

Statewide Automated Child Welfare Information System (SACWIS)

Technical Bulletin #1: Action Plan Guidance and Examples

Issued: December, 2005

Purpose:

This Technical Bulletin provides guidance for states developing action plans for the Statewide Automated Child Welfare Information System (SACWIS) Assessment Review Report (SARR). States submit action plans to describe to the Administration for Children and Families (ACF) their approach for bringing the SACWIS into compliance with federal requirements.

Background:

ACF conducts reviews of SACWIS under the authority granted by the Departmental regulations at 45 CFR 1355.55. These reviews are known as SACWIS Assessment Reviews. During these reviews, ACF evaluates compliance with the federal functional requirements delineated in Action Transmittal ACF-OISM-001 (issued: 2/24/1995) by comparing system functionality with the federal SACWIS requirements and approved Advance Planning Documents. ACF documents review findings in a SACWIS Assessment Review Report (SARR); the SARR is comprised of Appendices A, B, and C of the SACWIS Assessment Review Guide. Appendix B of the SARR lists each functional requirement with associated ACF findings and a conformance indicator of “Y – conforming,” “C – conditionally conforming,” or “N – nonconforming.” A state child welfare system must earn a rating of “Y – conforming” on all federal mandatory requirements and state-selected optional requirements to be SACWIS compliant.

If ACF identifies one or more findings and assesses the functional area as “C – conditionally conforming” or “N – nonconforming,” the state must take steps to bring the requirement into conformance. ACF will articulate in the SARR one or more requirements, which describe possible approaches a state may take to meet the requirement “Y – conforming.” ACF expects states to create action plans, which are appropriate when ACF has found that the SACWIS does not have, or only partially has, the functionality needed to meet a SACWIS requirement. If the state submits an action plan and ACF accepts it, the related requirement will be judged “Y – conforming” by virtue of the state’s commitment articulated in the action plan. ACF will monitor the state’s progress in executing its action plan in the Annual Advance Planning Document (ADP) Updates.

If a state has already implemented functionality to address a SACWIS deficiency, then an action plan is not needed – the work is done. In this case, the state’s updated SARR response should describe the new functionality and how it addresses the ACF finding. If there are multiple ACF findings, the new response should clearly address each finding by

1) listing or restating the specific ACF finding, 2) describing the functionality that satisfies this finding and 3) explaining how the functionality addresses the ACF concern.

As part of ACF’s on-going efforts to provide technical assistance to states, the Children’s Bureau (CB) has developed this technical bulletin to assist states with creating action plans to satisfy issues identified in a SACWIS Assessment Review conducted by ACF.

Organization:

This technical bulletin is organized into 2 sections, described as follows:

- Section I: Action Plan Description and Guidelines – This section introduces the action plan, describes the purpose of an action plan and lists the components of an action plan.
- Section II: Action Plan Examples – To assist states with the development of action plans, five action plan examples are included illustrating the guidelines. Each example presents an approach to meeting a specific SACWIS functional requirement or group of requirements; these requirements are identified in each example. Although the examples describe specific approaches to meeting SACWIS requirements, ACF notes that these approaches are provided for illustrative purposes only and should not be construed as an ACF endorsement of any particular approach. ACF requires states to develop approaches that meet SACWIS requirements, are appropriate for the state’s circumstances, and are efficient, economical, and effective. The five examples are:

Example #	Description
1	Action plan to freeze intake reports
2	Action plan to automate the title IV-E eligibility determination process
3	Action plan to enhance WORD templates for court reports
4	Action plan to support the accounts payable processes
5	Action plan to build the interface between SACWIS and the title IV-D (Child Support Enforcement) system

Each example is organized into three sections. First is the *ACF SARR response*. This is a typical ACF finding from a SARR and is presented in the same format as all SARR findings (i.e., in a table that includes the conformance indicator). This is included so that the reader can see the findings the state should address in its action plan. This is followed by the *State SARR response*. This is the action plan, written to address ACF’s findings. The final section is *Commentary on the state action plan*. This section is included to highlight how the action plan addresses the guidelines outlined in the Action Plan Description and Guidelines.

The five action plan examples referenced above are intended to illustrate the level of detail action plans should include. We emphasize that these examples do not convey ACF policy or guidance on the topics described. For policy questions concerning these topics, please contact the Director, Division of State Systems at 202-690-8177.

Section I: Action Plan Description and Guidelines

A SACWIS Assessment Review Report (SARR) action plan articulates a state's approach for satisfying a SACWIS requirement. It describes the proposed solution, explains how the solution satisfies the requirement, and includes a high-level project plan laying out the major tasks, due dates, and resources needed to develop and implement the solution. An action plan should provide evidence that the state has thoroughly analyzed the problem, addressed key issues, and is taking action or poised to begin. An action plan is a well-defined, specific, concise, and complete summary. It establishes a common understanding between the state and ACF of the planned approach.

States generally submit one action plan to address a single SACWIS requirement. However, a one-to-one correspondence between the action plan and the SACWIS requirement is not necessary. Frequently states submit one comprehensive action plan to address a group of related SACWIS requirements, such as one action plan for all of the title IV-E eligibility requirements (SACWIS requirements #21 – 28). Less common, but still acceptable, is the development of multiple action plans for one SACWIS requirement. States choose this approach when they judge that the issues associated with one requirement can be more effectively managed as multiple independent efforts. All three methods are acceptable to ACF.

States are encouraged to supplement the action plan with supporting documents (e.g., requirements analysis, design documents, user manuals, test plans, work breakdown structures, and/or project plans) that provide further details. Constructing an action plan by incorporating these types of documents can expedite a state's efforts, since it only has to reference these supporting materials in the body of the action plan. The action plan should list and define supporting documents and explain the reason for each document's inclusion so that the reader understands its contribution to the action plan. If only certain sections of a supporting document are related to the action plan, the state should reference the specific sections or pages in the narrative and submit only the relevant sections. The state may provide the URL for web-accessible documents in addition to submitting an electronic and paper copy. These supporting documents should be drawn from existing project documents. It is our expectation that states maintain complete and current documentation on project activities as a result of conducting a well-managed SACWIS project that follows industry standards for project management. In that context, the action plan should be a summary derived from existing project documents rather than documents created solely to justify the plan to ACF.

The action plan narrative and any supporting documents should provide evidence that the state has rigorously analyzed the problem, determined a feasible solution, defined the scope of the solution, allocated sufficient resources, and established a reasonable schedule. The action plan should answer the following five questions: 1) *How* will the requirement be met? 2) *Why* was this solution selected? 3) *What* is the plan for completing the work? 4) *When* will it be done? 5) *Who* will do it? Each question is discussed below:

1) *How* will the requirement be met?

The action plan should describe the functionality the state intends to build or enhancements it expects to make. This narrative description should be clear and complete so that a reader unfamiliar with the state's SACWIS will understand the solution – acronyms should be spelled out, terms with specialized meanings defined and state practices briefly explained. This narrative is a summary of the solution's functionality rather than an exhaustive description of each screen, report, data element, edit check, and process the state intends to implement. However, the state is encouraged to attach supporting design documents to provide these details.

The action plan should clearly explain how the solution addresses one or more findings and associated requirement(s) raised by ACF. The narrative should restate the finding and point out which features (e.g., screens, new data elements, new or modified processes) conform to the finding's requirement(s). If a comprehensive solution addresses multiple findings and requirements, the state should explain how the solution satisfies each finding and requirement separately.

2) *Why* was this solution selected?

The action plan provides the rationale for the state's approach.

The solution's design may be driven by other factors such as state child welfare policies and best practices, legislative mandates, consent decree requirements, or information technology (IT) constraints (e.g., limitations imposed by a tool set, platform, or state IT standards). If such factors influenced the solution's design, each factor should be described and its impact upon the design noted. Once again, ACF encourages the state to provide supporting documents to strengthen its business case. Such documents also provide evidence that the state has thoroughly analyzed the issues and has committed to a practical, workable solution that can be implemented within the confines of the state's child welfare practices. For example, requirement specifications, concept papers, sections of the title IV-E State Plan, child welfare policy directives, and best practice guidelines could further explain a policy or practice that SACWIS must support. Requirements or joint application development meeting minutes could also be submitted; these serve the dual purposes of demonstrating the user need for improvements and documenting the careful deliberations that contributed to the requirement (thereby showing activities undertaken to thoroughly analyze the problem). As a reminder, the state should indicate why these documents have been included. For example, do not submit sections of the title IV-E State Plan without explanation. Instead, briefly discuss how the plan has influenced the design and cite the relevant section, page, and paragraph.

3) *What* is the plan for completing the work?

The action plan should list the major tasks planned for developing and implementing the solution. It should include major milestones such as development, testing, data

conversion, training, and implementation. It should also include significant events affecting the schedule such as the purchase of new servers, network upgrades needed to manage increased traffic associated with the enhancement, or procurement of a vendor to do the work. The detailed work breakdown structure or project plan listing all tasks, tasks dependencies, and estimated hours is not required, however, states should consider including such a detailed plan with the supporting documents.

4) *When* will it be done?

The action plan should include a high-level schedule or project plan. Estimated start/end dates for the major tasks included in response to the above question is sufficient. However, if the state intends to begin the work activities described in the action plan many months into the future, it must justify the estimated start date. ACF has an expectation that the state will execute its action plans with all due haste.

5) *Who* will do it?

The action plan should indicate who will perform the work for each major task. It is sufficient to note if the work will be done by state employees, a current or future vendor or contractor, or a mix of both. Labor categories and estimated hours are not needed. For most action plans, a simplified project plan listing the major tasks, milestone dates, and assigned categories of staff is sufficient to answer the *What*, *When* and *Who* questions. If desired, the state may attach the project plan from which this information is drawn so that ACF can examine the relationship among the tasks.

In summary, by reviewing the action plan narrative explaining the *how* and *why*, the high-level project plan outlining the *what*, *when*, and *who*, and the details in the supporting documentation, ACF will be able to assess the action plan and determine if the related SACWIS functional requirement merits or will merit a “Y – conforming” rating. Well-defined, specific, concise, and complete action plans can save time, money, and reduce federal reporting requirements. Time is saved because ACF will not need to request clarifications and the state will not need to re-write the action plan to get it approved. Money is saved because a well-researched and conceived plan is less likely to require costly changes or enhancements. Federal reporting is reduced because once ACF approves all action plans, the SARR is closed and is no longer used as a reporting mechanism; all reporting is done through the Advance Planning Document (APD) Updates.

By contrast, a general or vague action plan that only acknowledges ACF findings, reiterates the state’s commitment to correct problems, and reports that the state is evaluating the issue to determine the appropriate approach is *not* sufficient and *will not* be accepted by ACF. The plan should not reflect that there are major unresolved policy, process, or design questions that could significantly influence the result. ACF will also request a revised action plan if it is not clear to a reader unfamiliar with the workings of the particular system or policies of a specific state.

Section II: Action Plan Examples

Example 1: Action plan to prevent changes (freeze) to intake reports (#6)

Note: This example illustrates the level of detail action plans should include. The details demonstrate the careful analysis and planning (hallmarks of industry standards for software design) that should precede all software development. However, ACF emphasizes that the approach and design details do not represent ACF policy or guidance. For policy questions concerning SACWIS, please contact the Division of State Systems.

ACF SARR response for SACWIS functional requirement #6

ACF Comments for Requirement: 6				
Conforms? Y/C/N	C	Action Plan? Y/N/Blank	Resolution Date	
Finding Summary Worksheet Completed? Yes or Blank				
<p>Finding: Intake reports taken by the Child Protective Services (CPS) hotline and entered into SACWIS are not frozen. Intake reports can be modified at any time, even after the CPS investigation is closed. Although SACWIS will note the User ID of the person last updating the intake and the date/time of the update, the specific information updated is not marked. If several persons have updated an intake, the system retains only the User ID of the last person updating the file. No audit history is maintained.</p> <p>ACF understands that the State policy is that intakes should not be updated once screened in/out. The State’s SACWIS should support this policy.</p> <p>We observed an inconsistent application of the State’s policy in county practices. In some offices we visited, the director and supervisors were insistent that intakes not be changed once a screening decision had been made. In others, this was not strictly followed. One worker noted that intake workers in that office would add new data to screened-in intakes with the intention of assisting investigators with more complete information.</p> <p>Requirement: A SACWIS should contain functionality that results in an intake report becoming unchangeable (frozen) within a short defined period after it has been entered, or after the state receives information about circumstances it describes. A SACWIS must contain functionality that safeguards the credibility and integrity of the data it contains. If it has not done so, the State should establish a policy that identifies the short timeframe after a circumstance is reported or a report is entered into the system. The system should contain functionality that reflects the State’s policy. In this document, the State should append a new response to its previous one with an action plan to implement this functionality within a short timeframe and to ensure its consistent statewide usage.</p>				

State SARR response (i.e., Action Plan) for SACWIS functional requirement #6 addressing ACF findings and requirements:

State Response MM/YYYY

The State determined that the system changes needed to meet the SACWIS requirements were specific, targeted, and limited in impact on other areas of the system. Therefore, the State did not convene full-scale Joint Application Development (JAD) sessions for this issue. A small team including DFS programmatic and legal representatives, technical staff, training coordinators, and field representatives analyzed the problem and proposed a solution.

SACWIS currently records the intake worker's screen in/screen out recommendation as well as the supervisor's decision. Our current process, which allows an intake to be passed back and forth between the intake worker and the supervisor and updated multiple times, will remain in place. The proposed solution will be to stamp intakes as read-only upon the supervisor's decision and record the approval date/time and supervisor's name. Our legal department confirmed that this is sufficient. The final intake, upon which a screen in/screen out decision is based, must be available for review by courts and attorneys. The system does not have to maintain an audit history of every update to the record.

This change will be essentially a "back-end" process. As the freezing will occur automatically when the supervisor executes a current function (i.e., recording their decision) no new screens are needed. Whenever a frozen intake is viewed, it will be labeled as read-only. If a supervisor or worker needs to add, post-decision, a clarifying comment, the current SACWIS contact note functionality (which date stamps each contact) can be used. Please see SACWIS functional requirement #17 for a discussion of how SACWIS documents contacts.

Because this is a "back-end" change workers will not have to be trained on new screens. However, the State plans to develop a "change management awareness" program so that caseworkers understand the implication of this change and why SACWIS no longer has the flexibility to update any intake at any time. We note that the Department of Family Services (DFS) has made correcting this system deficiency a high priority (as underscored by the involvement of legal staff in the enhancement). DFS has already issued policy directives and provided training to ensure that the State policy on this issue is strictly and consistently followed by all counties. Our "change management awareness" program will build on this effort. Because of the strong departmental interest and support, we expect that this change will be accepted by the workers with little resistance.

Following is our project plan for this enhancement.

10/05/2002 – System enhancements completed; work done by contractor design team
10/20/2002 – Testing of enhancements complete; work done by State acceptance testing team

- 10/20/2002 – Change management awareness announcements complete. Updates to user manual prepared; work done by State training staff and contractor technical writer
- 10/25/2002 – Enhancement discussed with county super users during weekly conference call; call run by State training staff
- 10/28/2002 – Implement enhancement; work completed by State’s contractor

Commentary on the state action plan:

- The State justifies the decision not to embark on a lengthy, detailed analysis of the problem by reasoning that the changes were very limited.
- The State explained current processing so that it is clear how the proposed enhancement is integrated into system functioning. The guidance for the legal department also emphasizes the appropriateness of the State’s proposed solution.
- The State addressed all the issues of the ACF finding. The State provided support (from the legal department) for the decision not to maintain an audit history. The State also noted steps taken to ensure policy is consistently followed statewide.
- The project plan for this limited enhancement is simply arranged as a chronological task list. However, it still answers the *what*, *when*, and *who* questions.

Example 2: Action plan to automate the title IV-E eligibility determination process (#21 – 28)

Note: This example illustrates the level of detail action plans should include. The details demonstrate the careful analysis and planning (hallmarks of industry standards for software design) that should precede all software development. However, ACF emphasizes that the approach and design details do not represent ACF policy or guidance. For policy questions concerning SACWIS, please contact the Division of State Systems.

ACF SARR response for SACWIS functional requirement #21:

ACF Comments for Requirement: 21				
Conforms? Y/C/N	N	Action Plan? Y/N/Blank		Resolution Date
Finding Summary Worksheet Completed? Yes or Blank				
<p>Finding: The SACWIS title IV-E eligibility determination process is not automated. The eligibility unit workers use information from SACWIS screens and paper documentation to make the title IV-E eligibility determination. The workers record their decision within SACWIS. SACWIS has the capacity to store the decision, but the system does not contain decision rules or associated processing to generate the decision automatically, based on the information that is captured in the system.</p> <p>Requirement: It is ACF’s expectation that the State’s automation approach will be sufficient to achieve the following two goals. 1) Document the case data used to calculate an individual’s eligibility in an automated information system so that it is available for independent review and audit. This provides a safeguard for ensuring accurate eligibility determinations and allows factors of eligibility data to be available to other child welfare professionals during the life of the case. 2) Ensure that all eligibility factors are consistently and accurately applied in every eligibility determination. Automation of the application of the eligibility rules and arithmetic calculations can eliminate much of the potential for error inherent in manual processes.</p> <p>The State must utilize automated title IV-E eligibility determination, based on title IV-A State Plan eligibility criteria in effect on July 16, 1996, in order to determine title IV-E eligibility. ACF Action Transmittal (AT) ACF-OSS-05, issued August 21, 1998, provides guidance regarding the level of automation required for supporting title IV-E eligibility determination.</p> <p>Regardless of the approach taken, the system must contain automated eligibility determination functionality. The system must not only capture eligibility-related data, but also process it in a manner that leads to an automated eligibility determination, in the absence of manual processes necessary to make the determination.</p> <p>The system should be used to capture and document the data used to establish an individual’s complete title IV-E eligibility and to ensure that all eligibility factors are consistently and accurately</p>				

applied in every eligibility determination. Automation of the eligibility rules and arithmetic calculations should eliminate errors that may result from a manual process.

The State's response should indicate its plans for enhancing the system such that it automatically determines title IV-E eligibility. The State should also indicate whether the SACWIS has functions to support the review and audit of the title IV-E eligibility determination/redetermination for each child.

The State should append a new response describing the action plan to automate the title IV-E eligibility determination process. We note that the State also does not conform to the related eligibility requirements #22 – 28. The State may submit a single action plan to address all the title IV-E eligibility requirements.

State SARR response (i.e., Action Plan) for SACWIS functional requirement #21 addressing ACF findings and requirements:

State Response MM/YYYY

In response to ACF findings requiring the automated determination and redetermination of title IV-E eligibility, the State submits the following action plan. Since requirements #21 – 28 are closely linked, the Department of Human Services (DHS) is submitting one action plan encompassing all ACF findings for these areas.

The SACWIS Project developed this action plan with input from the Child Welfare Division's (CWD) Eligibility Unit (EU) workers and supervisors, staff from the Financial Services Division (FSD), DHS foster care licensing staff, experts on the old AFDC income requirements from Family Income and Job Training (FIJT), and representatives from our county offices. We note that the Children's Bureau conducted a title IV-E Foster Care Eligibility Review in 2002 and the State was found to be in substantial conformity. Because of this result, we have great confidence in the expertise of our staff and their ability to help DHS design a module incorporating current title IV-E eligibility rules – they are well versed in the title IV-E rules and procedures that we intend to automate. We also plan to consult 45 CFR 1355 and 1356, Action Transmittal ACF-OSS-05, and "Title IV-E Foster Care Eligibility On-site Review Instrument and Instructions" during our design process. We will validate our design against these authorities.

We also acknowledge significant assistance from State1, State2, and State3. All three states were contacted and provided invaluable insight, assistance, and "lessons learned." Many features of our design owe their inspiration to the documents and guidance provided by these states.

The State designed the SACWIS title IV-E eligibility determination module based on the current title IV-E eligibility process, which was reengineered with the goal of making the process more efficient through automation support. Under the old process, EU workers gathered income, demographic, and court information from various paper documents and

interviews with clients and caseworkers. EU workers collected and verified the data and then evaluated it to determine if a client was title IV-E eligible. The process was slow, error-prone, and included many instances of EU workers collecting data already gathered by other staff.

The reengineered process, which has been approved by DHS, places great emphasis on 1) one-time data collection by staff members with the appropriate expertise, 2) improving data reliability with review and verification, 3) ensuring fairness and efficiency with standard decision rules consistently applied, 4) maintaining data for audit purposes, and 5) promptly updating eligibility status upon receipt of new information. The preliminary or conceptual design is discussed below; the discussion is organized around the listed DHS goals.

1) One-time data collection by staff members with the appropriate expertise

DHS identified this as a goal because it increases data quality to have staff collect data related to their expertise and job function – workers are motivated to collect reliable data when that information is critical to their job effectiveness. Conversely, data quality declines if workers are tasked with collecting information not directly relevant to their job functions. DHS also wanted to eliminate the duplicate data collection by EU workers that occurred under the old approach.

A wide variety of DHS staff with different responsibilities collect and enter client data including: hotline operators, child protective service investigators, case managers, EU workers, and court unit workers. Data relevant to child placements is also entered by our foster parent recruitment staff, licensing/home study staff, and even providers submitting claims via our Provider Web Interface (PWI). Data collected by each of these parties can contribute to title IV-E eligibility determinations or claims against title IV-E funds. In fact, the State has determined that all of the data required for the title IV-E eligibility determination process is currently captured by the combined efforts of the staff functions listed above and that the workers enter this data into SACWIS. However, with the obvious exception of EU workers, these workers are not collecting data with the conscious aim of determining title IV-E eligibility. Instead, they are collecting data that they recognize is important to fulfill their responsibilities to their clients and the department. Because they are collecting data needed to do their jobs properly, they have a vested interest in the accuracy and completeness of that information. As a data quality verification measure, workers will be asked to record, in SACWIS, data sources for the data elements serving as title IV-E eligibility factors (e.g., client interview, birth certificates, immigration documents, medical reports, pay stubs, tax returns, court reports, and benefit reports provided by another agency).

The new title IV-E automated eligibility determination module will utilize this existing base of reliable and complete data that is captured and entered into the system for title IV-E eligibility determinations. The relevant title IV-E data (which we refer to as *title IV-E eligibility factors*) that is captured in other SACWIS modules will be used to facilitate the automated title IV-E eligibility determination process. Some of the most reliable income and deprivation title IV-E data does not reside in SACWIS but is

collected by other human service divisions, such as FIJT and child support, and entered in their information systems. To support the principle of one time data collection, SACWIS will receive this data through electronic interfaces, commit it to the SACWIS database, and display it in the title IV-E eligibility determination module.

2) Improving data reliability with review and verification

The 2002 Title IV-E Foster Care Eligibility Review reinforced DHS's commitment to ensuring that the title IV-E eligibility factors are accurate, complete, and current. Both the State and the federal government have a fiduciary interest in correct decisions based on reliable data. A number of data review steps are currently in place and supported by SACWIS. For example, data collected by hotline workers is verified, corrected, and supplemented as the case moves through the investigation stage.

Although our experience supports our assertion that workers collect high quality data that is relevant to their job functions, we intend to further scrutinize the title IV-E eligibility factors to ensure they are accurate. In the past, EU workers collected many of the factors. Now their focus will be on ensuring the accuracy of data collected by others. This secondary review will be an added safeguard on data quality.

The SACWIS title IV-E eligibility determination module will support this data analysis. The preliminary design envisions a data consolidator window containing all the title IV-E eligibility factors grouped under different tabs. The suggested groupings are child demographics, family members, deprivation, income/assets, legal findings (including information on voluntary placement agreements), and removal. By selecting each tab, EU workers can review and verify the related information. By using these tabs, EU workers do not have to navigate through multiple screens or thumb through paper forms to review the title IV-E eligibility factors. We note that this grouping concept is inspired by a similar strategy used by State2. State2 strongly recommended this approach as the grouping design was popular with their EU workers.

The screens will list data values next to the source (e.g., client interview, birth certificates, etc.) for confirmation purposes – the EU workers asked for this feature so that they could spot check data against source documents. The EU workers will be able to correct most data elements. Some, most notably the data from the family assistance and child support systems, will be read-only (family assistance and child support staff have greater expertise with these areas and our workers generally defer to them). If the EU worker discovers errors with data provided by an electronic interface, corrections are made according to the procedures governing that interface. (Please see our responses for SACWIS functional requirements #83 and 84 for further details on these procedures.)

3) Ensure fairness and efficiency with standard decision rules consistently applied

All rules governing title IV-E eligibility determinations will be programmed into SACWIS. EU workers will execute the determination process with a mouse click. The SACWIS will then evaluate all eligibility data and display a preliminary decision. There will not be a manual override option. If the EU worker suspects the SACWIS rendered decision is in error, individual data elements can be examined, modified if in error, and

the determination process re-executed. The module's decision will simplify this process. When a decision is rendered, the module will display a pass/fail flag for each of the tabular windows. Therefore, the EU worker will be able to quickly hone in on the data elements contributing to the pass/fail decision and examine them. The EU worker can correct an element and re-run the title IV-E eligibility determination process to determine its impact. Once the EU worker is satisfied the data are correct, the worker will be able to authorize the decision. This will make the decision official. Title IV-E claiming will be made (or not made) based on this decision.

4) Maintaining data for audit purposes

To meet the ACF requirement listed above to document “the case data used to calculate an individual's eligibility in an automated information system so that it is available for independent review and audit,” SACWIS will maintain a history of all authorized and retroactive/reauthorized title IV-E eligibility determinations and redeterminations by copying the title IV-E eligibility factors to an audit table. The State has designed a report that will list all eligibility factors considered for each confirmed determination and redetermination. We note that the same report format will be used for all eligibility decisions even though redeterminations consider fewer factors than the initial determinations. This will facilitate easy comparisons between reports. The disregarded factors will be flagged on the redetermination version. To ensure that auditors can trace all modifications between determinations and redeterminations, a comprehensive audit trail report is planned. This report will list every modification made to every title IV-E eligibility factor, even if the factor is updated several times between authorized title IV-E determinations. The audit trail will list the before and after values, date/time of change, and the staff member making the change. These reports, accessible through SACWIS, are intended to meet needs of both federal and State auditors.

5) Promptly updating eligibility status upon receipt of new information

To ensure that our title IV-E claiming remains current and to reduce claim adjustment transactions, the State plans to implement a nightly batch job to confirm the eligibility status of all children in placements who have been determined title IV-E eligible. This batch job will compare data from the most recent eligibility record for each title IV-E eligible child in foster care to the most current data entered in SACWIS or received from an electronic interface. If any differences are found, SACWIS will run a preliminary eligibility determination. If SACWIS finds the child ineligible, the system will generate an alert to the EU worker and “hold” any payments related to that child. The EU worker will investigate the discrepancy and determine if the ineligible finding is correct. The preliminary eligibility determination will not be official unless authorized by the worker.

How the design satisfies SACWIS functional requirements #21 – 28

As noted above, the State opted to submit one action plan for all SACWIS functional requirements (#21 – 28). ACF found all eight eligibility requirements out of conformance during the SACWIS Assessment Review. Following is an explanation of how the design outlined above satisfies each requirement.

- #21: Determine title IV-E eligibility. How does the State use the automated system to

support the determination of AFDC-related eligibility for title IV-E?

We were fortunate to learn during early meetings with FIJT that the TANF system, which is essentially a modified version of the legacy AFDC system, contains the eligibility determination rules from the title IV-A State plan in effect on July 16, 1996, and associated business rule processing. These are the rules that should be applied when determining title IV-E eligibility (reference: ACF-OSS-05). After negotiations between CWD and FIJT sponsored by DHS upper management, FIJT agreed to 1) reactivate this module, 2) accept a daily electronic file from SACWIS, 3) process the file, and 4) return an electronic file with eligibility status information and, if available in the TANF system, more complete income and asset data. (Income and asset information collected by caseworkers and EU staff will be included in the SACWIS file sent to TANF and, if TANF locates a matching case, the TANF system will compare the data.) The action plan under SACWIS functional requirement #83: title IV-A (TANF) lists the information that will be exchanged between the two systems, the related data processing steps, and procedures for resolving conflicting data.

The file returned to SACWIS will contain all data used by the TANF system to reach the income qualifying decision. This data will be accessible on the “Income/Assets” tab so that EU workers can confirm its accuracy. If an error is discovered, the worker can correct the data, provide the reason for the correction, and resubmit the case to TANF. The eligibility status provided by TANF is read-only; the only way the EU can influence the TANF eligibility status is by submitting new data that results in a new status.

- #22: How does the State use the automated system to record/track the legal requirements (judicial determinations) related to IV-E eligibility?

The SACWIS captures all orders, judgments, and findings issued by family courts for our clients as follows.

Each county office has a scanner. In some counties, each caseworker is responsible for scanning his or her court orders; in others, one clerk performs this task for the office. The worker links the scanned document (which is stored as an Oracle BLOB field and cannot be modified) to the associated client(s). This is a straightforward task requiring no knowledge of court procedures or documents.

All scanned documents are further processed on-line by a reviewer in our court unit. The reviewers are trained to recognize the various categories of court documents (e.g., removal hearings, custody assignment, termination of parental rights, placement changes, adoption hearings) and extract child welfare relevant data for entry into discrete fields for storage in the database. SACWIS supports this process by displaying court order images on the computer desktop beside a court data entry screen associated with the client. The reviewer determines the correct document category, selects it from a drop down menu, and SACWIS processes this entry and

displays the data entry screen for that category. The reviewer completes the associated fields while reading the on-line document (i.e., entering docket numbers, dates, and findings such as, in the case of a removal hearing, contrary to the welfare and reasonable efforts). SACWIS therefore contains an image of the original court order as well as relevant data stored in fields that can be used for ticklers, alerts, reports, and, in this case, title IV-E eligibility determinations. For further details on court document processing, please see the State's response to SACWIS functional requirement #60.

The State intends to use this court data in the title IV-E eligibility determination process. The relevant court data will display on the "Legal Findings" tab of the Eligibility Module. The EU worker will have access rights to this data as well as the document image. As EU workers are trained to review court documents, they will verify and/or correct the eligibility data entered by the court reviewer. The judicial findings will be considered by the title IV-E determination algorithm to be built into SACWIS.

- #23: How does the automated system determine/track a child's title IV-E eligibility in an out-of-home placement (e.g., type of facility, license status, etc.)?

Note on State terminology: The State does not commonly refer to "a child's title IV-E eligibility in an out-of-home placement." Instead, the State child welfare policies distinguish between a *child's title IV-E eligibility status* and a *foster placement's allowability*. Title IV-E eligibility status adheres to the child. Each child has an assigned status (e.g., pending determination, title IV-E eligible, title IV-E ineligible, pending redetermination) which is determined by the unique demographic, circumstantial, financial, and legal characteristics associated with the child. Allowability adheres to the foster care provider. Each provider is deemed either allowable or non-allowable based on licensing and type of facility. A child's title IV-E eligibility and a provider's allowability are separately and independently determined. The State only claims title IV-E reimbursement for title IV-E eligible children placed with an allowable provider.

SACWIS currently stores information on foster home applications, home studies, provider training, and licensing. Licensing workers use the system to generate licenses and to record licensing data including facility type, licensing status, recertification dates, and expiration dates. Allowability status on all foster parents is already in SACWIS. Please see the responses for SACWIS functional requirements in the Resource Management section for further details on our processes for managing foster care providers, particularly #44, 45, 47, 48, 50, and 52.

A nightly batch file will automatically link a child's title IV-E eligibility status to the foster placement's allowability, generating a claimability code for every placed child for every day. This nightly run and the associated planned reports will assist us in discovering errors well in advance of the monthly batch calculating provider billing and funds claiming.

- #24: Verify eligibility for other programs. How does the automated system provide for the exchange and referral of information necessary to determine eligibility/status under other related programs such as a) title XIX (Medicaid) and b) title IV-D?

The SACWIS has established, working interfaces found in conformance with SACWIS requirements. For complete details on the functioning of these interfaces, please see SACWIS functional requirements #84 (title IV-D) and #85 (title XIX).

- #25: Record authorization decisions. Describe how the automated system provides for recording the eligibility authorization decisions.

DHS policy grants EU workers the authority to determine a child eligible or ineligible for title IV-E. Therefore, EU staff will be the only line staff with access rights to the “Determine title IV-E Eligibility” tab. This tab will allow workers to run preliminary title IV-E determinations (i.e., SACWIS calculates title IV-E eligibility, but does not apply the status to the child), authorize title IV-E determinations (i.e., the system will save all eligibility factors, apply the status to the child, stamp the record with the execution date/time and EU worker’s ID, and freeze the record), make retroactive corrections and reauthorize eligibility. The EU worker’s authorized title IV-E determination recorded in SACWIS will be considered a State authorized eligibility determination.

- #26: Generate documents related to eligibility determinations. Describe how the automated system produces a) alerts/tickers, b) notices, and c) reports needed to provide information on and track the initial eligibility determinations.

Eligibility alerts, ticklers, notices, and reports will be integrated into the existing SACWIS report module. Please see the State’s response under SACWIS functional requirement #12 for the specifics on this module and the report display, printing, query, and sorting features.

The SACWIS Project, in consultation with the experts listed at the beginning of this action plan, identified needed alerts and reports. These include: 1) an alert generated when a child enters placement for the first time prompting EU to determine the child’s title IV-E eligibility status; 2) an alert to the EU supervisor if an eligibility remains pending after 30 days; 3) an alert to county directors and the court unit listing children removed but missing both court information and a voluntary placement agreement in SACWIS; and 4) a management report summarizing the reasons children are determined ineligible for title IV-E reimbursement. The complete list of reports with a summary of each report’s purpose, data elements, and intended audience is found in “Section 5: Reports” of the attached title IV-E Requirements Specification. Please note that report formats and generation schedules are not yet defined. This task is listed on our summary project plan, which follows. The State will update the requirements and design documents as this work progresses.

We anticipate the report list will grow. Experience has taught us to expect a flurry of new report requests once a new module is actively used; we expect the title IV-E module to be no different. The SACWIS Project has an established process to manage report requests. Users submit all report requests to the county office designated *super user*. Super users are county staff trained to provide on-site support to SACWIS users and convey problems, questions, and suggestions to the project team. The super user works with the report requester to clarify the need and document the request. The super user submits the report documentation to the project team where it is reviewed, approved/disapproved, and, if approved, integrated into the project plan. The project team reports its decisions to the super user who in turn informs the report requester – this step assures the user that the SACWIS Project takes his/her request seriously and is intended to foster a sense of system ownership.

- #27: Redeterminations. Describe how the automated system provides for the a) processing of regularly scheduled and as needed program redeterminations, and b) recording of redetermination decisions.

The SACWIS screens planned to support the title IV-E eligibility redetermination process are a subset of the screens reviewed and updated for the initial title IV-E eligibility determination. This design choice mirrors the redetermination process in that some title IV-E eligibility factors evaluated during the initial process are excluded from reconsideration. For example, the redetermine functions will allow the EU worker to review and edit demographic, deprivation, and financial data and reconfirm the State's ongoing legal custody. However, income data on the family from whom the child was removed while viewable, is not modifiable – this data is also not considered by the redetermination algorithm.

As noted below under #28, EU workers will be reminded of regularly scheduled redeterminations by ticklers; alerts will be generated when a redetermination is required as a result of a changed eligibility factor.

EU workers will process redeterminations with a mouse click, which will execute the redetermination algorithm similar to the automated process described above for the initial eligibility determination. And, as with the initial determination, the decision cannot be manually overridden and the authorized decision is retained for the audit history.

- #28: Generate documents related to eligibility redeterminations. Describe how the automated system produces a) alerts/ticklers, b) notices, and c) reports (e.g., exception reports) needed to provide information on and track the changes in eligibility status d) are the child welfare workers alerted to changes made in the title IV-A, title IV-D, and title XIX systems (the mandatory interfaces).

The SACWIS Project, in consultation with the experts listed at the beginning of this action plan, identified needed reports. These include: 1) ticklers to alert EU workers to redeterminations that are due within 30 days; 2) alerts that a factor affecting the

child’s title IV-E eligibility status (either keyed into SACWIS or imported via an electronic interface) has changed; and 3) alerts of overdue redeterminations sent to EU supervisors. A list of other reports related to redeterminations with a summary of each report’s purpose, data elements, and intended audience is found in “Section 5: Reports” of the attached title IV-E Requirements Specification. Please see the narrative under #26 above for further details on reporting. Also see the State’s responses under SACWIS functional requirements #83, 84, and 85 for further details on the operation of the title IV-A, title IV-D and title XIX mandatory interfaces and the data they contribute to the title IV-E determination/redetermination process.

Title IV-E eligibility determination/redetermination project plan

Following is our high-level project plan for automating the title IV-E eligibility determination process. Our detailed project plan, which will be submitted with our APD Update, is maintained as a Microsoft Project workplan. For this high-level version, we have included rows from the spreadsheet describing major tasks. All tasks will be performed by State staff.

Although the above description demonstrates that we have carefully considered our design and approach, we have not finalized our requirements specification. This incomplete task is reflected in our project plan. The State emphasizes that all major issues and requirements have been addressed; detailed specifications in some areas are undefined, but these should not significantly affect our project schedule. Barring federal title IV-E regulatory changes, we do not anticipate any changes in scope that will alter our estimated schedule below. If significant scope changes occur, the State will submit an As-Needed APD.

Major Task	Start	Finish
Requirements (complete)	12/18/2001	02/01/2002
Interface design	02/02/2002	03/15/2002
Interface coding/testing	03/16/2002	06/01/2002
Title IV-E algorithms – design/coding/testing	04/01/2002	06/10/2002
Batch jobs – design/coding/testing	04/15/2002	06/15/2002
Audit history maintenance	03/01/2002	07/01/2002
Reports	03/15/2002	07/15/2002
Integration Testing	07/17/2002	08/15/2002
Help screens	05/01/2002	07/01/2002
Develop training	05/01/2002	07/01/2002
Provide training	08/20/2002	08/30/2002
Implement module	09/01/2002	09/01/2002

Commentary on the state action plan:

- The State chose to submit one action plan for all title IV-E eligibility requirements (#21 – 28). Within this action plan, the functionality addressing each functional requirement is discussed separately; this clarifies how the State intends to meet all aspects of the title IV-E eligibility requirements. (The State will also append a new

response to requirements #22 – 28 to “See our response under SACWIS functional requirement #21.”)

- The parties involved in the requirements/design are listed and their areas of expertise included. This demonstrates State efforts to ensure all relevant functional areas are represented in the design of this complex module. The State also provides an important detail about their design validation process – that the design will be validated against authoritative title IV-E references. This provides assurance that the State is carefully monitoring progress and validating design concepts against federal requirements.
- Because this is a complex module linking work done on other SACWIS modules, the conceptual design refers to other SACWIS functional areas and briefly explains how those areas contribute to this module. Rather than provide detail about the other modules, the action plan refers the reader to the relevant portions of the SARR.
- The *how* and *why* are clearly linked by relating the State’s goals to specific design features. This link is maintained in the discussion of SACWIS requirements #21 – 28.
- The State has chosen to implement one of the options listed in Action Transmittal ACF-OSS-05 for determining the AFDC related components – using code already implemented in the TANF (title IV-A) system.
- This action plan draws freely from work done by other states. ACF encourages states to contact and exchange ideas with one another, benefiting from their interaction.
- The State, in its discussion under requirement #23 defines state-specific terms.
- Assurances are provided that, even though detailed requirements are not finished, the State is confident that the scope is understood and that the schedule embedded in the project plan is reasonable.
- The project plan does not list resources because the State previously noted that all work would be done by State staff. The action plan guidelines only require that the action plan indicate if work is done by State or contractor staff.

Example 3: Action plan to enhance WORD templates for court reports (#58)

Note: This example illustrates the level of detail action plans should include. The details demonstrate the careful analysis and planning (hallmarks of industry standards for software design) that should precede all software development. However, ACF emphasizes that the approach and design details do not represent ACF policy or guidance. For policy questions concerning SACWIS, please contact the Division of State Systems.

ACF SARR response for SACWIS functional requirement #58:

ACF Comments for Requirement: 58				
Conforms? Y/C/N	C	Action Plan? Y/N/Blank		Resolution Date
Finding Summary Worksheet Completed? Yes or Blank				
<p>Finding: The SACWIS has many robust features to manage the agency’s interactions with the State family courts including screens to document scheduled court hearings and the findings, decisions, and orders resulting from those hearings. The system’s report module produces paper copies of the Permanency Plan, Risk Assessments, and other case documents for submittal to the courts – workers attach these documents to petitions and letters that are also generated by SACWIS via a Word template feature.</p> <p>However, SACWIS does not consistently populate template fields with data from the database. Workers pointed out that some templates would pre-fill with client names and related demographic data while other templates did not. Workers demonstrated this by generating several templates with blank fields; the fields did not contain the data available in SACWIS (e.g., addresses, child’s date of birth, primary caseworker name, date of last administrative review, and the child’s placement history). Workers had to reenter this data on the templates.</p> <p>Requirement: All template fields that correspond to SACWIS data fields should be automatically populated with the data values from the SACWIS database. The system’s automated features should reduce duplicate data capture (i.e., entering data into SACWIS and then reentering the same data on templates generated by SACWIS) and thereby reduce the record keeping burden imposed on workers. The State should submit an action plan to address this requirement.</p>				

State SARR response (i.e., Action Plan) for SACWIS functional requirement #58 addressing ACF findings and requirements:

State Response MM/YYYY

Action plan narrative

The State notes that it has been our intention to pre-fill template fields with SACWIS data whenever possible. As the ACF finding indicates, we have fallen short of this goal. As a result of the above finding, the State catalogued all templates and identified two reasons that our current templates have blank fields: 1) the database/template fields are

not linked so that SACWIS data cannot populate template fields; 2) the database/template fields are linked but the data is missing from the SACWIS database. The analysis included diagrams showing all existing and proposed links; these diagrams will guide our enhancements. The following action plan is predicated on this analysis.

To address reason 1), code will be implemented to link the identified database/template fields. The State will address issue 2), missing data, with new help pages tied to each template. The help pages will map each template field to the associated SACWIS module, screen, and field so that caseworkers can quickly complete missing data within the appropriate SACWIS module. As with all our help pages, these screens will open in a separate window that workers can reposition and refer to as they navigate to the missing data. (See SACWIS requirement #80 for a more detailed description of our help functions.) To ensure workers enter missing data into SACWIS, all fields linked to the SACWIS database will be read-only. If the data is missing or incorrect, workers will have to enter or correct the data in SACWIS.

Our action plan also includes additional training for caseworkers. Missing data remains a troublesome problem in SACWIS. Allowing workers to type critical information into templates instead of entering it into SACWIS has exacerbated the problem. Eliminating this option will help ensure all data is keyed into SACWIS, but also frustrate workers accustomed to entering data on templates. To accustom workers to this change, our training team has outlined a half-day course for our county super users on the changes. This training includes the rationale for the redesign as well as “How to” tips. Super users will return to the counties to train staff.

Supporting documents

The following documents, from which the above high-level action plan was derived, are attached:

- Template Field Analysis – This is an analysis of each template, its associated fields, and links to the database.
- Training outline – This is the latest draft of the training mentioned above. The project plan lists additional training tasks.

Court report/Word template project plan

The State uses Microsoft Project to track projects. We have imported the high-level tasks associated with the above described action plan in the rolled-up plan below. Sub-tasks, which are not shown, include coding, testing, and review steps for various screens, etc. As indicated by the start date, some tasks are in progress. The schedule takes into account other concurrent projects and does not imply full time resource commitments. For example, “Train super users” (01/05/03 – 01/10/03) is envisioned as five two-hour sessions held over five days, not five eight-hour days of training. The detailed project plan, listing all tasks and dependencies and updated as the project progresses will be submitted with the APD Updates.

#	Task Name	Est. Start	Est. Finish	Resources
27	Link data fields/templates	10/01/02	11/10/02	1 Vend.; 3 State

#	Task Name	Est. Start	Est. Finish	Resources
32	Enable “read-only” feature of template fields linked to SACWIS	10/10/02	11/15/02	1 Vend; 2 State
40	Template help screens	11/16/02	12/10/02	1 State; 2 Vend.
70	Training materials	11/15/02	12/20/02	2 State; 1 Vend.
85	Train super users	01/05/03	01/10/03	2 State
89	Roll-out	01/15/03	01/15/04	1 State; 3 Vend.

Commentary on the state action plan:

- The State demonstrates that the action plan is the result of careful consideration by describing the analysis upon which the action plan is based. The State submitted documentary evidence of this analysis.
- The action plan is comprehensive. Instead of focusing strictly on system enhancements, it also describes the training planned to ensure worker acceptance of the changes.
- The State submitted summary tasks from Microsoft project plan format (ACF does not require a specific format for these summary action plans). The State did not create the plan solely for reporting to ACF, but imported the high-level tasks from the existing project plan. By noting that these tasks were drawn from a detailed action plan, the State signaled that they have a mature project plan in place.

Example #4: Action plan to support the accounts payable processes (#62)

Note: This example illustrates the level of detail action plans should include. The details demonstrate the careful analysis and planning (hallmarks of industry standards for software design) that should precede all software development. However, ACF emphasizes that the approach and design details do not represent ACF policy or guidance. For policy questions concerning SACWIS, please contact the Division of State Systems.

ACF SARR response for SACWIS functional requirement #62:

ACF Comments for Requirement: 62				
Conforms? Y/C/N	N	Action Plan? Y/N/Blank		Resolution Date
Finding Summary Worksheet Completed? Yes or Blank				
<p>Finding: The SACWIS does not adequately support the accounts payable process. Accounts payable remains a manual process.</p> <p>Requirement: The child welfare accounts payable process (e.g., paying foster care providers and other service providers) should be automated. ACF does not require that the SACWIS perform all financial functions; financial processing may, at the State’s option, be performed in a separate State financial system. However, any data exchanges between SACWIS and an external financial system (such as payment authorizations sent from SACWIS to a financial system or payment confirmations sent from the financial system to SACWIS) should be electronic and automated. One system should not generate paper reports that are keyed into the receiving system.</p> <p>The State should append a new response describing the action plan to automate the accounts payable process.</p>				

State SARR response (i.e., Action Plan) for SACWIS functional requirement #62 addressing ACF findings and requirements:

State Response MM/YYYY

The context: processes contributing to the accounts payable process

The accounts payable process is highly dependent on data provided by a number of other activities supported by SACWIS, most notably 1) Registering providers and establishing rates, 2) Service authorization, and 3) Submission of provider claims. These three activities, although not strictly part of the accounts payable process, provide information needed for the initiation of payments. We outline these processes below to clarify the context of the Department of Family and Child Services (DFCS) accounts payable process. These summary descriptions also reference other SACWIS functional requirements that contain relevant details not repeated here.

1) Registering providers and establishing rates

All service providers must be entered into SACWIS; payments can only be authorized for providers registered in SACWIS. This includes information on the provider (such as services, licensing and certifications, locations, and employees). DFCS also establishes payment rates for every service authorized for a client. DFCS classifies providers as either *contracted providers* or *non-contracted providers*.

Non-contracted providers include adoptive parents receiving adoption subsidies or foster parents directly recruited by DFCS rather than by another organization. Standard daily rates, varying by the child's age and other factors such as medical disabilities, are set for these providers. Contracted providers are all other service providers (this covers all types of services, including child placement agencies). DFCS establishes contracts with these service providers and negotiates rates for each provider.

For further details on DFCS contractual processes and SACWIS support for these processes, please see SACWIS functional requirement #54: Process contracts and contract changes.

2) Service Authorization

SACWIS supports the authorization of all contracted and non-contracted services, although the process for placement services has more steps and internal checks than the process for other services. These alternative processes are described below.

Placement services: It is DFCS policy to match children to the most appropriate available placement. SACWIS supports this policy with functionality that enables caseworkers to enter child characteristics from the child assessment when searching the resource directory for appropriate placements. Some examples of characteristics are child age, sex, medical conditions, behavioral problems, and proximity to family and schools. SACWIS then returns a list of placements that are appropriate for that child's characteristics. For further details on the placement selection process and the resource directory (including a complete list of searchable fields), please see SACWIS functional requirements #33: Match client to placement alternatives and #52: Maintain directory.

Other services: SACWIS also supports the provision of other needed services for case plan participants. Goals, objectives, issues, and problems identified through assessments and the case plan process are recorded in SACWIS. The Services Module retrieves this data and provides pick lists of recommended services that match the listed needs. After the caseworker selects services from the list, the SACWIS has an option to search the resource directory for a service provider. Please see SACWIS functional requirements #30: Identify and match services to meet the client's case plan needs and #31: Record contact with and acquisition of needed resources for further information on the Services Module.

Service Authorization: DFCS requires that a supervisor authorize all services – everything from long-term foster care placement to a one-time service provision. SACWIS supports this process by generating an alert to the caseworker's supervisor for

each service recommended by the caseworker. The supervisor accesses the authorization screens by clicking the link embedded in the alert and authorizing or denying the service.

3) Submission of provider claims

The third and final activity supported by SACWIS that must take place before the accounts payable processes begins is capturing provider claims. Claims are submitted in two ways: 1) all service providers may submit paper claims to DFCS, which are entered into SACWIS by clerical staff or; 2) placement providers have the additional option to submit claims via the SACWIS web-based Provider Claims screens. For further details on SACWIS support for claims processing, including the generation of paper and on-line invoices for providers to complete, please see SACWIS functional requirement #64: Provider Claims Processing. Our response to #64 also references sections of the SACWIS User Manual listing the claim form data elements and describing both the paper and web-based claims submission process.

Please note that, as required by DFCS procurement regulations, any and all services submitted for payment must go through the three steps listed above. To ensure the consistent creation of an audit trail, even the one-time provision of a service by a small vendor must have an established rate, an authorized service, and a corresponding claim. This up-front rigorous consistency and standardization enabled DFCS to design a comparatively straightforward accounts payable process since there are few exceptions the automated process must accommodate.

The accounts payable design process and related documentation

We note that the State has a high degree of confidence in the suitability of this module's design; this confidence is founded on the rigorous requirements gathering and design process followed by the project. The project took care to identify appropriate staff to contribute to the design of the accounts payable process. Participants in the Financial Team Meetings (the name given to the requirements sessions) included DFCS fiscal management staff, financial experts supporting the State Payment System (SPS) maintained by the State Department of Administration, line staff responsible for financial functions, county supervisors and caseworkers, representatives from large private agencies contracting with DFCS, several independent service providers, and individual foster parents licensed by DFCS. These participants signed off on the design described below.

We note that the following is a high-level description intended to convey our general approach and how the design meets our specific State's financial processing needs. For in-depth information, please see the attached supporting documentation:

- SACWIS Financial Module Requirements – This document lists the goals of this module, the high-level requirements with corresponding detailed requirements, and includes an appendix with a traceability matrix updated to link requirements to design features. The traceability matrix is updated at each project stage. For example, the team will update the matrix upon completion of the test plan to ensure that all requirements have associated test scripts.

- SACWIS Financial Module Detailed Design – This document includes screen prototypes, report formats, process descriptions, data flow diagrams, table layouts, and data definitions. This document is updated as further decisions are reached. For example, it will be updated as new reports are designed and edit checks further refined.
- Financial Team Meeting Minutes – This requirement artifact documents the meeting proceedings and is the primary source for the requirements and design decisions made by the team. These minutes provide evidence of the rigorous approach taken to develop this module.

The proposed automated accounts payable process

DFCS plans to provide significant support for child welfare financial activities within the SACWIS. SACWIS will authorize services, verify claims and generate payment authorizations. The SACWIS will also generate reports needed by staff to run and manage the accounts payable process. SACWIS will interface with the SPS. SPS is the financial system that distributes all payments (through services such as check cutting and initiating electronic funds transfers) for the State.

All claims entered into SACWIS (either by a clerk or by providers via the web-based Provider Claims screens) will be batch processed in a nightly run. The processing of a claim will fail if: 1) there is no existing authorized service record; 2) there are duplicate authorized services records or duplicate claims; or 3) the authorized service data does not match the claims data. SACWIS will flag all failed claims and generate alerts to staff familiar with the client and/or the provider for investigation and correction. SACWIS will maintain an audit trail of these modifications to authorized services or claims and will require users to document reasons for modifications.

Because of past complaints of payments delayed because of a few un-reconciled claims in a large claims submission, SACWIS will support an improved accounts payable process. Although failed claims will not be processed, failed claims will not delay payment on valid claims. If, for example, a provider submits placement claims for 100 children and three claims fail, the processing of the reconciled 97 claims will continue as described below. The provider will receive timely payment for all reconciled claims. Failed claims will be investigated as noted above and the corrected service authorization/claim resubmitted and processed in a later run.

Claims successfully matched and reconciled with authorized services will be flagged as *pending payments*. DFCS accounting practices require that a county manager review and approve all pending payments. SACWIS will support this verification step. A Pending Payment Report will be generated for each county office with access limited to the county director. The report will include a row for each service received by each client, listing client, service, provider, and cost data. Although the print option available for all SACWIS reports is included, we anticipate that county workers will exclusively use the on-line version because the screen has the required approval function. To support DFCS audit requirements, SACWIS will store the history of all approvals. To provide for an in-depth review, each client name will link to the client's services history screen so that

service provision can be investigated with a mouse click; similarly, a provider link will display a history of all service payments to that provider. As the county manager has complete access to all county clients, the manager can also view assessments and case plans to determine if services were appropriate. The county manager notes a reason in the system if disallowing a payment. SACWIS then generates alerts for disallowed payments to the associated caseworker and supervisor and will escalate the alerts after 10 business days if the payment is: 1) not corrected and resubmitted or 2) not formally revoked.

SACWIS will collect approved pending payments in a weekly batch job. A payment file containing provider information, client information, service codes, approved payment amounts, and funding sources will be electronically transmitted to SPS for processing and payment. SACWIS also labels these payments in SACWIS as “Sent to SPS” so that DFCS fiscal staff knows which payments cannot be changed as they are in the final processing stage. Within three business days, SPS will transmit SACWIS a file with payment information for each service. The file will include (for issued paper checks): check date, number, amount, payee name, mailing address and associated claim number(s). For electronic funds transfer it will include the transfer ID and date, amount, payee name, and receiving bank. SACWIS will import this read-only data and link it to the associated services, and mark the service as paid. Designated DFCS staff will have access to this data to respond to questions from providers regarding payments. By State policy, the numbers of bank accounts receiving electronic funds are strictly held and will not be provided to SACWIS. However the State Department of Administration has established protocols to review electronic funds transfers if a transfer has been misdirected; this protocol will be modified so that DFCS staff can initiate an electronic funds inquiry using the SPS provided data if, for example, a provider has not received a payment. We note that although the data elements have been defined, the file format has not been finalized. This will happen later as is noted in our project plan.

The module will include the capability to export payment data in Excel, Access, and SPSS formats. Staff will be able to export all payment data or select a subset based on variables such as provider, client, service category, and date ranges. These features, accessible only by financial staff, will support their needs to run a wide variety of complex ad-hoc queries to support their audit and review responsibilities. The team initially intended to develop standard reports to meet these needs. However further discussion revealed that the financial staff writes many varied and specific queries for each analysis and that queries must be continually adjusted to account for different circumstances. This led to the conclusion that it was more efficient and cost effective to allow the staff to do their own research with the data rather than try to accommodate all their reporting needs.

As an added enhancement not strictly required by the accounts payable process, but deemed necessary by DFCS management to support our best practice of ensuring that clients received approved and authorized services, additional reports are planned to monitor service delivery. Such reports will help DFCS determine if contracted services are not delivered, if a client misses an appointment, or if more intensive case

management supervision is needed. ACF may view a reference to this best practice on-line at our web site at:

<http://www.DFCS.statename.gov/CWPolicyManual/ServiceMonitor.html>.

Accounts payable project plan

Following is an estimate high-level project plan. The State maintains a detailed project plan in Microsoft Project. We will include it in the APD Update.

1. Complete detailed design. The SACWIS Financial Module Detailed Design is unfinished. Some issues, such as the file formats for data moving between SACWIS and SPS, have not been decided. Estimated start date: This task is in progress. Estimated end date: September 15, 2003. Resources: DFCS and SPS financial staff (State employees); two contractor staff; complete design to be approved by the Financial Team (a mix of State staff, private providers, and two contract representatives).
2. Coding. Coding will begin shortly on modules signed off on by the Financial Team. Estimated start date: August 1, 2003. Estimated end date: March 31, 2004. However, we anticipate there will be fixes and minor upgrades up through parallel testing. Resources: Contractor developers; State staff to oversee development; Financial Team involvement as needed to resolve unanticipated issues.
3. Testing. This will begin as soon as functions and screens are ready to be tested. Estimated start date: September 1, 2003. Estimated end date: June 30, 2004.
4. Training. This involves updating the SACWIS User Manual, developing the classroom training and conducting the trainings for designated staff. Estimated start date: October 1, 2004, Estimated end date: July 31, 2005. The accounts payable training will then be available as a module in DFCS ongoing training curriculum. Resources: DFCS training staff
5. Parallel testing of SACWIS accounts payable module against current manual processing. Estimated start date: July 10, 2004. Estimated end date: July 31, 2004. Resources: Contractor staff to set up environments; State staff to test module against manual processes.
6. Implementation. Estimated to occur the first week of August, 2004. Resources: contractors to move new module to production; State training and help desk staff to provide support to new users.

Commentary on the state action plan:

- Overall, the action plan is a summary of many complex processes. The summaries are clear and easy to follow.
- The State explains processes that feed the accounts payable process. This establishes the context in which the accounts payable process occurs and explains that the primary tasks that affect accounts payable are handled elsewhere in the application. This deepens the reader's understanding of the process and promotes understanding of the interlocking nature of the modules. Note that these are only summaries; the reader is referred to other sections of the SARR and supporting documentation for further details.

- Acronyms are spelled out and terms with meanings particular to this State (i.e., *contracted providers* and *non-contracted providers*) are defined. Readers unfamiliar with the State's practices would not know these definitions.
- The State lists those involved in the design of the module. The participant list is appropriate for the design of a financial module to pay service providers – this suggests that the State conducted a reasonable requirements gathering and design process since key stakeholders had a voice in the process. ACF can have confidence that the State has carefully established the project's scope. Because it is correctly scoped, it is likely that the accounts payable project plan is reasonable.
- Supporting documentation is attached and described. ACF can review these documents to confirm that the State's action plan is well considered. One critical document is not included, but the State provides the web address for the information.
- The State provides the rationale for the design. The overall design is intended to support all child welfare financial activities, per DFCS plans. The action plan describes specific processes and notes the reason for the described design – some reasons are best practices, established DFCS accounting practices, and the reporting needs of financial staff.
- Note how it links the findings or the expected results to the planned work.
- The format for the project plan is different from previous examples. States are not restricted to this format. However, all the information listed in this project plan example should be included.
- Note the references to State (or DFCS) policies and how SACWIS supports those policies. This helps to provide the rationale for the development. Note that state policies and other state IT systems are described or summarized.

Example 5: Action plan to build the interface between SACWIS and the title IV-D (Child Support) system (#84)

Note: This example illustrates the level of detail action plans should include. The details demonstrate the careful analysis and planning (hallmarks of industry standards for software design) that should precede all software development. However, ACF emphasizes that the approach and design details do not represent ACF policy or guidance. For policy questions concerning SACWIS, please contact the Division of State Systems.

ACF SARR response for SACWIS functional requirement #84:

ACF Comments for Requirement: 84				
Conforms? Y/C/N	N	Action Plan? Y/N/Blank		Resolution Date
Finding Summary Worksheet Completed? Yes or Blank				
<p>Finding: There is no automated bi-directional interface between SACWIS and the title IV-D (Child Support) system. All current data exchanges between the two systems are manual.</p> <p>Requirement: There must be an automated bi-directional interface between SACWIS and the title IV-D system in order to be SACWIS compliant. The manual paper-driven process must be supplanted by an electronic interface.</p> <p>The State should append a new response describing the action plan to implement this interface. This response should describe how the SACWIS-title IV-D interface will achieve the expected results enumerated in Action Transmittal ACF-OSS-05. The State should also consider requesting parent locate services through the interface to locate one or both parents of a child in the State's custody. The State should include a description of the data flow between the two systems and the State's plans for implementing a fully automated interface. The response should identify the data that will pass between the SACWIS and the title IV-D system. Additionally, the State must indicate if any other data not included in the electronic exchange will be passed by manual means between the systems.</p>				

State SARR Response (i.e., Action Plan) for SACWIS functional requirement #84 addressing ACF findings and requirements:

State Response MM/YYYY

The project recently completed (on 3/10/2002) a series of requirements meetings with representatives from the program and technical staffs of the child welfare agency (owner of the SACWIS), the child support agency (owner of the title IV-D system known as Child Support Tracking and Enforcement (CSTE)) and the Department of Administration (the owner of the State's Common Financial System (CFS)). As a result of these meetings, agreement was reached on a plan to develop the mandatory bi-directional

interface between SACWIS and CSTE. Although this interface will transmit data directly from SACWIS to CSTE, the CSTE data will not be transmitted directly to SACWIS. Instead, the CSTE data will be transmitted through an already established interface between CSTE and CFS. CFS will forward the data to SACWIS.

Following is an overview of the process: SACWIS will transmit, on a monthly basis, an XML file on all children in out-of-home care to CSTE. CSTE will transmit a weekly XML file (with the same data fields and format as the file transmitted by SACWIS) on all open child support cases to CFS. CFS will automatically transmit a copy of this file to SACWIS. CFS will also transmit a second weekly XML file to SACWIS with information on payments, funding sources, and claims adjustments. CFS currently transmits a weekly financial XML file to CSTE so the two systems can be reconciled. Each receiving system is responsible for processing the incoming files. When the interfaces are complete, all data will be electronically transferred; there will be no manual data transfers between the systems (such as paper reports printed out from one system and keyed into another). The planned processes are described in detail below.

Please see the following flow chart (Chart 21B) from our design document for a graphical representation of the data exchange.

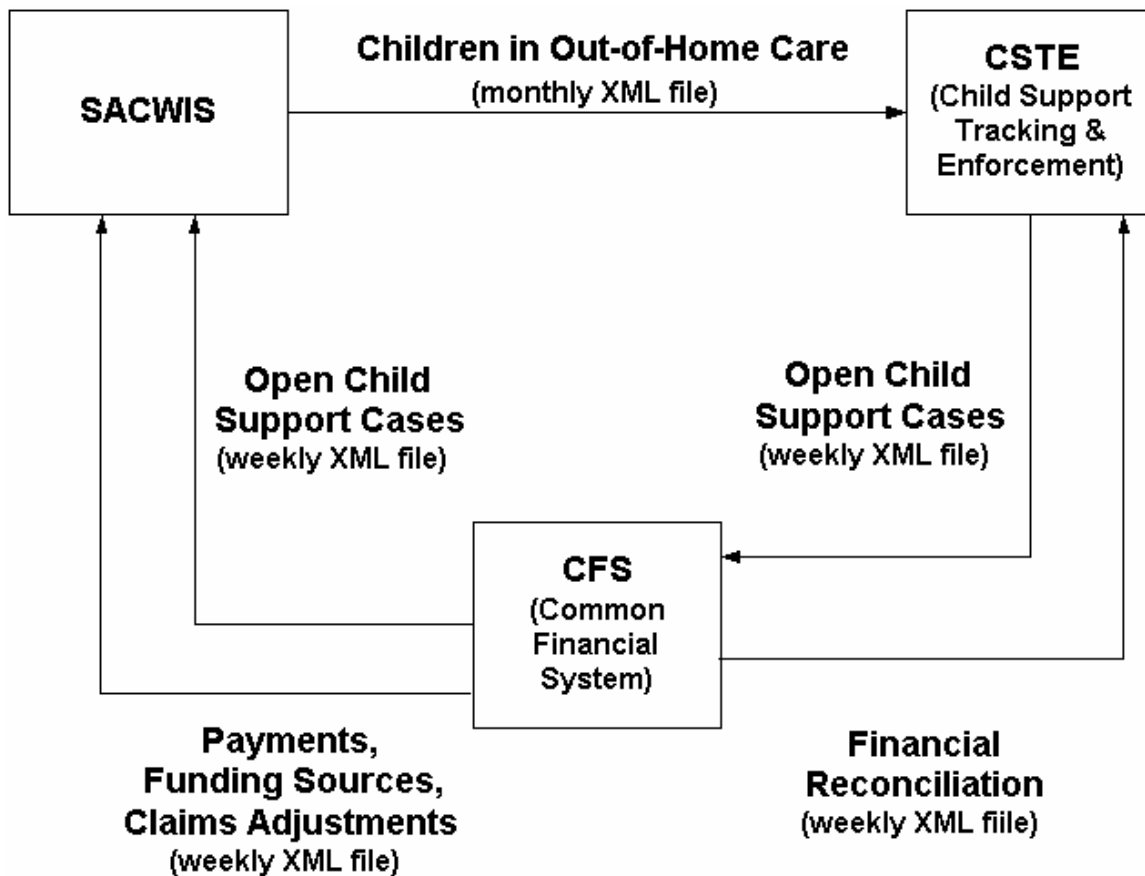


Chart 21B

ACF’s response requested that we demonstrate how our action plan will address the expected results listed for the SACWIS/title IV-D interface in Action Transmittal ACF-OSS-05. We have listed each expected result below followed by a description of how our plan will address it.

The interface must:

- 1) Provide for the exchange of data necessary to establish a child support case.

Child support cases are established within CSTE. To begin the process of establishing a new child support case, basic client and family data must be provided to CSTE. To meet this requirement, the SACWIS will automatically send a monthly file to CSTE on all children in out of home placement. The batch file is scheduled to be sent on the last day of month and will transmit both demographic and financial data elements. The demographic information is: child name, date of birth, social security number, home and mail addresses, Medicaid number, Medicaid eligibility date, parent names, home and

mail addresses for both parents, and employer name and address for all current jobs for both parents. Financial data elements are broken into two categories, child support financial information and foster care maintenance payments. The child support financial information includes any court ordered child support amount received in the current month by the child welfare agency on behalf of the child, the payment dates and method of payment for that child support. The foster care maintenance information includes the payment amount, payment type, the date service began, the date service ended, a service code, the date the check was issued, and, if applicable, the recoupment code. The file also contains SACWIS IDs, CSTE IDs, and CFS IDs for all clients – this will facilitate record matching within the three systems. SACWIS may not contain all the above data elements on every child’s record transmitted to CSTE (for example, a new client may not yet have an assigned CSTE or CFS ID). However, as new or corrected data is entered into SACWIS or received from other systems, that data will be included in further transmissions.

The child welfare agency in collaboration with child support staff derived the list of data elements. The child support staff identified the above elements as the elements SACWIS collects that are most useful to either 1) establish new child support cases or 2) identify children in foster care who have existing child support cases.

2) Accurately record child support collections on appropriate title IV-E reports.

The SACWIS/CSTE/CFS interface will ensure that accurate child support collections are recorded on title IV-E reports by ensuring that child support data is loaded into the CFS, the source of the financial data for title IV-E reports. Weekly, CSTE will transmit to CFS a file on all active child support cases containing the same data elements as those listed in 1). CFS will establish accounts on all these children, regardless of title IV-E eligibility. CFS, the State financial system, reconciles accounts and adjusts title IV-E claims against child support collections. CFS also aggregates child support information, such as the Federal share of child support collections, for Federal IV-E reports such as Form ACF-IV-E-1.

3) Identify potential child support resources for the title IV-E child.

The SACWIS/CSTE interface will identify potential child support resources for all children in out of home placement (not just children who are title IV-E eligible). As described in our response to 1) above, the exchange of data between SACWIS/CSTE will ensure that the child support agency has all information that SACWIS collects that could assist in the establishment of a new child support case or verify the existence of an open child support case. If child support monies are collected, the interface with CFS will ensure that those resources will be credited to the child and, if the child is title IV-E eligible, used to offset title IV-E payments.

- 4) Allow for the automatic exchange of common and/or relevant data between the two systems (to prevent duplicate data entry).

The interface from SACWIS to CSTE is designed to replace manual data entry. All child welfare clients new to CSTE will be automatically loaded into CSTE for further processing. The child support agency will not automatically load data on pre-existing clients. The agency plans to establish automated methods to vet such data; only data passing guidelines established by the child support agency will be loaded into CSTE.

As noted in our overview, demographic and financial data on all open child support cases will be passed from CSTE to SACWIS through the existing interfaces between CSTE/CFS and CFS/SACWIS. CFS uses the CSTE data for its own internal processes. CFS will automatically forward a copy of the CSTE file to SACWIS. The planned automated features to prevent duplicate entry of this data incoming to SACWIS are described below under 5).

In addition to sending SACWIS a copy of CSTE data on all active child welfare-related child support cases, CFS will generate a weekly batch file for SACWIS that includes SACWIS, CSTE, and CFS client IDs, all payment amounts, dates, types, and payees as well as funding sources. This data will be loaded into SACWIS and used as a resource in the determination or redetermination of title IV-E eligibility. The payment information is also, as noted in our response to the SACWIS financial requirements, imported into SACWIS to verify service provider payments and respond to payment queries from service providers.

- 5) Accept and process updated or new case data.

Our agency's policy requires that caseworkers examine all contradictory data to ensure that accurate data is maintained in the system. The SACWIS will have automated features to support this caseworker review. Incoming CSTE data (arriving through the interface mediated by CFS) will be segregated to tables designated for that purpose. A batch process will execute the same night the file arrives to compare the CSTE data to SACWIS data in matching records. The general rule is that the process will load CSTE data if there is no data in the designated SACWIS field.

However, if CSTE data does not match the equivalent SACWIS data, the following process is envisioned. SACWIS will generate an alert to the primary caseworker that contradictory data has arrived on one (or more) of their cases. Only one alert per worker per batch run will be generated; the alert will list all the case names next to the SACWIS data and the CSTE proposed replacement data. The worker may access a case by clicking an embedded link on the alert or by accessing the client and associated screen/field by the standard navigational process. In either case, the field of interest (with the current SACWIS data) will appear in a different color. Clicking the field will open a popup with the CSTE data. The caseworker may accept or decline the CSTE data and indicate a reason for the decision. The reason and discarded data (either the CSTE data or the replaced SACWIS data) will be saved by the system.

SACWIS will note that whether or not the CSTE data has been declined and consider this during the processing of subsequent files. If the same data is submitted again, SACWIS will ignore it – it will not generate an alert.

This process will not apply to the financial file sent from CFS. As CFS is the State’s sole manager of financial data, applies all appropriate edits to this data, and this information reflects actual account credits and debits, SACWIS will import the information with limited data validation (such as verification of IDs). SACWIS will also verify that payments to service providers were authorized by caseworkers and that all authorized payments were made. The exception reports associated with these checks are described in our responses to the SACWIS financial requirements.

- 6) Capture the data necessary to report AFCARS Foster Care data element number 62 (AFCARS Foster Care data element number 62 indicates whether child support funds are being paid to the State agency on behalf of the child).

Workers currently key child support data into the SACWIS using paper reports from CSTE. As noted in 5) above, child support payments are tracked in CSTE/CFS and will be loaded into SACWIS via the planned interface. The AFCARS batch file that collects this data to report AFCARS data element #62 will not need to be modified. The only change will be the automated loading of the child support data accessed by the AFCARS batch file.

- 7) Provide the title IV-D system with information about the current foster care maintenance payment, either from the SACWIS or, if the State chooses, a statewide financial system.

As noted in the list of data elements in response to expected result 1), the file transmitted from SACWIS to CSTE will contain information on foster care maintenance payments on a monthly basis. This includes payment amount, payment type, the date service began, the date service ended, a service code, the date the check was issued, and, if applicable, the recoupment code.

ACF also recommended that the “State should also consider requesting parent locate services through the interface to locate one or both parents of a child in the State’s custody.” The State plans to implement this suggestion. The State will request locate services to find one or both parents of children that come into the care of the State if the location of one or both parents is unknown. We plan to modify the SACWIS such that a flag can be activated for each parent of a child in the State’s custody to indicate if the parent’s whereabouts and address are unknown. During the batch process for the monthly file transmission from the SACWIS to the CSTE, the SACWIS database will be swept to capture records with the activated flags for one or both parents. The inclusion of this flag in the file will trigger normal locate processing when received and processed by the CSTE. When locate information is received by the CSTE, it will be passed from

CSTE to CFS to the SACWIS. Locate data would be limited to only the last known address and last known employer data.

Project Plan:

Following is our estimated schedule (please note this is a list of significant milestones and does not breakout subsidiary tasks such as design, coding and testing). These tasks were derived from our project plan, which will be submitted with our next APD Update:

Milestone	Estimated Date	Resources
Finalize format of SACWIS/CSTE/CFS file (SACWIS outbound version to contain all out-of-home care cases; CSTE outbound version to contain all active child support cases)	4/1/2002	3 State CW program 2 CW vendor 4-8 Child Support and Department of Administration staff (not on our project plan)
Implement outbound SACWIS file transfer	5/15/2002	2 CW Vendor 2.5 State CW Program (includes testers)
Implement inbound CSTE/CFS file transfer (includes alerts and reports)	6/15/2002	3 CW Vendor 6 State CW Program (includes testers)
Finalize format of inbound CFS financial file	4/20/2003	3 State CW program 2 CW vendor 2-4 Department of Administration staff (not on our project plan)
Implement inbound CFS financial file transfer	7/15/2003	3 CW Vendor 6 State CW Program (includes testers)

Commentary on the state action plan:

- The action plan begins with a summary of the process undertaken to develop the process (thereby confirming the involvement of key stakeholders).
- The action plan briefly summarizes the new process and provides a chart, drawn from a standard design document, to further explain the process – the chart was not developed to justify the task to ACF, but was part of the State’s standard design process.
- State specific acronyms are spelled out and the sponsors of the various information systems identified. The State has chosen not to explain the “XML” acronym since this is commonly used and understood in the IT industry.
- The State explicitly and separately addresses the expected results of the SACWIS/IV-D interface. All points in the ACF response are addressed.
- Overall, note how the details provided convey enough information so that someone unfamiliar with the system can understand the approach.

- The project plan format varies from the previous examples. Although ACF does not specify a format for project plans, the Agency encourages states to follow industry best practices for project management. Many project management experts recommend the use of project management software.