

Child Welfare League of America Comments on the Statewide Automated Child Welfare Information Systems

October 21, 2010

Mr. Terry Watt
Director, Division of State Systems
Children's Bureau
Administration for Children and Families
1250 Maryland Avenue, SW
8th Floor
Washington, DC 20024

Dear Mr. Watt:

On behalf of the Child Welfare League of America (CWLA) and our public and private member agencies across the country who work directly with abused, neglected, and otherwise vulnerable children, youth and their families, we submit the following comments on the Statewide Automated Child Welfare Information System (SACWIS) in response to the Administration for Children and Families July 23, 2010 Request for Public Comment (75 Fed. Reg.141).

CWLA acknowledges the commitment of ACF to improve SACWIS. Since its inception in 1993 SACWIS has been intended as a comprehensive automated case-management tool that operates at the state level and supports social workers' foster care and adoptions assistance practice.

Background

State child welfare information systems are largely defined by two major factors: (1) federal reporting requirements and their relation to the implementation of the CFRs as part of a heightened national effort at measurement and accountability and (2) the unique needs of individual states, particularly as they apply to the demands of case management and individual financial record keeping.

The systems have evolved to be responsive to such things as unique state case practice standards, differing levels of authority between state and local jurisdictions, varying roles among state agencies, and the demands of well-established state finance and management systems. This certainly reflects a sound strategy, given the differences among states, but it has increased the overall complexity associated with the design and implementation of improved systems.

President George W. Bush and the Congress gave the country an important tool to make progress with the enactment of the Fostering Connections to Success and Increasing Adoptions Act in 2008. This legislation made a number of changes to the IV-E program that will impact child welfare practice and information systems used to support them. In

addition, Fostering Connections included specific provisions related to Tribes and tribal organizations which also need to be addressed in regards to collecting information and data information systems.

When we put all of this into practice, a system must have the capacity to accomplish three things:

- state compliance with federal reporting requirements, including documentation of the state's ability to meet federal outcome standards under ASFA;
- program management and decision making, including providing the data necessary to track and analyze both short- and long-term indicators of individual and system performance; and
- ongoing daily case management.

The requirement to perform case management functions is perhaps the most important thing to appreciate about state information systems, particularly those designed to comply with SACWIS requirements. These systems are not simply for reporting. They also must be fully integrated into the daily work of thousands of direct service staff as tracking and decision-making tools. Complete, accurate, and timely information about the status of individual children is essential to providing supervision and care to children. The need to bring this capacity to life places a much higher demand on states at both the design and maintenance levels than would be the case if their information systems were simply reporting tools.

States, even those with approved SACWIS systems, have much more to accomplish in fully implementing information systems that meet all of the demands of federal reporting, agency management and accountability, and case management. Significant technological challenges still exist, both for those states still designing systems and those in need of upgrades for existing systems. The most daunting challenges, however, remain with the human factor. Caseworkers are the most important ingredient in achieving success with these systems. Additional investments are necessary in reducing workloads and improving the capacity of frontline staff to integrate information management methods into sound case practice.

On occasion, federal guidance and rules can make use of state SACWIS systems a barrier for caseworkers and agencies attempting to address the needs of the families and children they serve. Some local agencies have the technology to link directly with a state's SACWIS system. They have been blocked by the federal government, however, and as a result may be using valuable resources of staff and money to reenter data into SACWIS when they have the software to avoid this duplication.

Given the complexity of these systems, maintaining strong federal leadership is necessary. States will continue to need support in the form of funding, technical assistance, training, and clear standards for both practice and data management, but guidance that recognizes the always changing world of computer technology.

Another difficulty in data collection that extends to oversight is the penalty structure when errors are detected. In some human service areas, such as the Supplemental Nutrition Assistance Program, when a program is in error, the state is allowed to take the fine imposed by the federal government and reinvest it in the system to address the cause of the errors. The same process should be incorporated into child welfare. Instead of taking money from child welfare as a penalty on states for failures, it would be more logical to require penalty funds to be reinvested in an agreed way between the child welfare agency and HHS.

Recommendations

- The Administration should facilitate and encourage states that use the services of private non-profit providers to work with these provider agencies to develop their systems and any changes in SACWIS jointly with the state so that the state system not only addresses the federal requirements around data collection but helps to address the needs of local and private agencies such as billing, patient needs and history, etc. ACF should encourage a partnership among states and private providers.
- The Administration should allow states that use the services of nonprofit child welfare agencies to allow them to enter data directly and indirectly (uploaded) into a SACWIS system, allowing for transfer of data between agencies, better use of staff time, more attention to caseload, and maintenance of required data. Data entry does not have to be done directly into the state system by the case manager if the private provider can efficiently transfer the necessary information from their system into SACWIS electronically.
- Congress should enact the Child Welfare Workforce Improvement Act to fund a study on workforce by the National Academy of Sciences that would examine the challenges and strategies related to child welfare and make recommendations about caseload standards, the use of data to expand research, training, and demonstration projects. Such a study should ensure to include workers involved with CPS and those who are part of the front end of services.
- The Administration should build on progress with Tribes and tribal organizations in regards to information technology systems. In particular the provisions affecting Tribes from the Fostering Connections to Success Act that result in changes to these systems must be fully and successfully implemented for tribal communities.
- States should update their SACWIS in regards to the Fostering Connections Act to ensure new information is captured. In particular states should ensure that data regarding new provisions in the act on kinship/guardianship placements, health care, education, and youth transitioning to adulthood should be included in SACWIS.
- The Administration should conduct a comprehensive evaluation of data collection and reporting strategies in fields similar to child welfare, with particular attention to established national standards, the effects on service provision and workforce, and states'

capacity to comply with federal data collection requirements. Recommendations for future data collection efforts should be based on the findings of this study. In light of the recent request for public comment on AFCARS regulations, this study should be done before any rule changes.

- The Administration should replace the current penalty format with a system that reinvests dollars so child welfare systems can make necessary improvements.
- Congress should enact legislation that provides more comprehensive federal funding for states developing SACWIS systems and supports more flexibility in data collection and reporting strategies and partnerships with local agencies.
- If cost-efficient, SACWIS functions could include resource management, tracking and maintenance of legal and court information, administration and management of staff and workloads, licensing verification, risk analysis, and interfacing with other automated information systems.

Summary comments

CWLA wishes to once again thank ACF for its efforts towards enhancements in data collection. We believe that the continuous improvement of SACWIS in a way that is both effective and attainable is of the utmost importance. CWLA and our members look forward to working with you in a partnership that can achieve the improvements we all seek and that will ultimately improve the lives of children and families most directly affected by this system.

Linda Spears, Vice-President
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