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PROGRAM INSTRUCTION

TO: State Public Assistance Agencies, State Information Technology Executives, SACWIS Project Managers, and Other Interested Parties

SUBJECT: Guidelines for conducting pilots in a Statewide Automated Child Welfare Information System (SACWIS) environment

LEGAL & RELATED REFERENCES: Omnibus Budget Reconciliation Act of 1993 Public Law (P.L.) 106-33; 45 CFR 1355.52-53; 45 CFR Part 95 – Subpart F; Action Transmittal ACF-OISM-001 (issued February 24, 1995); Program Instruction ACYF-CB-PI-06-01 (issued February 16, 2006); and ACYF-CB-PI-09-01 (issued January 9, 2009))

PURPOSE: This Program Instruction (PI) provides guidance to help States with SACWIS systems maintain compliance with SACWIS requirements while evaluating new child welfare business processes, tools, or information technologies through pilot projects. The PI describes the documentation requirements States should follow when piloting innovative practices or techniques that may have implications for their SACWIS. By providing the Division of State Systems (DSS) with documentation of pilot activities, States can maintain SACWIS compliance during all pilot stages and as pilot innovations are incorporated into SACWIS or decommissioned. The documentation is necessary for DSS to effectively exercise its fiduciary responsibility for activities and systems receiving Federal financial participation (FFP) at the SACWIS rate. By submitting pilot documentation for DSS review, States may avoid possible recoupment of Federal funds for duplicative automation costs and recoupment arising from the potential re-classification of a child welfare information system as non-SACWIS.

For the purposes of this PI, a *pilot* is a time-limited demonstration and evaluation of a child welfare business process, tool or information technology that, if adopted and implemented, will affect SACWIS

compliance.

OUTLINE: The PI contains six sections titled:

Section I: Background
Section II: Pilots impact upon SACWIS compliance
Section III: Pilot plan documentation
Business case
Project plan
Plans for process and outcome evaluations
Dissemination plan
Section IV: Full-scale implementation or pilot decommissioning
Section V: Funding considerations
Section VI: Pilot submission and approval

DISCUSSION:

Section I: Background

The Children's Bureau (CB) recognizes the dynamic nature of both child welfare practice and information systems technology and therefore encourages States to explore innovation and practice improvements in their child welfare programs and the supporting SACWIS applications. CB recommends that both child welfare program and Information Technology (IT) innovations be tested before statewide implementation to ensure that program changes and/or new technical approaches support program practice goals and are efficient, economical and effective.

To encourage the development and testing of new practice models and IT tools that could support child welfare innovations, CB provides States the flexibility to pilot new processes, tools or information technologies without compromising SACWIS compliance. This flexibility allows States to test the feasibility and effectiveness of new and innovative child welfare policies, practices and tools without the risk of committing significant resources to enhance SACWIS functionality to support untested proposals. This PI provides guidance so that States may test program practice innovations that will, if incorporated into established State practice, require automated support or implement new technologies without compromising the SACWIS-compliance status of their child welfare information systems and thereby continue to claim SACWIS level funding for their systems.

Section II: Pilots impact upon SACWIS compliance

As noted under the Purpose heading, this guidance in this PI is only applicable to pilots that, *if adopted and implemented, will affect SACWIS compliance*. Pilots that could potentially affect SACWIS compliance include the following:

1. <u>A demonstration and evaluation of a new IT tool or platform.</u> For

example, a State may pilot handheld mobile devices to support home visits or scanning of court documents. Or a State may want to evaluate the advantages of moving from a client/server platform to a browser-enabled environment. To test this concept, the State may re-program one SACWIS module, such as the foster home licensing functionality, using web-based tools.

2. A demonstration and evaluation of a child welfare process or tool. Examples include pilots of a new risk assessment tool, a new case plan, establishing a private case management provider in a county or region, or testing alternative response procedures. IT support for the process or tool may or may not be integrated into the pilot.

Such initiatives could affect SACWIS compliance. A child welfare information system must meet SACWIS requirements[1] and be "a comprehensive system which is effective and efficient, to improve the program management and administration of the State plans for titles IV-B and IV-E…"[2] in order to be SACWIS compliant. States are encouraged to carefully assess the long-term impact of any pilots upon SACWIS compliance and consult with DSS to determine if the documentation described below should be submitted to ensure uninterrupted SACWIS level funding.

We emphasize that even pilots without integrated IT support can affect SACWIS compliance. If, for example, a State were to pilot a new risk assessment tool by having workers complete hardcopy versions of the risk assessment, SACWIS compliance would be affected if the process were adopted statewide as this new child welfare business process must be incorporated into the system in order for the system to be compliant with Federal SACWIS requirements.

Section III: Pilot plan documentation

By submitting proper pilot plan documentation, DSS can assess a pilot's impact on SACWIS compliance and provide guidance to ensure a State maintains its compliance and thereby continues to qualify for the additional FFP available for a SACWIS system. To avoid compromising the State's SACWIS compliance the State must submit a plan to DSS that includes the following components:

Business case:
The plan must include a business case for the pilot. The business case must include an overview that provides the reasons the State plans to embark on the pilot.

[1] SACWIS requirements are outlined in 45 CFR 1355.52-53 and ACF-OISM-001, Part IV
[2] 45 CFR 1355.53(a)

The reasons a State might undertake a pilot include (but are not limited to):

- evaluating an approach to address a Federal statutory or regulatory requirement;
- evaluating an approach to address a new program or practice model being implemented by the State;
- evaluating a new automated support strategy for agency business practices;
- testing new technology to meet a current need;
- testing a new evidence-based service delivery model;
- evaluating a method to address an identified problem; or
- providing automated support for a child welfare demonstration project.

The business case should cite authorities and references as appropriate. For example, if the genesis of the pilot is the need to comply with a Federal regulation or State mandate, or to support an approved child welfare demonstration project, the business case should cite the applicable Federal regulation, State statute or child welfare demonstration project grant number. If the pilot is intended to implement an evidence-based service model, the State should describe the expected outcomes. We note that if the enhancements are designed to support a CB-approved child welfare demonstration project, only the grant number and a brief summary of the approved project is needed since DSS can access detailed information via the grant number.

The business case must define project goals, the expected benefits (whether quantifiable or qualitative) and outline the criteria for determining the success of the pilot. The factors used to determine success of the pilot may not include the investment in the pilot infrastructure. A feasibility study is not required for the business case; feasibility will be addressed in the pilot process evaluation stage.

The business case must describe any planned automated support for the pilot, and if applicable, describe other IT alternatives considered to support the pilot and the rationale for the preferred alternative. The described automated support is not required to conform to SACWIS requirements to be approved as a pilot. However, we remind States that if the pilot is successful and adopted, the SACWIS must be enhanced to support the new approach in accordance with applicable SACWIS requirements. Therefore, the business case must describe the expected impact an adopted pilot would have upon SACWIS. A State will submit an Advance Planning Document (APD) for these changes in accordance with Federal regulations[3] only if the pilot is successful and the State moves to full adoption.

[3] 45 CFR 95 – Subpart F

Project plan:
The State must provide a project plan to describe any planned automated support and related training for the pilot. The project plan should include the schedule, resources needed, milestones and completion dates, and the total costs of the automated support. The plan should include brief narratives describing each automated support task. The project plan should also describe how the pilot and any automated support will be evaluated and success measured. Again, the investment in automated tools and equipment may not be used as a factor in the evaluation of the success of the pilot.

If the State has an open APD, the State must integrate this project plan into the larger SACWIS project plan. The project plan should discuss this integration and the estimated impact of the pilot on the project and the pilot schedule. Since States with a closed APD do not regularly submit a SACWIS project plan to DSS, these States do not have to demonstrate the integration of the pilot project plan into the SACWIS project plan.

Plans for process and outcome evaluations:
CB encourages replication of successful projects and information sharing about all successful and unsuccessful projects so that other child welfare agencies may leverage the experience, benefits and lessons learned of pilots. Therefore, to support efforts by other States interested in similar programmatic or technical innovations, States must conduct process and outcome evaluations of their pilots. The evaluations are also required in order to support continued enhanced SACWIS funding.

For the process evaluation, States must maintain a history of project steps, activities, decisions and lessons learned, and conduct an analysis of the pilot implementation process to aid other jurisdictions seeking to replicate or implement similar innovative projects. This should include a description of the pilot's operational conditions, environment or circumstances to help other jurisdictions assess if the pilot is transferable or applicable to their situation. The process evaluation must include an assessment of the feasibility of full implementation given the State's environment.

States must conduct an outcome evaluation to assess if the pilot met intended goals and pre-defined criteria of success. States proposing pilots must specify measures or criteria to determine if the pilot met or exceeded the goals defined in the business case.

Plans for both evaluations must be submitted to CB. At the conclusion of the pilot, the completed process and outcome evaluations must be submitted to CB.

Dissemination plan:
States must include a plan for maintaining process and outcome evaluation documentation for all pilots so that this documentation is readily available and may be easily disseminated to other jurisdictions.

Section IV: Full-scale implementation or pilot decommissioning

At the conclusion of the pilot period, States are expected to either fully implement SACWIS compliant IT support or decommission the pilot. A pilot that will not be fully implemented must be decommissioned within a timeframe proposed by the State and approved by CB. If the pilot is not implemented in the SACWIS or decommissioned, CB may determine the SACWIS to be noncompliant with Federal requirements and classify the project's operational costs as non-SACWIS.[4] However, CB acknowledges that experience gained and data gathered during the pilot implementation and evaluation phases could lead States to adjust the pilot schedule and eventual full-scale implementation of successful pilots or decommissioning of unsuccessful pilots. Schedule modifications must be reported to CB in the APD or, for those States with a closed APD, via a letter to this office accompanied by supporting documentation.

Section V: Funding considerations

Pilot IT costs are not eligible for SACWIS funding. Pilot IT costs may be funded under the terms of a State's child welfare demonstration project; such pilots cannot request additional FFP for IT support. Otherwise, States may request administrative cost reimbursement from the applicable funding sources by following the guidance in this PI and the APD regulations.[5]

Once a State moves to implement the piloted innovations in the SACWIS, the costs to enhance and integrate the automated support into the SACWIS should be eligible for title IV-E SACWIS funding. The State should document the costs and report progress on this effort via the APD process.

Section VI: Pilot submission and approval

If requesting FFP for any planned automated support for a pilot, States should submit pilot documentation prior to developing the automated support. States are encouraged to submit documentation for all other pilots promptly to ensure that SACWIS compliance is unaffected. *A properly documented, approved and conducted pilot will not affect SACWIS compliance.* CB may review pilots during a site visit but this will not result in a SACWIS-compliance finding if the pilot has been previously approved.

[4] ACYF-CB-PI-06-01
[5] 45 CFR 95 – Subpart F

Failure to submit pilot documentation, even for pilots not requesting FFP, could affect SACWIS compliance.

States with an open APD should include the pilot documentation referenced in Section II in their annual APD Update or, if IT costs exceed APD thresholds,[6] in an As Needed APD Update. As pilot IT costs are not eligible for SACWIS funding, these costs should be segregated from costs eligible for SACWIS reimbursement rates. States with a closed APD that are planning to conduct a pilot whose IT costs will not exceed the APD thresholds should submit the referenced pilot documentation to CB with a cover letter. If pilot costs exceed APD thresholds, the State must submit an APD.

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

/s/

Bryan Samuels
Commissioner
Administration on Children, Youth and Families

[6] 45 CFR 95.611