DEPARTMENT OF LABOR AND INDUSTRY

Memo

Date: May 1, 2025
To: NHWSB Data Workgroup
From: Leah Solo, Executive Director, NHWSB

RE: Unemployment Insurance Data

The Data workgroup, and the NHWSB (the Board) as a whole, have been working to plan for the Board's data needs as it reviews the impact of current standards, and prepares for potential future standards or amendments, pursuant to Minn. Stat. § 181.213, subd. 3.. This includes needs for ongoing market conditions investigations, data points that could serve as a baseline for future comparisons, and data that could help the Board determine the efficacy of its standards. One of the most perplexing challenges has been wage data, as there seems to be no perfect, consistently gathered data for the Board to examine. Despite the challenges, we have continued to search for data on wages by occupation and geography, as required by Minn. Stat. § 181.213, subd. 2(b)(1).

In the Board's first investigation in 2023-2024, the Board considered Unemployment Insurance (UI) employer and wage detail data that DLI has access to through a data sharing agreement with DEED, but it was determined that one time data from the workforce incentive grants was more accurate and available to the Board through DHS. Given the importance of wage data and that the workforce incentive grant data was a one-time snapshot, it seemed worthwhile to examine the UI employer and wage detail data a second time to see if UI data could be useful to the Board going forward.

Unemployment Insurance Data

DLI has some access to UI data reported by employers about their industry, locations, and employee wages. I worked with DLI staff to understand what could be accessed. Using UI data, DLI staff generated a list of employers reporting their industry as NAICS ([North American Industry Classification System (NAICS) U.S. Census Bureau](#)) code 623110 (Nursing Care Facilities), which included over 700 entries of companies that that have an active UI account with a primary industry of NAICS code 623110.

In order to determine if the data under this code would be helpful to determining wages of nursing home workers that fall under NHWSB statutes, I analyzed the data to understand the percentage of the entries in the list that were from nursing homes or nursing home related organizations and also the percentage of nursing homes that reported under that NAICS code. To do this, the data was sorted in a number of ways.

1. A list from Minnesota Department of Health's provider directory was created by using this webpage: [Health Regulation Division: Health Care Provider Directory - MN Dept. of Health](#), choosing "nursing

home" in step 1 and #4 (select all) in step 2. Similarly, additionally, the list for Boarding care homes was pulled.
2. The lists were merged and compared by address and name.
3. It was noted if the entries from the MDH list had a corresponding entry in the UI list. The reverse was also noted.
4. It was also noted if a facility was reimbursed under 256R.

Results

The items in the list were counted. Here are some results.

Table

Item	number	Percentage
Entries of Nursing Facilities or Boarding Care Homes reimbursed under 256R (MDH list)	328	100%
Entries in the UI list under 623110 (UI List)	708	100%
Facilities from the MDH list with no clear corresponding entry in the UI list	115	35%
Entries on UI list with no clear corresponding entry in the MDH list	368	52%
Entries on UI list potentially tied to a nursing facility, but not clearly so	58	8%

The results above indicate that over a third of the nursing homes that fall under the NHWSB are not clearly represented in the UI data. Additionally, up to 60% of the entries in the UI list are not obviously related to a nursing home that falls under the NHWSB statutes.

Limitations of data

In examining the data, the searches included address comparison and name of organization comparison. The UI data are self-reported, raw administrative data so there could be missed matches due to inconsistencies in their UI account information such as old names and addresses. There could be other matches between entries in the two lists if there was more data to compare, for instance if both lists had employer identification numbers. This could show that more organizations were included in the lists.

Conversely, some of the matches could be organizations that do not fall under the NHWSB statutes. For instance, though an entry was at the same address, it could represent staff that are present at an assisted living at the same address. This would mean a smaller percentage of the UI list represents nursing homes that fall under the NHWSB statutes.

This was done with a manual process with no unique identifier between the lists, so matches could have been missed due to human error and inconsistencies in data reporting to UI and MDH.

Conclusion

Based on prior investigations, the Board was already informed that examining the UI data would be limited because UI data cannot be divided by occupation. At best, the UI data can provide data on the nursing home industry as a whole. Further review of the UI data that the Board could potentially access indicates that data from this list could represent up to 60% non-nursing facility data. Because of the inability to extricate relevant data from irrelevant data, as well as the inability to gather specific wage data from UI data, it would be reasonable for the Board to conclude, as it previously did during the 2023-2024 investigations, that this data source would not be sufficient on its own for the next market conditions investigation.