

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.: 2023-CA00010
DATE OF REPORT: OCTOBER 24, 2024

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

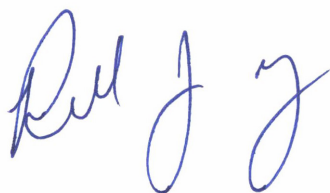
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Randall J. Meyer
Ohio Inspector General



STATE OF OHIO
OFFICE OF THE INSPECTOR GENERAL

RANDALL J. MEYER, INSPECTOR GENERAL

REPORT OF INVESTIGATION

FILE ID NUMBER: 2023-CA00010

SUBJECT NAME: Ericka Holland

POSITION: Subcontract Employee

AGENCY: Ohio Department of Job and Family Services

BASIS FOR INVESTIGATION: Agency Referral

ALLEGATIONS: Abuse of Office/Position

INITIATED: June 29, 2023

DATE OF REPORT: October 24, 2024

INITIAL ALLEGATION AND COMPLAINT SUMMARY

On June 15, 2023, the Ohio Department of Job and Family Services (ODJFS) referred an allegation of wrongdoing to the Office of the Ohio Inspector General, the Ohio State Highway Patrol (OSHP), and the U.S Department of Labor - Office of the Inspector General (DOL-OIG). ODJFS alleged that former Randstad employee, Customer Service Representative (CSR) Ericka Holland, improperly accessed and authorized payments on Pandemic Unemployment Assistance (PUA) claims. Randstad was subcontracted to provide staffing to process ODJFS PUA claims. ODJFS alleged Holland removed eligibility and fraud issues on PUA claims she was not authorized to access, resulting in the improper release of PUA funds to ineligible claimants. ODJFS also alleged that Holland inflated claimants' incomes on some PUA claims to fraudulently increase the weekly benefit amounts paid to the claimants.

BACKGROUND

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, protect child welfare, ensure payment of child support, provide benefits to the unemployed, assist individuals in preparing for work; and administers Medicaid at the local level.¹

Pandemic Unemployment Assistance (PUA)

On March 27, 2020, the Coronavirus Aid, Relief and Economic Security (CARES) Act² was signed into law. The CARES Act contained provisions for the Pandemic Unemployment Assistance (PUA) program. The PUA program supported self-employed individuals, independent contractors, and others who did not qualify for traditional unemployment benefits. The PUA program also supported those individuals whose earnings averaged less than \$280 per week in their former job. The American Rescue Plan Act of 2021 made it possible for qualified individuals to receive PUA benefits for up to 79 weeks, through September 6, 2021. Previously,

¹ Source: Biennial budget documents.

² The text of the legislation can be found at: [Text - S.3548 - 116th Congress \(2019-2020\): CARES Act | Congress.gov | Library of Congress.](#)

individuals could only receive PUA benefits for up to 50 weeks. The State of Ohio ended the PUA program on September 4, 2021.

According to the ODJFS website,³ PUA applicants were required to self-certify that they met a COVID-19 related reason for their unemployment. The U.S. Department of Labor issued guidance expanding PUA eligibility to the three groups of people listed below:

- Those previously receiving traditional unemployment benefits who refused to return to work or refused an offer of work because the workplace was not in compliance with local, state, or national health and safety standards directly related to COVID-19.
- Those who provided services to an educational institution or educational service agency and were fully or partially unemployed as a direct result of COVID-19.
- Those who were laid-off or had their work hours reduced as a direct result of COVID-19.

Ohio claimants have the option of receiving their unemployment benefits as a direct deposit in a current bank account or in the form of a debit card which is issued as a U.S. Bank ReliaCard[®] debit card. Once ODJFS approves a claim, ODJFS contacts U.S. Bank ReliaCard[®] who then mails the debit card to the claimant. ODJFS then deposits the approved benefit amount to the debit card. Claimants can make purchases with the U.S. Bank ReliaCard[®] anywhere Visa[®] and Mastercard[®] debit cards are accepted or can withdraw cash from bank ATMs. The U.S. Bank ReliaCard[®] debit card does not require a Personal Identification Number (PIN) for signature-based purchases should the claimant choose credit when making a purchase. However, a PIN number is needed for debit card purchases and cash withdrawals from ATMs. The four-digit PIN number is created by the cardholder when activating the card.

APPLICABLE LAWS, RULES, AND POLICIES

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 the 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

³ <https://jfs.ohio.gov/ouio/pdf/COVID-19-CARES-Act-Reasons.pdf>

will not include in their report any of the prohibited information obtained from ODJFS during the investigation in accordance with Ohio Revised Code §4141.21.

INVESTIGATIVE SUMMARY

As a result of the COVID-19 pandemic and subsequent increase in unemployment claims, ODJFS received a large number of claim applications for unemployment compensation. To address the increase in claims, ODJFS hired additional intermittent⁴ employees and used subcontracted employees to process claims.

PUA claims submitted to ODJFS were reviewed to ensure that they included all necessary documents and met the requirements for eligibility to receive benefits. Any claims failing to meet these requirements were blocked and identified as possible fraud. Common reasons for claims being blocked or designated as possible fraud were:

- IDV – Identity Verification Issue, meaning the documents submitted to verify a claimant’s identity were either insufficient, appeared to be fake, or did not match other information on the claim.
- EMER – Employment Evidence Requested, meaning the evidence submitted for proof of the claimant’s employment seemed insufficient, fake, or did not match the wages reported.
- PE – Program Eligibility, meaning the reason for the claimant’s unemployment was not related to COVID-19, or that the claimant’s lack of availability did not meet eligibility standards.

Claimants were notified of the reason of denial on the claim and were asked to provide any additional or required documents.

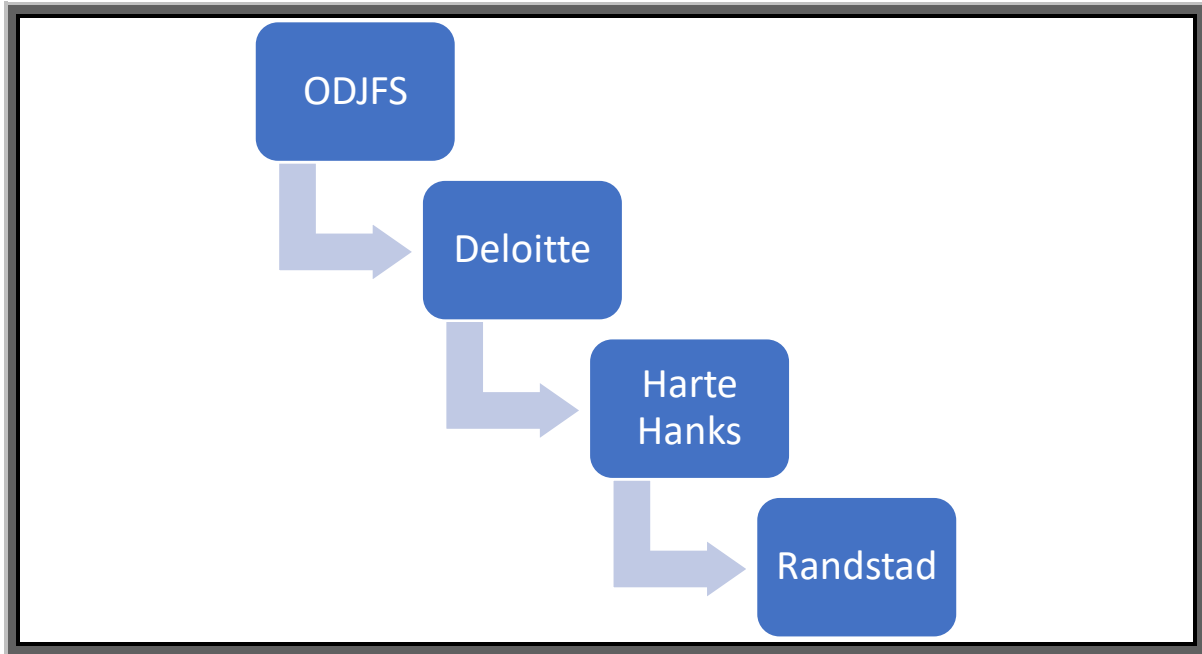
Deloitte⁵ was one of the companies who originally contracted with ODJFS to provide manpower to process PUA claims. Deloitte then subcontracted with Harte Hanks⁶ to provide manpower to fulfill the ODJFS contract. Harte Hanks subsequently subcontracted with Randstad and other

⁴ Intermittent employees are temporary employees hired for a limited number of hours.

⁵ Deloitte is a company that provides a variety of services to business and governmental entities.

⁶ Harte Hanks describes itself as a marketing services, customer care, and fulfillment and logistics company. Hartehanks.com

staffing agencies, to provide additional manpower. Harte Hanks provided supervisors for the PUA workers provided by Randstad.



Ericka Holland’s Work as a Subcontracted Customer Service Representative

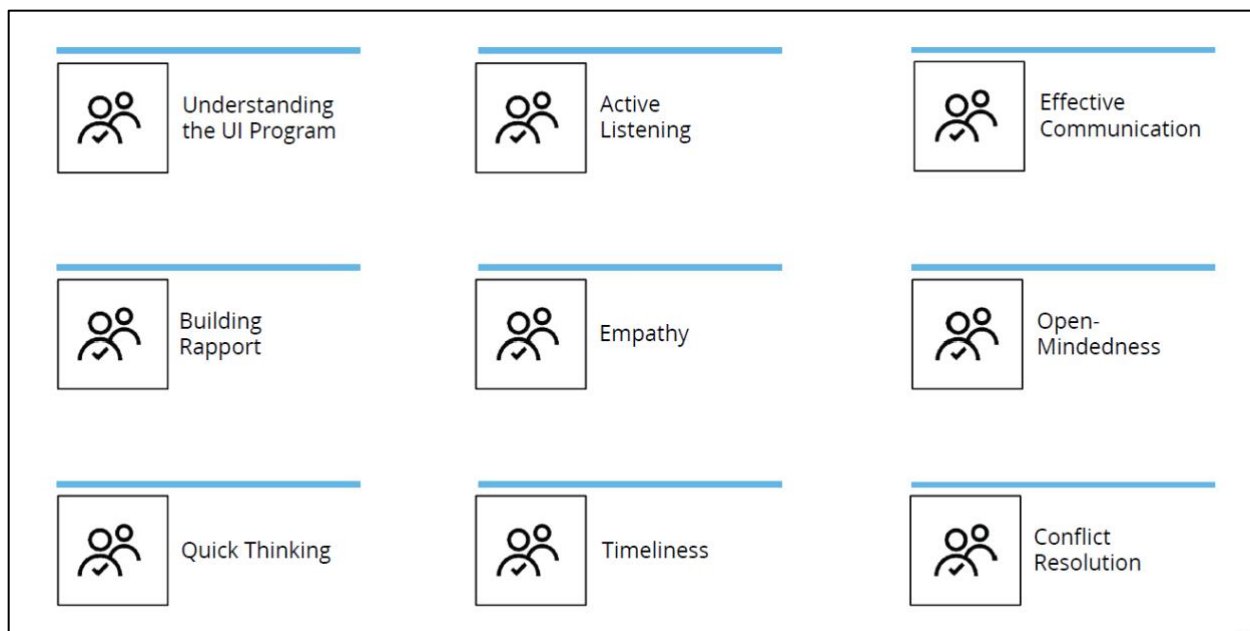
On June 15, 2023, ODJFS referred an allegation of wrongdoing by a former Randstad employee, Customer Service Representative (CSR) Ericka Holland, to the Office of the Ohio Inspector General and other agencies. Randstad was subcontracted to provide staffing to process ODJFS PUA claims. ODJFS claimed Holland improperly accessed 393 PUA claims and for 126 of those claims, had improperly released a total of \$3.2 million in PUA payments. ODJFS generated a report of Holland’s activities from the Unemployment Framework for Automated Claim & Tax Services (uFACTS)⁷ software system. The uFACTS system tracks all accesses and changes to a claim and notes the person responsible for those accesses and changes, creating an audit trail for each claim. For their review, ODJFS provided to investigators the uFACTS report of Holland’s activities.

Holland was hired by Randstad and assigned to work as a Customer Service Representative (CSR) on Ohio PUA claims under the supervision of Harte Hanks. As a subcontracted Randstad employee, Holland worked as a CSR from home and was required to use her own computer to access the PUA claims. Holland started working for Randstad and was assigned to Harte Hanks

⁷ uFACTS is an unemployment system developed and marketed by Deloitte.

and the Ohio PUA Call Center on Sunday, June 28, 2020. Holland's training for her position as a CSR call taker emphasized empathy and communication skills and instruction on how to process PUA claims and what tasks she was permitted to perform.

Customer Service Skills⁸



Holland first accessed claims in the uFACTS system on Friday, July 3, 2020, and worked as a PUA Call Center CSR until August 20, 2020, when her assignment to Ohio PUA under the supervision of Harte Hanks and her employment with Randstad was terminated.

Holland's primary job as a CSR was to respond to calls received by the Ohio PUA Call Center. Her duties included answering claimants' questions, and assisting claimants with filing claims, and uploading identification and proof-of-income documents. A small number of calls received by the Call Center were of a general nature and did not require the CSR to access the uFACTS system. Other incoming calls were from claimants needing assistance with their specific claim, which required the CSR to access uFACTS (possibly multiple times), and when necessary, to take action on the caller's claim in the uFACTS system. All calls to the Call Center were

⁸ Excerpt from training materials provided by Harte Hanks.

recorded. Holland and other CSRs who worked under the same supervision could communicate with each other and seek assistance from supervisors using Microsoft Teams.⁹

Holland did not have authority to “adjudicate” or resolve any issues which could trigger a payment to a claimant, or which would prevent a claim from being paid. As a CSR call taker, Holland was not permitted to “redetermine monetary”¹⁰ status, which involved taking action to increase the weekly PUA benefit payments on a claim. While Holland was not permitted or authorized to adjudicate issues, there were no controls in the uFACTS computer system that prevented CSRs assigned to the Call Center, including Holland, from taking actions beyond the scope of their training and authority. CSR call takers who had issues involving the adjudication of PUA claims or redetermining money were instructed to flag the claims and refer them to other staff who had the training and authority to resolve the issues. Additionally, CSR call takers working for the Call Center were not permitted to make outbound calls without prior approval by a supervisor. The only reason for a CSR placing an outbound call was to call back a claimant whose call had been disconnected prior to concluding the requested assistance.

Investigators for the Office of the Ohio Inspector General analyzed the audit trail data spreadsheet for Ericka Holland provided by ODJFS. The spreadsheet contained information about all claims which had been accessed by Holland on uFACTS during her employment as a PUA CSR call taker. Notes were added to that spreadsheet by an ODJFS employee who reviewed and evaluated actions taken by Holland to determine which actions were considered to be fraudulent and/or outside the scope of her authority and training.

Investigators reviewed a report provided by ODJFS, which indicated that Holland accessed PUA claims in the uFACTS system for 791 different claimants. Of those 791 claims, ODJFS flagged 393 for potential fraud.¹¹ From their review of records and the ODJFS report, investigators determined that PUA funds were released on 126 of the 393 claims flagged for potential fraud.

⁹ Microsoft Teams is a workspace for real-time collaboration and communication, meetings, file and app sharing.

¹⁰ Redetermine monetary is a term used by ODJFS in identifying certain actions taken by a PUA worker. Only trained workers with the proper authority were allowed to determine if legitimate uploaded documents supported an increase in the weekly benefit amount of PUA payments based upon income prior to COVID-19.

¹¹ Fraud was flagged when action taken by the identified ODJFS employee or contractor working on claims was suspected to be outside the scope of his or her authority and training. Not all claims designated as fraud resulted in an undue payout to a claimant.

On these 126 claims, investigators determined that Holland had improperly “voided fraud” alerts; cleared identity verification and program eligibility issues; and increased claimants’ weekly benefit amounts without the proper documentation to prove eligibility – all of which were actions she was not permitted to perform. Investigators determined that a totaled of \$3,247,402 in PUA funds were fraudulently disbursed as a result of Holland’s improper actions on 126 of the 393 claims flagged for fraud, but that Holland’s actions did not release PUA funds on the remaining 267 claims flagged for fraud.

According to records provided by Harte Hanks, Holland answered or initiated a total of 1,459 calls during her employment at the Call Center. This total included both incoming and outgoing calls and, in many instances, multiple calls to and from the same Ohio PUA claimants. The following chart shows Holland averaged just under 11 minutes per call.¹²

Month	Contacts Handled	Average Handle Time (minutes)
July	902	10.85
Aug	557	11.10
Total	1459	10.95

On or about August 19, 2020, Valery Alston, Holland’s direct supervisor, discovered that Holland was working and making outbound calls outside of her normal schedule. While employed at the Call Center, all of Holland’s calls were recorded, and included numerous outbound calls. Alston listened to some of Holland’s recorded calls and eventually discovered that Holland was placing outbound calls to claimants, without obtaining supervisory authorization, to notify the claimants if there had been a status update on their claim. When Alston reviewed Holland’s computer-generated daily time reports, she observed that Holland had logged out for the day but would later log back into the PUA system to make outbound phone calls. Per Harte Hanks, these outbound phone calls would only be appropriate during working hours and only when the original call had been disconnected while the CSR was assisting the claimant. Harte Hanks noted that an outbound call by the CSR to the claimant would require prior permission from the CSR’s supervisor. Investigators discovered Holland was being paid by Randstad for the additional time worked when she logged into the PUA system after her

¹² When asked by investigators Alston estimated the typical call took only five to seven minutes.

scheduled work hours. Alston told investigators that she remembered Holland and noted that prior to discovering Holland was making outbound calls after-hours, she believed Holland had been a “pretty good employee.”

Alston notified her operations manager, Jennifer Creer, that Holland was making unauthorized outbound calls and working outside her assigned work hours. Creer advised Alston to compose an email to Harte Hanks Human Resources notifying them of Holland’s outbound calls and for working outside her assigned schedule. In her email Alston requested that Holland be terminated from her PUA assignment with Harte Hanks.

From: Valery Alston
Sent: Wednesday, August 19, 2020 2:51 PM
To: Marni Nelms <Marni.Nelms@hartehanks.com>
Cc: Jennifer Creer <Jennifer.Creer@hartehanks.com>
Subject: Termination - Ericka Holland

Good Afternoon Marni,

I am requesting to term the above mentioned agent. I am going thru this weeks calls and i noticed a number of outbound calls. When I listen to the calls it is her offering people to check on their accounts and call them when she sees a change. She also logs out at her regular scheduled time then logs back in to make an outbound call then logs out again as showed below.

Randstad was notified by Harte Hanks of Holland’s improper actions and Holland was terminated on August 20, 2020.

Although Holland had been instructed not to make outbound calls from the PUA Call Center and not to work outside her scheduled hours, Alston reported to investigators that she heard nothing in the content of the calls she reviewed that was otherwise improper. Alston stated that Holland was returning calls to people she had spoken with earlier, and that she seemed to be trying to eliminate the need for claimants to contact the Call Center for assistance.¹³ Alston also noted to investigators that in her review of Holland’s calls, she never heard Holland request compensation from the claimants for assisting them. However, while Alston believed Holland’s intentions were good, Alston confirmed that Holland’s actions were not authorized or permitted in her position as a CSR call taker for the Call Center.

¹³ Extremely long wait times to speak to a CSR were normal when calling the Ohio PUA Call Center.

Investigators contacted Harte Hanks, Deloitte, and ODJFS, and requested Holland's call recordings for their review. Harte Hanks, Deloitte, and ODJFS informed investigators that they did not retain the logs or recordings of Holland's calls using the PUA call system. Harte Hanks indicated that even the recordings of the calls used to support terminating Holland's assignment as a CSR were not retained. Therefore, investigators' analysis of Holland's actions was limited to the claims that Holland accessed using uFACTS.

Investigators found that Holland did not try to conceal from her supervisors the outbound calls she made from the Call Center. When Holland returned calls to claimants, she used the system Harte Hanks required her to use for conducting these phone calls. By using the Harte Hanks-required system, Holland's calls, including dates and times, were recorded and included on reports provided to Harte Hanks' supervisory staff. If Holland had used her personal phone to make the outgoing PUA-related calls, Harte Hanks would have had virtually no way of discovering the calls.

The Office of the Ohio Inspector General subpoenaed and received Holland's bank records and personal cell phone records. Additionally, investigators obtained for their review Holland's personnel files from Randstad, Harte Hanks, and Deloitte. Investigators evaluated Holland's bank records and analyzed her personal cell phone records for any evidence of financial gain, motive, or a personal relationship with any of the claimants whose claims were accessed by Holland and flagged for fraud. Investigators found no evidence that Holland knew or had a personal relationship with any of the callers. Additionally, investigators found no evidence of profit or collusion with co-conspirators and none of the claimants' phone numbers appeared on Holland's personal phone records.

On March 7, 2024, investigators contacted Holland and she agreed to be interviewed. Holland informed investigators that she had worked for Randstad as a CSR call taker and answered calls from people who needed help with their PUA claims. When asked if she was able to help claimants, Holland responded, "... we were able to actually push through getting them the funds." Holland told investigators that she was able to resolve PUA claimants' issues and she provided several scenarios to investigators as to how she resolved these issues. Holland stated that if a claimant was missing necessary identity verification (ID) information, she would request

the claimant to send to her the required documents and she would verify the information provided by the claimant, and release PUA benefit funds. Holland also stated that if a W-2 had already been submitted as documentation, she would verify the information and release the PUA funds to the claimant. Holland said that if a claim was flagged in uFACTS for fraud, she would access the claim to evaluate what was needed to resolve the issue on the claim. Holland added that she would inform the claimant of what documentation they needed to provide to reconcile the issue on their claim. If the claimant was able to provide the required documents, Holland would update and resolve the issue on the claim. Holland noted to investigators that there were not many issues she could not resolve if she received the correct documents by the claimant. Holland told investigators that there were many claimants with sad stories, but that she put an equal amount of effort in assisting all the claimants with whom she interacted.

Holland acknowledged to investigators that in some instances, after her initial phone call with a claimant through the Call Center, she would later call the claimant back. Holland cited some examples of why she called claimants back, including incidents when she and the claimant were disconnected or because a mother needed to deal with an issue with her child. Holland told investigators that she did not remember what her schedule was, or why she would call claimants back after her scheduled work hours. Holland told investigators that if they needed to verify her claims, investigators could contact Harte Hanks or others who were in possession of the recordings of her phone calls. When investigators told Holland that ODJFS claimed she improperly released PUA funds that should not have been disbursed, Holland responded that she followed the protocols and only released funds that she was permitted to release. Holland indicated that she was encouraged by supervisors to do all she could to help claimants. Holland noted that she did nothing that she was not asked, trained, and authorized to perform.

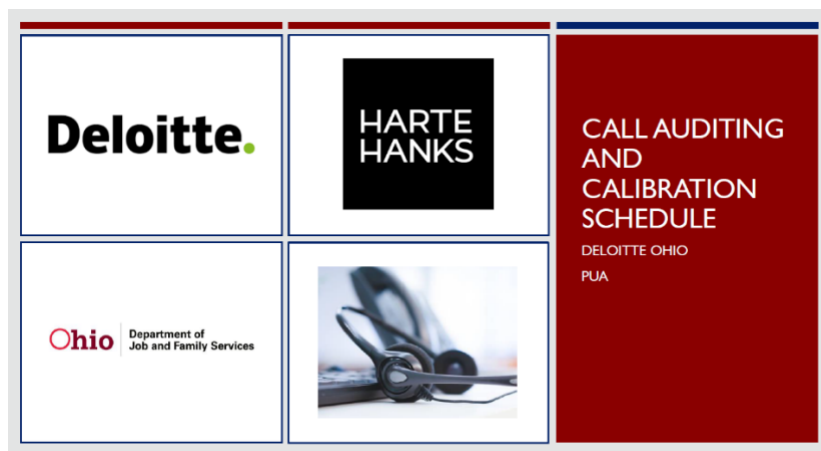
However, in contrast to Holland's understanding of her job duties, investigators were informed by Harte Hanks supervisory staff members that Holland's training and duties as a CSR call taker were limited to answering the calls during work hours and helping callers understand the issue(s) with their PUA claims. Harte Hanks stated Holland was permitted to inform callers of what documents were needed for their claims and to assist them in uploading those documents, but noted that Holland had no authority to clear issues, redetermine monetary status, or take any action on the claims that would release funds to the claimants.

Holland’s Training and Supervision by Harte Hanks

Harte Hanks employees Maria Garcia and Valery Alston agreed to be interviewed by investigators to obtain additional information regarding Harte Hanks’ supervision of PUA Call Center CSRs and Ericka Holland. Garcia became the Ohio PUA Operations Manager for Harte Hanks in the fall of 2020 (after Holland’s PUA employment and termination), and Alston worked as a supervisor for the CSRs subcontracted to work on the Ohio PUA project. Alston explained that each Harte Hanks supervisor generally managed 20 CSR call takers, and that her responsibilities as a supervisor included ensuring CSRs were active on the phones for the Call Center, and making sure that the CSRs were going to lunch and taking breaks at the appropriate times. Alston was also responsible for monitoring and evaluating her team’s PUA calls.

Garcia explained that a CSR’s calls were monitored by both the CSR’s supervisor and a Quality Assurance (QA) team. Supervisors were required to listen to a minimum of two calls per CSR per week and the QA team was to listen to five calls per CSR per week – for a total of seven calls to be monitored for each CSR per week. The CSRs were informed that their calls were recorded and could be monitored and evaluated, but the CSR was not aware at the time of a call whether someone was listening in on their call.

Training materials carrying the Deloitte, Harte Hanks, and ODJFS logos were provided to investigators. Below is an excerpt from those materials referring to the requirement that supervisors listen to and “audit” at least two calls per week for each of the CSRs they were supervising.



Two audits per agent per week (Additional audits if the agent needs coaching or is on Performance Improvement)

NOTE ON GRAPHIC ABOVE: Deloitte and Harte Hanks used the term “agent” rather than “CSR.”

Investigators requested and received Holland’s “Call Listening Survey” summary from Deloitte. Quality Assurance (QA) forms were used by Harte Hanks supervisors and the QA team to evaluate the work of Ohio PUA CSRs.¹⁴ The forms included the following evaluation categories to which an answer of “Yes” or “No” or a rating of 1 (worst) to 5 (best) was assigned to the CSR by either the supervisor or QA team member:

- Greet or thank the caller?
- Did the agent provide his/her name to caller?
- Did agent offer assistance?
- Did agent use proper transfer procedure?
- Did the agent properly verify the caller?
- Did the agent ask probing questions when necessary?
- Did the agent offer the most appropriate solution?
- Did the agent take ownership of the call?
- All issues and requests were correctly identified and resolved?
- Agent followed the correct procedures for placing the call on hold?
- Hold time did not exceed 2 to 4 minutes?
- Documentation was provided to caller with clear instructions for next step?
- Agent confirmed the details of the transaction with the caller?
- Agent did not interrupt or talk over the caller?
- Agent demonstrated active listening?
- Agent was empathetic to the caller’s situation?
- Agent addressed all issues raised during the contact?
- Agent made the caller feel valued?
- Agent closed the call properly?
- Agent offered further assistance at the end of the call?
- Rating of how the caller felt at the end of the call?
- Did agent resolve the issue?

¹⁴ Investigators were told that the individual CSR evaluation forms were no longer available.

The individual QA forms were then summarized into a report. From their review of Holland's QA forms related to her work on PUA claims, investigators found that only 18 of Holland's 1,459 phone calls were evaluated by her supervisor or a QA team member. Since Holland had worked the Call Center job for a total of seven weeks, at least 49 of her calls (two per week by her supervisor and five per week by the QA team) should have been reviewed and evaluated.

While the primary emphasis of the CSRs' training and call evaluations stressed providing customer service, empathy, and professionalism, the review of Ohio PUA calls required the Harte Hanks supervisor and QA team members to also evaluate the quality of the work performed by the CSRs on the claims they accessed in the uFACTS system.¹⁵ According to Alston, during training and individual weekly coaching sessions, CSRs were advised that they were not permitted to adjudicate any claim that resulted in the release of, or increase in PUA payments. Actions that were not permitted included voiding fraud designations, resolving identity and employment verification issues, and redetermining monetary activity. Alston also stated that during these training and coaching sessions, Call Center CSRs were further instructed that they were not to make outbound calls without a supervisor's approval, and that all the CSRs' PUA-related work was to be completed within their scheduled work hours.

While working under the supervision of Harte Hanks, CSR call takers were only permitted to work in excess of their eight-hour scheduled work hours when a previously answered call continued past their normal end-of-day work hours. Alston explained that she looked at the CSRs' work hours on a daily basis to confirm the hours were correct and they were being paid the correct amount for the time they were on the phone. The daily time reports included items such as the CSR's status and how many calls the CSR had taken each day.

To evaluate the level of supervision Harte Hanks' supervisors provided to CSRs, investigators obtained for review the log of Alston's access to uFACTS. Alston claimed to have listened to two calls per CSR per week while also checking the CSR's work in uFACTS for those calls. When comparing Holland's access/actions in uFACTS to Alston's access to uFACTS, there were only 11 claims that both Holland and Alston accessed. Of those 11 claims, six were accessed by

¹⁵ Calls of a general nature, not pertaining to a particular claim, would not have necessitated access to the uFACTS system by the CSR or review in uFACTS by the supervisor.

Alston prior to Holland's access, indicating that Alston did not review Holland's work. Of the remaining five of the 11 claims that both Holland and Alston accessed, Alston accessed one claim 47 days after Holland accessed it, which was a week after Holland was terminated. Investigators determined that only four claims were accessed by Alston at the same time or within two weeks of Holland's access, indicating a timely review of Holland's work.

In one of the claims that Alston reviewed in uFACTS, Holland had previously voided an identity verification issue (IDV). If Alston had thoroughly reviewed Holland's actions in uFACTS for this claim, Alston should have discovered that Holland was performing tasks and taking actions outside the scope of Holland's training and authority. In addition, if Alston had thoroughly reviewed a more significant portion of Holland's PUA work, she would likely have discovered that Holland was performing actions on the claims she accessed beyond the scope of Holland's training and authority. Holland told investigators that she was aware that her calls were recorded and spot checked. The failure by supervision to identify and correct Holland's improper actions served to implicitly support Holland's belief that she was properly performing actions on the claims she accessed as a CSR call taker.

Investigators contacted and interviewed Lindsay Payne who worked as a QA team member under Harte Hanks supervision and who listened to and evaluated Holland's PUA calls as part of her duties. Payne explained that in early 2020, she started working as a Keystaff¹⁶ employee assigned to the Ohio PUA project. She was trained and supervised by Harte Hanks. Payne initially worked as a PUA call taker and after about five weeks began working as a QA team member. As a QA team member, Payne was tasked with reviewing the calls of a group of CSRs assigned to one or more supervisors. Payne told investigators that she was responsible for evaluating the calls of 40 to 60 CSRs. Payne stated that initially she was expected to listen to 12 to 15 calls answered by the CSRs each day and their related claims activity in the uFACTS system. However, Payne noted to investigators that later, around the fall of 2020, she was tasked to listen to 26 calls per day. Investigators obtained the log of Holland's calls that were reviewed by the QA team. According to records provided by Deloitte, Payne was the only QA team member who evaluated Holland's claims calls and activity.

¹⁶ Keystaff is another staffing firm that provides candidates to companies in search of additional manpower. Harte Hanks subcontracted with Keystaff to provide CSRs to work on the Ohio PUA project.

When investigators compared Holland’s activity in uFACTS to Payne’s access to uFACTS, there were only seven claims that both Holland and Payne accessed. Of those seven claims, Payne accessed four of the claims before Holland’s access, indicating that Payne did not review Holland’s work in uFACTS on those four claims. Of the remaining three claims that both Holland and Payne accessed, Payne accessed one claim in uFACTS more than a month after Holland had accessed the claim, and just prior to Holland’s termination. Investigators determined that only two claims were accessed by Payne in uFACTS within a few days of Holland’s access and were within the proper time period that would allow for a timely evaluation of Holland’s work.¹⁷

Though Holland told investigators that she believed her phone calls and uFACTS actions on PUA claims were being monitored and evaluated, Harte Hanks failed to monitor Holland’s actions and took no action to notify Holland that she was acting improperly or to re-train her. Despite claims by Harte Hanks that procedures were in place to identify improper activity by CSRs, Holland’s improper actions and work performed outside of her scheduled hours were not noticed by her supervisor or the QA team until mid-August 2020 when Holland was terminated.

Harte Hanks provided to investigators Holland’s work schedule during her assignment to the Call Center:

HOLLAND'S WORK SCHEDULE	
DAY	HOURS
Sunday	Off
Monday	7am - 4pm EST
Tuesday	Off
Wednesday	7am - 4pm EST
Thursday	7am - 4pm EST
Friday	7am - 4pm EST
Saturday	9am - 5pm EST

¹⁷ While inspecting Payne’s actions in uFACTS, it was discovered that Payne filed and accessed a PUA claim belonging to a close family member using her uFACTS credentials. It was determined that Payne also accessed another close family member’s claim using her access to uFACTS. Access to both claims was a violation of the policy and training forbidding access to claims of friends, relatives, or acquaintances. However, an investigation by ODJFS into those two claims did not uncover any fraud on either claim.

Investigators obtained and evaluated a list of all accesses and actions taken by Holland on PUA claims in the uFACTS system, including dates and times. The uFACTS system logged 3,278 accesses and actions by Holland, and 1,405 of these accesses and actions, or 43%, occurred outside Holland’s scheduled work hours,¹⁸ including 342 accesses and actions that occurred on Tuesdays and Sundays, which were days she was not scheduled to work. Investigators discovered one incident when Holland had accessed the uFACTS system as late as 11:42 p.m. on July 31, 2020. Alston claimed to investigators that she had conducted a daily review of the work time records of her assigned CSRs. Investigators are unable to reconcile how Holland’s work activity outside of her scheduled work hours went unnoticed for the seven weeks she worked as an CSR call taker.

Holland uFACTS Accesses and Actions		
	Number	Percentage
During Work Hours*	1873	57%
Outside Work Hours	1405	43%
Total Accesses and Actions	3278	

Holland’s after-hours activity in uFACTS and outbound calls to claimants were not reported to ODJFS by Deloitte, Harte Hanks, or Randstad. ODJFS only discovered Holland’s improper actions when a search was conducted to investigate whether any of the subcontracted workers who were supervised or employed by Harte Hanks had voided fraud issues on claims. None of the Harte Hanks employees or subcontracted CSR workers (through Randstad, Keystaff, and others) had the authority or training to void fraud alerts on PUA claims.

Holland’s Personal PUA Claim

Holland filed her own claim for PUA benefits on July 8, 2020, while working full-time as an Ohio PUA Call Center CSR. However, Holland waited until July 21, 2020, to file to receive PUA payments. On July 24, 2020, Holland received a payment of \$10,257 in PUA benefits which was to cover a 13-week period, beginning with the week ending April 4, 2020, through the

¹⁸ Investigators allowed one-half hour before and after the assigned work hours for early starts and for calls that continued after the end-of-work hours.

week ending June 27, 2020. Since Holland was not hired by Randstad until June 28, 2020, she was not at that time claiming PUA benefits for the time she had been employed. However, a review of Holland's work history and the uploaded supporting documents indicate she was never eligible to receive PUA benefits because she had no qualifying work history and did not lose employment due to COVID-19.

On August 7, 2020, Holland filed another claim for PUA benefits to cover an additional six weeks beginning with the week ending February 16, 2020, through the week ending March 22, 2020. This time period covered the six weeks prior to the time period of her earlier claim for PUA benefits and was also prior to her employment with Randstad. On August 11, 2020, Holland received an additional payment of \$1,134 in PUA benefits for that claim. Again, while this claim did not overlap with the time Holland was working for Randstad, she was still not eligible to receive PUA benefits because she had no qualifying work history and did not lose employment due to COVID-19.

On July 2, 2020, Holland was paid only \$11.28 for one hour of work for Randstad for the week ending June 28, 2020. On August 16, 2020, Holland updated her earnings in her PUA claim to \$0 for the week ending July 4, 2020, even though she was employed and paid for one hour by Randstad during that period. On August 18, 2020, the day before Holland's employment was terminated, Holland was paid \$789 in PUA funds for the week ending July 4, 2020. While her employment earnings were minimal for that first week of her employment, Holland was not eligible for PUA benefits due to her lack of prior employment.

On August 23, 2020, three days after being terminated from Randstad, Holland filed a claim for PUA benefits for the seven weeks she was employed by Randstad (the week ending July 5, 2020, through the week ending August 16, 2020). Though Holland was paid \$3,291 by Randstad for her work as a PUA call taker, Holland fraudulently reported \$0 income for each of the weeks she was employed by Randstad. For those same seven weeks she worked for Randstad, Holland received a payment of \$3,123 in initial PUA benefits on August 25, 2020. However, later, Holland fraudulently reported an inflated prior income and ultimately received a total of \$8,380 in PUA benefits for the seven weeks she worked at Randstad.

The following chart shows Randstad’s payments to Holland for the seven weeks she was employed by Randstad as a PUA call taker and the total PUA unemployment benefit payments Holland received for the same time period:

Week Ending	Date Paid	Hours Worked	Net Weekly Pay from Randstad	PUA Received for Week
Sunday, June 28, 2020	Thursday, July 2, 2020	1	\$ 11.28	\$ 1,080.00
Sunday, July 5, 2020	Thursday, July 9, 2020	32.15	\$ 358.56	\$ 940.00
Sunday, July 5, 2020	Friday, July 17, 2020	Attendance Award	\$ 41.84	--
Sunday, July 12, 2020	Friday, July 17, 2020	42.64	\$ 487.57	\$ 1,080.00
Sunday, July 19, 2020	Thursday, July 23, 2020	40.52	\$ 452.93	\$ 1,080.00
Sunday, July 26, 2020	Friday, July 31, 2020	44.95	\$ 525.32	\$ 1,080.00
Sunday, July 19, 2020	Friday, July 31, 2020	Attendance Award	\$ 39.43	--
Sunday, August 2, 2020	Friday, August 7, 2020	42.40	\$ 483.65	\$ 780.00
Sunday, August 9, 2020	Friday, August 14, 2020	41.17	\$ 463.55	\$ 780.00
Sunday, August 16, 2020	Friday, August 21, 2020	21.54	\$ 241.62	\$ 780.00
Sunday, August 23, 2020	Friday, August 28, 2020	16.51	\$ 185.53	\$ 780.00
			\$ 3,291.28	\$ 8,380.00

After her employment with Randstad was terminated, Holland continued to file weekly PUA claims until September 4, 2021, when the PUA program ended. On March 9, 2021, Holland uploaded a fictitious Form 1099-MISC (see following photo) claiming income of \$55,386 in 2019.¹⁹

¹⁹ Investigators verified that the Form 1099 that Holland submitted to support her PUA claim was never filed with the Ohio Department of Taxation. The Payer was listed as Ericka’s Nanny Services using the same address and Social Security number as Ericka Holland, the Recipient. Holland actually earned no 2019 or 2020 income prior to February 2020 to support her claim for PUA benefits.

PAYER'S name, street address, city or town, state or province, country, ZIP or foreign postal code, and telephone no. Ericka's Handy Services Address (line 1): Cincinnati OH 45207		1 Rents \$ 0	OMB No. 1545-0115 2019 Form 1099-MISC	Miscellaneous Income
PAYER'S TIN RECIPIENT'S TIN		2 Royalties \$ 0	3 Other income \$ 0	
RECIPIENT'S name Ericka Holland Street address (including apt. no.) Address (line 1): Cincinnati OH 45207		4 Federal income tax withheld \$ 0	5 Fishing boat proceeds \$ 0	For Privacy Act and Paperwork Reduction Act Notice, see the 2019 General Instructions for Certain Information Returns.
Account number (see instructions) - Click To Add -		6 Medical and health care payments \$ 0	7 Nonemployee compensation \$ 55,386	
15a Section 409A deferrals \$ - Click To Add -		8 Substitute payments in lieu of dividends or interest \$ 0	9 Payer made direct sales of \$5,000 or more of consumer products to a buyer (recipient) for resale <input type="checkbox"/>	
15b Section 408A income \$ - Click To Add -		10 Crop insurance proceeds \$ 0	11 12	
16 State tax withheld \$ - Click To Add -		13 Excess golden parachute payments \$ - Click To Add -	14 Gross proceeds paid to an attorney \$ - Click To Add -	17 State/Payer's state no. STATE OH State State ID #:
18 State income \$ 0		19 State income tax paid \$ - Click To Add -		

Form 1099-MISC www.irs.gov/Form1099MISC Department of the Treasury - Internal Revenue Service

When Holland fraudulently submitted a false Form 1099-MISC, Holland was able to inflate her reported income on her PUA claim to substantially increase her PUA benefit payments. Holland's income was subsequently increased on her PUA claim and uFACTS automatically backdated Holland's increased income to the beginning date of her claim. Holland was paid an additional PUA benefit amount for all weeks for which a claim was previously filed and all weeks thereafter. In all, Holland received a total of \$56,780 in improper PUA benefits. Investigators noted that Holland did not use her PUA credentials while working as a CSR call taker to file or access her own claim in uFACTS.

When investigators asked Holland about collecting PUA benefits for herself, Holland stated she believed she received about \$10,000 to \$15,000 in PUA benefits. However, Holland stated that if the records indicated she was paid a total of \$56,780 in PUA benefits, she agreed that would be the correct total. Holland told investigators that she did not believe she had collected PUA benefits until after she was terminated from her employment with Randstad.

CONCLUSION

In 2020, because of the COVID-19 pandemic and the subsequent increased unemployment of millions of Americans, Congress passed various legislative programs to address the crisis, including the Pandemic Unemployment Assistance (PUA) program. The PUA program expanded and loosened eligibility unemployment requirements for recipients. Consequently, the increase in claims made it necessary for ODJFS to hire intermittent and temporary contracted or subcontracted workers to process these claims. ODJFS contracted with Deloitte as a vendor to provide additional staffing to help process the unprecedented number of unemployment compensation claims ODJFS received because of the COVID-19 pandemic. Deloitte subcontracted with Harte Hanks to provide additional manpower. Harte Hanks further subcontracted with Randstad to provide additional staff to handle the PUA claims. Harte Hanks provided the training and supervision of those subcontracted workers.

Holland's Work as a Subcontracted Customer Service Representative

On June 15, 2023, the Ohio Department of Job and Family Services (ODJFS) referred an allegation of wrongdoing to the Office of the Ohio Inspector General, the Ohio State Highway Patrol (OSHP), and the U.S Department of Labor - Office of the Inspector General (DOL-OIG). ODJFS alleged that a former Randstad employee, Customer Service Representative (CSR) Ericka Holland, improperly accessed and authorized payments on Pandemic Unemployment Assistance (PUA) claims. On June 28, 2020, Ericka Holland was hired by subcontractor Randstad as a CSR assigned to answer calls for the PUA Call Center under the supervision of Harte Hanks. Randstad terminated Holland on or about August 20, 2020, after Harte Hanks discovered that Holland was making outbound calls from the Call Center, which was prohibited without supervisory permission, and was working outside her scheduled hours. As a CSR call taker, Holland did not have authority to "adjudicate" or resolve any issues which could trigger a payment to a claimant or prevent a claim from being paid. Additionally, Holland did not have the authority to "redetermine monetary" status, which involved taking action to increase the weekly PUA benefit payments on a claim. ODJFS alleged Holland improperly took actions outside the scope of her training and authority in 393 PUA claims. ODJFS generated a report of Holland's activities from the Unemployment Framework for Automated Claim & Tax Services (uFACTS) software system and provided the report to the Office of the Ohio Inspector General for their review.

Investigators reviewed the records provided by ODJFS and determined Holland had improperly released PUA benefit funds on 126 of the 393 claims flagged for fraud, totaling \$3,247,402. Investigators found that Holland “voided fraud” alerts on PUA claims; cleared identity verification, program eligibility and other issues on PUA claims; and increased the reported income amounts for claimants – all of which were actions Holland was not permitted to perform in her position.

On March 7, 2024, investigators contacted Holland and she agreed to be interviewed. Holland admitted that when appropriate, she had voided fraud alerts and cleared issues on PUA claims and increased the monetary PUA benefits for claimants who contacted the PUA Call Center. Holland stated that she had been trained to take those actions and was encouraged by supervisors to do all she could to help claimants. Holland stated that when she found an issue on a claim that she believed she was not authorized to correct, she would forward that issue to the appropriate team of workers for resolution. Holland also admitted that, using the PUA Call Center phone system, she called some claimants back after speaking with them earlier in the day to provide updated information on the status of their claims, which she was not authorized to do without a supervisor’s prior approval. Holland said that she did not receive any payments from claimants in exchange for her assistance and claimed she did not collect PUA benefits while employed by Randstad. Holland said she believed her work was being monitored and evaluated by her supervisor and Quality Assurance (QA) team.

Investigators subpoenaed and evaluated Holland’s bank records and personal cell phone records for any evidence of financial gain, motive, or a personal relationship with any of the claimants whose claims were accessed by Holland and flagged for fraud. Investigators found no evidence that Holland knew or had a personal relationship with any of the callers. Additionally, investigators found no evidence of profit or collusion with co-conspirators and none of the claimants’ phone numbers appeared on Holland’s personal phone records.

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

Holland's Training and Supervision

Though Harte Hanks was responsible for supervising, monitoring and evaluating Holland's PUA assignment, investigators found Harte Hanks supervisors reviewed very little of Holland's work activity. Investigators learned that a CSR's calls were monitored by both the CSR's supervisor and a Quality Assurance (QA) team. Supervisors were required to listen to a minimum of two calls per CSR per week and the QA team was required to listen to five calls per CSR per week – for a total of seven calls to be monitored for each CSR per week. Supervisors were also required to review the CSR's work in the uFACTS system related to these calls. The CSRs were informed that their calls were recorded and could be monitored and evaluated, but the CSR was not aware at the time of a call whether someone was listening in on their call.

However, during the approximately seven-week period Holland worked for Randstad, Holland's supervisor only accessed four claims to review, and the QA team accessed only two of the 791 claims Holland accessed (about 3/4 of 1%) in uFACTS at the time of or within two weeks of Holland's work on the claims. Quality Assurance evaluations related to Holland's work emphasized professionalism and compassion toward callers but did not directly evaluate or address the quality of Holland's work product on PUA claims. Though Holland told investigators that she believed her phone calls and uFACTS actions on PUA claims were being monitored and evaluated, Harte Hanks failed to monitor and evaluate Holland's actions in the uFACTS system and took no action to notify Holland that she was acting improperly or to re-train her. Despite claims by Harte Hanks that procedures were in place to identify improper activity by CSRs, Holland's improper actions on PUA claims were not noticed by her supervisor or the QA team and was only discovered by ODJFS long after Holland was terminated by Randstad. Additionally, investigators determined that 43% of Holland's accesses to the uFACTS claims system occurred more than one-half hour after Holland was scheduled to end her workday. It took seven weeks for Holland's Harte Hanks supervisor to notice that Holland was improperly working outside of her scheduled work hours. Investigators concluded that Harte Hanks' insufficient supervision and a lack of effective quality control allowed Holland to routinely release PUA funds to ineligible claimants. Additionally, investigators concluded that Harte Hanks lack of appropriate oversight and evaluation of Holland's work product led Holland to believe that she was acting in accordance with her training and authority. Investigators determined that adequate supervision and review of Holland's work product would have likely

led to the discovery of her improper actions much sooner – preventing or markedly reducing the improper release of over \$3.2 million in PUA funds.

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

Holland’s Personal PUA Claim

Investigators discovered that Holland had filed a claim for PUA unemployment benefits for which she was not eligible. Holland’s ineligible PUA claim and the benefits she received included the time period she worked for Randstad as a PUA CSR. Investigators also discovered Holland had fraudulently submitted a false Form 1099-MISC to inflate her reported income on her PUA claim and substantially increase her PUA benefit payments. Investigators determined Holland received in total, \$56,780 in improper PUA benefits. Investigators verified that Holland did not use her PUA credentials while working as a CSR call taker to file or access her own claim in uFACTS.

Accordingly, the Office of the 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 the recommendations will be implemented. The Ohio Department of Job and Family Services should:

- 1) Review the PUA claims relating to this investigation and take the appropriate steps to recover the overpayments issued for each claim.
- 2) Develop safeguards and supervision protocols to prevent employees and contractors from exceeding the scope of their training and authority.
- 3) Provide or require supervision adequate to detect actions outside the training and authority of an employee or contractor.

REFERRAL(S)

The Office of the Ohio Inspector General is referring this report of investigation to the Hamilton County Prosecuting Attorney and the Ohio Auditor of State for consideration.



STATE OF OHIO
OFFICE OF THE INSPECTOR GENERAL

RANDALL J. MEYER, INSPECTOR GENERAL

NAME OF REPORT: Ohio Department of Job & Family Services

FILE ID #: 2023-CA00010

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
October 24, 2024

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