

Per our discussion....

You were not clear in your email that this is volunteer on your own time. That said, I think it would be okay to include in your BIO that you are employed at JFS, as that is information about you. However, please make sure that your BIO does not make assumptions that you are sitting on the board as representation of JFS.

Thanks,
Angie

From: Ford, Maria <Maria.Ford@jfs.ohio.gov>
Sent: Wednesday, May 4, 2022 7:27 AM
To: Odom, Angela <Angela.Odom@jfs.ohio.gov>
Subject: RE: County board

Angela,
I was not asking for approval since as I said I was not asked because of my position with JFS. I will not be working with another (single) agency and of course all of my activity is done on my own time. My question is, am I permitted to put in my bio where I work?

Thanks,
Maria

From: Odom, Angela <Angela.Odom@jfs.ohio.gov>

Sent: Wednesday, May 4, 2022 7:04 AM

To: Ford, Maria <Maria.Ford@jfs.ohio.gov>

Subject: RE: County board

Maria,

Since you've already accepted, then prior approval now seems insignificant. However, in the future anything that involves any of us working with another agency should be directed to me for prior approval. Also, will this be something you're doing on your own time or during state work hours? Will this be virtual or in-person. I'm certain you're aware of the questions that management would be asking of you to approve or deny this participation. In regards to your BIO, I will get prior approval from my manager to determine if you should include it. I'll let you know....

Thanks,
Angie

From: Ford, Maria <Maria.Ford@jfs.ohio.gov>

Sent: Tuesday, May 3, 2022 4:50 PM

To: Odom, Angela <Angela.Odom@jfs.ohio.gov>

Subject: County board

Angela,

I have been invited to sit on the Franklin County Reentry Advisory Board (RAB) which I have accepted. In asking for a BIO can I reference that I work for Ohio JFS/Workforce Development? Before you send this to Steve, know that they are not looking for someone from JFS and this was not why I was asked to be involved, however, I believe it is important for people to know what I do during the day.

Thanks and I'll wait for a reply,

Maria Ford

Employment Professional, Office of Workforce Development

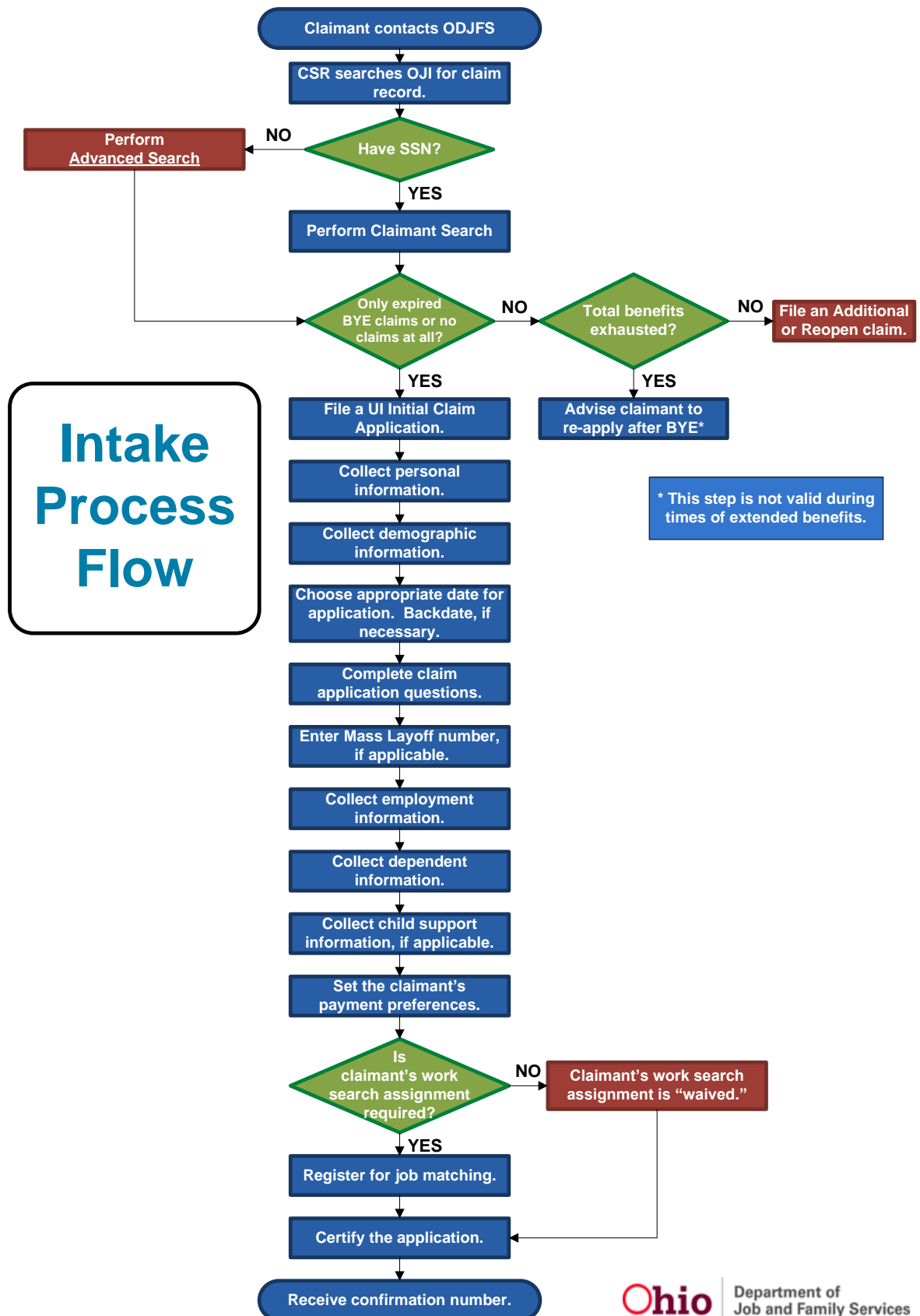
OhioMeansJobs Franklin County

Columbus, OH

[614-559-4788](tel:614-559-4788)

BUILDING Ohio's Workforce
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Adjudication Dos and Don'ts

When taking a continued claim, you may clear select Types/Subtypes.



Clear

Source	Type	Subtype
Continued Claim	Availability	Other*
Continued Claim	Ability	Other*
Continued Claim	Actively Seeking Work	Other*
Continued Claim	Late filing/ break in claim	Late filing of CC <small>ONLY AFTER TRAINED ON ADDITIONAL/REOPEN</small>

*the only exception: If the claimant states that they made an error when completing the continued claim week, then the volunteer may clear any subtype within these issue types

DO NOT CLEAR ANY ISSUE ASSIGNED TO BENEFIT PAYMENT CONTROL UNIT!

If the Unit listed is one of the following, **DO NOT HANDLE**:

Special Claims
UCTech
BPC
Redetermination
UCRS

Locked claims - Regular Ohio NT



SOURCE	TYPE	SUBTYPE
Monetary	Verify Wage Category	Verify Claimant is School Employee
Monetary	School Employee	Between Term Disqualification
Potential Mutualization	Employer Charges	Request for Relief of Charges
Initial Claim	Disqualification (Disq)	Varies
Initial Claim	Separation: Quit	Varies
Initial Claim	Separation: Discharge	Varies
Additional/Reopen	Disqualification (Disq)	Varies
Additional/Reopen	Separation: Quit	Varies
Additional/Reopen	Separation: Discharge	Varies
Manual	Varies	Varies
Initial	Requalification	6x6
Data Hub	SSN Verification Failed	Surname does not match one on file
Initial	Alien Verification	Alien work authorization not valid
Cross Match	No Longer Unemployed	New Hire (RTW)-Ohio (BPC Issues)
Initial	Ability	Varies
Initial	Availability	Varies
Earnings	Varies	Varies

PUA Call Center @1.833.604.0774. Bank Card # 1-855-254-9198

If a caller wants to report Fraud, please give the caller the BPC number which is **800-686-1555** or the email address which is ucbenprotest@jfs.ohio.gov

Finance Unit 614 466-4047 option 3

For internal use only: Email Proxy Accounts and staff's personal email as well as their phone numbers are NOT to be shared with claimants.

Office	Social Security #	Email Proxy	Fax Number
Cleveland Adjudication Center	0000-0765		614-466-7449
Akron UI Delivery Center	0766-1942		614-466-7449
Lorain UI Delivery Center	1943-2649		614-466-7449
Toledo UI Delivery Center	2650-4121		614-466-7449
Chillicothe Adjudication Center	4122-4710		614-466-7449
Marietta Adjudication Center	4711-6005		614-466-7449
Youngstown Adjudication Center	6006-7182		614-466-7449
Dayton UI Delivery Center	7183-7477		614-466-7449
Interstate and Federal/Franklin	7478-7701		614-466-7449
Columbus UI Delivery Center	7702-8360		614-466-7449
Lima Adjudication Center	8361-9999		614-466-7449
Columbus Adjudication Center UCX and UCFE Claims	0000-9999		614-466-7449

Overpayments - 614-995-5691, option #3.

The page that explains overpayments is <https://jfs.ohio.gov/ouio/RepayOverpayment.stm>

Fraud -JFS UCBenProtest direct the caller to BPC at 1-800-686-1555.

Eligibility Notices:

Tier 1: Send email to the proxy account with the last four of the claimants' SSN number, first and last name and their claimant ID in the subject line. Verify phone number is correct state claimants' concerns and place in the body of the email. Tell claimant an email will be sent to the processing center. If additional information is needed expect a phone call within 72 hours. Instruct claimant that the call will be coming from 1-877-644-6562 to please answer. If no further information is required, the claim will

be processed without a return phone call to the claimant. Please do not promise a return call we will process the issue.

* Annotate notes: Claimant called regarding status of claim asked to allow 72 hours.

Eligibility Notices:

UCBenProtest@jfs.ohio.gov

Tier 2- Intake:

- ✓ • **Active Search - Fact-finding completed** by claimant if done in error staff will clear the issue(s).
 - If no fact-finding staff will take it. If claimant states marked in error certify the information
 - ✓ ○ Clear the issue with reasoning statement: Clear-marked in error no issue.
- ✓ • **Availability Issues- Fact-finding completed** by claimant if done in error staff will clear the issue(s).
 - If no fact-finding staff will take it and if claimant states marked in error certify the information.
 - ✓ ○ Clear the issue with reasoning statement: Clear-reopen completed in error no issue.
 - Fact-finding completed by claimant or by staff person and claimant has a true availability issue instruct the claimant that an email will be sent to the processing center (see highlighted instructions above).
- ✓ • **Ability Issues- Fact-finding completed** by claimant if done in error staff will clear the issue(s).
 - ✓ ○ If no fact-finding staff will take it and if claimant states marked in error certify the information.
 - ✓ ○ Clear the issue with reasoning statement: Clear- mark in error no true ability issue.
 - Fact-finding completed by claimant or by staff person and claimant has a true ability issue- tell claimant an email will be sent to the processing center (see highlighted instructions above).
- **Claimant marked discharge, quit, refuse work in error on continued claims - Fact-finding completed** by claimant if done in error staff will clear the issue
 - ✓ ○ If no fact-finding staff will take and if claimant states marked in error certify the information.
 - ✓ ○ Clear the issue with reasoning statement: Clear- Claimant marked in error no issue.
- **Social Security Verification (Social Security Card/Birth Certificate- The only alert which does not request a copy of the individual's birth certificate is "surname does not match one on file") -**
 - Fact-finding completed by claimant if claimant states that they are unable to get Social Security Number card due to Social Security Administration being close because of Covid-19 and that the Social Security office is no longer providing "Numi Lite" forms.
 - ✓ ■ Clear the issue with reasoning statement: Clear-based on claimant's good faith attempt to get the information.
 - ✓ ○ Fact-finding completed and claimant stated that they fax/mailed it in.
 - Verify date submitted.
 - If date submitted is prior to working day of file-net (see daily email) email processing center (see highlighted instructions above).
 - If documents were sent after the working date of file net (see daily email) Verify that the claimant received a confirmation number and ask that they allow processing time.

**** Note:** If staff have access to file-net and documentation is located annotate the information in the additional fact-finding box and clear the issue with reasoning statement: Clear- Claimants information verified-documents in file net.

- If calling about the issue and no fact-finding staff will take the fact-finding.
 - If the claimant states, they are going to fax it in provide the fax number and make sure to give them the deadline date of when the documentation is needed.
 - Annotate the notes: Claimant was instructed to provide information by deadline date on OJI.

- **Earnings-** If the claimant forgot to enter their earnings, complete fact-finding- tell claimant an email will be sent to the processing center (see highlighted instructions above).

- ✓ • **Late filing/Break in claim-** Complete the reopen/additional as appropriate.
 - Clear the issue with reasoning statement: Clear- reopen/additional completed.

**** Note:** Start date can be verified by the issue screen, the active BIC screen, or continued claim screen.

- Staff will be required to do a reopen application for every BIC start date listed.

- ✓ • **Late filing issue-** Complete fact-finding-clear issue with reasoning statement: Clear- late filing waived due to Covid-19.

- **Claimant calls wishes to claim back weeks and out of registration**

- Staff person should take all the back weeks first.

- ✓ ○ Complete a reopen application with the effective date of the first week that was entered in OJI.

- Staff person will take the fact-finding with reasoning statement: Clear-late filing waived due to Covid-19

- ✓ • **Deductible Income-** If fact-finding is completed by claimant check due date from miscellaneous.

- If "action needed by date" has not past explain to claimant to allow processing time.

- If the "action needed by date" has past tell claimant an email will be sent to the processing center (see highlighted instructions above).

- ✓ • **Alien Verification-** Instruct claimant of necessary documentation needed.

- Verify date submitted.

- If date submitted is prior to working day of file-net (see daily email) email processing center (see highlighted instructions above).

- If documents were sent after the working date of file net (see daily email) Verify that the claimant received confirmation and ask that they allow processing time.

**** Note:** If staff have access to file-net and documentation is located annotate the information in the additional fact-finding box and clear the issue with reasoning statement: Clear- Claimants information verified-documents in file net.

- Email will need to be sent to **JFS UCTECH** in lieu of processing centers following the same (highlighted instructions above).

- **Owner Business/Corporate Officer**

- Fact-finding completed by claimant if done in error staff will clear the issue.
 - If no fact-finding staff will take and if claimant states marked in error certify the information.
 - ✓ ▪ Clear the issue with reasoning statement: Clear- Claimant marked in error no issue.
 - It true exist, an email will need to be sent to **JFS UCTECH** in lieu of processing centers following the same (highlighted instructions above).
 - **Claim is in pending and weeks are in pending**
 - Review issue screen to verify no open issues
 - Address any open issue(s)
 - Verify Employer response date has past
 - Check Miscellaneous /Correspondence screen for due date
 - Verify Monetary Affidavit due date has past (if applicable)
 - Check Miscellaneous /Correspondence screen for due date
 - Check to see if waiting on out-state/UCX/UCFE wages
 - Check Special Claims tab for entries
 - ✓ ○ Review dependent status
 - If any dependent status is “pending” staff will use the status drop-down to make a decision on the dependent. Staff need to either allow or deny the dependents.
- ****Remember Claim must be in **PENDING** status****

“A dependent child is a child, step-child, or adopted child 17 years old or under for whom the claimant has personally provided more than 50% of his/her support during the 90 days prior to the effective date of their claim. If 18 or older, however, a child may be a dependent only if he/she has a permanent physical or mental handicap that prevents him/her from working.

“A dependent spouse is a spouse, living with the claimant, and they personally provided more than 50% of his/her support in the 90 days prior to the effective date of the claim. In addition, their spouse’s income for the 90-day period must be 25% or less than the claimant’s average weekly wage.

- A spouse that does not qualify as a dependent will be an allowed independent spouse.

*** **DO NOT** add, edit or delete a dependent once the **monetary becomes FINAL*****

- **NOTE: If you are a new trained staff person on Tier 2-Intake and you were not trained on how to address the issues above:** Send email to the proxy account follow the (highlighted instructions above). State claimants’ concerns and place in the body of the email.
- **Claim was allowed and week is denied-** send an email to the proxy account as noted in the highlighted instructions above
- **Claimant has a separation on their claim other than a lack of work i.e quit, discharge, leave of absence etc-**
 - If fact-finding is completed by claimant check due date from miscellaneous
 - If “action needed by date” has not past explain to claimant to allow processing time.
 - If the “action needed by date” has past tell claimant an email will be sent to the processing center as noted in the (highlighted instructions above).
 - If fact-finding has not been completed by the claimant staff will complete it and certify.

****Note:** Any claim with a separation issue customer must allow 3-4 weeks for processing from the date the claim was filed.

- **Claimant is requesting for claim to be backdated:**
 - Ask for claimant's last day of work and check the effective date of the claim.
 - If claim has the correct effective date explain that to the customer.
 - If a true backdate is needed send an email to the proxy account in subject line state: "Backdate" claimants last four of SSN, first and last name with the claimant ID. In the body of the email state the claimants true last day of work and they are requesting a back date.
 - Take all back weeks for the claimant.
 - Take weeks in OJI by selecting the most recent prior allowed claim to add them to.
 - If no prior allowed claim take on paper and attach to email.
 - Tell claimant an email will be sent to the processing center as noted in the (highlighted instructions above).