

To Whom It May Concern,

On behalf of the membership of the Professional Logging Contractors of Maine (PLC), I am writing to provide comments regarding the work of the UI Stakeholders Group, which was created by Public Law 2021, Ch. 456, "An Act To Amend the Laws Governing Unemployment Compensation,". The PLC was invited to participate as a stakeholder on the group but would like to provide further comments to be included in the public record for consideration in the final report that is presented to the Maine Legislature.

For background, the PLC is a trade association that represents logging and associated trucking contractors throughout the state of Maine. The PLC was formed in 1995 to give independent contractors a voice in a rapidly changing forest industry. As of 2017, logging and trucking contractors in Maine employed over 3,900 people directly and were indirectly responsible for the creation of an additional 5,400 jobs. This employment and the investments that contractors make contributed \$620 million to the state's economy. The PLC membership, which includes 200 contractor members and an additional 100 associate members, employs over half of the individuals who work in this industry and is also responsible for 80% of Maine's annual timber harvest.

The PLC's comments here will pertain to the highlighted areas of responsibility (below) of the stakeholder group as identified in public law:

D. Methods to streamline and facilitate application for unemployment insurance benefits that will increase access for unemployed workers, simplify reporting requirements for employers and determine any clarifications or modifications that may be needed related to the submission of partial unemployment claim forms in accordance with Title 26, section 1194, subsection 1-A;

E. How an employer liaison contract might be designed to provide assistance to the business community in interacting with the unemployment insurance program, focused on the goal of reducing administrative burden and improving user experience, including recommendations of a funding source to support such a contract;

F. Whether unemployed individuals have completed reemployment services and eligibility assessment with the Department of Labor within the prior 5 years and whether these individuals should be considered to have good cause for not participating in reemployment services and eligibility assessment under Title 26, section 1192, subsections 2 and 13; and

G. Any software or technology issues contributing to delays, claims processing issues and paperwork burden to businesses that may be resolved through technological means or any ways to promote improved claimant or employer user experience and interface with the unemployment insurance system.

In response Section D. and Section G above, the PLC surveyed its membership to solicit their feedback as small businesses and on behalf of their employees with respect to the UI system. The following is a summary of the survey as well as the responses:

1. 200 small businesses were surveyed, and the PLC received 40 responses.

2. Respondents were from Avon, Bowerbank, Fort Kent, Hancock, Harmony, Hermon, Jackman, Jay, Lee, Livermore, Lowell, Madawaska, Mexico, Milford, Millinocket, Naples, Old Town, Poland, Portage, Porter, Saint David, Smithfield, Smyrna Mills, South china, Wallagrass, Waltham and Weston. Several responses came from businesses that operated in the same community as another.
3. Questions posed on the survey were as follows: a) Do your employees have difficulty applying for unemployment during mud season; b) If yes, what are the problems they face; c) Does your company have difficulties verifying employment with the Maine Dept. of Labor?; d) If yes, please describe the problems you have; e) Have your employees encountered challenges with the work search requirement and the six week work search waiver provided to job attached employees; f) If yes, what are the challenges; g) Are there other parts of the unemployment system that do not work well for your company and if so, what are your recommendations for change?
4. Date on respondents and sample responses to each question are provided here:

Question A – 60% of respondents said yes, their employees have difficulty applying for unemployment during mud season

Question B – if they said yes to Question A, respondents provided the following responses:

The whole sign up then the long delay before benefits...we pay in and it's hard to get any back

They went 6 weeks without pay

Nobody answers telephone

Work search when there is no work available in the woods.

It is extremely difficult for them to file for benefits, there are always problems with the unemployment

Not being able to login or more so talk to a person directly

Takes time to get their first check and wait a lot to talk to someone

Starting a claim (new or continued of previous year) and work search

Reapplying same answers every year for the same reasons when their gonna come back to work for sa

Need in person support again in offices at close proximity and when making a phone call having someo

Trying to contact someone in the unemployment office

If they have to call I believe that there are sometimes long wait times

They need to have someone to talk to.

Long waits and seems things get delayed on the states side

Getting kicked out of the system

Calling unemployment no answer or short time. Unable to get the online system to work due to lack o

having to prove identity has been a big problem for some, takes weeks at times to get it straightened o

Problems with the technology being used to apply for benefits. Big problems with their website and b

Unemployment department hard to get a hold of due to small hours of phone operations

Question C – Only 10% of respondents stated that they had challenges verifying employment

Question D – Those who did respond yes to Question C stated the following, “I called them, I emailed everything to them several times and they still took 6 weeks to give them anything,”

“Unemployment often asks for the same verification multiple times even though we have to respond in the electronic SIDES system.”

Question E – 60% of respondents said yes, their employees have encountered challenges with the work search requirement and waiver process.

Question F – If they said yes to Question E, respondents provided the following responses:

They told them we would be going back in the woods when allowed, but, still had to go around and look for work

Confusion over rules

Can't use the same employers for work search, even though they are going back to work.

Knowing when, or if they should. It is my understanding that for six weeks employees do not have to file a work search waiver, but if they are granted a waiver for beyond those six weeks.

A few never got their checks when calling they were told they had to look for work. They would tell them they were not eligible.

No option for a green slip week

No work in our field of employment at that time of year

Question G – Are there other parts of the unemployment system that do not work well for your company.....? Here is a sample of the responses:

they maybe should be quicker about paying people after they are sent all the paperwork

Not all employees use computers, add more state workers to answer phones

When we are told we don't need to do a work search for a few weeks. Then they refuse to pay you because you didn't do a work search.

It should not be so hard to talk with someone who is knowledgeable about my employees claims.

Yes, employers are not able to get logged in in order to help our laid off employees

Accessibility!!!

Many! Need more knowledgeable personnel for sure. Application has too many questions. Stop writing questions that's too much! Hard working punctual dependable flexible self-taught loggers shouldn't be put in the same bucket as people who are not.

Can't get through to call center.

They need to totally abandon their reemployment website with is NOT very user friendly and design something that is more user friendly (a user friendly website would help. Using what they have now is challenging, exasperating - even if you are computer and internet savvy).

Employees who have gone to work for someone else and then claim unemployment, at times it has been challenging to get them back on track.

With respect to Section E. above, “How an employer liaison contract might be designed to provide assistance to the business community in interacting with the unemployment insurance program, focused on the goal of reducing administrative burden and improving user experience, including recommendations of a funding source to support such a contract,” the PLC is in opposition to having an employer liaison at the Maine Dept. of Labor for the time being. It will add further cost to the employers to fund such a position and may/may not have positive benefits for the employers in the state.

With respect to section F. above, “Whether unemployed individuals have completed reemployment services and eligibility assessment with the Department of Labor within the prior 5 years and whether these individuals should be considered to have good cause for not participating in reemployment services and eligibility assessment under Title 26, section 1192, subsections 2 and 13; the PLC and its members were strong supporters of having this provision included in law in 2018. For unemployed individuals who are job attached and return to the

same position year after year, it is not necessary to have those employees participate in reemployment services more than once every five years. If the employee was not job attached, then certainly, gaining the assistance of reemployment services such as training might be warranted, but not for an individual who has been laid off due to no fault of their own and the fact that they will return to their employer following the seasonal layoff.

Thank you for the opportunity to provide comments on this stakeholder process. If you have any questions regarding our comments or if I can provide any further information, please do not hesitate to contact me.

Best,

Dana

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