

Children's Bureau Advance Planning Document (APD) Process: APD 101

Presentation Overview

- APD definition and purpose of APD process (3-8)
- The APD Continuum – contents and processes overview (9-20)
- Regulatory changes made in 2010 (21-27)
- The APD Continuum – detailed description (28-94)
- Submission, review and approval processes (95-106)
- Prior approval and exemptions (107-120)
- Cost allocation and Federal Financial Participation (FFP) (121-127)
- Waivers (128-129)
- Disallowances and denial (130-131)
- Non-SACWIS (132)
- Independent verification and validation (IV&V) (133-137)
- Technical assistance suggestions – **the dos and don'ts (138-148)**
- Helpful references and citations (149-158)

APD Background

45 CFR§ Part 95 covers APDs, and
§ 95.605 provides definitions of
the types of APDs

APD Defined

- Advance Planning Document means: a recorded plan of action to request funding approval for a project which will require the use of automated data processing services or equipment
- Types of APDs during the planning, design, development and implementation of a project may include a Planning APD, an Implementation APD, or an APD Update to these documents.

Purpose of an APD

- When required, states and tribal IV-E agencies use an APD to:
 - Request FFP
 - Present a business case for Information Technology (IT) acquisitions
 - Demonstrate they have conducted appropriate IT project planning, and
 - Establish they have sufficient resources and will follow disciplined processes to achieve their project objectives

The APD Process

- The Advance Planning Document (APD) process is a series of consecutive steps defined at 45 CFR 95 Subpart F, through which states and tribes define plans and seek approval for information technology activity supported by FFP
- By following these steps, state and tribal IV-E agencies can obtain the necessary federal prior approval for FFP to build and operate automated systems

The Federal Perspective on APDs

- APDs help to mitigate risks, by outlining plans, activities and approaches
- They demonstrate that the expenditure of federal funds is made in accordance with federal regulation
- They provide a basis for federal approval and oversight

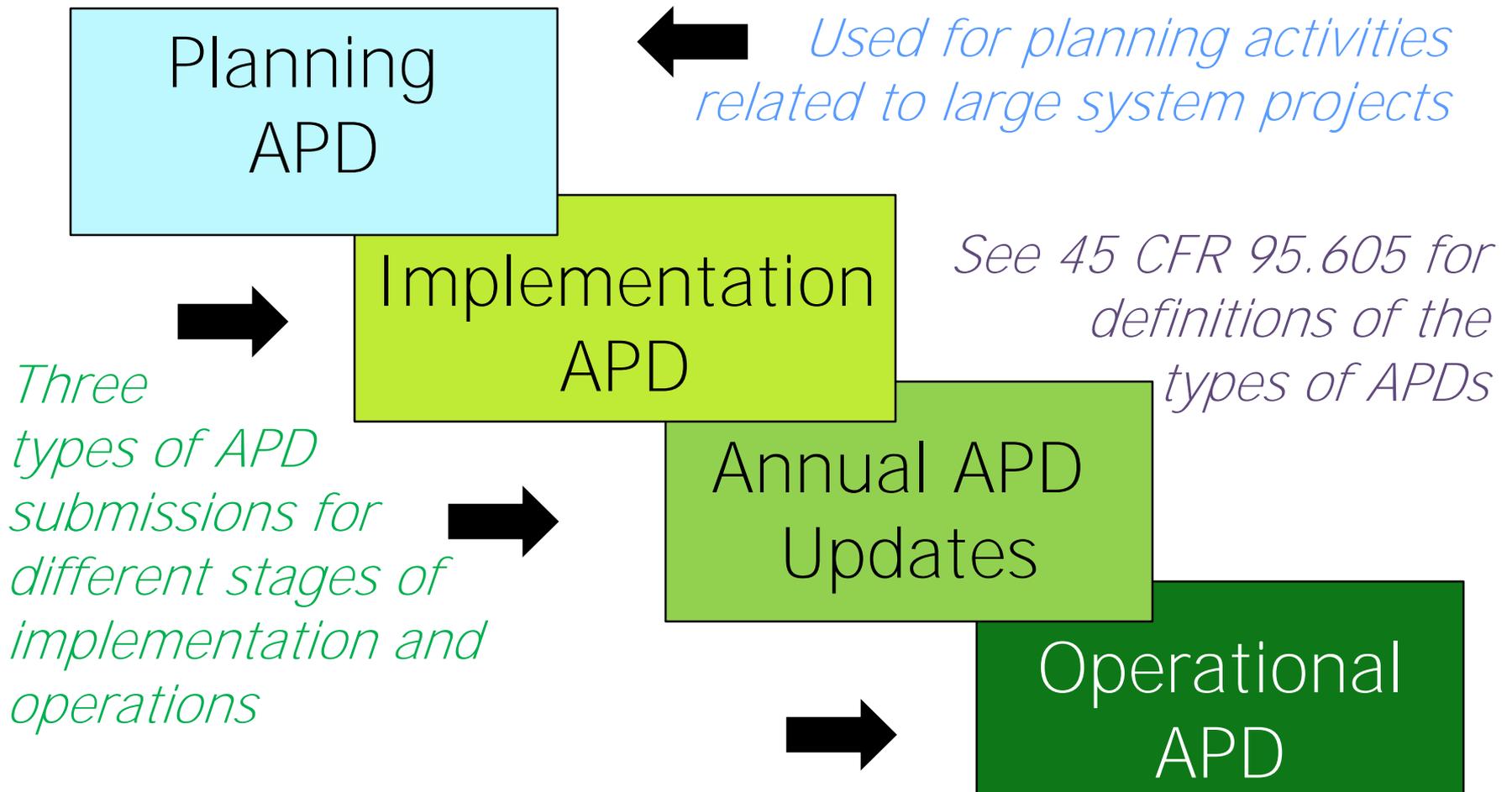
Shared Responsibilities

- Title IV-E agencies whose IT plans meet or exceed APD thresholds as defined in the regulations at 45 CFR 95.611 must prepare and submit APDs and APD Updates when necessary
- The Division of State Systems (DSS) is responsible for timely review, feedback as required, and approval

The APD Process Continuum

- The APD continuum roughly parallels the automated system development life cycle:
 - Planning
 - Design, development and implementation
 - Maintenance and operations, enhancement and upgrades

APD Continuum for CW Systems



The APD Continuum

Planning APD

*Used to claim project
funding for planning
activities*

Secures funds for planning activities, which may include:

- Defining the problem or need to be addressed
- Developing a project management plan
- Estimating the total project budget
- Defining requirements specification, general system design and developing RFPs
- Preparing an Implementation APD

The APD Continuum

Planning APD

The Planning APD is also used to:

- Certify that all acquisitions will comply with agency and federal requirements
- **Detail the state's or tribe's commitment to complete a** needs assessment, feasibility study, system alternatives analysis, and cost benefit analysis
- Provide a list of planned procurements and an acquisition summary for planning activities

The APD Continuum

Implementation APD

Mandatory (with exceptions)

Funds the costs of designing, developing, and implementing the system, and includes:

- Results of the planning activities
- Needs and objectives
- Requirements analysis (functional and technical)

Provides approval for system implementation

The APD Continuum

Implementation APD

IAPD should also include:

- Personnel requirements
- An activity schedule
- Budget for development
- Budget for operations
- Cost allocation methodology
- Cost benefit analysis

The APD Continuum

Implementation APD

IAPD should also include:

- A statement indicating how long the system will be used
- Interface/data exchange requirements
- Security and continuation of operation plans
- Additional requirements as noted at 45 CFR 1355.54 through 1355.57

The APD Continuum

**APD Updates:
Annual**

*Continues project funding
year-to-year*

An update to either a planning or implementation APD for a project going on for more than one year, and includes:

- Reference to the approved APD
- Project activities, status and problems
- Risk management plan
- Updated project schedule for the remainder of the project

The APD Continuum

**APD Updates:
Annual**

Includes:

- Updated project budgets and expenditures
- Staffing
- Updates to the cost allocation methodology
- An acquisition summary for the next year

The APD Continuum

APD Updates: As-needed

*An out-of-schedule update,
completed only when needed*

Prepared when unexpected project changes have a significant impact on any of these:

- Project scope or system concept
- Costs or schedule
- Changes to cost allocation methodology
- Project acquisitions

The APD Continuum

Operational APD

Required when the system is in operations and maintenance mode (may be included in the Annual APD Update)

Brief (2 pages), high-level document submitted annually to report:

- Activities planned in coming year
- Any planned acquisitions
- Budget for maintenance and operations activities
- Cumulative total of all project expenditures-to-date

Outside the APD Continuum

Emergency
Acquisition
Request
Part 95.624

*Must be followed by an APD within
90 days of ACF's recognition of an
emergency*

Used **ONLY** to request immediate funding for hardware, software or services in emergency situations, when program operations would be harmfully interrupted or delayed

Changes to APD Rule in 2010

- APD rule issued October 28, 2010—viewed as major changes to APD regulations
- Provided a risk-based, more flexible approach
- Revised the APD regulations published in 1986, and accommodates changing technologies
- Gave states and tribes more flexibility and ownership of decisions
- Rules treat Title IV-E tribes and states equally

Changes with 2010 APD Rule

- Simplified process and placed emphasis on reducing and managing risk
- Increased federal oversight of high-risk IT projects; gave less oversight to low-risk projects
- Reduced documentation required for low-risk projects

Changes with 2010 APD Rule (Continued)

- Deferred to state or tribal procurement rules
- Increased submission thresholds (\$\$\$) for prior approval; gave IV-E agencies ability to request exemptions from prior approval for acquisitions
- Changed procurement standards for IT acquisitions to be subject to 45 CFR part 92 rather than part 74

Changes with 2010 APD Rule – Acquisition Exemptions

- Provided routine granting of acquisition exemptions
- An exemption request is assumed to be concurrently approved with the approval of the Planning, Annual, or As-Needed APDU unless the federal reviewer indicates in writing the acquisitions for which prior approval is needed

Changes with 2010 APD Rule – Acquisition **Exemptions (Cont'd)**

- In certain circumstances, exemption can NOT be assumed:
 - Not submitting information in the acquisition summary that is required in § 95.610
 - If the state or tribe deviates from the terms of the exemption
 - The acquisition is for high risk activities, such as customized software development, a new or replacement system
 - There is a history of past cost overruns or implementation problems, limited competition, or discrepancies between acquisition size and the size of program or caseload

Changes with 2010 APD Rule

– Important Note

- **Rule references “enhanced funding”** which is defined under § 95.605 as the matching rate that is “higher than regular rate of FFP authorized by Title IV–D, IV–E and XIX of the Social Security Act”
- **NO enhanced funding for SACWIS projects is available at this time**
 - Therefore, if a SACWIS project was initially developed with Enhanced Match Rate funding but is currently being completed or enhanced with funding at the Regular Match Rate, use the Regular Match Rate submission thresholds

APD Final 2010 Rule

- Published in the Federal Register Volume 75, Number 208, page 66319, on October 28, 2010, and can be found at:
<http://www.gpo.gov/fdsys/pkg/FR-2010-10-28/pdf/2010-26727.pdf>
- Program instruction ACYF-CB-PI-11-07, issued July 5, 2011 provides information to states and tribes regarding changes to the regulations and can be found at:
http://www.acf.hhs.gov/programs/cb/laws_policies/policy/pi/2011/pi1107.pdf

The APD Continuum

**Planning
APD**

Planning APD

- A brief document – Approximately 10-plus pages
- Optional, but recommended
- Initiates planning for major IT acquisitions, such as large-scale system development projects, or large volume equipment acquisitions
- An agency may submit a separate PAPD or may choose to combine both planning and implementation phases into a single APD

Planning APD (Continued)

- Used to request project related funding to initiate a large IT project
 - Traditionally used for large statewide system development or major hardware acquisitions
 - For complex projects, a Planning APD (PAPD) provides time and funding for planning activities
 - Required when requesting project dedicated funding

Planning APD (Continued)

- Planning activities may include preparing specifications and cost estimates, developing request for proposals (RFPs) and conducting procurements for:
 - Planning services
 - System design, development and implementation services
 - QA/QC and IV&V services
 - Project management support
 - Document generation services, and
 - Developing the Implementation APD

Planning APD (Continued)

- Planning APD Contents should include:
 - Problem/need statement
 - Project management plan
 - Commitment to conduct various studies
 - Planning budget
 - Estimated total project cost and cost sharing methodology
 - **Commitment to define the agency's functional requirements**

PAPD Content Detail – Problem Statement

- Problem/Need Statement:
 - Identify business needs, problems, or new or changed program requirements that can be solved through IT acquisition and implementation
 - Identify opportunities for improved program economies, efficiencies, and effectiveness that could be met with IT acquisition and implementation

PAPD Content Detail – Project Management Plan

- The Project Management Plan should describe:
 - The nature of the planning project
 - Planning activities and related deliverables
 - Agency and contractor resource needs
 - Key personnel and their positions
 - An organizational chart for the planning team
 - Procurement activities
 - Planning project schedule

PAPD Content Detail – Studies

- **The PAPD should also describe the agency's** commitment to conduct the following studies:
 - Needs assessment
 - Feasibility study
 - Alternatives analysis
 - Cost benefit analysis
 - Functional requirements specification and general system design

PAPD Content Detail – Budget

- Planning Budget content should include:
 - Specific budget for the planning phase that includes cost by:
 - Category (for example - equipment, hardware, contracts, and agency staff)
 - Quarter
 - Subtotaled by program funding source
 - Estimated total project cost
 - Prospective agency and federal cost allocation and distribution

Planning APD: Sample Project Budget

* Actual agency cost categories may differ—use your agency's categories
 ** Include additional quarters and years as needed
 *** Subtotal program share

| Cost Category* | Quarter 1 Year 1 | Quarter 2 Year 1 | Quarter 3 Year 1 | Quarter 4 Year 1 | Year 1 Total | Quarter 1 Year 2** | Total |
|------------------------|---------------------|---------------------|---------------------|---------------------|--------------|-----------------------|-----------|
| Direct Personnel | 187,500 | 187,500 | 187,500 | 187,500 | 750,000 | 187,500 | 937,500 |
| Contractor Services | 0 | 0 | 0 | 35,000 | 35,000 | 35,000 | 70,000 |
| System Hardware | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| System Software | 0 | 0 | 0 | 120,000 | 120,000 | 0 | 120,000 |
| Training | 0 | 0 | 0 | 16,000 | 16,000 | 2,000 | 18,000 |
| Overhead | 27,000 | 31,000 | 31,000 | 45,000 | 134,000 | 0 | 134,000 |
| Supplies | 13,000 | 18,000 | 18,000 | 18,000 | 67,000 | 18,000 | 85,000 |
| Other | 0 | 0 | 0 | 3,800 | 3,800 | 3,800 | 7,600 |
| TOTALS | 227,500 | 236,500 | 236,500 | 425,300 | 1,125,800 | 246,300 | 1,372,100 |
| Program A Share *** | 207,500 | 216,500 | 216,500 | 405,300 | 1,045,800 | 226,300 | 1,272,100 |
| Program B Share | 20,000 | 20,000 | 20,000 | 20,000 | 80,000 | 20,000 | 100,000 |

PAPD Content Detail – Cost Benefit Analysis

- Although the APD rule changes in 2010 eliminated the requirement for annual cost benefit updates:
 - Cost Benefit Analysis (CBA) remains a required element of the Planning and Implementation APDUs
 - See 45 CFR, § 95.610(a)(2)(v) and § 95.610(b)(4)

PAPD Content Detail – Cost Benefit Analysis (Continued)

- The cost benefit analysis is developed during the planning phase, and is performed for each system alternative evaluated
- The CBA is then submitted as part of the Implementation APD along with the feasibility study and analysis of alternatives

PAPD Content Detail – Cost Benefit Analysis (Continued)

- Suggested format for the status quo solution and each alternative:
 - Spreadsheet with recurring and nonrecurring cost by category, and year with totals for all columns and rows
 - Spreadsheet with identified benefits by year, with totals for all columns and rows
 - Detailed description and basis of all quantified benefits
 - Detailed description of all qualitative benefits

Federal Review of PAPD

The review of the PAPD will include the following questions:

- Is the need or problem clear?
- Is the planning approach reasonable?
- Is there a commitment by the agency to prepare a needs assessment, feasibility study, alternatives analysis, and cost/benefit analysis?
- Are the planning costs and cost allocation reasonable for this project?
- Is there an estimate of the total cost of the project?

Federal Review of PAPD (Continued)

- Agency should build in a 60-day federal review period when scheduling a project timeline
- Delays are not usually linked to the federal review, but to the need for additional information, changes and corrections
- Make sure that all sections are included; that cross-references between sections are valid, and double check the formulas for accuracy

The APD Continuum

Implementation
APD

Implementation APD

- The Implementation APD (IAPD) is submitted to request FFP for system design, development, implementation and operations
- The project approach, schedule, budget, progress and plan described in the IAPD are updated each year (or as necessary) with an APD Update that reports status, provides detailed information on project or budget activities, and requests continuation of funding

Implementation APD (Continued)

- The detail provided should be commensurate with the complexity and scope of the project or acquisition
- The IAPD requests approval for system design, development and implementation
- The submission of the IAPD and, if applicable, the **start of the implementation vendor's work completes** the planning phase

Implementation APD (Continued)

Key Definitions:

- **Development:** *building the system* – the definition of system requirements, detailing of system and program specifications, programming, and testing; includes design and implementation activities
- **Operations:** *using the system* – the automated processing of data used in the administration of agency plans for the applicable program(s) with a deployed system

Implementation APD Content

Implementation APDs should include:

- Statement of Needs and Objectives
- Description of the activities completed under a Planning APD, if a PAPD was used
- Detailed summary of the requirements analysis, feasibility study, and analysis of alternatives considered, including the transfer of a system

Implementation APD Content (Continued)

- Project Management Plan
 - Detailed description of the nature and scope of project activities, and the methods and processes to be used to accomplish these project activities
 - Personnel resource statement, including a position description and the number of assigned project staff
- Proposed budget
 - Note that separate budgets are needed for development and operational expenses

Implementation APD Content (Continued)

- Prospective cost allocation
- Proposed activity schedule, or work plan
- Cost/benefit analysis
- Budget detail
- **Planned duration for the system's use**
- Security and interface requirements, and
- The disaster recovery and business continuity processes

Implementation APD Content (Continued)

- The APD rules also impose additional requirements for acquisitions funded at the enhanced level (see 45 CFR 1355.54-1355.57 for SACWIS systems)

IAPD Content Detail – Exec Summary

- Begin with a brief Executive Summary:
 - Overview of goals and expectations
 - Statement describing executive support
 - Summary of planning activities (If the PAPD process was followed, summarize outcome)
 - Summary of any requests for prior approval exemptions
 - Total project cost estimate
 - Summary of initial funding request

IAPD Content Detail – Needs

- Statement of Needs and Objectives
 - Specify the business problems or needs to be addressed by the IT acquisition, and
 - Describe the planned outcomes and objectives for the planned IT project
- Needs may be expressed as deficiencies in the current environment, a response to new or changed program requirements, or opportunities for efficiencies or economies

IAPD Content Detail – Analyses

- Summary of requirements analysis, feasibility study and alternatives analysis
 - Requirements section should describe functional, technical and interface requirements
 - Alternatives analysis should identify each option considered, and provide a rationale for the **agency's selection**
 - The feasibility of transferring a non-specified system should be addressed as one of the alternatives considered for a SACWIS system

IAPD Content Detail – Analyses (Continued)

- Alternatives Analysis should address:
 - What alternative IT solutions were assessed, and what conclusions were drawn?
 - What alternatives were not selected and why?
 - For which alternatives were costs and benefits evaluated? What were the findings?
 - What made the chosen alternative the best solution for the state or tribe?
- Note: Unless DSS asks for them, copies of the requirements and alternatives analyses and the feasibility study are not required as part of the APD submission, only the detailed summaries of this work

IAPD Content Detail – Security and Risk

- Security
 - Description of IT Security Plan (such as covering personnel, software, hardware, facilities, custom applications, and COTS software)
 - Description of IT risk analysis (such as scope, data access, physical plant, personnel, frequency and mitigation plan)
 - Description of IT Disaster Recovery and Business Continuity Plan, and test plan
 - Identification of IT Security Officer

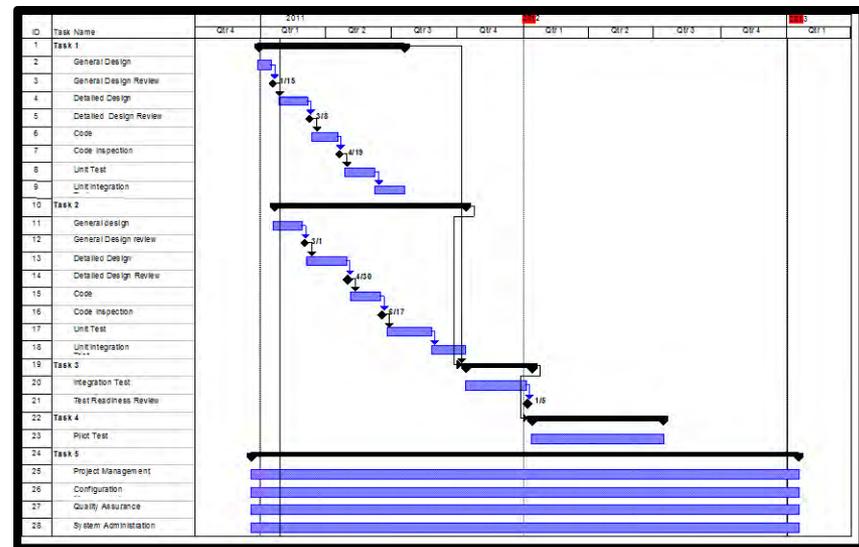
IAPD Content Detail – Project Management Plan

- Project Management Plan
 - Summary of project activities, deliverables and products, project organization, agency and contractor resource needs, and system lifespan
 - Combination of narrative and graphics
 - Describes the nature, scope, methods, activities, schedule and deliverables for the project
 - A workflow chart should be used to illustrate project activities, planned resources, milestones and major deliverables (for example, Gantt chart, Microsoft Project)

Project Schedule Example

For each task, the project schedule should illustrate how resources will be used to complete the planned tasks within the intended timeframe

If the agency has chosen to use Microsoft Project as a planning tool, a PDF copy of the MS Project plan may be included in the APD submission. Note that using MS Project is not a requirement—the agency may use any tool or format that summarizes resource use across the project schedule



IAPD Content Detail – Project Management Plan (Continued)

- Project Management Plan
 - Project organization should be described with a narrative overview of staff positions, responsibilities, and relationships
 - An organization chart should illustrate the project manager, key staff, and overall structure, with
 - Relationship to the project steering committee
 - Interrelationships with users and contractors

IAPD Content Detail – Project Resources

- **A narrative explanation of the project's resource** needs should be included to supplement the work plan, for example, descriptions of staff, hardware and software, telecommunications, office infrastructure, and equipment
- Where appropriate, quantitative detail should be provided within the narrative: *xx* number of staff, *xx* servers, *xx* square feet of office space

IAPD Content Detail – Resource Procurement

- Procurement activities should be described for the project resources: how and when contractor services will be obtained, how many contract staff, and the products and services they will provide within the overall plan
- If there are multiple contractors, such as a development vendor, and an IV&V vendor, their relationships with each other and the IV-E agency should be explained

IAPD Content Detail – Cost Allocation

- The cost allocation plan for development should be described in narrative and in a chart or an exhibit illustrating cost share and dollars
- The cost allocation plan should describe agency procedures to identify, record, allocate, and report:
 - Direct and indirect costs
 - Costs partially and fully attributable to the system project

Sample Cost Allocation Chart

| Estimated Implementation Phase Budget | | | | | \$200,000 |
|--|------------------------------|--------------------|-----------------|---------------------------|--------------------------|
| Federal/State or Federal/Tribal Program | Program Share of Cost | Amount (\$) | FFP Rate | Federal Share (\$) | Agency Share (\$) |
| Title IV-E | 90% | \$180,000.00 | 50% | \$90,000.00 | \$90,000.00 |
| Title IV-B | 4% | \$8,000.00 | 75%* | \$6,000.00 | \$0.00 |
| Juvenile Justice | 6% | \$12,000.00 | 0% | \$0.00 | \$12,000.00 |
| Total | N/A | \$200,000.00 | N/A | \$96,000.00 | \$104,000.00 |

*Capped entitlement

IAPD Content Detail – Cost Allocation Narrative

- **Describe the agency’s methodology for cost distribution**
- Describe departmental or project cost pools affecting overhead, data center, telecommunications, or other reported costs
- Cite the Division of Cost Allocation Services approvals for operational costs

IAPD Content Detail – Cost Allocation Resources

- Program Instruction on Cost Allocation: ACYF-CB-PI-01-05 SACWIS Policy Guidance - Cost Allocation Policies for Operational SACWIS Systems
<http://www.acf.hhs.gov/programs/cb/resource/pi0105>
- Office of Management and Budget Circular A-87 - Cost Principles for State, Local and Indian Tribal Governments
https://www.whitehouse.gov/omb/circulars_a087_2004/
- IMPLEMENTATION GUIDE FOR OFFICE OF MANAGEMENT AND BUDGET CIRCULAR A-87 (ASMB C-10)
<https://rates.psc.gov/fms/dca/ASMBc-10.pdf>

IAPD Content Detail – Cost Allocation Resources

- Tri-Agency Letter on Details of Cost Allocation Waiver (SMD-1-23-12)
http://www.acf.hhs.gov/sites/default/files/ocse/smd_1_23_12.pdf
- Cost Allocation Methodology (CAM) Toolkit
<https://www.acf.hhs.gov/programs/css/resource/cost-allocation-methodologies-cam-toolkit>

IAPD Content Detail – Cost Allocation Concepts

| Primary Concept | Benefiting Program Concept |
|--|--|
| The costs of an activity (developing a system) are allocated to that program as the designated benefiting program | The costs of an activity must be allocated to all benefiting programs based on the relative benefits derived |
| Permitted only when the head of a federal agency determines that the enabling legislation requires a program absorb costs that would normally be allocable to other programs | Any benefiting program must share in the costs associated with that activity |
| N/A | Where multiple programs benefit, a single program may not be designated as the sole benefiting, or primary program |

IAPD Content Detail – Cost Allocation Concepts (Cont'd)

- Limited Primary Program Allocation (e.g., SACWIS) permitted only when the head of a federal agency determines that the enabling legislation requires that a program absorb costs for a specific program
- In SACWIS, states and tribes may charge system costs to IV-E regardless of the title IV-E eligibility of children receiving **foster care or adoption assistance, or youth in the Guardianship Assistance program**

IAPD Content Detail – Enclosures

- The IAPD will usually have at least two enclosures:
 - **Budget detail** with cost projections by category, quarter and funding source, and
 - **Cost benefit analysis** for the alternatives considered and the approach selected

IAPD Content Detail – Budget Detail

- The budget narrative in the body of the IAPD should provide brief definitions of cost categories, describe how costs were derived, and offer summary cost totals by year and project totals for the system implementation phase
- The budget detail enclosure should provide prospective estimated expenditures by category, quarter and funding source for the life of the project*
- *Actual expenditures will be provided in Annual Updates

IAPD Content Detail – Budget Detail (Continued)

- Separate budgets should cover all costs of the implementation and operational phases
- Separate budget costs by:
 - Development vs. operations
 - Fiscal quarter and year
 - Funding source:
 - Each federal funding source
 - State or tribal funds
 - Local funds

IAPD Content Detail – Budget Detail (Continued)

- Budget:
 - Line items should reflect the major tasks in the project plan
 - Should include cost categories such as software, data conversion, vendor costs (for all participating vendors), supplies, training, data processing, operations, and maintenance
 - Summarize costs by quarter, year, project, phase and funding source

Example – Budget Detail by Task Area

| Project Budget 2013 - Design App | | | | | | |
|----------------------------------|---------------|----------------|---------------|--------------------|------------------|-----------------|
| Project Task | Funding Type | Q1 Development | Q1 Operations | Q2 - Q4 Operations | 2013 Development | 2013 Operations |
| State Funds | N/A | \$6,905.00 | \$5,040.00 | \$4,780.00 | \$34,500.00 | \$20,600.00 |
| State Funds | Personnel | \$4,000.00 | \$0.00 | \$3,500.00 | \$0.00 | \$0.00 |
| State Funds | User Training | \$2,500.00 | \$0.00 | \$1,000.00 | \$0.00 | \$0.00 |
| State Funds | Travel | \$405.00 | \$0.00 | \$230.00 | \$0.00 | \$0.00 |
| Contractor | N/A | \$3,260.00 | \$1,450.00 | \$500.00 | \$12,800.00 | \$6,750.00 |
| Contractor | Personnel | \$3,260.00 | \$0.00 | \$500.00 | \$0.00 | \$0.00 |
| Contractor | Task Total | \$10,165.00 | \$6,490.00 | \$10,010.00 | \$47,300.00 | \$27,350.00 |
| Total | N/A | \$30,495.00 | \$12,980.00 | \$20,520.00 | \$94,600.00 | \$54,700.00 |
| Agency Share | N/A | \$15,247.50 | \$6,490.00 | \$10,260.00 | \$47,300.00 | \$27,350.00 |
| Fed Share | N/A | \$15,247.50 | \$6,490.00 | \$10,260.00 | \$47,300.00 | \$27,350.00 |

| Project Budget 2013 - Code App | | | | | | |
|--------------------------------|---------------|----------------|---------------|--------------------|------------------|-----------------|
| Project Task | Funding Type | Q1 Development | Q1 Operations | Q2 - Q4 Operations | 2013 Development | 2013 Operations |
| State Funds | N/A | \$5,400.00 | \$3,840.00 | \$4,250.00 | \$19,770.00 | \$17,750.00 |
| State Funds | Personnel | \$3,000.00 | \$0.00 | \$3,000.00 | \$0.00 | \$0.00 |
| State Funds | User Training | \$2,000.00 | \$0.00 | \$1,000.00 | \$0.00 | \$0.00 |
| State Funds | Travel | \$400.00 | \$0.00 | \$250.00 | \$0.00 | \$0.00 |
| Contractor | N/A | \$3,200.00 | \$8,900.00 | \$7,890.00 | \$12,500.00 | \$33,855.00 |
| Contractor | Personnel | \$3,200.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| Contractor | Task Total | \$14,000.00 | \$0.00 | \$16,390.00 | \$32,270.00 | \$51,605.00 |
| Total | N/A | \$31,200.00 | \$12,740.00 | \$32,780.00 | \$64,540.00 | \$103,210.00 |
| Agency Share | N/A | \$15,600.00 | \$6,370.00 | \$16,390.00 | \$32,270.00 | \$51,605.00 |
| Fed Share | N/A | \$15,600.00 | \$6,370.00 | \$16,390.00 | \$32,270.00 | \$51,605.00 |

Example – Summary Budget Detail with FFP

| Operations Budget Summary (in thousands of dollars) | | | | | | | | |
|--|-----------------|---------------|------------------|----------------|------------------|----------------|----------------|--------------|
| Benefiting Programs | FY2012 Costs | FY2012 FFP | FY 2013 Costs | FY 2013 FFP | FY 2014 Costs | FY 2014 FFP | Total Costs | Total FFP |
| Title IV-E (SACWIS) -- 30% Share FFP Rate -- 50% | 0 | 0 | 240 | 120 | 450 | 225 | 690 | 345 |
| Child Care -- 10% Share FFP Rate -- N/A | 0 | 0 | 80 | 0 | 150 | 0 | 230 | 0 |
| Title XIX -- 10% Share FFP Rate -- 50% | 0 | 0 | 80 | 40 | 150 | 75 | 230 | 115 |
| Agency Funds -- 50% Share | 0 | 0 | 400 | 0 | 750 | 0 | 1,150 | 0 |
| Total | 0 | 0 | 800 | 160 | 1,500 | 300 | 2,300 | 460 |

Example – Budget Detail for Projected Costs

| Summary of Projected SACWIS Expenditures—Remainder of Project | | | |
|--|--------------------------|---|--------------------|
| FFY 2013-2017 | Development Total | Operations & Maintenance Total | Grand Total |
| FFY 2013 | \$3,120,060 | \$4,772,547 | \$7,892,607 |
| FFY 2014 | \$0 | \$18,840,340 | \$18,840,340 |
| FFY 2015 | \$0 | \$19,925,425 | \$19,925,425 |
| FFY 2016 | \$0 | \$21,250,181 | \$21,250,181 |
| FFY 2017 | \$0 | \$22,171,284 | \$22,171,284 |
| Total: | \$3,120,060 | \$86,959,777 | \$90,079,837 |

IAPD Content Detail – CBA Detail

- APD rule changes in 2010 eliminated the requirement for **annual cost benefit analysis updates**
- **CBA remains a required element of the Planning APDU and Implementation APDU**
- See 45 CFR, § 95.610(a)(2)(v) and § 95.610(b)(4)
- The CBA enclosure is part of the Implementation APD submission, not a separate report

IAPD Content Detail – CBA Detail (Continued)

- Submit a cost benefit analysis for each of the alternatives considered in the feasibility study and analysis of alternatives
- This will be used in the business case to help justify the selected alternative

IAPD Content Detail – CBA Resources

- The Feasibility, Alternatives and Cost Benefit Analysis Guide was developed to support state and Administration for Children and Families professionals in the development, review, and approval of feasibility studies, alternatives analyses, and cost-benefit analyses

<http://www.acf.hhs.gov/programs/cb/resource/cba-guide>

- The Cost Benefit Analysis (CBA) 101 PowerPoint describes how to prepare a CBA as part of the feasibility study and alternatives analysis for the Planning or Implementation APD

<http://www.acf.hhs.gov/programs/cb/resource/cba101>

Federal Review of IAPD

- Agency should build in a 60-day federal review period when scheduling a project timeline
- Delays are not usually linked to the federal review, but to the need for additional information, changes and corrections
- Make sure that all sections are included; that cross-references between sections are valid, and double check the formulas for accuracy

Federal Review of IAPD (Continued)

The review of the IAPD will include the following questions:

- What does this FFP buy?
- Is the need for the investment clear and appropriate?
- Did the applicant analyze requirements, feasibility, and alternatives?
- Were at least two reasonable alternatives evaluated for costs and benefits?
- Is the selection basis reasonable?
- Is the acquisition well planned?
- How much will this investment cost?
- How will the costs be shared?

The APD Continuum

APD Updates:

- Annual
- As-Needed

Purpose of APD Updates

- Report project status, past performance and plans
- Update project-related information
- Request additional or continuing funds for a project in process
- **Submit the Annual APD Update at least 60 days before FFP authority granted in the previous APD will expire**

APD Update Detail

- Unlike PAPDs or IAPDs, which initiate action and request **prior** federal approval, the APD update simply requests formal written approval for continuation of activity
- According to the type of APD, the update may be submitted according to an established schedule, or in response to a change

Failure to Submit

- Failure to submit a required APD to the satisfaction of the Department may result in disapproval or suspension of project funding

Annual APDU Content Detail

- Executive summary
- Reference to approved APDs and all changes
- Project activity report—status of major tasks and milestones; degree of completion, problems and delays; risk management plan
- Report of all deliverables completed in past year and degree of completion for unfinished tasks
- Updated project activity schedule for remainder of project

Annual APDU Content (Continued)

- Revised budget for project life cycle, and an expenditure status report
- Narrative description of changes
- Acquisition summary for upcoming year or development phase
- Report of changes to the cost allocation methodology
- Other updates as needed

Federal Review of Annual APDU

The review of the Annual APDU will include the following questions:

- **Is the agency's progress acceptable?**
- Is the investment still sound?
- How do changes in cost allocation methodology affect HHS programs?
- Are project program performance, cost, and benefit goals being met?
- Are corrective actions being taken to address schedule slippage or cost overruns?
- Is there enough information to justify an exemption from prior federal approval for a procurement?

As-Needed APD Updates

Content Detail

- Submit when necessary to:
 - Request additional funding, report a schedule or scope change, or another significant project change:
 - Project costs increase
 - Cost allocation methodology or cost distribution changes
 - A major milestone is missed by 60 days or more
 - Obtain additional dollars when a project is funded on a phased implementation basis

As-Needed APD Updates Content Detail (Continued)

Required if:

- Projected cost increases of \$1 million or more or cumulative contract amendments exceed 20 percent of base contract, whichever is higher
- A schedule change of more than 120 days is anticipated for major milestones
- Change in project scope, timeline, approach, or cost allocation methodology
- Change in procurement scope or approach
- Request by federal agency with approval authority

As-Needed APD Updates

Content Detail (Continued)

- Requests approval for additional funding or authority for project continuation
- May be submitted at any time as a stand alone funding or project continuation request, or may be included as part of the annual APD
- As Needed APDs must be submitted **no later than 60 days** after the change being reported is known or occurs

As-Needed APD Updates Content Detail (Continued)

- Update should follow the format of the original APD, but may address only those elements or areas that have changed
- Update need only provide information necessary to relay change—may simply be a brief letter
- The narrative and supporting documentation should justify the change to the approved IAPD, as amended by previous approved APD Updates

As-Needed APD Updates Content Detail (Continued)

- The As-Needed APDU must contain a revised schedule and budget to show the change in schedule, cost, or cost allocations
- The As-Needed APDU must contain supporting documentation and narrative explanation to justify the need for changing a previously approved project schedule, cost, milestone, tasking, or procurement approach

The APD Continuum

Operational
APD

Operational APD

- Annual report for **all** federally funded systems in the maintenance and operations phase, which are not operating under an open Implementation APD
- For projects with open Implementation APD, operational costs may be reported in the Annual APD Update
- Operational APD (OAPD) defined at 45 CFR 95.605

Operational APD (Continued)

- Submitted annually and includes
 - A short summary of project activities,
 - Planned acquisitions, and
 - Annual budget for operations and software maintenance for the project or system receiving federal funds
- The OAPD may be as brief as two pages
- If the agency has an open IAPD, the OAPD components may be included in that document or the related Annual APD Update

When is an OAPD Used?

- When the system is in the Operations and Software Maintenance (O&M) phase, and
- The agency has a closed Implementation APD

Software Maintenance

- The definition of software maintenance used in the APD regulations is consistent with the definition issued by the Institute of Electrical and Electronics Engineers
- **Software maintenance** means routine support activities that normally include corrective, adaptive, and perfective changes without introducing additional functional capabilities
- The absence of an APD for system development determines whether or not the agency must submit a standalone OAPD

Submitting the APD

APD Submissions

- Submit electronic versions of APDs, acquisition solicitation and contract documents, **but make sure there is a valid signature on the cover letter accompanying the documentation**
- The signature of an appropriate state official on the cover letter may be submitted by email as a scanned PDF document, with electronic signature, by fax, or even as a hard copy by mail or courier

APD Submissions (Continued)

- Send electronic copies of the APD to the CB/DSS Director, your Regional Program Office and the federal analyst working with your Agency
- If you wish to send hard copies of signed cover letters for which title IV-E/IV-B is the only federal funding source, use USPS or express courier to:

*Associate Commissioner
Children's Bureau
8th Floor
1250 Maryland Avenue SW
Washington, D.C. 20024*

Attn: Director, Division of State Systems

APD Submissions (Continued)

- For APDs with multiple funding sources from titles IV-D, IV-B/E or XIX, send electronic copies to each DHHS funding program and your DHHS Regional Program Office(s); transmit the signed cover letter via email, fax, or hard copy
- If you wish to transmit the cover letter with signature via hard copy, send to:

*Deputy Assistant Secretary for Administration
Administration for Children and Families
370 L'Enfant Promenade, S.W.
Washington, DC 20447*

Approval Process

Approval of APDs

Formal response to an APD submission will come from either:

- Associate Commissioner (ACF/ACYF/CB) if funded with IV-E or IV-B dollars or;
- Deputy Assistant Secretary (ACF/OA) if funded with multiple federal sources within DHHS

Approval of APDs (Continued)

- The federal response may:
 - Grant approval, with or without conditions;
 - Disapprove the APD request; or
 - **Defer a decision pending the agency's** submission of additional information
- Once approved, the APD becomes part of the official project Implementation APD

Approval of APDs (Continued)

- If no written response is received by the agency **within 60 days of the date of the Department's letter acknowledging receipt of your request**, the request will automatically be deemed to have **provisionally met the prior approval conditions of paragraph (b) of 45 CFR 95.611**

Approval of APDs (Continued)

- Under a **provisional approval**, the agency may proceed with its project, **at its own risk**, if it chooses not to wait for DHHS written approval; and
- If DHHS approves the project, it will be eligible for funding **from the date of acknowledgement of the APD's receipt**

APD Disapproval

An APD may be disapproved in the case of:

- Ill-conceived project plan
- Not enough resources are allocated to the project (including QA)
- Poor or inadequate project management
- The project ceases to comply with the IAPD
- The APD requirements are not satisfied

APD Disapproval (Continued)

When ACF disapproves an APD:

- Federal support for the IT acquisition or project implementation is suspended, and
- No additional FFP will be approved until the APD is approved

Closing an IAPD

After completing the project, including any conditions identified as a result of a federal review, the agency may provide a final update with:

- A total project budget and
- A notation that all agreed upon development work is completed, or
- An explanation why the system cannot or will not be completed

Once the IAPD is closed, the agency must annually submit a standalone OAPD

Prior Approval Requirements

Systems and Services Procurement

What does “Prior” Mean?

- PAPD/IAPD – before the state or tribe initiates the activity
- Solicitation Document – before the release of the solicitation document
- Contract – before the state, tribe or county executes the contract

What Needs Prior Approval?

- Planning APD, if claiming project funding for planning activities
 - Implementation APD*
 - Acquisition documents:*
 - Solicitation documents issued by the state or tribe, such as an RFP, IFB, or RFQ
 - Contract or contract amendment
 - Task order
- * If the project or procurement is over the threshold defined in 45 CFR 95.611

Prior Approval Requirements

Thresholds for obtaining prior approval vary for the:

- type of document, and
- whether the procurement type is competitive or non-competitive

See summary chart on the next page

Thresholds for prior approval

| Type of Correspondence | Prior approval is needed when: |
|--|---|
| Planning APD (optional, may be rolled in to IAPD) | Project costs exceed \$5,000,000 |
| Implementation APD | Project costs exceed \$5,000,000 |
| Contracts – software application development or IV&V | Competitive procurement - \$6 Million Non-competitive procurement - \$1 Million |
| Contracts – hardware and commercially available off the shelf software (COTS) | Competitive procurement- \$20 Million Non-competitive procurement - \$1 Million |
| Contract Amendment | The cumulative costs of all amendments exceed 20 percent of the cost of the base contract |

Sole Source “Prior Approval”

- 45 CFR 95.613 references procurement standards at § 92.36 which indicates a grantee may use their own procurement procedures that reflect applicable state or tribal laws and regulations, provided that the procurements conform to applicable federal law and, they are used for all state or tribal funded procurements
- Sole source procurements >\$1M must be submitted for federal approval, but federal analysts will consider the state or tribal procurement laws related to acceptable sole source justifications

Consequences of not Obtaining Prior Approval

- Federal funding is **not** available for activities undertaken or work performed prior to the date of federal approval

Exemption From Prior Approval Requirements

Acquisition Summary

If an agency wishes to qualify for an exemption from prior approval requirements at § 95.611, the APD must include an Acquisition Summary

The summary must provide:

- detail on all proposed procurements during the period covered by the APD
- a narrative of sufficient detail for each component that allows federal reviewers to understand the complete scope of the procurement

Acquisition Summary (Continued)

The Acquisition Summary must include:

- The type and scope of contract
- **The agency's procurement strategy**—whether open competition, sole source, or limited competition
- Estimated cost or not to exceed amount
- Timeframe of the contract, with begin and end dates
- Certification of an authorized agency official that the proposed acquisition will comply with all federal, state or tribal requirements

Exemption – Acquisition Checklist

CB has developed an optional checklist template for use in documenting an exemption request

- See Information Memorandum 13-01
- Guidance is available online at:

<http://www.acf.hhs.gov/programs/cb/resource/im1301>

State or Title and Project Name: _____
Acquisition Reference Number: _____

I

Acquisition Checklist Template

The Children's Bureau (CB) has developed the following optional checklist for title IV-E agencies to use to provide assurances that an acquisition of automated data processing equipment and/or services complies with all relevant State, Tribal, and Federal regulations and policies. CB, in accordance with the regulations at 45 CFR 95.611, may grant an exemption from prior approval for an acquisition document based on a title IV-E agency's responses to this checklist.

Please include the following information:

Project name: _____

Purpose of Acquisition Activity (Check all that apply):

| | | | |
|-----------------------------------|--------------------------|------------------------|--------------------------|
| Project Planning | <input type="checkbox"/> | System Development | <input type="checkbox"/> |
| System Implementation | <input type="checkbox"/> | System Operations | <input type="checkbox"/> |
| System Maintenance | <input type="checkbox"/> | Hardware and Equipment | <input type="checkbox"/> |
| Commercial Off the Shelf Software | <input type="checkbox"/> | | |
| Other: _____ | <input type="checkbox"/> | | |

Estimated or Actual Cost of the acquisition, contract, or contract amendment (including all option years): _____

A brief paragraph describing the acquisition activity should be included in the cover letter submitted with this request. The submission should identify: (1) the agency(s) and stakeholders involved; (2) basic system characteristics, project scope, and estimated life span; and (3) the type of contract or agreement that has or will result from the acquisition. For each "No" response to the checklist, a narrative explanation must be provided either directly following the checklist, in the cover letter or on a separate sheet of paper.

The checklist should be submitted to the Children's Bureau.

Indicate the type of document to which this checklist applies:

Acquisition Document (Complete Sections I and II)
 Contract (Complete Sections I and III)
 Contract Amendment (Complete Sections I and III)

Acquisition Checklist Page 1

Exemption Request

- Submission **must** also include a narrative that:
 - Identifies state or tribal agency and stakeholders
 - Describes system characteristics, project scope, life span, benefits, other relevant details
 - **Provides a full explanation for each “No” answer to checklist questions**
- Use of the Acquisition Checklist does not guarantee federal acceptance, especially for high-risk efforts, such as software development

Acquisitions Not Subject to Prior Approval

- If the Department has not specifically requested additional acquisition documentation for **acquisitions summarized in an approved Annual, Planning, or As-Needed APD**, the approval constitutes an exemption of the acquisition documents from prior federal approval
- States and tribes are required to submit any acquisition documents, contracts, and contract amendments under threshold amounts if so requested by the Department

Prior Approval

- Prior approval is not required for contract amendments until cumulative cost increases exceed 20 percent of the base contract cost
- Once the cumulative costs of all amendments exceeds the 20 percent threshold, the agency must submit previous contract amendments for informational purposes
- *NOTE: Federal agencies retain the right to review acquisitions not subject to prior approval-- see § 95.621*

Standards and Conditions Related to Receiving FFP

Procurement Standards

- Procurements of automated data processing equipment and services are subject to the procurement standards at 45 CFR Part 75

Access to Systems and Records

- The state or tribal agency must allow the US Department of Health and Human Services access to all aspects of the system and related project, including agency and contractor staff, costs, project documentation and activities associated with the planning, design, development, maintenance and operation of the system to assess if conditions for approval are being met, and to determine the efficiency, economy and effectiveness of the system

FFP – Equipment Costs

- In computing FFP claims, equipment costing \$25K or less may be claimed in the period acquired or depreciated
- Equipment costing more than \$25K must be depreciated, unless a waiver of that restriction is requested (see 45 CFR 95.641)
- When equipment whose costs are claimed for FFP reaches the end of its useful life, it is subject to property disposal rules in 45 CFR 92.32 (e)

FFP in an Emergency

- If a state or tribe is not able to request prior approval due to an emergency situation, the agency can receive FFP by submitting a written request to HHS containing:
 - A brief description of the acquisition and cost
 - A brief description of the emergency situation
 - **A description of the state's or tribe's harm**
- This request must be submitted **before** the state or tribe acquires the APD equipment or services

FFP in an Emergency (Continued)

- Emergency Situation:
 - The agency must demonstrate immediate need to continue operation of the program, **and**
 - The agency must clearly document this need **could not have been anticipated** or planned for and that the agency was prevented from following prior approval requirements

FFP in an Emergency (Continued)

- HHS will provide a written response to an emergency request within 14 days
- The response will:
 - Indicate if CB recognizes that an emergency exists, in which case the state or tribe can proceed with the project immediately, on condition that it submit an APD for approval within 90 days, or
 - Inform the agency that the request has been disapproved and the reason for the disapproval, in which case, the state or tribe must submit an APD for prior approval

Waivers

- States and tribes **may apply** for a waiver of any requirement in 45 CFR Subpart F
- Waiver requests must be submitted and approved as part of an APD or APD Update
- When a waiver is approved, it becomes part of the APD;
- If a waiver is disapproved, **the entire APD will be disapproved**
- Disapproval is a final administrative decision not subject to administrative appeal

Waivers (Continued)

- The waiver request must demonstrate an alternative approach that safeguards federal and state or tribal interests and enables substantial compliance with other requirements of 45 CFR Part 95 Subpart F
- Request should demonstrate
 - Why meeting this condition is unnecessary
 - Why the APD rules diminish its ability to meet program requirements, or
 - How an alternative approach provides more efficient, economical, and effective program administration

Disallowance of FFP for Failure to Comply with Requirements

- All or part of any costs for system projects that have a major failure to comply with an approved APD are subject to disallowance by the Department
- This provision could be invoked, for example, if an agency:
 - Fails to complete the system as described in an approved APD, or
 - The system as built does not support program requirements related to the funding received

Reconsideration of Denied FFP for Failure to Obtain Prior Approval

- States and tribes may request a reconsideration of a denied FFP by submitting a written request within 30 days of the original determination
 - The request must address the following factors:
 - The acquisition was reasonable, useful and necessary
 - The failure to obtain prior approval was inadvertent
 - The request was not previously denied by HHS
 - The acquisition meets applicable federal and agency requirements, and
 - The agency does not have a record of recurrent failures in automated data processing acquisitions
- The agency may take into account overall federal interests in such a reconsideration

Decision to Go Non-SACWIS

- If a state or tribe elects not to complete a project as a SACWIS, the agency submits an APDU that:
 - Provides the supporting business case for the decision
 - Identifies the benefits derived and anticipated from the application as developed
 - Shows the total approved, expended and claimed FFP
 - Indicates if the system will continue to be used by the agency as a non-SACWIS
- If a state or tribe carries on with that project as a non-SACWIS, it should continue to submit APDUs

Independent Verification and Validation (IV&V)

Requirement for IV&V

- **IV&V is “a well-defined standard process for examining the organizational, management, and technical aspects of a project to determine the effort’s adherence to industry standards and best practices, to identify risks, and make recommendations for remediation, where appropriate”**
- A state or tribe may choose to contract for IV&V services as part of their project oversight approach

IV&V

- The federal agency may require the state or tribe to conduct an IV&V review under certain circumstances, including when projects:
 - Are a new project or total system redesign
 - Miss deadlines, fail to meet milestones
 - Are at risk of failure, major delay, or cost overrun
 - Fail to submit timely APD updates or other documentation

IV&V (Continued)

- An IV&V analysis may also be required if the IV-E agency:
 - Fails to adequately pursue competition or follow procurement processes that put the project at risk
 - Fails to adequately involve stakeholders and program offices
 - Is developing a system under waivers
 - IV&V efforts must be conducted by an entity independent from the state or tribe
- Acquisition documents and contract for IV&V services must be submitted for prior written federal approval

IV&V (Continued)

- The IV&V contractor must:
 - Develop a project work plan and submit it concurrently to both DHHS and the agency
 - Make recommendations on project management and technical aspects
 - Consult with stakeholders; assess user involvement
 - Conduct an analysis of past project performance
 - Provide risk management and capacity planning
 - Develop performance metrics for tracking project progress

**Technical Assistance:
Do's and Don'ts
to guide APD
submission**

Do list for the Planning APD

- Understand and summarize your business case and your vision
- Consider the level of effort it will take to realistically plan for and cost-estimate your major challenges like data conversion, user change readiness and training, data exchanges with other systems; put a solid estimate for this work in your planning schedule

Do list for the Planning APD

- **Line up your leadership's buy-in** and support
- Discuss your approaches with your federal analyst early and often
- Submit drafts of APD sections or content for early review
- Put a thoughtful APD development process in place; keep good records and documentation as you move through the successive types of APDs

Don't list for the Planning APD

- **Rely solely on a planning or implementation vendor's** budget and schedule estimates
- **Copy another state's PAPD, or use another state's RFP as** the basis for your own planning estimates
- **Use language your federal analyst won't understand** because it is relevant only to your state or agency
- Ignore or hide problems as you prepare the PAPD—ask for assistance from your federal analyst, colleagues, or vendors
- Discard the background notes and artifacts that support your PAPD

Do list for the Implementation APD

- Use the APD development process as a training opportunity for SACWIS compliance
- Clarify development vs. Operations work with your federal analyst
- Create templates to reduce work on APD development and update
- Include a cost benefit analysis in the initial submission
- Review for content compliance prior to signature and submission

Do list for the IAPD Update

- Continue to clarify development vs. Operations work with your federal analyst
- Document the ongoing project history and costs in the APD document
- Review budgeted and claimed SACWIS costs throughout the year
- Match the requirements development and enhancements cited in the IAPD with your SACWIS Review Instrument (SRI) or SACWIS Assessment Review Guide (SARGe) content

Don't list for the IAPD

- Miss your due date!
- Bypass a pre-submission review with your federal analyst
- Submit a partial or incomplete list of project costs
- Fail to keep your leadership and key stakeholders informed about project direction and progress

Do list for the As-needed APDU

- Remember to check the regulations about as-needed APD updates when:
 - the project costs, scope or schedule change
 - significant changes are made to cost allocation or cost distribution methodology or to the cost-benefit calculation
 - new acquisitions not addressed in the annual APDU are planned

Don't list for the As-needed APDU

- Assume that prior approval of your emerging project changes can wait until your next APD update



When in doubt, confirm with your federal analyst that an as-needed APDU should be submitted

Do list for the Operational APD

- Keep it simple: aim for a 2-3 page document
- Write a short summary of planned activities for the coming year and any planned acquisitions
- Include a **budget for the coming year's maintenance** and operation activities—clarify with your federal analyst that your planned work does not include development

Don't list for the Operational APD

- Submit an OPAD if your project is still in development
- Fail to review with your federal analyst prior to submission
- Forget to send a PDF of your signed cover letter with your electronic submission

**For further reading:
references and
citations**

References

- Links to public laws and sections of the Social Security Act that address SACWIS/TACWIS
<http://www.acf.hhs.gov/programs/cb/systems/sacwis/federal.htm>
- Title 45 Public Welfare and Human Services Code of Federal Regulations (CFR), Part 1355 – General
http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=/ecfrbrowse/Title45/45cfr1355_main_02.tpl

References (Continued)

- Title 45 Public Welfare and Human Services Code of Federal Regulations (CFR), Part 1356 – Requirements Applicable to IV-E

http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=/ecfrbrowse/Title45/45cfr1356_main_02.tpl

- Title 45 Public Welfare and Human Services Code of Federal Regulations (CFR), Part 95 – General Administration – Grant Programs (Public Assistance, Medical Assistance, and State **Children’s Health Insurance Programs**) Subpart F

<http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=ca7521dbbd84c03b96f151ba0def0a37&h=L&n=45y1.0.1.1.52&r=PART&ty=HTML#45:1.0.1.1.52.4>

References (Continued)

- Action Transmittal ACF-OISM-001 identifies the system requirements for States pursuing the development of a Statewide Automated Child Welfare Information System under title IV-E, February 24, 1995

<http://www.acf.hhs.gov/programs/cb/resource/at9501>

- Action Transmittal ACF-OSS-05, *SACWIS Policy Guidance – Interfaces; Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA); Cost Allocation & Other Issues*, August 21, 1998

<http://www.acf.hhs.gov/programs/cb/resource/at9805>

References (Continued)

- Information Memorandum ACYF-CB-IM-13-01 provides optional checklist for State and tribal title IV-E agencies (hereafter referred to as title IV-E agencies) to request an exemption of prior approval for automated data processing equipment and services procurements, April 22, 2013

<http://www.acf.hhs.gov/programs/cb/resource/im1301>

- Information ACYF-CB-IM-11-04 provides contract terms and conditions and their potential impact on a state's or tribe's procurement activities, and identifies Federal contract provisions required in all procurement documents funded through one or more of the programs identified in the Advance Planning Document (APD) regulations at 45 CFR Part 95 Subpart F

<http://www.acf.hhs.gov/programs/cb/resource/im1104>

References (Continued)

- Information Memorandum ACYF-CB-IM-09-02 provides information to tribes that are considering operating a title IV-E program and explores the implementation of an automated child welfare information system, July 10, 2009
<http://www.acf.hhs.gov/programs/cb/resource/im0902>
- Information Memorandum OISM-IM-93-1 *ADP System Security Requirements and Review Process – Federal Guidelines*, October 1, 1992, Information Memorandum OISM-IM-93-1, *ADP System Security Requirements and Review Process – Federal Guidelines*, October 1, 1992
<http://www.acf.hhs.gov/programs/cb/resource/oism-im9301>

References (Continued)

- Program Instruction ACF-OA-PI-13-01 provides information to states and tribes concerning changes regarding the APD waiver process within the Federal regulations at 45 CFR 95, and offers guidance when requesting a waiver to use a commercial-off-the-shelf (COTS) software product designed for the title IV-E or title IV-B programs
<http://www.acf.hhs.gov/programs/cb/resource/acf-oa-pi1301>
- Program Instruction ACYF-CB-PI-11-07 provides information to states and tribes regarding changes to the regulations at 45 CFR Part 95 related to the Advance Planning Document (APD) process used to obtain approval of Federal financial participation (FFP) for acquiring automated data processing equipment and services
<http://www.acf.hhs.gov/programs/cb/resource/pi1107>

References (Continued)

- Program Instruction ACYF-CB-PI-09-11 *Federal Information Technology Policy – Conditions for Federal financial participation (FFP) for Tribal Automated Information Technology Projects including Tribal Statewide Automated Child Welfare Information Systems (SACWIS)*, September 17, 2009
<http://www.acf.hhs.gov/programs/cb/resource/pi0911>
- Program Instruction ACYF-CB-PI-06-01, *Requirements and Level of Federal Financial Participation (FFP) Based on Status of a State's Statewide Automated Child Welfare Information System (SACWIS)*, February 16, 2006
<http://www.acf.hhs.gov/programs/cb/resource/pi0601>

References (Continued)

- OMB Circular A-87, *Cost Principles for State, Local, and Indian Tribal Governments*
https://www.whitehouse.gov/omb/circulars_a087_2004
- ASMB C-10, Implementation Guide for OMB Circular A-8
<https://rates.psc.gov/fms/dca/ASMBc-10.pdf>
- USDHHS, Administration for Children and Families – *Feasibility, Alternatives, and Cost/Benefit Companion Guide*, July 1993
<http://www.acf.hhs.gov/programs/css/resource/feasibility-alternatives-and-cost>
- USDHHS, Administration for Children and Families – *Companion Guide 2: Cost/Benefit Analysis Illustrated for Child Welfare Systems*, May 1996
<http://www.acf.hhs.gov/programs/cb/resource/cba-guide>

Questions?

Contact your federal analyst for any questions about APDs and APD development

<http://www.acf.hhs.gov/programs/cb/resource/state-tribe-assignments>