

**DEPARTMENT OF HEALTH AND HUMAN SERVICES
ADMINISTRATION FOR CHILDREN AND FAMILIES**

**Statewide Automated Child Welfare Information Systems
SACWIS ASSESSMENT REVIEW GUIDE**

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NOTICES

THE PAPERWORK REDUCTION ACT OF 1995

Public reporting burden for this collection of information is estimated to average 250 hours per response, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information.

An agency may not conduct or sponsor and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

ALTERNATIVE SUBMISSIONS

States MAY provide the information requested in the *SACWIS Assessment Review Guide* in an alternative form to the extent that the State already has it available.

PLEASE NOTE – Before committing resources to write or develop supporting documents requested as part of this effort, contact ACF to discuss. It is not the intent of ACF to have States develop the supporting documents submitted along with the *SACWIS Assessment Review Guide*. ACF believes that most of the requested supporting documents will have been developed as part of the overall system development project. ACF has attempted to reduce the overall burden on the States by relying on existing documentation.

1 INTRODUCTION

1.1 PURPOSE

The purpose of this document is to provide guidelines to Federal and State personnel on conducting SACWIS Assessment Reviews of statewide automated child welfare management information systems. The SACWIS Assessment Review Guide (SARG - pronounced "SARGe") identifies specific information to be provided by states and a questionnaire to be completed by States. This information is used to allow the Agency to determine state compliance with program and regulatory requirements.

1.2 BACKGROUND

The Department of Health and Human Services' (DHHS) Administration for Children and Families (ACF) provides national leadership and direction in planning, managing, and coordinating the administration and financing of a broad range of comprehensive and supportive programs for vulnerable children and families. These programs are, in large part, administered by public and private State and local agencies and are designed to promote stability, economic security, responsibility, and self-sufficiency.

For many years, concerns have been raised about the lack of information available on children in foster care and their families. To address some of these concerns, Congress amended title IV-E of the Social Security Act in 1986 by adding section 479 which requires the Federal government to institute a foster care and adoption data collection system. Federal regulations at 45 CFR 1355.40 (Code of Federal Regulations) set forth the requirements for the Adoption and Foster Care Analysis and Reporting System (AFCARS).

The Omnibus Budget Reconciliation Act of 1993 (OBRA 93) provided enhanced Federal financial participation (FFP) at the 75 percent rate (beginning October 1, 1993) for development of SACWIS systems to carry out the States' programs under title IV-E of the Social Security Act. In response, requirements for SACWIS were implemented under regulations at 45 CFR 1355.50. The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 extended the period of eligibility for the enhanced rate to September 30, 1997. Under these laws, enhanced funding was made available for the planning, design, development, and installation of statewide systems that meet the following standards.

1. The systems must meet the requirements imposed by regulations promulgated pursuant to section 479(b)(2) (AFCARS) of the Social Security Act.
2. The systems must, to the extent practicable, interface with the State data collection system that collects information relating to child abuse and neglect.
3. The systems must, to the extent practicable, interface with, and retrieve information from, the State data collection system that collects information relating to the eligibility of individuals under the title IV-A program.

4. The systems must be determined by the Secretary to improve program management and be likely to provide more efficient, economical, and effective administration of the programs carried out under a State's plans approved under title IV-B or IV-E of the Act.

1.3 REVIEWS

States are encouraged to develop SACWIS systems. States electing to develop such systems with Federal financial participation are subject to the existing Federal review and approval processes, initiated and updated by Advance Planning Documents (APDs) submitted to ACF. ACF has established the following types of reviews.

MONITORING REVIEWS: 45 CFR 95.621 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 in the law, regulations, and guidelines.

These reviews, conducted on an as-needed basis, assess the State's progress in developing the comprehensive statewide system described in the approved APD. During planning, development, and installation, these reviews are generally concerned with the overall progress, work performance, expenditure reports, system deliverables, security, and supporting documentation. ACF assesses the State's overall conformance with the approved APD and provides technical assistance and information sharing from other State projects.

ASSESSMENT REVIEWS: There are no specific certification requirements for SACWIS. Once a system is operational, ACF will conduct and report the results of a SACWIS Assessment Review (SAR). The purpose of these reviews is to validate that all aspects of the project, as described in the approved APD, have been adequately completed, and conform to applicable regulations and policies. Either the State or ACF may initiate these reviews. However, ACF reserves the right to initiate a SACWIS Assessment Review at anytime in the life cycle of a system.

A SACWIS Assessment Review (SAR) is based on the requirements of law, implementing regulations, the SACWIS Action Transmittals (AT) and Program Instructions (PI), the State's approved APD, State contract documents, and any additional policy guidance or conditions provided to the State. Every effort will be made to reach mutually acceptable solutions to any identified issue. However, if this is not possible, the State may be subject to the remedies described at CFR 45 1355.56.

The timing and manner in which SACWIS reviews are conducted is based on available staff and resources; not all SARs will be conducted on-site nor will they necessarily be conducted at the time the system becomes operational. Therefore, States that use contractor assistance in the development of their system should not link final acceptance or payment to an ACF review. Instead, States are encouraged to base contractor payments on task-specific deliverables and system acceptance on demonstrations and system acceptance tests.

In preparation for a SAR, every effort will be made by ACF to conduct a technical assistance consultation with the State, considering staff resource availability. This consultation discussion should occur during or immediately after pilot implementation. The State and ACF should use this technical assistance consultation as an opportunity to estimate system conformance with SACWIS requirements, specify a time frame for resolution of obvious or highly visible issues as needed and discuss when the SAR should be conducted.

Generally, ACF will not conduct the Assessment Review until, at a minimum, the following conditions are met:

- 30 percent of the total foster care and adoption caseloads (State and Federal) have been converted to, and are maintained under the fully functional SACWIS system; and
- One (1) or more county or district offices are fully operational.
- States should note that they MAY provide the information requested in the SACWIS Assessment Review Guide in an alternative form to the extent that the State already has it available.

AFCARS REVIEWS: The purpose of the AFCARS review is to assess a State's information system's capability to accurately collect, extract and transmit the AFCARS data to ACF and on ascertaining a State's degree of compliance with all of the AFCARS requirements and the quality of its data. Therefore, AFCARS reviews have a separate and distinct purpose from SACWIS reviews and may be conducted before, during, or after a SAR. The AFCARS review also assesses the State child welfare staff's ability to accurately collect and document the AFCARS information related to foster care and adoption cases. The review process goes beyond the edit checks that must be met in order to pass the AFCARS compliance error standards.

1.4 AUTHORITY AND REFERENCES

Title IV-E SARs are conducted under the authority of 45 CFR 1355.55, which requires that DHHS evaluate SACWIS system projects.

The following regulations and guidelines apply to the SAR process or may be of related interest:

- Conditions for approval of funding in 45 CFR 1355.53;
- Action Transmittal ACF-OISM-001, issued February –24, 1995;
- Action Transmittal ACF-OSS-05, issued August 21, 1998;
- AFCARS Regulations (45 CFR 1355.40), Policy Information Questions, Technical Bulletins and other policy guidance;

- Office of Management and Budget (OMB) Circular A-87, Cost Principles for State and Local Governments;
- Automated data processing services and acquisition procedures and requirements of 45 CFR Part 95, Subpart F;
- ACF's Information Systems Review Guide, Cost/Benefit Guide, and Companion Guide 2: Cost/Benefit Analysis Illustrated for Child Welfare Systems;
- SACWIS Conceptual Design, SACWIS Data Element Dictionary, SACWIS Integrated Data Set, and SACWIS Functional Requirements;
- NCANDS Detailed Case Data Component Guidelines and Procedures;
- ACF's review guides for programs that interface with SACWIS systems (e.g., the *Automated Systems for Child Support Enforcement: A Guide for States*); and
- Federal statues and regulations applicable to the programs administered through the State's SACWIS.

Federal guidance related to SACWIS may be accessed at:

<http://www.acf.hhs.gov/programs/cb/systems/sacwis/federal.htm>

1.5 ASSESSMENT REVIEW PROCESS SUMMARY

This Guide describes the SAR process and provides guidance and examples on completing the questions in appendices A, B, and C. A major component of the SACWIS review process is the self-assessment conducted by the State. As a result of its self-assessment, the State will be in a position to describe fully and accurately its system through its responses in the Guide. The Guide can be broken out by section or even by question, so that the responsibility for completing the Guide may be separated into smaller components and sent to the appropriate staff for completion.

The Guide sets forth the specific areas of the review and is divided into three parts, which can be found in Appendices A, B, & C. The three parts of the Guide are the **Overview**, **Process**, and **New Initiatives** Sections.

The **Overview** Section describes the general characteristics of the SACWIS system, including the objectives, applications, and architecture. It provides general identifying information that will help other States and ACF understand the overall size, cost, and programmatic functionality of the system.

The **Process** Section describes the SACWIS system's conformance with mandatory program requirements derived from statute and regulation. The questions in this section are derived from the SACWIS Action Transmittal (AT) No. ACF-OISM-001, dated February 24, 1995. The Section numbering conforms to the AT. Sequential numbering has been added to the Guide for

ease of use. ACF relies on the sequential numbering to reference areas of the document in discussions with the State.

The ***New Initiatives*** Section describes how the system supports new Federal and State initiatives. SACWIS systems are expected to be comprehensive child welfare case management tools and need to be enhanced as program requirements change.

The review is normally initiated when a State submits an electronic copy of the Guide and supporting documentation to the ACF Central and Regional Offices. Using an electronic version of the Guide simplifies the process of documenting the review, providing the State with the Federal review team's findings and producing a final report. ACF is able to provide an electronic copy of the original document in the following formats: Microsoft (MS) Word, or as an electronic rich text file (*.rtf). ACF prefers to receive the completed document as an MS Word file. If this format is not available, the document may be returned to ACF as an electronic rich text file.

After the documentation is evaluated, ACF will conduct the review either on-site (at the State offices) or off-site (by web information exchange or telephone conference calls). The State completed Guide is used by ACF to record comments, issues, resolution dates and negotiated action plans. Based on these comments, the State may update the Guide before finalization of the report.

The SAR Process is described in Chapter 2 of this document, while Chapter 3 provides instructions for completing the different parts of the Guide. Additional guidance may be requested from ACF's Central and Regional Offices. ACF systems staff can provide advice and assistance to the State regarding any phase of the review process.

2 SACWIS ASSESSMENT REVIEW PROCESS

2.1 OVERVIEW OF THE SACWIS ASSESSMENT REVIEW PROCESS

The process of conducting an on-site SACWIS Assessment Review (SAR) involves four phases, illustrated in Exhibit 2-1 below. These reviews will consist of:

- a Review Initiation Phase;
- an Assessment Review Planning Phase;
- an On-Site Review Phase; and
- a Post-Review Phase.

EXHIBIT 2-1

SAR METHODOLOGY

REVIEW INITIATION	ASSESSMENT REVIEW PLANNING PHASE	ON-SITE REVIEW PHASE	POST-REVIEW PHASE
<ul style="list-style-type: none"> ▪ Request Review ▪ State Submits Documentation ▪ Federal Response 	<ul style="list-style-type: none"> ▪ ACF Reviews Documents ▪ Plan Review & Draft Agenda ▪ Finalize Arrangements with State 	<ul style="list-style-type: none"> ▪ Entrance Conference & System Demonstration ▪ Local Office Visit & Interviews ▪ Document Review Findings ▪ Conduct Exit Conference 	<ul style="list-style-type: none"> ▪ Finalize Findings & Conclusions ▪ Prepare Final Report ▪ Post-Report Activities

Depending on resource availability, reviews may be conducted off-site instead of on-site. With the obvious exception of the site visit, the process is essentially the same. For an off-site review, the depth of the Document Review Phase will be expanded and supplemented with interactive distance communications methods such as web meetings and telephone interviews with appropriate State staff.

2.2 REVIEW INITIATION PHASE

The Review Initiation Phase involves two steps:

- First, a request by the State or a decision by ACF to initiate a review, followed by document submission;
- Second, the formal Federal response and scheduling activity.

2.2.1 Request Review and Submit Documentation

SARs should take place after the SACWIS system becomes operational. These reviews may be initiated approximately six months after the approved project completion date. If the State is initiating the review process, it should submit a written request to the:

Associate Commissioner Children's Bureau
Attention - Director, Division of State Systems
Administration for Children and Families
Department of Health and Human Services
330 C Street, SW
Washington, DC 20201

The written request must provide assurances that all operational components of the SACWIS system are used (i.e., that staff are not using another information system or paper processes to perform the work of a SACWIS component), that the system operates uniformly statewide or in the converted jurisdictions if the Assessment is being conducted prior to statewide implementation, and that it meets all mandatory requirements. See section 1.3 for guidance on requesting a SAR before completing statewide implementation.

The request should be accompanied by the following documentation in hard and, if available, soft copy. Please contact ACF if these documents are not already available – States should not create these documents for the sole purpose of this review:

- System diagrams, for both the technical architecture and elementary processes performed by the system include functional decomposition, data flow, and hardware configuration diagrams if available;
- An Organizational Chart inclusive of all SACWIS personnel;
- Current user manual for both technical and end users;
- Training manual and materials;
- Data element dictionary, with table definitions, data element data types, mandatory vs. optional elements, and table and key constraints;
- Numbered list of system screen prints;
- Numbered list of system alerts and ticklers, with a brief description of the alert or tickler including how the tickler is invoked, resolved and a general description of the tickler process;
- Numbered list of system notices, with a brief description of the notice including how the notice is invoked, resolved, and a general description of the notification process;
- Numbered list of reports, including management and financial reports and reference to whether reports are on-line, available in hardcopy, and generated in real-time or by batch;
- Planned schedule for submitting NCANDS Detailed Case Data Component (DCDC) data, if State's Child Abuse & Neglect system is included within the SACWIS;
- Copies of SACWIS reports used to complete the Form CB-496, the *Title IV-E Programs Quarterly Financial Report*, formerly the IV-E 1; and

- Other cross-reference material the State may wish to provide.

The Guide must be submitted to ACF in an electronic format. If possible, ACF prefers to receive the files in MS Word. If that format is not available, the files should be submitted as an electronic rich text format file (*.rtf).

A copy of all documents submitted to Central Office should be sent to the ACF Regional Administrator.

If ACF decides to initiate a formal SAR, the State will be notified in writing of the need to conduct the review and the reasons for this decision. The failure to cooperate with an ACF-initiated SAR could result in suspension of the project's approval and the disallowance of applicable title IV-E funds.

Alternative Approaches to a Single Statewide System

In addition, if the State has received approval to link a SACWIS-type system¹ existing in a large urban area to the new SACWIS system, that existing SACWIS-type system must be identified, the linkages described, and the following assurances made:

- The staff using either the new SACWIS or a SACWIS-type system must be able to easily check all SACWIS related systems for prior incidents and other available information.
- Either system must be able to generate management alerts if an individual is active in more than one of the systems.

AFCARS Reviews

SARs may or may not be scheduled for the same time period as AFCARS reviews. Beyond the condition that the system must be operational statewide, scheduling for AFCARS reviews depends on the availability of ACF and State staff time and resources. For additional information on AFCARS reviews and their scheduling, see the *State Guide to an AFCARS Review*. This guidance can be accessed from the Children's Bureau's web page.

2.2.2 Federal Response

In preparation for a SAR, the Federal review team and leader will be selected. The SAR team is composed of Federal Regional and Central Office staff with a mix of technical and program expertise, as well as a general knowledge of the State under review.

The Federal and State teams will work together to schedule the review.

¹ See ACF Action Transmittal number ACF-OISM-001 for discussion of alternative approaches to a single statewide system.

2.3 ASSESSMENT REVIEW PLANNING PHASE

The Assessment Review Planning Phase involves document review, development of a plan and agenda, and finalization of logistical arrangements.

2.3.1 Review Documents

The Federal team members will analyze the documents submitted by the State and examine the State's APD and contract documents to establish the scope of the project.

Given schedule and resource availability, States should plan to submit the review documents well in advance of the review to allow that all parties have sufficient time to either prepare or review the SAR documentation.

The preliminary evaluation of the State documentation is intended to prepare the Federal team, expedite the review and evaluation process, determine if there are any impediments to the review, identify those areas of the system that require additional evaluation, and document early findings. This can maximize the effectiveness of the on-site review period.

2.3.2 Plan Review and Draft Agenda

The Federal team, in consultation with the State, will plan review activities. The State team will be responsible for developing an agenda based upon the agreed upon activities. Activities will include all proposed county and local office visits, computer center visits, and interviews and demonstrations to review all functional areas. These Federal and State discussions will focus on: who the team must interview; the physical locations where the review activities will take place; and the tasks, responsibilities, milestones, deliverables, and schedules for the review period. The purpose of this phase is to clarify review expectations, answer State questions, and advise the State of any preliminary findings resulting from the document review.

Appendix E contains a sample on-site SAR agenda. The schedule lists days, time estimates, activities, and recommended State participants. The State will identify the participants for each activity and schedule interviews with key State, county, and local officials before the visit. Interviews with local office staff such as caseworkers and supervisors should not be scheduled in advance. These interviews will be conducted at users' desks, as they are available.

2.3.3 Finalize Arrangements with State

After the agenda is defined, the Federal and State teams will conduct at least one conference call prior to the on-site review to finalize schedules, clarify expectations, organize the interviews, confirm sites for the local office visits, and verify the availability of key State staff. The State may be asked to provide meeting space for Federal team members during the on-site review.

Once the details are finalized, the Federal team leader will conduct a conference call that will:

- provide information on how the review will be conducted, and address entrance and exit conferences, names of Federal team members, and scheduling;
- discuss the on-site agenda, including the local sites to be visited; and
- identify the review techniques that will be employed, such as interviews, examination of outputs, case sampling, review of general production outputs, viewing screens and operations, or collateral verifications.

The State should disseminate information on the nature and scope of the review to prepare program and data-processing staff that will either participate in, or be interviewed during the on-site review.

2.4 ON-SITE REVIEW PHASE

The on-site review phase is usually conducted over a four to five-day period and includes the following:

2.4.1 Entrance Conference and Detailed System Demonstration

The first day of the on-site visit begins with the entrance conference which serves to:

- introduce the Federal team to the State management and project staff;
- establish contacts for consultation later in the on-site review;
- advise the State of the nature and scope of the on-site review; and
- respond to any questions the State staff might have related to the review process.

Immediately following the entrance conference, the State presents a detailed functional walk-through of the system and an overview of actual and projected program improvements resulting from the system implementation. The demonstration focuses on how the system meets all of the SACWIS functional requirements and references the State's responses in the completed Guide. The State should arrange that appropriate State technical and programmatic staff participate in the demonstration. We expect that State staff will lead the actual walk-through of the system, although contractor staff can be available as resources during the SACWIS demonstration.

2.4.2 Local and State Office Visits and Interviews

The purpose of the local and State office visits and interviews is to confirm that the system functions in the field as it was described in the State's APD, Guide responses, and functional walk-through. In that light, it is the Federal review team's intent to interview at least one local or State office staff member in each of the different functional positions represented in those offices. Site reviews should include visits to at least two counties or local offices of varying size and complexity as well as State offices. In order to complete all the tasks identified on the agenda, the Federal team will divide into smaller groups.

The Federal team will use a variety of techniques to assess the functional conformance of the operational system. The team will:

- interview office managers and staff (including SACWIS users involved in referral/intake, investigation, assessment, resource development, out-of-home placement, family preservation, adoption, financial processing and claims, and provider licensing and contracts.) about how they use the system, what works well and what needs to be improved;
- ask the office staff to share their experiences and lessons learned;
- observe actual case information being entered into the system; and
- ask follow-up questions based on the information gathered during the review of the State documentation and on-site functional walk-through.

While State project staff should accompany the Federal team to the office site visits, they will not participate in the actual interviews. The State project staff person who accompanies the Federal team to the local and State offices should be available to answer questions that may arise during the interviews. The importance of allowing field office personnel to share their experiences will be re-confirmed at the entrance conference.

The Federal team will work with the State to identify the specific offices to be visited, typically to no fewer than two and no more than ten office locations. Each local office visit should include at least one hour of observing users entering case data into the system. The Federal team will identify the types of system users that they would like to interview.

The local office visit will allow the Federal team to talk to the SACWIS system users about how the system supports the flow of work. These discussions cover the SACWIS functions supported by the system, but less formally than was done in the Guide and the supporting documentation.

2.4.3 Document Review Findings

a. Daily Meetings.

As necessary, the full Federal team will reconvene at the end of each day to review the day's findings, summarize results, complete documentation, and plan the next day's schedule. The purpose of these daily meetings is to:

- Prepare a one to two page overview of the initial findings to present to the State;
- Discuss issues; and
- Refine or refocus the on-site process because of the day's findings.

If part of the Federal team cannot return to the central site for the daily team conference, the meeting should take place by teleconference. The full Federal team should convene the night before an exit conference to finalize findings.

b. Use of the Guide.

The State's completed Guide is used during the on-site inspection to direct the review process. ACF will not change a State response, which the State can update later. Federal team members may record notes on their own copy of the Guide.

The Federal team leader is responsible for collecting, synthesizing, and recording team documentation in the Guide. The Guide provides the primary documentation of the review and its findings. All supporting documentation collected and prepared during the preliminary evaluation, on-site inspection, and final evaluation is included in the permanent State SACWIS review file, which is retained by ACF.

The Federal team records the results of the functional review on the ACF portion of the Guide. For each mandatory functional requirement and each funded optional requirement, the team notes whether the system **conforms**, **conditionally conforms**, or **does not conform**. If the system has the required functionality, no further supporting documentation is required. However, if the system does not have full functionality (conditionally conforms) or lacks functionality (does not conform), the team will note the basis for the finding and record in the comment section of the report any actions the State must take or information the State must provide. A draft report will be provided to the State after the appropriate ACF managers have reviewed it.

The completed Guide will be initially issued to the State as a draft report. While it is anticipated that the State's responses and ACF's comments in the Guide will evolve after the draft report is issued, the final version will reflect the identified issues, planned or completed actions, and the corresponding resolution dates.

c. Finding Summary Worksheet

The Finding Summary Worksheet illustrated in Exhibit 2-2 may be completed if there are significant deficiencies that must be corrected in order for the system to meet the requirements established in the SACWIS AT or the State's approved APD. Use of the Finding Summary Worksheet will only be necessary when State and Federal staff cannot reach agreement on a specific finding. The Finding Summary Worksheet will be prepared after the on-site review is completed and the draft report has been given to the State.

The Finding Summary Worksheet is founded on the performance-based review methodology commonly used by evaluators for the examination of facts. The methodology requires that the following information be obtained and evaluated to determine whether the finding is valid and corrective action is needed:

- **Criteria:** What should be;

- **Condition:** What is;
- **Gap:** Difference between "what should be" and "what is;"
- **Effect:** Significance;
- **Cause:** Why; and
- **Recommendations:** How to make the condition equal the criteria.

2.4.4 Conduct Exit Conference

Before the Exit Conference, the Federal team will summarize its findings, consolidate the documentation, notify Central and Regional Office management of the preliminary review results, and prepare for the last day of meetings. The purpose of the exit conference is to:

- present specific initial findings resulting from the review process;
- report the preliminary recommendations or proposed resolutions to outstanding issues; and
- answer any questions that the State might have as a result of the review.

2.5 POST-REVIEW PHASE

The Post-Review Phase involves three steps:

2.5.1 Finalize Findings and Conclusions

The review team's findings and conclusions are consolidated. Although the major portion of the evaluation of the SACWIS system will be conducted on-site, a number of steps in the assessment and documentation process may be completed off site. These steps include:

- consolidation of findings from all team members;
- final consultation among Federal team members;
- organization of the review record;
- recording ACF's findings, requirements, recommendations, and observations in its portion of the Guide; and
- completing any collateral verification from other sources such as State plans, NCANDS and AFCARS reports/reviews, or State Cost Allocation plans.

All documentation or verifications from collateral sources are retained by ACF as a part of the archive file on the State's SACWIS project.

2.5.2 Prepare Final Report

The final SAR report is prepared. A SAR report will include:

- an overview of the SACWIS system;
- a summary of the functional components of this system that work particularly well;
- a summary of the deficiencies and recommendations for improvements; and
- the completed Guide.

When the Guide (and any Finding Summary Worksheets) is complete, the Federal team will draft a brief overview of the SACWIS system. The overview will describe the findings and identify any actions the State needs to complete. The overview will be included in the cover letter sent to the State with the completed Guide.

ACF will attempt to have the report drafted and approved within 120 days after the on-site review ends; however States should be aware that the completion of the draft SAR report is based on available resources. The reports are unlike the typical audit or management review report which includes separate sections on background, purpose and scope of the review, review methodology and so forth. Instead, this Guide establishes background, purpose, scope, and methodology for *all* SACWIS reviews.

The purpose of the report is to support a decision by ACF that the SACWIS system has met the tests of efficient, effective, and economical operation and qualifies for the SACWIS enhanced funding and cost allocation methodology.

All Federal team members will contribute to the final draft report. The draft report requires review and approval prior to issuance by the Associate Commissioner of the Children's Bureau, and the Director of the Division of State Systems.

After review and approval, the draft report will be sent to the State. The State has an additional 160 days to respond to the draft report. The process will continue until all issues have been resolved and corrective action plans approved. The final report will be issued within 120 days of receiving the State comments and ACF approval of the response.

Although the final report is prepared primarily for ACF, the State under review, and other States for transfer evaluation, it is public information and will be prepared in such a manner that it may be shared freely.

2.5.3 Post-Report Activities

As specified at 45 CFR Part 95.610, program-performance improvements must be reported through the Annual APD Update. More rigorous follow-up is required for systems that do not meet SACWIS

functional requirements. States will be required to report the results of their approved action plan(s) as part of their Annual APD.

ACF may also take the following steps:

- For functionally deficient systems, ACF may request an APD Update that presents a workplan for any additional development necessary to meet the required functionality. In addition, periodic monitoring reports may be required if development is extended.
- To assist the State in eliminating reported deficiencies, ACF staff may regularly contact the State about its progress towards achieving compliance in each of the deficient functional components. If corrective actions are not undertaken in a timely way, ACF may limit funding or recoup previously approved funds.
- ACF may require revisions to the State's past claims for FFP or the SACWIS cost allocation methodology to reflect benefits other programs derived from the system's use, or to adjust funding for functionality that exceeds the SACWIS requirements, but was never approved by ACF in an APD.

Before initiating a negative financial action against a State, ACF will work diligently with the State to come to a mutual agreement on the findings. If necessary, ACF will work with the State on action plans to resolve any outstanding issues. It is ACF's desire to support innovative State solutions and program successes that respond to program needs.

EXHIBIT 2-2

FINDING SUMMARY WORKSHEET

<u>FINDING:</u>	[<i>Condition:</i> What is.]
<u>BASIS FOR FINDING:</u>	[<i>Criteria:</i> What should be.]
<u>FINDING:</u>	[<i>Gap:</i> Difference between what should be and what is.]
<u>CORRECTIVE ACTION:</u>	[Description of any corrective action underway or planned.]
<u>CRITICALITY:</u>	[<i>Effect:</i> Significance.]
<u>CONCLUSION:</u>	[<i>Cause:</i> Why?] [Assessment as to whether further action is required. Reflects conclusion based on "why," "so what?" and current or planned corrective action. Note that conclusion may be that a recommendation need not be developed.]
<u>RECOMMENDATION:</u>	[Recommendation: How to make the condition equal the criteria.]

3 INSTRUCTIONS

3.1 OVERVIEW

This chapter provides instructions to complete the SACWIS Overview, Process, and New Initiatives Sections of the Guide (Appendices A, B, and C). The State must send the completed SACWIS Assessment Review Guide to ACF, as described in chapter 2.2.1. By organizing the review material as a set of questions supported by citations and narrative explanation, the processes of documenting and creating a report are combined in a single electronic document. This should greatly reduce the time required of State and Federal reviewers.

The Guide is divided into three segments:

- **Appendix A** - an *Overview* Section that describes characteristics of the SACWIS system, including the objectives, applications, and architecture;
- **Appendix B** - a *Process* Section that describes the system's conformance with mandatory program requirements derived from statute and regulation; and
- **Appendix C** - a *New Initiatives* Section that describes how the system supports new State and Federal initiatives and demonstration waivers.

States MAY provide the information requested in the SACWIS Assessment Review Guide in an alternative form to the extent that the State already has it available.

3.2 STATE COMPLETION OF THE GUIDE

Appendix A: Overview Section

This part of the SACWIS Assessment Review Guide provides an overview of the SACWIS system, including the objectives, applications, and architecture. The following section provides guidance and describes the purpose of requesting the information.

All State responses should be typed in the text boxes provided in the instrument.

A. I: covers general identifying information as well as information that will help other States understand the overall size, cost, and programmatic functionality of the system.

Questions 3 and 4 are included for the following reasons:

Question 3, which addresses system support staff, is primarily intended to help other States assess the suitability of the system for transfer. By understanding the numbers and types of people who operate and maintain the system, other States may be able to make a preliminary assessment about transfer potential. This question is geared to normal support staff, not staff available for major system modifications. If this information is not available because a contractor maintains the system and the information is considered proprietary, please provide the available information and note the exception.

Question 4 addresses the number of system users and thus provides scale, and is also intended to help other States assess suitability for transfer. The State should specify the number of current on-line users.

A. II collects summary technical information. A paragraph or two for each question should be sufficient.

A. III provides for identification of each of the contractors that participated in the planning, development, implementation, and operation of the SACWIS system. Please identify contractor by project phase and role within that phase.

A. IV captures financial information. This information should identify all developmental costs (Planning, Design, Development, and Implementation) and should correspond to the information in the approved APD.

A. V allows documentation of lessons learned. Because of the value of this section to other States, ACF strongly encourages States to thoughtfully complete this section. The section is for information only, and States will not be penalized for the content.

A. VI lists required enclosures to be submitted with the completed Guide. Note that the information provided will be cross-referenced to responses in Appendix B.

Appendix B - SUMMARY TABLE

The *Summary Table* located in Appendix B is updated by ACF as the report is finalized and summarizes the findings of the Federal review team. This table will allow the reader to focus on unresolved findings, as well as identify those components with an approved *Action Plan*, which requires tracking in the State's Advance Planning Document. As findings are resolved by the State, this table will display the status of each functional component, whether the component has an *Action Plan* associated with it, and the page number where the component is discussed.

The table makes use of the bookmark functionality in Word. The State should not type in this table, nor delete this table. As the State completes the questionnaire, the page reference numbers in the table may not match the actual pages in the questionnaire. It is not necessary for the State to update the table to refresh the page numbers. If the State document manager wishes to update the page numbers on the Summary Table, the process is to highlight the entire document by clicking Ctrl A and then click the F9 key. This will update the page reference numbers on the table.

The Table will appear as follows when the State initially completes the questionnaire.

ACF Only			
Requirement Number	Conforms?	Action Plan?	Page Reference #
1			B-#
2			B-#
3			B-#

After ACF completes its part of the draft report, the table will be refreshed and will appear as follows.

ACF Only			
Requirement Number	Conforms?	Action Plan?	Page Reference #
1	Y		B-#
2	N		B-#
3	C		B-#

Once the report is finalized, the table will appear as follows.

ACF Only			
Requirement Number	Conforms?	Action Plan?	Page Reference #
1	Y		B-#
2	Y	N	B-#
3	Y	Y	B-#

This table indicates that SACWIS requirements have been satisfied for the identified requirements. Component number two has been totally resolved and thus an Action Plan is not needed, while component number three has an approved Action Plan that will be tracked and reported on though the State’s Advance Planning Document.

Summary table definitions:

- *Requirement Number* refers to the sequential numbering of each of the SACWIS requirements.
- *Conforms* indicates if the component conforms to the specified SACWIS requirement.

- *Action Plan* indicates if ACF has approved the State's plans for bringing the specific SACWIS component into compliance at some point in the future. A **Y** in this column indicates that an Action Plan has been provided to ACF and has subsequently been approved. An **N** indicates that a compliance issue was resolved without an Action Plan (e.g., the State clarified existing functionality or completed an enhancement that resolved the identified issue). An **NA** or blank in this column would indicate that the component was found to be compliant at the time of the initial review and an Action Plan was not necessary.
- *Page Reference #* identifies the page number of the report where the finding is discussed. The # symbol represents a numeric page reference. Page reference numbers, as do all bookmarked items, must be periodically refreshed. ACF is responsible for this task.

Appendix B: Process Section

The Process Section is intended to establish the conformance of the State's SACWIS system to the functional requirements established in the SACWIS Action Transmittals, Program Instructions, program regulations and State contract documentation. The section numbering corresponds to that in SACWIS Action Transmittal, ACF-OISM-001. The sequential numbering is used for ease of discussion. Each of the SACWIS functional requirements are stated as open-ended questions. In response to each, the State will describe in the *State Response* section how the functionality is met.

The State will provide a brief, but complete narrative description in the *State Response* section, summarizing how the SACWIS supports the required and optional functional components approved in the APD. Each response should reflect a self-assessment describing the extent to which the State's SACWIS system fulfills the functionality. If the State determines that a requirement is incomplete, the State should describe:

- the differences or gaps between what is required and what has been implemented;
- the reasons for the gaps;
- actual or potential effect on the State's child welfare program; and
- planned actions for closing the gaps to meet all requirements.

Required functional components are identified with an asterisk (*) after the title. Optional functional components are followed by a question that asks if the State elected to include the functionality in the SACWIS system (*Was this function selected as an option in the State's Approved APD? Yes or No*). The State indicates whether the optional functionality was a State Selected Option by checking the appropriate box. Optional functional components, for which the State was approved funding, become mandatory with APD approval.

The Guide uses a table to cross-reference the system functionality to the documentation provided by the State in response to Appendix A - VI: Enclosures. The cross-reference tables are to be completed for each of the functional sub-components, such as Intake & Screening.

The following Cross-Reference table is used for all functional sub-components:

Cross Reference Box for the XXXX Section			
Reference Sources (Document/Chapter):			
Screen Identifier	Alert Identifier	Notice Identifier	Report Identifier

Cross-reference table definitions:

- The *Reference Sources* is used to list the titles and page numbers of the enclosed documents such as a User Manual that provide supporting evidence or additional detail on how the system meets the functional requirements.
- The *Screen Identifier* is used to identify the screen or screens utilized to meet the functional requirement. This can either be cross-referenced by number to a screen print included as an attachment or to another resource such as a User Manual provided by the State that identifies the use of the screen.
- The *Alert Identifier*, *Notice Identifier*, and *Report Identifier* are for identifying the alerts/ticklers, notices, or reports that support a functional sub-component. The response should be cross-referenced by number to the lists of alerts, notices, and reports provided by the State (Appendix A. VII: Enclosures).

The term **Alert** is used in the Review Guide. It refers to an automated or worker generated tickler or reminder to the user of the need to complete an important task.

A **Notice** can refer to system-generated correspondence, task lists, reports or word processing templates that are integrated into the SACWIS application.

Appendix C: New Initiatives Section

The New Initiatives Section examines how the State's SACWIS system supports new Federal and State initiatives in the Child Welfare program. The State should describe how its SACWIS supports the program areas identified in Appendix C. If the system does not currently support one or more of the identified program initiatives, the State should describe its plans for modifying the system to support the applicable initiatives. Whether or not the system supports a new initiative, the response should describe the processes used by the State to satisfy the requirement.

3.3 EXAMPLE FOR COMPLETING THE PROCESS SECTION OF THE GUIDE

The following provides an example of how a State should complete the *Process* Section of the Guide. The information presented in this example is for illustration only. Please contact ACF staff if you have questions about using the form.

The State's narrative (*State Response*) should be brief but complete and rely on the *Documentation References* for the supporting details. The *Documentation References* should correspond to the numbering sequence of the Reference Lists provided by the State at the time the Guide was submitted to ACF (see section 2.2.1).

Appendixes A, B, and C are Microsoft Word templates; their answer fields will expand to accommodate the State's response. Their answer fields appear as rectangles .

The State should use its selected word processing program to add text to the appropriate sections. The word wrapping capabilities of the word processing program will expand the document to fit the need.

Example –

A: Intake

Goal: To provide an automated entry point into the child welfare services agency for children and families who seek services, are referred for services, and/or who are reported to the agency.

Cross Reference Box for the INTAKE Section			
Reference Sources (Document/Chapter): User Manual - Chapter 4 & Training Manual - Chapter 11			
Screen Identifier	Alert Identifier	Notice Identifier	Report Identifier
Screens 24 through 28 The numbers used in this example correspond to the list of screen prints provided with the Guide.	Alerts 2, 45, & 67 The numbers used in this example correspond to the list of alerts provided with the Guide.	None. If one or more notices are generated by this functional sub-component, they are listed here. The numbers should correspond to the list of notices provided with the Guide.	Reports 15, 16, 34 & 37 The numbers used in this example should correspond to the list of reports provided with the Guide.

1 - Intake Management - Section A: Intake

1. (1) Record contact/referral * — Describe how the automated system
 - a) records initial contacts regarding allegations of abuse or neglect, and/or

- b) provides for the input of a formal referral for protective services, voluntary placement services, juvenile corrections, and other services.
- c) The State response should also indicate when the Intake Report is frozen in the system.

State Response:

Our SACWIS includes functionality that supports the State's child/abuse and neglect component. The State has a 24-hour Intake Unit located at the CMI Building. That unit is responsible for receiving and processing all public and private referrals and telephone calls regarding allegations of abuse or neglect.

1.a. Initial contacts regarding allegations of abuse or neglect are captured on the system's 5 intake screens. These screens capture basic information about the caller, victim, family, initial contact and allegation. After the initial information is assessed through the system and the finding approved by the supervisor, the system generates a referral in the form of a discrete task for the appropriate unit (e.g., Investigations, Voluntary Services, or the Community Service Office).

1.b. Inquires and requests for voluntary services are captured on the contact screen and are handled by the Community Service Office nearest the family. The Community Services Office uses the same service referral functionality as the Continuing Services Unit. The system prompts the social worker to refer the case to the applicable services. All referrals are generated by the system. The system records all referrals in the database. The system supports the referral process to the Investigation Worker after the case has completed the screening process. If the incident is screened-in, the system refers the case to the investigation unit and sends an alert to the supervisor and the unit clerk.

1.c. The intake referral is frozen (or locked) at the point the supervisor approves the initial finding. The system allows additional information to be attached to the initial referral as Post-Referral Additions. The summary screen will display the initial referral and any subsequent Post-Referral Additions. Based on State defined parameters, Post-Referral Additions are frozen two days after entry or when the Investigation is completed (whichever comes first).

All SACWIS requirements have been met.

2. (2) Collect intake/referral information * — Describe how the automated system
- a) allows for the input of available situation and demographic information,
 - b) including the cross-referencing of relationships among participants and
 - c) the reason for referral.

State Response:

2.a. The Intake Unit located at the CMI Building records situational and demographic information on the five intake screens. Additional information is collected during assessment

and investigation of the allegation or request for services. Information can be recorded in the applicable data fields as a caller provides it, or the system allows the worker to use structured text fields on each of the Intake screens to capture free flowing information. If the text fields are used, the data fields are completed once the call is finished. Where applicable, the system uses pick-lists, checklist, and radio buttons to simplify data entry.

2.c. The Reason for Referral is captured on the initial contact screen.

2.b. To the extent that it is known, individuals are linked to other members of the family during the initial Intake. According to State policy, the system records the relationship of all extended family members to the alleged victim. The system allows inquires based on the family or the individual. Furthermore, individuals can be linked to more than one family and family members to more than one victim. Where it is possible, the system calculates reciprocal relationships when the cross-referenced relationship is established (e.g., if Maya is Caroline's sister, therefore, Caroline is Maya's sister).

While we believe that the system meets all SACWIS Requirements, the current process for linking family members to the family unit is cumbersome. We will be examining alternatives to the current process. A budget and schedule will be submitted in the next APD Update.

4. (4) Record "information only" requests — Describe how the automated system records calls or contacts which do not involve a specific allegation or a referral concerning abuse and/or neglect.

Was this Function selected as an Option in the State's Approved APD? YES NO .

If Yes - State Response:_

Note to the reader: This is an example of how a State would respond to a question about an optional component that was not included in the State's approved APD.

1 - Intake Management - Section B: Screening

2. (6) Record the results of the screening evaluation * — Describe how the automated system provides for the recording of the determination resulting from the screening process.

*State Response:*_

Once the supervisor approves the screening recommendation, the system automatically records the determination on the case status screen. The system's business rules and the Social Worker's assessment support the recommendation.

All SACWIS requirements have been met.

Note to the reader: This example is intended to show that some of the responses can be very brief. The purpose of the narrative is to succinctly and accurately answer the questions and to provide a framework for evaluating the cross-referenced material.

3.4 ACF COMMENTS

Specific ACF comments will be documented in the space provided after the *State Response* section.

ACF Comments for Requirement: [1]					
Conforms? Y/C/N		Action Plan? Y/N/Blank		Resolution Date	
Finding Summary Worksheet Completed? Yes or Blank					

Table definitions:

- *Conforms? Y/C/N* - The Federal team records the results of the functional review on the ACF portion of the Guide. For each mandatory functional requirement and each funded optional requirement, the team notes whether the system *conforms (Y)*, *conditionally conforms (C)*, or *does not conform (N)*. See section 2.4.3 for additional information. This field is bookmarked to the Summary table found on page two of Appendix B.
- *Action Plan? Y/N/Blank* – The Federal team will use this area of the report to indicate if it has approved the State’s plans to bring the system into conformance at some point in future (**Y**). An **N** in this field indicates that the initial issue has already been resolved and that the system is SACWIS compliant in this area (an Action Plan is not necessary). A blank field indicates that the component was found SACWIS compliant in the initial assessment. Approved Action Plans are tracked in the Advance Planning Document through their completion. This field is bookmarked to the Summary table found on page two of Appendix B.
- *Finding Summary Worksheet Completed? Yes or Blank* - The Finding Summary Worksheet (see Exhibit 2-1 on page 9) should be completed if there are significant deficiencies that must be corrected in order for the system to meet the requirements established in the SACWIS AT or the State's approved APD. Use of the Finding Summary Worksheet ordinarily will only be necessary when State and Federal staff cannot reach agreement on a finding. The Finding Summary Worksheet will be prepared after the on-site review is completed and the draft report has been given to the State. This section is used to indicate that a Finding Summary Worksheet was completed.
- *Resolution Date* - Used to record the date that an issue was resolved or an action plan proposed by the State was accepted by ACF.
- *ACF Comments* - ACF draft and final comments regarding the system.

3.5 STATE RESPONSE TO ACF COMMENTS

The State should use the ACF-provided version of the draft SAR report to respond to the identified concerns. If the State believes that it is necessary to update one of its original responses, it should do so by adding additional text separated by a header-line that indicates the date when the new text was added. The project staff should call the ACF Review team leader if there are any questions about responding to the draft report.

As an example:

*State Response:*_

Original response remains.

MM/DD/YYYY

(This date represents the State's subsequent response. If additional responses were needed, they would also be preceded by a date header.)

Additional information is provided to address any concerns and/or to propose an action plan to address the concern.

3.6 LESSONS LEARNED FROM PREVIOUS REVIEWS

This section presents a list of lessons learned from previous SARs. This information is intended to help States prepare for their review. The guidance is organized into three categories: preparing for the review, completing the Guide, and suggestions for the on-site review.

Preparing for the Review:

Careful preparation for the assessment review will save time, help all parties understand the critical issues for the review, and provide a common understanding of the purpose and goals of the review.

- *Validate that the approved Implementation APD is complete and accurate.* ACF uses the approved APD, contract documents, and requirements listed in program regulations, Action Transmittals, and Program Instructions to measure the system's scope and determine compliance. It is therefore critical that the approved Implementation APD accurately reflects system functionality, including optional functions the State has chosen to implement. ACF recommends that States regularly review the approved APD to check that it accurately reflects the intended system design and functionality. If the scope of the system's functionality, including optional functions originally planned for the system design is not reflected in the approved APD, submit an APD Update to explain the variations and changes in system functionality. Submit the APD Update before the review.

- *Communicate frequently with the Federal team leader.* Use conference calls, telephone calls, and e-mail to answer documentation questions, understand and define on-site review expectations, finalize the agenda, and complete site visit logistics. Use the opportunity to ask ACF questions posed by staff who will be participating in the review. This preparation can help the State further understand the review scope and help identify critical issues well in advance of the on-site visit.
- *Keep State staff informed.* The State's project manager should regularly share what is learned from communications with ACF with the management and line staff who will be involved in the review. Clearly define the roles staff will play during the review so they know what to expect and are prepared.
- *Learn from other States.* The project manager may contact other States that have had an assessment review to benefit from their insights. ACF can provide a list of States that have had a recent assessment review. ACF User Group Meetings also provide opportunities to network with States and hear their perspective on the assessment process.
- *Understand ACF goals for the assessment review.* In general, ACF's goals for the review are: to determine State compliance with the State APD, contract documents, and federal requirements; to assist the State in correcting any deficient areas; identify best practices that can be shared with other States' SACWIS efforts; and identify areas for future technical assistance to States.

Completing the Guide:

Appendices A, B, and C of the Guide and the supporting documentation supplied by the State are essential to the final assessment review report (please see Section B.1. in Chapter Two of these instructions). These materials are critical to understanding the SACWIS and assessing compliance. If any of the supporting documentation cannot be provided, include a brief explanation why this information was not available; do not create new documentation solely for this review. States are encouraged to consult with ACF about supplying the requested information in existing or alternative formats.

When responding to questions in the Guide, the State should consider the following:

- *Completely answer the entire question that is posed in each section of the Guide.* Several of the original requirements have multiple parts; please answer each part of the question.
- *Responses should be complete, clear, and concise.* Each answer should stand on its own, without reference to responses in other parts of the Guide.
- *Fully explain potential or existing system related problems and incomplete functionality.* ACF will work with the State to develop action plans to bring the system into compliance. This action plan will be incorporated into the report so it is clear how each problem is addressed.

- *Cross-reference responses to documentation provided in support of the review.* The cross-referenced documentation will enrich ACF's understanding of the system by supplementing the written response.
- *Use State and local office staff with a detailed knowledge of the system.* Knowledgeable users and system support staff will be able to write concrete, precise, and knowledgeable responses and show how the system meets the needs of end users.
- *Work on the document in Sections, but edit it for overall consistency.* If many staff contribute to the document, the project manager should review it for unnecessary duplication and repetition and statements that may appear contradictory or require clarification.
- *Remember that these documents could eventually become public.* Responses should provide sufficient detail to address the questions and be clear to readers lacking detailed knowledge of the SACWIS system.

By following the above guidance, States may limit the need to revise and re-submit responses.

The State is reminded to submit copies of the documentation to both the Central and Regional ACF Offices.

Suggestions for the On-Site Review:

- *Focus the on-site system demonstration on functional areas that reflect the processing of a typical child welfare case.* It is very helpful for the Federal team to understand how the system is used to support local and State office business processes, and see it used as it is intended in day-to-day operations. Clearly outline the steps and processes that will be demonstrated and how they interrelate. As the demonstration proceeds, specify the functional area being demonstrated to the Federal team.
- *Use State and local office staff with a detailed knowledge and experience with the system to demonstrate the system.* Experienced staff will convey to the Federal team a sense of how the system is used in the field and can quickly navigate between different interfaces, reports, and ticklers.
- *The Federal team will ask questions during the demonstration.* Although the demonstration is a presentation of the system's functionality, it is an interactive presentation. The Federal team may ask questions of the presenters throughout the demonstration and refer to the Guide responses and supporting documentation. The questions are to help clarify understanding and do not signify a potential finding or that something is wrong with the system.

- *Child welfare programmatic staff and information systems staff should be present during the demonstration.* As the demonstration proceeds, questions may arise on a wide variety of child welfare program, policy and technical issues such as State policy, eligibility determination, work flow processes, case management supervision, system security, edit checks, and database design. The presentation should be attended by State staff knowledgeable of the system's technical details as well as representatives familiar with how policy-compliant work is done in the field and how reports and ticklers are used.
- *The local and State office interviews should not be pre-scheduled; interviews will be conducted at the caseworker's desk.* In order to accommodate normal daily operations and to provide maximum flexibility for interviews, the review team will interview local office staff as they are available over the course of the day. Caseworkers and other users will be interviewed at their desks so that the Federal team can observe how they use the system. The State project team member accompanying the Federal review team should help coordinate the interviews by determining when individuals are available for interviews.
- *The local office interviews require logistical coordination by the State.* The local office interviews typically take an entire business day and require visits to between two and ten of the various types of offices that use the system. The time and distance involved requires careful advance planning by the State and the Federal team to maximize time spent in local offices, rather than travel time. The selection of offices to visit will be made during pre-visit conference calls.
- *The Federal team may need to interview private provider's staff.* If the State requires private providers to use the SACWIS, the Federal review team will interview the private providers' staff at one or more of their offices. The State will coordinate the logistics of these interviews.

In summary, SARs are a cooperative process between the State and Federal teams. ACF encourages the State to ask questions and seek clarification on any issues before, during, or after the review.