

## **Supporting Statement for the Statewide Automated Child Welfare Information System (SACWIS) Assessment Review Guide**

### **A. Justification**

#### **1. Circumstances Making the Collection of Information Necessary**

It is necessary to collect the SACWIS Assessment Review information from States to assess if the large amounts of Federal funding used to design, develop and implement these projects resulted in an efficient, effective and economical case management information system. Furthermore, by collecting this information, the Administration for Children and Families (ACF) can determine if the system design complies with SACWIS requirements, which would allow the State to claim significant amounts of additional Federal funds for operating and maintaining a SACWIS compliant system. If a State operates a SACWIS compliant system, it may claim all expenditures necessary to operate the information system without regard to whether the system may be used to administer State funded foster care and adoption assistance programs. If the State has not implemented a SACWIS compliant system, it would be required to repay incentive funds paid to develop the system and pay a greater share of the ongoing expenses to operate the system. Finally, as the primary source of information reported to the Federal government, it is critical that ACF evaluate these systems to determine that they are being utilized and that the information reported to ACF, and ultimately Congress, is reliable. This is particularly true as ACF implements its Child and Family Service Review (CFSR) process. The information necessary to conduct CFSR reviews is largely dependent on the systems being evaluated with the use of the assessment form for which we are requesting OMB approval.

The purpose of this request is to obtain OMB's approval of the estimated burden hours for reporting and record keeping requirements contained in the attached Statewide Automated Child Welfare Information System (SACWIS) Assessment Review Guide. SACWIS Assessment Reviews are conducted under the authority of 45 CFR 1355.55 and the Omnibus Budget Reconciliation Act of 1993 (OBRA 93). In addition, under 45 CFR Part 95, Subpart F, the ACF has an established responsibility to review major State systems development efforts paid for with Federal title IV-E and IV-B funds. OMB previously approved ACF's reporting and record keeping requirements contained in the SACWIS Assessment Review Guide on February 18, 1998, reinstated this approval on May 8, 2002 and on July 06, 2005.

#### **2. Purpose and Use of the Information Collection**

States submit the completed SACWIS assessment review questionnaire to ACF. OBRA 93 requires that ACF continually review, assess, and inspect the planning, design, and operation of SACWIS systems to determine how such systems meet and continue to meet the requirements imposed by OBRA 93 and 45 CFR 1355.

The procedures and information requirements contained in the assessment guide will allow State and Federal officials to determine if State SACWIS systems meet applicable statutory and regulatory requirements. This determination will allow the State to claim additional funds to operate a SACWIS compliant system.

The primary purpose of the information collection is to assess SACWIS compliance. Since our last OMB approval of this collection instrument, ACF has conducted 2 SACWIS assessment reviews, bringing the total number of States to participate in the SACWIS assessment review process to 31. ACF has been able to accomplish its goal of assessing the target system's compliance with SACWIS requirements.

Once a State's SACWIS Assessment report has been finalized, it is available to other States as a resource in determining if the target system of the report could be used as a transfer system to the interested State. The general information collected in the first part of the SACWIS Assessment Review Guide has been shared with a number of States as they consider their options for developing a child welfare case management information system and to respond to inquiries from their own State legislatures. ACF has also produced technical assistance products and presentations from the information collected through this process. Also, because the collection effort focuses on using documents prepared as part of the normal development cycle (e.g., training manuals, user guides, and data element dictionaries) ACF is able to share these documents with other interested States.

### 3. Use of Improved Information Technology and Burden Reduction

The State agency is encouraged to provide the questionnaire in an electronic format, and may at their option, provide the supporting documentation electronically. It has been our experience that States prefer to submit the questionnaire electronically. We believe all States will continue to use this option. The questionnaire is supplemented by existing documentation produced by the State as part of its project. This approach was adopted in order to reduce the overall collection burden while maintaining appropriate Federal oversight of these large child welfare related information systems. States are asked to briefly describe how the target system supports a specific functional component in the questionnaire, and to refer the reader to existing documentation for additional detail (e.g., User Training Manuals, User Guides, Design documents, and Requirements Analysis documents, prepared by the State as part of their implementation effort). This has the added benefit of allowing ACF to share these documents with other States that request them.

### 4. Efforts to Identify Duplication and Use of Similar Information

The information collection is unique to 45 CFR 1355.55 and OBRA 93.

### 5. Impact on Small Businesses or Other Small Entities

The collection of information requirements does not involve small businesses or entities.

### 6. Consequences of Collecting the Information Less Frequently

An Assessment Review will be completed for each SACWIS type system developed. Once the review has been successfully finished and the system has been determined to meet the requirements at 45 CFR 1355.53, a State would not be required to participate in another

SACWIS Assessment Review process until such time that a subsequent SACWIS development effort has been completed. These reviews are usually initiated by the State; however, ACF reserves the right to initiate SACWIS Assessment Reviews, at any time in the system life cycle.

HHS cannot fulfill its obligation to effectively serve the nation's Adoption and Foster Care populations, nor report meaningful and reliable information to Congress (Adoption and Foster Care Analysis and Reporting System (AFCARS) required by section 479(b)(2) of the Social Security Act, and CAPTA reporting requirements) about the extent of the problems facing these children or the effectiveness of various methodologies designed to provide assistance to this population, without access to timely and accurate information. Forty-three States and the District of Columbia have developed, or are developing, a SACWIS with extensive Federal Financial Participation (FFP). Considering the importance of the information being gathered by these systems, the amount of FFP used to develop them, the one-time nature of the review, the possibility that incentive funds will need to be recouped and the regulatory citations to conduct these types of reviews (45 CFR 95.621 and 1355.55), it is critical that the Federal government develop a standard format to conduct these reviews.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

The collection of information does not involve any special circumstances.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

No comments were received from the first Register Notice.

9. Explanation of Any Payment or Gift to Respondents

No payment or gift is provided to respondents, other than remuneration of contractors or grantees.

10. Assurance of Confidentiality Provided to Respondents

Once the report is finalized, the information collected and records maintained are not of a confidential nature.

11. Justification for Sensitive Questions

The required information collection does not involve asking questions of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

Number of respondents (annually) - approximately 1. The number of annual reviews will decline as the number of States that have completed the Assessment review increases.

Frequency of Response - A State will only need to complete a SACWIS Assessment review one time during a SACWIS system development effort.

Basis - The number of annual reviews is based on the number of States implementing this type of system, the Federal resources available to conduct these reviews and the scheduled implementation dates of these systems (as reported in the State's approved Advance Planning Document).

As part of ACF's review of several SACWIS systems, ACF requested comments from the participating States. All of the States had positive comments about the approach. Based on the information ACF received from Utah, Nebraska, and Idaho, ACF revised the burden estimate to 200 (adjusted from an average of 250 hours from respondents) to complete the Questionnaire.

UT (40 hours) – Jack Green (801) 538-4466  
 ID (100 hours) – Frank Sessek (208) 334-5520  
 NE (400 hours) – Margo Gamet (402) 471-9318

One person completed the questionnaire in the State of Utah. The State of Idaho divided the task among a small team. The State of Nebraska used a larger team to complete the SACWIS questionnaire, and this resulted in a higher burden estimate for their State. Everyone that has expressed an opinion of the Assessment Review Guide has been supportive of our plans to use existing State documentation as an integral part of the review. Our approach to these reviews is based on the premise that certain documentation is developed as part of any major system development effort. By using this pre-existing documentation, the State's actual burden is limited to gathering the documentation and briefly describing the functional processes that are then cross-referenced to the existing documentation. Furthermore, the regulations at 45 CFR 95.61 7 give the Federal government access to documentation developed with Federal Financial Participation.

This request is for a single document.

Basis - We estimate that it will take approximately 12 hours to review the guide, 8 hours to identify the necessary documentation and 180 hours to prepare a brief summary of the different functional processes, assemble the responses, and review the completed questionnaire. This is based on experience in using the review guide and informal comments from States that completed the guide.

<b>Instrument</b>	<b>Number of Respondents</b>	<b>Number of Responses</b>	<b>Average Burden Hours</b>	<b>Total Burden Hours</b>
SACWIS Assessment Review Guide	1	1	200 hours	200 hours
<b>Total</b>				<b>200 hours</b>

### 12.1 Respondents' Cost for Hour Burden

The estimate of costs to respondents is based on the following assumptions:

- The average salary of an employee completing the Guide is \$64,000 annually / 2080 hours = approximately \$30.77 per hour.
- The request is for a single document.
- There will be approximately one respondent per year.

Item	Total Burden Hours	Cost per Hour	Total Cost
13. Annualized Costs to Respondents for Collection of SACWIS Information	200 hours	\$30.77	\$6,154.00
<b>Total</b>			<b>\$6,154.00</b>

Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no additional direct costs to respondents.

The information provided under this reporting requirement should be available to States during the course of good project and contract management, regardless of the federal reporting requirements. States will not need to incur additional costs, of the nature to be reported under this item, to meet these requirements. As such, the staff time needed to gather and format this information for submission to ACF is the principal burden of this requirement (see item 12).

14. Annualized Cost to the Federal Government

The estimate of cost to the Federal government is based on the following assumptions:

- The average salary of staff reviewers is \$80,000 annually / 2080 hours = approximately \$38.46 per hour.
- Activities are broken down into the following categories:
  - pre-review staff time – calls, letters, e-mails, and document review;
  - visit/review staff time – onsite activities;
  - post-review staff time – coordination with State, draft and final reports; and
  - travel – approximately \$1,500 per person per visit.
- Estimates are based on previous experience conducting SACWIS Assessment Reviews.

	<b>Steps to Complete SACWIS Assessment Review</b>	<b>Total Activity Hours</b>	<b>Cost per Hour</b>	<b>Staff</b>	<b>Federal Cost</b>
15.	Pre-review	45 hours	\$38.46	4	\$6,922.80
	Review	40 hours	\$38.46	4	\$6,153.60
	Post-review	40 hours	\$38.46	4	\$6,153.60
	Travel	N/A	\$1,500 per staff trip	4	\$6,000
	<b>Total</b>	<b>125</b>	<b>\$38.46</b>	<b>4</b>	<b>\$25,230 (including travel)</b>

Explanation of Program Changes or Adjustments

ACF initially estimated that we would complete six SACWIS Assessment Reviews per year. We now expect to complete an average of one review per year. The current estimate of 200 hours is based on the comments we received from three States that completed the SACWIS Assessment Review Guide. The estimate received from the respondents averaging 250 has been adjusted to an average of 200 hours based on past knowledge and experience with the States. Also, please note that salary bases for both State and ACF identified in #12 and #14 have increased since the 2005 OMB Clearance submission.

16. Plans for Tabulation and Publication and Project Time Schedule

Not applicable.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submission

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

The information collection requirements outlined in this report do not employ the use of statistical methods.