

<h1>ACF</h1> <p>Administration for Children and Families</p>	U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Administration on Children, Youth and Families	
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PROGRAM INSTRUCTION

- TO:** State SACWIS Project Managers, State Information Technology Executives, and Other Interested Parties
- SUBJECT:** Utilization of SACWIS by Private Providers that deliver Child Welfare Case Management Services under Contract to a title IV-B/IV-E Agency
- LEGAL AND RELATED:** Omnibus Budget Reconciliation Act of 1993 (P.L. 106-33); Title IV-E of the Social Security Act (the Act) at Section 474(a)(3); 45 CFR Part 1355; 45 CFR Part 95 – Subpart F; Action Transmittal ACF-OISM-001 (issued February 24, 1995)
- PURPOSE:** The purpose of this Program Instruction (PI) is to provide information on Federal requirements for the use of Statewide Automated Child Welfare Information Systems (SACWIS) by private providers. It discusses the parameters governing private provider use of SACWIS, enumerates SACWIS implementation options for States and private providers, and outlines funding considerations related to private providers and SACWIS.
- OUTLINE:** The PI contains four sections titled:
- Section I: Definitions and Background
 - Section II: SACWIS Requirements Applying to Private Case Management Providers
 - Section III: Options for Integrating Private Case Management Providers with SACWIS
 - Section IV: Funding Considerations
- INFORMATION:** **Section I – Definitions and Background**
- Definitions of Private Providers*
- For the purposes of this PI, we define private providers as non-governmental entities (e.g., non-profit groups, faith-based organizations, for-profit enterprises) contracting with a title IV-B/IV-E agency to provide services. The private providers are categorized as follows:

1. Private Case Management Providers: Entities providing case management services (e.g., case planning; service authorization, coordination, and monitoring; child and family visitation) and/or fulfilling other functions covered by SACWIS requirements, such as private child-placing agencies (see following paragraph for further discussion on private child-placing agencies). Private case management providers may also offer other services, such as those offered by private service providers (see the following category).

A sub-category of private case management providers are private child-placing agencies. These agencies are responsible for placing children in foster care settings. Frequently the foster care settings are either licensed by and/or under contract to the private child-placing agency.

2. Private Service Providers: Entities delivering services not required to be supported by SACWIS. These services may include, but are not limited to family and child counseling, mental health services, tutoring, mentoring, health services, substance abuse counseling, job counseling, and employment training. Private case management providers or State social workers using the State SACWIS may authorize the delivery of these services to an individual or family.

Complete, Timely & Accurate Data is an Important Component of Successful Child Welfare Practice

It is generally recognized that effective child welfare case management requires a holistic perspective of children and families; case managers need complete family histories and a thorough grasp of internal familial dynamics and external influences. Comprehensive records of all past and current activities and decisions such as case plans, court actions, placements, and delivered services are required in order to tailor the best approach to serve each family. Case workers and their supervisors must have access to this complete data to adequately assess a family's needs and progress. In addition to complete historical records of past activities, positive outcomes can be improved by ongoing, coordinated services and ensuring that services are matched to needs, synchronized in delivery, and consistently monitored and evaluated. Case workers must have complete, timely, and accurate information, presented in a unified framework, in order to gain this holistic client perspective and manage service delivery effectively.

However, maintaining a unified historical case record constantly updated with new service data is challenging. Families may be served by different State, County and private provider staffs in different locations at different times. Even within one child welfare episode, families may receive case management services from different providers as they move through the child welfare service continuum: from intake and investigation, to case

management and service provision, to case closure. Operating independently, providers may assemble incomplete family portraits and service records containing only the data known to them. It is difficult to share child welfare service information between different agencies that are not using the same information system; information that is not shared cannot be combined into a unified case file. Even if information from different systems is shared, the data may not be standardized. The lack of a standard unified view of a family, supported by a common information system framework, compromises child safety. Workers at one agency may not have access to timely information from other agencies, and if they do have access to information, they may not easily and accurately interpret the case histories and services records of providers defining data elements differently.

SACWIS Provides Unified Case Records to Support Child Welfare Practices

Congress recognized the benefits and challenges of unified case records to children, families, and workers when it authorized additional funding to States¹ electing to implement comprehensive SACWIS case management systems. A SACWIS compliant system provides a common framework that supports a consistent, complete, and standardized data collection methodology and view of family circumstances to allow for program monitoring and positive family outcomes. To promote the adoption of such systems, Congress provided financial incentives for States to build SACWIS through legislation authorizing enhanced funding. The incentives included 75 percent funding through Federal fiscal year 1997 to plan, design, develop, and implement a SACWIS and an ongoing favorable cost allocation methodology for the development, maintenance, and operation of systems complying with Federal SACWIS requirements.²

Subsequent to the legislation's passage, the Administration for Children and Families (ACF) promulgated Departmental regulations³ implementing sections 474(a)(3)(C) and (D) of title IV-E of the Social Security Act. The legislation and regulations delineated requirements a statewide child welfare information system must meet to be considered SACWIS compliant.

Section II – SACWIS Requirements Applying to Private Case Management Providers

Overview of Private Providers Contracting with State Title IV-B/IV-E Agencies

¹ In this Program Instruction, "States" refers to States and other jurisdictions with title IV-B/IV-E agencies (e.g., the District of Columbia and tribal organizations)

² The Omnibus Budget Reconciliation Act (OBRA) of 1993 (Public Law: 103-66).

³ 45 CFR 1355.50 – 1355.57, issued 12/22/1993

State title IV-B/IV-E agencies have implemented a range of unique and diverse practice models to provide child welfare services. Especially during the past decade, the number of States incorporating private providers into their family service delivery strategy by contracting with private providers to perform child welfare case management and deliver services has steadily increased. This increased reliance on private providers comes as more States roll out operational SACWIS systems.

SACWIS Requirements

If a State elects to build a SACWIS and contracts with private case management providers, these providers must use SACWIS to document, track and manage all case management activities.⁴ While private case management providers may have proprietary information systems, those systems cannot be used to perform SACWIS required functions; the private case management providers must use SACWIS for these activities.

If private child-placing agencies are responsible for placing children in specific homes or moving children to other homes in their network, they must use SACWIS to record placements and placement moves. It is not sufficient for the private child-placing agency to inform the title IV-B/IV-E agency of placements or placement shifts. To ensure prompt and accurate documentation of each child's location, the private child-placing agency must, at a minimum, have access to SACWIS functionality to record placements and placement changes.

The above requirements are embodied in congressional legislation, regulations, and other Federal policy issuances. The legislation specifies that a SACWIS must provide for the "efficient, economical, and effective administration of the programs carried out under a State plan approved under part B [title IV-B] or this part [title IV-E]..."⁵ Policy issuances require that a SACWIS "must operate uniformly as a single system...throughout the State and must encompass all political subdivisions which administer programs provided under title IV-E."⁶

ACF regulations also call for SACWIS to provide for the "...collection, maintenance, management, and reporting on all children in foster care under the responsibility of the State..."⁷ The regulations specify that the information collected and managed by SACWIS include, for example, demographic information, case planning information, and information

⁴ This requirement does not extend to "private service providers" performing activities and providing services that fall outside of the SACWIS scope. However, SACWIS may include functionality to generate service referrals to private agencies providing services not required to be managed by SACWIS. The service referral and resulting service report sent back to the social worker may be exchanged via an electronic interface or via hardcopy. States electing to add functionality to SACWIS to document services or to extend SACWIS use to private service providers should notify CB of such plans through the Advance Planning Document process.

⁵ Section 474(a)(3)(C)(iv) of the Social Security Act as amended by OBRA.

⁶ Action Transmittal (AT) ACF-OISM-001, issued February 24, 1995, Section II – SACWIS Policies. The complete AT is available at: http://www.acf.hhs.gov/programs/cb/laws_policies/policy/at/at9501.htm

⁷ 45 CFR 1355.53(b)(3)

necessary to facilitate the evaluation and delivery of services. Other functions SACWIS must perform include supporting case assessment activities, managing information necessary to determine eligibility, and quality assurance functions.⁸

A SACWIS must also satisfy the Child and Family Services Review statewide information system systemic factors of identifying the legal status, location and goals for the placement of every child who is (or within the immediately preceding 12 months, has been) in foster care.⁹

To perform these functions SACWIS must be the State's system of record and contain complete, timely, and accurate documentation of case management activities. Requiring all users to enter data into the same system ensures that all case data is unified in one system (it is complete), all data is real-time (it is instantly available to all users as soon as it is entered, rather than delayed because it must be imported from other systems), and there is a common understanding of the meaning of the data (because data definitions apply universally; there is no concern that elements may be defined differently in different systems). As the system of record, all child welfare case data must be input in the State's SACWIS, not ancillary systems. Private case management providers must use the SACWIS for all child welfare case management activities. If instead the data is entered into systems owned by private case management providers, SACWIS cannot control the collection, maintenance and management of the data as required.

A SACWIS, by operating "uniformly as a single system..." that is used by the private providers specified above, must provide features promoting the "efficient, economical, and effective administration of the programs..." including the following:¹⁰

- Reducing duplicate data entry and ensuring immediate access to complete, timely, and accurate data. A single statewide system accessed by all workers serving child welfare clients guarantees that information entered by one worker can be accessed, viewed, updated, and used by other case workers, supervisors, and managers. If the child or family moves to a different county or city and is served by different case managers (either public or private employees), the information does not have to be reentered into a separate system. Instead, the previously entered information can be accessed by other case workers using the common system. Workers therefore spend less time documenting cases and more time serving families. Complete, timely, and accurate data protects children by providing workers with

⁸ 45 CFR 1355.53

⁹ The summary of these systemic factors are found in the CFSR Procedures Manual, Appendix B: Index of Outcomes and Systemic Factors, and Associated Items and Data Indicators under the Statewide Information System heading. The document may be accessed at:

http://www.acf.hhs.gov/programs/cb/cwmonitoring/tools_guide/procedures/appendixb.htm.

¹⁰ The following is not an exhaustive enumeration of all advantages a SACWIS provides.

tools needed to serve their clients. The real-time data can also provide managers and program administrators with up-to-the-minute reports ensuring timely supervision, proper oversight and better decision making.

- Reducing data standardization and synchronization costs. It is straightforward to enforce data standardization and common data definitions with a single statewide system. Edit checks to ensure compliance with common data definitions and case practice requirements are developed once and apply statewide. However, with multiple systems, each system must be evaluated (and possibly modified) to ensure compliance with standard data definitions and case practice requirements. Furthermore, edit checks have to be written for each participating system. If case practice or data definitions are later changed, the updates must be coordinated with all agencies and systems. States can incur costs when synchronizing the multiple systems with a unified database needed for statewide reports and to provide staff at other entities access to critical and timely case data. If all data is entered and maintained in one system, synchronization is not needed and the associated costs eliminated.
- Improving data quality to produce reliable reports to support effective program monitoring and performance. The precise standard data of a unified system is the foundation of accurate reporting, confident decisions, program planning and measuring outcomes. Standard data definitions enable States to compare performance of different entities to identify and promote effective practices and encourage improvement of weak performers. In contrast, a fragmented data landscape maintained across changing and redundant data systems, where information definitions and business processes will diverge, complicates monitoring by making standard comparisons difficult.
- Ensuring that critical historical information is always obtainable. A SACWIS with a unified state-controlled database ensures that historical information on all children and families is maintained and available. Case information in private case management provider systems can become inaccessible or be lost if the contract with the private case management provider is terminated or the provider ceases operations.
- Simplifying data sharing with other systems. A single statewide child welfare data system will enable easier sharing of information with related human service programs (e.g., Child Support, Medicaid, and Temporary Assistance to Needy Families) as well as mental health agencies, courts, school systems and other state and local agencies.¹¹

¹¹ Subject to confidentiality requirements at 471(a)(8) of the Act, 45 CFR 205.50, 45 CFR 1355.21, and 45 CFR 1355.30(p)(3).

- Increasing accountability. Edit checks and a consistent set of definitions allow for the implementation of system designs and management reports to ensure workers are complying with policy and practice guidelines. For example, a single system can ensure cases are always assigned to workers. With a unified system it is easier to confirm that cases transition smoothly from one worker to another; cases are less likely to be inadvertently dropped or “orphaned” without staff assigned to work the case.
- Reducing information system development and maintenance costs. Under the SACWIS model common case management functionality is developed once and used by all providers. Absent a single statewide system, case management providers (both public and private) develop and implement redundant functionality in multiple parallel systems. This redundant development across many independent systems (and the related maintenance and operation of the duplicative functionality) multiplies costs. This duplicative administrative overhead increases the cost of care to children and families and contradicts SACWIS mandates.
- Reducing disaster recovery/business continuity costs and complexity. Child welfare information systems must include Disaster Recovery Plans (DRP) and Business Continuity Plans (BCP). Although such planning is complex and requires frequent review and validation testing, the SACWIS model simplifies the DRP/BCP process by virtue of being a single, statewide system. States are able to implement and test a single DRP/BCP. States are able to leverage pre-existing State DRP/BCP plans and processes. By contrast, ensuring disaster recovery/business continuity of multiple independent systems maintained by private case management providers magnifies the logistical complexity, cost, and risk.
- Reducing the cost of complying with Federal requirements. States use child welfare information systems to support Federal data reporting requirements for the Adoption and Foster Care Analysis and Reporting System (AFCARS), the National Child Abuse and Neglect Data Set (NCANDS), the Child and Family Services Review (CFSR), and the National Youth in Transition Database (NYTD). A SACWIS reduces the data collection and reporting costs associated with Federal requirements. Multiple applications increase the costs associated with coordinating data collection and reporting.

Furthermore, when new data elements are added or changes made to existing collections, duplicative changes must be made to multiple systems, rather than enhancing a single statewide system.

- Reducing the costs of client confidentiality¹² and data security. A single unified database simplifies administering client confidentiality and data security; standard policies are more easily imposed and enforced. There is less administrative overhead in securing information in one statewide database versus multiple independent databases maintained in various settings by different providers that may change over time. State child welfare databases can further reduce administrative costs by leveraging pre-existing statewide information policies, procedures, and secure data facilities.

Section III – Options for Integrating Private Case Management Providers with SACWIS

CB recognizes that, because of the varieties of State service delivery models, a single information technology implementation strategy cannot address the child welfare business practices of all States. CB therefore provides States with three broad options for implementing child welfare information systems to accommodate varying State practices and to help States realize the SACWIS benefits enumerated in Section II. These options are intended to grant States considerable flexibility in implementing SACWIS.

States are encouraged to pursue the option most suitable for their circumstances. We remind States that these are broad implementation categories. The details of each State’s specific implementation strategy must be communicated to CB via the established Advance Planning Document (APD) process.

Option 1: SACWIS is the sole child welfare management information system used by all entities, including private case management providers.

Under this option, State child welfare workers and private case management providers (if any) use the SACWIS exclusively; they do not use another information system for case management. States may consider this option when the State does not contract with private case management providers or when the State and the private case management providers are able to design and implement a SACWIS that will meet the SACWIS-related private case management providers’ information processing needs.

Using the same system will ensure coordination between the State and private case management providers, promote seamless service delivery, and ensure that all public and private case management providers have access to complete, timely, and accurate case information.

¹² Confidentiality requirements are found at 471(a)(8) of the Act, 45 CFR 205.50, 45 CFR 1355.21, and 45 CFR 1355.30(p)(3).

Option 2: Private case management providers enter data into SACWIS as their case management system and the State downloads appropriate data to the private case management provider's information systems.

States should consider this option when private case management providers serve, in addition to clients provided via contracts with the title IV-B/IV-E agency, other populations, such as adults or children that the State has not elected to include in its SACWIS or when private case management providers perform functions that the State has not elected to include in its SACWIS.¹³

Although, as noted in Section II, a SACWIS “must operate uniformly as a single system...throughout the State and must encompass all political subdivisions which administer programs provided under title IV-E,” States may not have elected to build an information system that supports all of the clients and/or program areas (e.g., juvenile justice, child care) within the State's multi-program service domain.

Option 2 satisfies Federal SACWIS regulations and provides flexibility in meeting State and private case management provider business needs. Under this option, private case management providers use other systems for non-SACWIS functions (e.g., services not covered by SACWIS, or the management of non-child welfare clients) and the SACWIS for all SACWIS related functions.¹⁴ Please note however that if a State selects Option 2, title IV-E administrative funds are not available to support the development, maintenance, or use of private case management provider information systems, because all State defined title IV-E requirements are supported by the SACWIS application.

Because private case management providers may want to use data previously entered into the SACWIS, the State may download appropriate data to private case management provider systems.¹⁵ This data may be either provided by means such as an electronic interface directly to private case management provider systems or via a data file that is generated by SACWIS and imported into private case management provider systems. Please note that Federal Financial Participation (FFP) is available for building one mechanism to provide SACWIS data to private case management provider systems (such as an electronic interface to private

¹³ A State may build a single system encompassing multiple populations and programs (including Titles IV-B and IV-E) of which SACWIS required functionality is a subset. Such a strategy could enable a State to build a single statewide system to be used by all private providers to satisfy all business activities, obviating the need for secondary case management systems. Under this approach, system costs would be allocated to all programs in accordance with an approved cost allocation plan.

¹⁴ The SACWIS functions are described in AT ACF-OISM-001, Section IV – SACWIS Functional Requirements and General Program and Systems Guidance.

¹⁵ When considering what data the State elects to provide to a private case management provider, the State should consider the sensitivity of the data and the fact that the State may not always have a relationship with the vendor that would allow the vendor access to sensitive information. Please see confidentiality requirements at 471(a)(8) of the Act, 45 CFR 205.50, 45 CFR 1355.21, and 45 CFR 1355.30(p)(3).

case management provider systems or a data file that will be uploaded by all private case management provider systems). FFP is only available for the SACWIS costs associated with generating a data file or collecting and sending data to an external system. FFP is not available for private case management providers to modify their systems.

Regardless of whether the State provides the data via a single interface or a data file, the information flows in one direction only: from SACWIS to private case management providers' systems. All child welfare case management data must be entered into and maintained in the SACWIS, not private case management provider systems. To ensure statewide data consistency and integrity, if a user needs to update, correct, or delete SACWIS data, the SACWIS must be used.

A State child welfare information system is not SACWIS compliant if separate private provider systems perform SACWIS functions, capture SACWIS-related data, and/or upload data to SACWIS. If SACWIS functions reside outside a State's child welfare information system (or if SACWIS functions are duplicated by multiple systems) the SACWIS cannot manage the data or realize the benefits of efficiency, economy, and efficacy (examples of these benefits are enumerated in Section II above); a system that does not provide such benefits is not SACWIS compliant and does not qualify for the enhanced funding and favorable cost allocation described in the enabling legislation.

Option 3: Implement both Option 1 and Option 2.

If a State contracts with different types of private case management providers (i.e., some providers have the characteristics described under Option 1 and others have the characteristics described under Option 2) the State may blend Option 1 and Option 2. Some private case management providers would use SACWIS exclusively (Option 1) and others would use SACWIS to perform SACWIS functions and import SACWIS data into their systems (Option 2).

Recommendations for Partnering with Private Providers in SACWIS Development

As noted above, private case management providers are key partners in many States. Their involvement is critical in efforts, such as a SACWIS project, that affect service delivery. States that use private case management providers and elect to implement a SACWIS may consider the following strategies that other States employ to ensure private case management providers use SACWIS:

- educate private case management providers on SACWIS, including the requirement that SACWIS must be the system of record for child welfare data and that systems duplicating SACWIS functions will jeopardize SACWIS funding;

- remind private case management providers that participation in the SACWIS effort will allow the State to claim FFP for the costs of technology upgrades for the private case management provider's staff and training related to installation and use of SACWIS (thereby reducing the administrative costs for the private case management provider);
- ensure that the SACWIS offers benefits to private case management providers by considering their business and reporting needs in the overall system design;
- include private case management providers in SACWIS project governance (e.g., executive steering committees and change control boards);
- include private case management providers in system design sessions to ensure their needs are addressed;
- provide support during the testing and training phases to ensure that the private case management providers are comfortable with and knowledgeable about SACWIS;
- after SACWIS rollout, encourage private case management providers to submit suggestions for enhancing/improving SACWIS; and
- mandate SACWIS use in contracts with private case management providers.

Section IV – Funding Considerations

This section includes information on SACWIS funding claimable by States incorporating private case management providers in SACWIS (i.e., implementing one of the three options described in Section III). Funding is available for equipment and training.

Equipment

The following conditions apply when States apply for FFP for SACWIS equipment for private case management providers:

- In order for the State to receive Federal reimbursement for initial and replacement SACWIS equipment, private case management providers must be under contract with the title IV-B/IV-E agency at the time the equipment is provided.
- The reimbursement for SACWIS equipment purchased for private case management providers under contract to a State will be allowed only to the extent that the private agencies are performing SACWIS-defined

activities equivalent to those of the State's title IV-B/IV-E agency employees.¹⁶ If any of the staff activities are not allowable under titles IV-B or IV-E as a SACWIS administrative cost (e.g., activities supporting the provision of social services such as counseling and treatment services), the cost of the equipment must be allocated on a basis that reflects its usage for allowable SACWIS versus non-SACWIS activities performed by the private case management provider using the equipment.

- All equipment provided to the private case management provider must remain the property of the title IV-B/IV-E agency. Should the contractual relationship between a private case management provider and the title IV-B/IV-E agency be terminated, the equipment must be returned to the title IV-B/IV-E agency or disposed of in accordance with Federal regulations.¹⁷
- The number of computer workstations installed at private case management provider offices must meet a reasonable standard. The reasonable standard should be proposed by the State in its APD and approved by CB. The number of computer workstations should be proportional to the number of families served by the private case management provider for SACWIS activities. The State should propose a methodology that considers the number of families served and the number of full-time equivalent staff performing specific SACWIS activities.

Training

Training costs related to instructing staff, including private case manager staff, on how to use SACWIS are allowable expenditures. Specific guidance on training costs for SACWIS is delineated in AT ACF-OISM-001.

INQUIRIES: HHS – ACF/ACYF/CB/Division of State Systems

/s/

Joan E. Ohl
Commissioner

¹⁶ ACF-OISM-001

¹⁷ 45 CFR 95.707