

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

### **A. Justification**

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

The SARG provides for collection of information from States regarding the functionality and performance of their statewide automated child welfare information systems (SACWIS) and begins the process of a SACWIS assessment review (SAR). The SAR allows the Administration of Children and Families (ACF) to assess if the Federal funding used to design, develop and implement a State's SACWIS resulted in a State's development and implementation of an efficient, effective and economical case management information system. The information in a SARG also enables the Administration for Children and Families (ACF) to determine if the system design complies with SACWIS program and regulatory requirements, which allows the State to claim enhanced Federal funds for operating and maintaining a SACWIS compliant system. Thus, this data collection is required to permit the State to obtain or retain benefits.

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.

SACWIS systems serve as the primary source of State-level child welfare information reported to the Federal government. Section 476(b) of the Social Security Act requires that States submit statistical reports for child welfare populations, and Section 479 of the Act details State responsibilities to report specific information related to child abuse and neglect. CFR 1355.52 provides funding authority for statewide automated child welfare information systems (SACWIS) that meet Federal requirements for child welfare data collection. In §13713 of the Budget Reconciliation Law of 1993, the law provides for the payment of enhanced match for automated data systems that "meet the requirements" for that child welfare information collection.

If a State chooses to implement a SACWIS, that system serves as the primary data source for Federal reporting. States use their SACWIS to provide data for the following Federal child welfare-related reporting requirements: the Adoption and Foster Care Analysis and Reporting System (AFCARS) required by section 479(b)(2) of the Social Security Act; the National Child Abuse and Neglect Data System (NCANDS); Child Abuse Prevention and Treatment Act (CAPTA); and the Chafee Independent Living Program's National Youth in Transition Database (NYTD). SACWIS data outputs also support the Child and Family Service Review process and Title IV-E reviews.

ACF's evaluation of these systems within the context of a SACWIS Assessment Review determines that they are being utilized as intended, that their information outputs are

accurate, complete, and reliable, and that they thus may receive enhanced match for ongoing system operations and maintenance.

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 Assessment Review Guide (SARG). 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, on July 06, 2005, and on August 18, 2008.

## 2. Purpose and Use of the Information Collection

The primary purpose of the information collection with a SACWIS assessment review guide (SARG) is to assess SACWIS compliance. As part of the preparation for a SACWIS Assessment Review, States submit the completed SARG 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 functional and process information about the SACWIS systems as documented in the assessment guide helps ACF staff review the system's compliance with statutory, regulatory and program requirements. This determination will allow the State to claim enhanced Federal funds to operate a SACWIS compliant system.

Since the last OMB approval of this collection instrument, ACF has conducted 5 SACWIS assessment reviews, bringing the total number of States to participate in the SACWIS assessment review process to 36. By using the SARG as a data collection instrument to support the review process, ACF has been able to accomplish its responsibilities of assessing the target States' system compliance with SACWIS requirements. The SARG serves a dual purpose: as a baseline document for States to complete prior to the assessment review and is also used to summarize Federal reviewers' comments to the State.

Because a SARG provides detailed system documentation, it provides Federal analysts with a resource for state-to-state technical assistance and information sharing. After 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 may be used as a potential transfer system; it may also serve as a model for the level of detail and approach to SARG completion. The findings documented in the SARG also provide ACF with a basis for the development of training and technical assistance products and presentations.

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

The SARG questionnaire is made available to States in electronic format. The State agency is encouraged to submit the SARG questionnaire in electronic format, and to provide the supporting documentation electronically. It has been our experience that States prefer to submit the questionnaire electronically and we believe that responding States will continue to use this option.

The SARG questionnaire is supplemented by existing documentation produced by the State as part of its project work. This approach was adopted in order to reduce the overall collection burden while providing Federal analysts with comprehensive documentation allowing appropriate Federal oversight of these large child welfare 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 that have been prepared by the State as part of their implementation effort). The submission of the additional documentation has the added benefit of allowing ACF to share these documents with any other State that requests them.

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

The information collection is unique to 45 CFR 1355.55 and OBRA 93; there is no similar information.

#### 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

A SARG is completed, and an Assessment Review performed one time upon completed implementation of a State's SACWIS system development. A SACWIS Assessment Review is typically initiated by the State upon full system rollout; however, ACF reserves the right to initiate SACWIS Assessment Reviews at any time in the system life cycle. After the review has been successfully finished and the system is determined to meet the requirements at 45 CFR 1355.53, a State is not required to participate in another SACWIS Assessment Review process unless a subsequent SACWIS development effort has been undertaken and completed.

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 required child welfare 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 and necessary that the Federal government develop a standard format to conduct these reviews. As noted, the timing of a review, and the decision to undertake completion of review forms is typically initiated by the participating State.

#### 7. Special Circumstances Relating to the Information Collection

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 publication of the Federal Register notice on January 11, 2011. After the publication of the subsequent notice on April 12, two States requested copies of the draft updated SARG; neither has provided additional input after reviewing the documents and learning the limited content of the proposed 2011 updates. The SACWIS review process, and content of the SARG document have been substantially unchanged for over 15 years. The SARG information collection process is primarily a compilation of existing system design or development documentation, and requires little original material or detailed analysis. ACF maintains frequent communication with State SACWIS managers—the individuals who oversee SARG completion—through an annual meeting and a series of SACWIS managers’ calls approximately 10 times per year; Federal analysts also schedule one call per month with their assigned State SACWIS managers. This frequent communication affords the opportunity to consult with States regarding the content, completion, and approaches to the completion of the SARG. While a State is completing a SARG, State staff typically discusses their progress and ask questions about any aspect of SARG completions with their assigned Federal analyst. Because SARG completion is a longstanding and familiar process, and subsequent submissions are incremental additions, rather than the development of fully original content, we do not receive common complaints or protests about the SARG information collection process.

9. Explanation of Any Payment or Gift to Respondents

No payment or gift is made to respondents in regard to this information collection.

10. Assurance of Confidentiality Provided to Respondents

The information collected, the SARG, and the SACWIS Assessment Review report are not considered of a confidential nature; no assurance of confidentiality is provided to respondents.

11. Justification for Sensitive Questions

No sensitive questions are included in the SARG.

12. Estimates of Annualized Burden Hours and Costs

The estimates of the hour burden reflect three State respondents completing one form per year with an annual burden of 250 hours each. Each responding State will complete a single SARG form as part of this information collection. For a data collection universe of three States, the total annual burden hours total 750.

ANNUAL BURDEN ESTIMATES

INSTRUMENT	NUMBER OF	NUMBER OF	AVERAGE	TOTAL
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	RESPONDENTS	RESPONSES PER RESPONDENT	BURDEN HOURS PER RESPONSE	BURDEN HOURS
SARG	3	1	250	750
Estimated Total Annual Burden Hours: 750				

The time involved including accessing records within project files, collecting or abstracting relevant information, and assembling and referencing any other information necessary to complete the SARG is included in this estimate. We estimate that it will take each State's preparers approximately 12 hours to review the guide, 8 hours to identify the necessary documentation and up to 230 hours to prepare a brief summary of the different functional processes, assemble the SARG document, and review the completed questionnaire. This is based on experience in using the review guide and informal comments from States that have completed the guide.

This estimation does not include staff time spent during the onsite visit to a State for a SACWIS assessment review. The onsite visit typically consists of a detailed demonstration of the system's functionality, and brief meetings with user staff who are asked to show the Federal reviewer how they use the system in their daily work. While staff are dedicating time to the process, they are not compiling or reporting information to the Federal reviewers.

The annualized monetary cost to the State is 750 hours times \$40, which equals \$30,000. State monetary cost estimates reflect data from the Bureau of Labor Statistics' 2009 Employer Costs for Employee Compensation Survey which reports that the average hourly wage cost for state and local government employees is \$39.60, which represents salary and benefits.

13. Annual cost burden to respondents or recordkeepers resulting from the collection of information

Responding States use existing project documentation to complete the SARG; no capital, equipment, technology or purchase of service costs are involved; there are no costs for generating, maintaining, or disclosing this information. Thus, there are no direct monetary costs to respondents who complete the SARG other than their time to complete the form.

14. Estimates of annualized cost to the Federal Government.

Federal cost estimates are based on an expectation of reviewing three SARG documents per year as part of the SACWIS Assessment Review process. Costs associated with the Federal Government's review of SARG documents include the following:

Staff time for review of a SARG submitted by a State = 45 hours

Staff time for document response and the provision of technical assistance = 40 hours

Staff time for travel to participating states for the conduct of a SACWIS Assessment review = 40 hours

Travel costs to the responding states, of approximate \$1,500 per staff trip.

Our time estimates are based on historical records of staff time and current travel costs; no other direct operational, printing, technology, support staff time or other direct costs are associated with SARG information collection or analysis.

Typically, four analysts participate in a State SACWIS Assessment Review. Estimates of Federal Staff time costs are based on an estimated annual salary of \$80,000, which affords an hourly wage of \$38.46.

<b>STEPS TO COMPLETE SACWIS ASSESSMENT REVIEW</b>	<b>ACTIVITY HOURS</b>	<b>NUMBER OF FEDERAL STAFF</b>	<b>COST PER HOUR</b>	<b>FEDERAL COST OF TIME</b>
Review of the SARG	45 hours	4	\$38.46	\$6,922.80
Document response and the provision of technical assistance	40 hours	4	\$38.46	\$6,153.60
Hours of travel to participating States	40 hours	4	\$38.46	\$6,153.60
<i>Subtotal Staff time costs per State Review</i>				\$19,230
<b>TRAVEL COSTS FOR SACWIS ASSESSMENT REVIEW</b>		<b>NUMBER OF FEDERAL STAFF</b>	<b>COST PER TRIP</b>	<b>FEDERAL COST OF TRAVEL</b>
Cost of travel per State		4	\$1,500 per staff trip	\$6,000
<i>Subtotal time and travel costs per State Review</i>				\$25,230
<b>TOTAL TIME AND TRAVEL COSTS FOR 3 STATE REVIEWS</b>				<b>\$75,690 (including travel )</b>
Estimated Total Annualized Cost to Federal Government: \$75,690				

## 15. Explanation of Program Changes or Adjustments

ACF has made minor changes to the SARG, reflecting changes in Federal programs that may be reflected in time associated with document completion. A program change requiring States to collect information about youth transitioning out of foster care is reflected in the SARG. . Specifically, since the last OMB review of the SARG, a new reporting requirement related to the National Youth in Transition Database has imposed information collection requirements for States; similarly, the new Fostering Connections program has been implemented. Information for these reports is generated from SACWIS systems. We have slightly modified the SARG, adjusting two questions so that States can report any related functionality within their SACWIS systems that may support the operation of or related reporting for these programs. We adjusted the burden to 250 hours from the 2008 estimates of 200 hours. This may be an overly generous adjustment, but NYTD reporting and Fostering Connections reporting represent system modifications not previously documented in a SARG. The format of the document did not change, but the following additions were made to the document's content:

- In Appendix B, at question #72, *Produce other Federal Reports*, there is additional language asking responding States to describe how the system generates required Federal reporting, such as the National Youth in Transition (NYTD) reports and the data used for Form CB-496, the Title IV-E Programs Quarterly Financial Report (formerly IV-E1);
- In Appendix C, at Question #22, *Other State Initiatives*, we ask responding States to describe system support to State child welfare initiatives, and States who have implemented new program initiatives related to the Fostering Connections to Success and Increasing Adoptions Act of 2008 (P.L. 110-351) or pilot projects that are operated under the provisions of Program Instruction ACYF-CB-PI-10-05 may document their related information collection activities.

The 50-hour upwards estimate in burden hours allows States to develop new responses that document their related system modification, reports preparation, and the implementation of any related data entry practices.

States continue to complete their information systems development, and based on current activity levels, we anticipate requests from three States per year for a SACWIS Assessment Review. This estimate reflects current experience and anticipated progress of States who are currently finishing or nearly finished with system development and implementation. In 2010, ACF performed four SACWIS reviews; in 2011 we received three requests for reviews from states at or near completion; and based on knowledge of current progress in system development, we expect three candidates for reviews in the following year. The SARG is the basic document that initiates and documents the review process.

## 16. Plans for Tabulation and Publication and Project Time Schedule

The entire process of SARG completion, review, and response to a submitting state may take approximately six months. A SACWIS assessment review is scheduled at the request of a State. After State submission of the SARG, Federal analysts review the submitted material, schedule a one-week onsite review within the State, and prepare a Federal response to the SARG which is returned to the submitting State. No formal tabulation or publication is undertaken.

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.