#### **DEPARTMENT OF SOCIAL SERVICES**

744 P Street, Sacramento, CA 95814



October 17, 2003

COUNTY FISCAL LETTER (CFL) NO. 03/04-27

TO: COUNTY WELFARE DIRECTORS COUNTY WELFARE FISCAL OFFICERS COUNTY AUDITOR CONTROLLERS COUNTY WELFARE EDP COORDINATORS

#### SUBJECT: NEW CLAIMING INSTRUCTIONS FOR CHILD WELFARE SERVICES/CASE MANAGEMENT SYSTEM (CWS/CMS) STATEWIDE AUTOMATED CHILD WELFARE INFORMATION SYSTEM (SACWIS)

The purpose of this letter is to provide County Welfare Departments (CWDs) with new CWS/CMS SACWIS claiming policy. This information will help clarify, define, and illustrate the process necessary for claiming and allocating Electronic Data Processing (EDP) activities and expenditures appropriately to the CWS/CMS SACWIS and Non-SACWIS categories in accordance with Federal policy and guidelines.

#### Background

In 1995, California received federal approval to develop an enhanced funded SACWIS system. In order to qualify for enhanced funding, the SACWIS system would have to include several required components. The first phase of the SACWIS project was to develop a CWS/CMS component that would collect and disseminate case plan data for all children in foster care statewide. In 1998, the CWS/CMS component was designated as fully functional and moved from development to maintenance and operation (M&O). Although the CWS/CMS component is fully functional, until all federally required components are operational, the SACWIS is only partially developed.

In order to meet federal approval and reporting requirements, counties were required to obtain prior approval by submitting an Advance Planning Document (APD) for all CWS/CMS M&O purchases to the California Health and Human Services Data Center (HHSDC). To ensure consistency with county claiming, the California Department of Social Services (CDSS) developed Program Code (PC) 536, SACWIS M&O to capture and fund all CWS/CMS related costs. However, the amounts reflected in the local county APD's submitted for approval have not corresponded with the amounts being claimed to SACWIS M&O on the County Expense Claim (CEC).

Some of the CWS/CMS costs may have been claimed as Generic EDP on the CEC or the costs may not have been claimed at all due to changing county priorities/timelines. It is important to note that claiming these costs as generic does not allow county CWS/CMS expenditures to be funded with enhanced SACWIS funds. Also, by not having a reconciliation process for costs included in county APDs along with other claiming and reporting issues, the Federal Department of Health and Human Services (DHHS) has delayed approval of the State's APD.

Therefore, in order to meet the federal approval requirements and maintain SACWIS funding statewide, the CWS/CMS claim instructions listed below should be implemented by all counties effective with the September 2003 quarter.

#### SACWIS/NON-SACWIS MATRIX

The SACWIS/Non-SACWIS matrix (Attachment A) was developed to clearly identify what type of CWS/CMS hardware, software, personnel, etc. can be claimed as SACWIS at the enhanced Title IV-E rate and which ones must be claimed at the Non-SACWIS Title IV-E rate. Enhanced SACWIS funding means the total expenditures claimed to SACWIS are not discounted using the non-federal Title IV-E discount ratio.

#### POLICY DEFINITIONS

In order to claim and allocate costs in accordance with federal guidelines, counties must categorize all CWS/CMS costs as either SACWIS or Non-SACWIS and determine whether the costs benefit programs outside of the Title IV-E and IV-B State Plans. By using the policy definitions listed in Attachment B, along with the SACWIS/Non-SACWIS matrix, counties will be able to correctly define and categorize costs.

#### SACWIS APD PRIOR APPROVAL PROCESS

It has been a long-standing policy that federal matching funds are not available for CWS/CMS costs incurred prior to federal or State approval. Therefore, as a reminder, any county CWS/CMS expenses incurred before receiving approval can not be claimed for reimbursement and must be claimed as county only cost on the CEC, under the extraneous category. The Administration for Children and Families' (ACF) Action Transmittal (AT) OISM-ACF-AT-93-3, dated January 3, 1993, establishes prior approval policy and provides technical assistance for all EDP equipment acquisitions and services. It also states that all SACWIS acquisitions in excess of \$100,000 must receive prior approval from ACF. Manual of Policies and Procedures Division 28 requires all new EDP system development/implementation, contracted EDP equipment/vendor services acquisitions in excess of \$25,000, M&O expenditures beyond amounts previously authorized, or inter-county EDP service agreements, must have prior review and written approval from CDSS.

In order to obtain prior approval for CWS/CMS purchases/activities, counties must submit an APD to the HHSDC. The APD must be developed in accordance with new updated APD guidelines. The new APD guidelines can be accessed via the following website address <u>http://www.hwcws.cahwnet.gov/forms.asp</u>. This includes a new process that requires follow-up documentation to be submitted to HHSDC at the end of the fiscal year that outlines the actual county expenditures claimed under each approved APD during that year. Counties will be responsible for reconciling this detailed expenditure information to the totals claimed on the CEC.

Note: If a county has already submitted an APD to HHSDC prior to the release of this CFL, counties will not be required to submit an updated APD to HHSDC for approval during the transitioning period from the old APD guidelines to the new APD guidelines.

#### FEDERAL SACWIS PRIOR APPROVAL THRESHOLDS

Per federal interpretation, California's CWS/CMS is an "Enhanced Project" subject to enhanced prior approval requirements until the completion of the SACWIS assessment process, including any enhancements or modifications to the system determined to be necessary to meet SACWIS requirements. Therefore, any county APD request that exceeds \$100,000 must be submitted by the HHSDC to the DHHS for federal approval.

For the purpose of gaining federal approval, all equipment meeting statewide system requirements, e.g. computers, printers, servers, etc., that attaches to the CWS/CMS system is defined as SACWIS provided it is used for the operating or functioning of the system. DHHS has the authority to disapprove or suspend the CWS/CMS project funding if the State fails to submit a request for prior approval. The following is an example of when the State would need to obtain prior Federal approval for an individual county purchase related to SACWIS:

County A wants to enter into a competitively bid contract with a vendor to purchase workstations for a total acquisition cost of \$5 million. The prior approval threshold of \$100,000 is applied to the total contract acquisition cost, not the individual purchase price of the workstations. Therefore, this purchase would require prior federal approval.

#### FEDERAL NON-SACWIS PRIOR APPROVAL THRESHOLDS

When acquiring Non-SACWIS EDP goods and services, prior federal approval is required for total acquisition costs that exceed \$5 million for competitively bid contracts and \$1 million for sole-source acquisitions. This is based on the total cost of the contract. Federal regulation requires states to follow the general EDP prior approval requirements for Non-SACWIS M&O.

Therefore, Non-SACWIS APD requests for contracted services that exceed the \$5 million/ \$1 million thresholds must be submitted by HHSDC to DHHS for review and approval. Federal EDP regulations state that the thresholds listed above are applied to the total acquisition cost. Two examples are used to illustrate when prior federal approval is required for purchases that are Non-SACWIS:

County A enters into a sole-source contract with a vendor to purchase digital cameras at a total acquisition cost of \$1.1 million. Because this is a sole-source acquisition, the prior approval threshold of \$1 million is applied to the total acquisition cost not the individual purchase price of the cameras. Because the purchase price exceeds the applicable threshold, county A would be required to obtain both federal and State approvals.

County B enters into a competitively bid contract for the purchase of data warehouse and data extract software for a total acquisition cost of \$5.7 million. The prior approval threshold in this instance is \$5 million and is applied to the total contract acquisition cost. Because the purchase price exceeded the federal threshold, County B would be required to obtain both federal and State approvals.

#### SACWIS/NON-SACWIS COST ALLOCATION CATEGORIES

When submitting an APD request for approval or when claiming costs on the CEC, counties are to use the information referenced below, as well as the SACWIS/Non-SACWIS matrix, to put costs into the appropriate category.

#### TYPE OF SACWIS EDP COSTS

There are two types of SACWIS EDP costs:

- 1. Personal Services: county or contracted EDP staff salary and benefit costs associated with time spent on SACWIS activities, i.e. county help desk staff will record their time spent on CWS/CMS to PC 536, SACWIS M&O.
- 2. Equipment: includes hardware, software, and any type of EDP equipment that is issued statewide and is required for the functioning of the system, i.e. Personal Computer (PC) workstations are considered SACWIS equipment since they are in all counties statewide and are necessary for the functioning of the system, however digital cameras are not since they are not in all counties statewide and are not required for the functioning of the system. Therefore, the SACWIS costs are claimed to PC 536, SACWIS M&O and the Non-SACWIS costs are claimed to PC 105, Non-SACWIS M&O.

#### SACWIS M&O Cost Allocation

Personal service costs do not need be allocated if the staff activity only benefits SACWIS. SACWIS costs are claimed as a direct cost to PC 536, SACWIS M&O on the DFA 325.1A, EDP Cost Detail Schedule Direct to Program section under Personal Services or CWD Operating Costs Purchase of Services. More detailed instructions are listed in Attachment C.

Personal service costs (staff activities) that benefit other programs that fall outside of the Title IV-E or IV-B State Plans must be allocated to the benefiting program(s). In order to appropriately allocate staff salary and benefit costs to the benefiting program(s), as outlined in CFL No. 01/02-36, dated, October 30, 2001, subject: California Countywide Cost Allocation Plan (CCAP) and the EDP Program Code Descriptions, EDP staff must time study continuously. They must record their time spent on the various activities to the appropriate time study code. Therefore, if county or contracted EDP staff perform SACWIS and/or Non-SACWIS activities, their costs should be recorded between SACWIS and the other appropriate benefiting program time study code(s).

EDP equipment or contracted vendor services costs do not need to be allocated if the equipment/vendor costs only benefit SACWIS. SACWIS EDP equipment/vendor services costs are claimed as a direct cost to PC 536, SACWIS M&O, on the DFA 325.1A, EDP Cost Detail Schedule Direct to Program section under Personal Services or CWD Operating Costs Purchase of Services.

If the CWS/CMS equipment/contracted vendor services costs benefit programs outside of Title IV-E or IV-B, the costs must be allocated to the benefiting program(s). As an example, federal regulations specifically prohibit the use of Title IV-E funds for services. This means that if any CWS/CMS equipment or vendor services costs supports the direct delivery of services to a child or family, those costs can not be claimed to Title IV-E and must be allocated to Title IV-B and/or any other benefiting program(s).

When determining whether or not SACWIS costs must be allocated to a benefiting program(s), it should be noted that the case management component of CWS/CMS is currently fully operational. This component captures the case plan data for children in foster care, which includes the referral to services. The system is not utilized as part of the delivery of the services listed in the case plan. Therefore, under federal regulations, all of the activities/costs associated with entering or retrieving case plan data is fully chargeable to Title IV-E without regard to the non-federal status of the child. This is because the referral to services is being recorded in the case plan. The system is not being used for the actual provision of, or payment for services to the child/family. In the future, if other components are incorporated into CWS/CMS that support the delivery of services, or a county adds hardware or software that is used for this purpose, part of the SACWIS system would be allocated to the Title IV-B program and/or any other benefiting program(s).

Based on this analysis, the majority of CWS/CMS M&O costs should be identified to Title IV-E. However, if an individual county adds software or hardware related to functions/activities that benefit programs other than Title IV-E or IV-B, (e.g., Emergency Assistance [EA], Supportive Transitional Emancipation Program [STEP], or CalWORKS) the costs must be allocated to the benefiting program(s). This is accomplished by using caseworker time study hours, which is consistent with the cost allocation methodology contained within CDSS' CCAP, under the EDP M&O Section.

Equipment costs that benefit programs outside of Title IV-E and IV-B, will be recorded to the appropriate benefiting program codes on the DFA 325.1A, Single and Multi Function Development and M&O SACWIS/Non-SACWIS. This method is consistent with the cost allocation methodology referenced in CDSS' CFL No. 01/02-36, titled, "California Countywide Cost Allocation Plan", dated, October 30,2001, under the EDP M&O Section.

#### Non-SACWIS M&O Cost Allocation

Non-SACWIS CWS/CMS is related to items/activities that are not required for the functioning of the system and/or are not used in all counties statewide. If an M&O cost is identified as Non-SACWIS via the SACWIS matrix and benefits Title IV-E, the cost will be claimed to PC 105, Non-SACWIS M&O and reported on the DFA 325.1A M&O Direct to Program Costs on the CEC. An example of a Non-SACWIS cost would be county specific tools and Geographic Information System (GIS) software that counties have purchased or utilized to enhance management of child welfare services.

Non-SACWIS costs do not receive enhanced SACWIS funding; this means that the non-federal discount rate is applied to the total expenditures in order to allow costs to be allocated to non-federal codes and to any other benefiting program(s). Non-SACWIS costs that benefit other programs outside of Title IV-E will be reported on the DFA 325.1A Single and Multi-Function Development and M&O SACWIS/Non-SACWIS Input Screen of the CEC.

#### SACWIS AND NON-SACWIS CLAIM INSTRUCTIONS

After identifying CWS/CMS costs as SACWIS or Non-SACWIS and determining whether the items purchased benefit other programs, counties must claim the costs to the appropriate SACWIS or Non-SACWIS PC or to the appropriate benefiting PC's on the CEC. Counties can use the updated claim instructions listed below as well as the more detailed instructions included in Attachment C. Counties should remember that SACWIS and Non-SACWIS costs cannot be claimed as Generic EDP; such claiming does not allow the SACWIS and Non-SACWIS costs to be appropriately funded with Federal Financial Participation and does not meet the federal reporting guidelines.

#### Claim Codes

Effective with the September 2003 quarter, SACWIS and Non-SACWIS costs will be claimed to the PCs listed below on the DFA 325.1A, EDP Cost Detail Schedule under the Direct to Program section. Please note that PC 105, Non-SACWIS M&O has been established to track all Non-SACWIS CWS/CMS costs. All costs that are allocated to other benefiting programs will be claimed to the appropriate three digit PCs on the DFA 325.1A Single and Multi-Function Development and M&O SACWIS/Non-SACWIS Input Screen of the CEC.

<u>PC</u>	<b>Description</b>
536	SACWIS M&O
105	Non-SACWIS M&O

#### **Time Study Instructions**

Electronic data processing staff and first line EDP supervisors who perform CWS/CMS EDP activities will record their time to the SACWIS or Non-SACWIS categories as applicable. In order to appropriately capture their time, all EDP staff must complete continuous time studies every month. Step by step instructions outlining how to cost allocate, discount, and claim the CWS/CMS SACWIS and Non-SACWIS costs are listed in Attachment C.

Please note that prior to claiming any CWS/CMS costs on the CEC, counties are required to submit an APD to HHSDC for approval. If a county does not have an approved APD prepared in accordance with HHSDC's updated APD Guidelines which can be accessed via the following website address <u>http://www.hwcws.cahwnet.gov/forms.asp</u>, the costs associated with the purchase will be ineligible for federal or State reimbursement and must be claimed as county only cost on the CEC, under the extraneous category.

If you have any questions regarding the APD guidelines, please contact Rene Paz of HHSDC CWS/CMS at (916) 263-1119. If you have questions regarding the claim instructions, please contact your county analyst in the Fiscal Systems Bureau at (916) 654-1750.

Sincerely,

Original Document Signed By

MARGE DILLARD, Chief Fiscal Systems and Accounting Branch

Attachments

c: CWDA

**SACWIS Items** 

Items are defined as SACWIS because they:

Are integral to (non-separable from) our SACWIS solution (CWS/CMS)

Would not exist without our SACWIS solution

Are necessary to develop and operate our SACWIS

Are necessary to fulfill the SACWIS requirements

Are defined/implemented/available Statewide

#### Category: Development (SACWIS)

Function	Description	Provider	2001 Annual Budget Category	Federal citation/ comment
Mainframe (Server Tier)	Responsible for the development of mainframe hosting solution.	Vendor	One-Time – Vendor – Development Contract	<ul> <li>1355.52(a) –</li> <li> expenditures related toa statewide automated child welfare information system, to the extent such system:</li> <li>(1)collect and electronically report certain data required</li> <li>(2)provides an interface with the State data collection system</li> <li>(3)provides for an interface with and retrieval of information fromsystem that collects information relating to eligibility</li> <li>(4) provides for more efficient, economical, and effective administration of the programs carried out under a State plan approved under title IV-B and IV-E.</li> </ul>

**DRAFT COPY** 

Function	Description	Provider	2001 Annual Budget Category	Federal citation/ comment
State Data Center Administrative Overhead	The HHSDC Systems Integration Division is responsible for the management and implementation of specific statewide systems for the California Department of Social Services.	HHSDC	One-Time – State – Admin Overhead	See above 1355.52(a) These are overhead costs allocated in conformance with OMB A-87 and HHSDC's federally approved Cost Allocation Plan.
Technical Architecture	Services for the overall design and construction of a computer system and all its component parts (servers, routers, and printers).	Vendor	One-Time – Vendor – Development	1355.52(a) –
Project Management and Administration	Review and analysis of vendor deliverables.	HHSDC Consultant (IV&V) CDSS pre 1995	One-Time – Contracted – Project Management	<ul> <li>1355.52(a)</li> <li>expenditures related to a statewide automated child welfare information system, to the extent such system</li> <li>(4)provides for more efficient, economical, and effective administration of the programs carried out under a State plan approved under Title IV-B and IV-E.</li> </ul>

Function	Description	Provider	2001 Annual Budget Category	Federal citation/ comment
System Acceptance Testing	Testing of new functionality or changes to functionality that results in acceptance.	HHSDC Consultants CDSS Counties	One-Time – State – HHSDC Project Staff & One-Time – Contracted – Technical Support	See above 1355.52(a), plus 1355.53(b) At a minimum, the system must provide for effective management, tracking and reporting
State and Federal Reporting	Modify procedures and/or system to support changes reporting requirements. CDSS and county program costs to support reporting data.	HHSDC Vendor Consultants CDSS Counties	One-Time – State – HHSDC Project Staff & One-Time – Vendor – Development & One-Time – Contracted – Technical Support	<ul> <li>1355.53(b) At a minimum, the system must provide for effective management, tracking and reporting by providing automated procedures and processes to:</li> <li>(1) Meet the Adoption and Foster Care reporting requirements through the collection, maintenance, integrity checking and electronic transmission of the data elements specified by the AFCARS requirements</li> <li>(3) Support theautomated collection, maintenance, management and reporting of information on all children in foster care</li> </ul>

Function	Description	Provider	2001 Annual Budget Category	Federal citation/ comment
Independent Oversight	Review and analysis of vendor deliverables.	Consultant (IV&V)	One-Time – Contracted – Project Mgmt	<ul> <li>1355.52(a)</li> <li> expenditures related toa statewide automated child welfare information system, to the extent such system:</li> <li>(4) provides for more efficient, economical, and effective administration of the programs carried out under a State plan approved under title IV-B and IV-E.</li> </ul>

Function	Description	Provider	2001 Annual Budget Category	Federal citation/ comment
Conversion	Assistance to counties	Vendor	One-Time – Vendor –	See above1355.52(a)
Support	for the migration of		Development	
	local data into	HHSDC	&	
	CWS/CMS.		One-Time – State – HHSDC	
		Consultants	Project Staff	
Requirements	The term refers to the	HHSDC	One-Time – State – HHSDC	See above 1355.52(a), plus
Analysis	initial activities by staff		Project Staff	
-	to define needs for a	CDSS	&	1355.53(b) At a minimum, the system
	system or		One-Time – Contracted –	must provide for effective management,
	enhancement.	County	Technical Support	tracking and reporting by providing automated procedures and processes
		Consultants		to:
				(1) MeetAFCARS

Function	Description	Provider	2001 Annual Budget Category	Federal citation/ comment
Programming Services	Implementing additional (new) features and/or functions.	Vendor	One-Time – Vendor – Development Or	<ul> <li>1355.52(a) –</li> <li> expenditures related toa statewide automated child welfare information system, to the extent such system:</li> <li>(1)collect and electronically report sectors data required</li> </ul>
			One-Time – Contracted – New Development	<ul> <li>certain data required</li> <li>(2)provides an interface with the State data collection system</li> <li>(3)provides for an interface with and retrieval of information fromsystem that collects information relating to eligibility</li> <li>(4) provides for more efficient, economical, and effective administration of the programs carried out under a State plan approved under title IV-B and IV-E.</li> </ul>
				1355.53 (c) A system established under paragraph (a) of this section may also provide support in meeting the following program functions: (1) Resource management, including automated procedures to assist in managing service providers, facilities, contracts and recruitment activities associated with foster care and adoptive families; (2) Tracking and maintenance of legal and court information, and preparation of appropriate notifications to relevant parties; (3) Administration and management of staff and workloads; (4) Licensing verification; and (5) Risk analysis.

Function	Description	Provider	2001 Annual Budget Category	Federal citation/ comment
External Reviews & Audits	At the direction of ACF, perform technical/fiscal audits and report results to ACF.	Consultant	One-Time – Contracted – Project Mgmt	<ul> <li>1355.52(a) –</li> <li> expenditures related toa statewide automated child welfare information system, to the extent such system:</li> <li>(4) provides for more efficient, economical, and effective administration of the programs carried out under a State plan approved under title IV-B and IV-E.</li> </ul>
Workstations Printers Routers Switches Hubs Servers	User interface device used for primary input/interaction with the CWS/CMS application.	Vendor	Initial Procurement	1355.52(a). Final release published in the Federal Register: May 19, 1995 (Vol. 60, number 97). In response to general comments the following is stated "hardware costs are eligible for 75% matching within the window provided by statute regardless of the operational status of the system."
Build Out (New item)	Physical plant changes necessary to implement.	County Vendor CDSS	Initial Procurement	1355.52(a)

Function	Description	Provider	2001 Annual Budget Category	Federal citation/ comment
SAS	A commercial-off-the- shelf software package used for defining and running statistical queries from CWS/CMS production data.	Vendor	One-Time – Vendor	<ul> <li>1355.52(a)</li> <li>(1) (system) provides for the State to collect and electronically report certain data required by section 479(b)and 1355.40 of this part.</li> <li>1355.53(g) and SACWIS Requirement VII-B.2(b) – The system must generate statistical reports needed to assist in the analysis of the program.</li> </ul>
Business Objects	A commercial-off-the- shelf software package used for defining and running ad-hoc queries from CWS/CMS data (within the CAD architecture).	Vendor	One-Time – Vendor	See above 1355.52(a), (c) and 1355.53 (g) and SACWIS Requirement VII-B.2(a) – The system must generate regular and ad-hoc management reports (e.g., workload status, client/case status, performance factors, outcome measures, etc.).

Function	Description	Provider	2001 Annual Budget Category	Federal citation/ comment
Batch Interfaces Includes: Licensing Information System (LIS), Medi-Cal Eligibility Data System (MEDS), Welfare Case Data System (WCDS), Welfare Case Management Information System (WCMIS), Integrated Benefits Payment System (IBPS), Automated Provider Payment System for Foster Care Providers for Los Angeles County (APPS), JNET (San Bernardino County Juvenile Network)	Example: For LIS, the one-way nightly- batch interface that provides CWS/CMS with placement facilities that are licensed by the State.	Vendor staff work with State staff to facilitate the interface and to work out any problems	One-Time – Development	<ul> <li>1355.52(c) –</li> <li>Expenditures for the operation of the automated information system described in paragraph (a) of this section are eligible for FFP at the 50 percent matching rate.</li> <li>1355.53 (c) A system established under paragraph (a) of this section may also provide support in meeting the following program functions:(4) Licensing verification</li> <li>1355.53(d) The system may also provide for interface with other automated information systems, including, but not limited to, accounting and licensing systems, vital statistics and education, as appropriate.</li> </ul>

Function	Description	Provider	2001 Annual Budget Category	Federal citation/ comment
Interfaces (IV-D, IV-E, IV-A, XIX)	Planned two-way interfaces.	Vendor	One-Time – Development	<ul> <li>1355.52(a) –</li> <li> expenditures related toa statewide automated child welfare information system, to the extent such system:</li> <li>(3)provides for an interface with and retrieval of information fromsystem that collects information relating to eligibility</li> <li>(4) provides for more efficient, economical, and effective administration of the programs carried out under a State plan approved under title IV-B and IV-E.</li> <li>1355.53(b)(2)</li> </ul>
				Provide, for electronic exchange with(unlessinterfacenot practicable) Systems operated under title IV-A, title XIX,title IV-D.
CWS/CMS User Training	Plan, manage, approve, and procure initial Statewide user training per SACWIS Action Transmittal. (trainers, material)	Vendor	One-Time – Development	1355.52(a)

Function	Description	Provider	2001 Annual Budget Category	Federal citation/ comment
IBM-Boulder Mainframe Operations (Server Tier)	Responsible for the maintenance of the mainframe operating system and components, including hardware configuration and the DB2 environment.	Vendor	On-Going – Vendor – Basic M&O	<ul> <li>1355.52(c) –</li> <li>Expenditures for the operation of the automated information system described in paragraph (a) of this section are eligible for FFP at the 50 percent matching rate.</li> <li>1355.52(b)</li> </ul>
State Data Center Administrative Overhead	The HHSDC Systems Integration Division is responsible for the management and implementation of specific statewide systems for the California Department of Social Services.	HHSDC	On-going – State – Admin Overhead	See above 1355.52(c) and 1355.52(a) (4) These are overhead costs allocated in conformance with OMB A-87 and HHSDC's federally approved Cost Allocation Plan.
Centralized Help Desk Support	Boulder help desk that serves State & County needs re: problems with application or connectivity.	Vendor	On-Going – Vendor – Basic M&O	See above 1355.52(c) and 1355.52(a) (4)

Function	Description	Provider	2001 Annual Budget Category	Federal citation/ comment
Service Level Reporting and analysis		Vendor	On-Going – Vendor – Basic M&O	See above 1355.52(c) and 1355.52(a) (4)
Technical Architecture Management (Middle Tier)	The management and maintenance of the system beyond the Boulder facility.	Vendor	On-Going – Vendor – Basic M&O	See above 1355.52(c) and 1355.52(a) (4)
Asset Inventory Services	The accounting of and disposal of IT property, hardware and software (for SACWIS equipment). Co-existent county desktops and county printers.	Vendor Co-Existent Counties HHSDC	On-Going – Vendor – Basic M&O Tech Infrastructure On-Going – County – User M&O	See above 1355.52(c) and 1355.52(a) (4)
Data Recovery Services (including Data Security)	Making adjustments to data in the database necessitated by conversion, changes to design, or by end-user errors or other sources of corruption to the data. Includes related reports.	Vendor	On-Going – Vendor – Basic M&O	See above 1355.52(c) and 1355.52(a) (4)

Function	Description	Provider	2001 Annual Budget Category	Federal citation/ comment
Project Management and Administration	Provide management, contract management, and administration of specific statewide health and human services automation projects. Includes project management, contract management, operations management, application release support, and all software life-cycle activities (e.g. requirements management, application design, application testing, system acceptance testing).	HHSDC County Consultants CDSS	On-Going – State – HHSDC Project Staff and County Consultants	See above 1355.52(c) and 1355.52(a) (4) These are costs allocated in conformance with OMB A-87 and HHSDC's federally approved Cost Allocation Plan.
Independent Oversight	Review and analysis of vendor deliverables.	Consultant (QA V&V)	On-Going –Contracted – Project Mgmt	See above 1355.52(c) and 1355.52(a) (4)

Function	Description	Provider	2001 Annual Budget Category	Federal citation/ comment
Requirements Analysis	The term refers to the initial activities by staff to define and highlight the scope of a requested change.	HHSDC County CDSS	On-Going – State – HHSDC Project Staff & On-Going – County User M&O	See above 1355.52(c) and 1355.52(a) (4)
Local county help desks	Coexistent Counties are required to have Local Help Desks.	County	On-Going – County – User M&O	See above 1355.52(c) and 1355.52(a) (4)
Application Maintenance	Modification of the CWS/CMS application and/or database.	Vendor	On-Going – Vendor – Application Maintenance	See above 1355.52(c) and 1355.52(a) (4)
Customer Services	Liaison staff to provide system support to county staff (e.g. 30k mile tune-up, ad-hoc report assistance, business reengineering).	HHSDC CDSS	On-Going – State – HHSDC Project Staff	See above 1355.52(c) and 1355.52(a) (4)
External Reviews & Audits	At the direction of ACF, perform technical/fiscal audits and report results to ACF.	Consultant	One-Time – Contracted – Project Mgmt	See above 1355.52(c) and 1355.52(a) (4)

Function	Description	Provider	2001 Annual Budget Category	Federal citation/ comment
Batch Interfaces Includes: Licensing Information System (LIS), Medi-Cal Eligibility Data System (MEDS), Welfare Case Data System (WCDS), Welfare Case Management Information System (WCMIS), Integrated Benefits Payment System (IBPS), Automated Provider Payment System for Foster Care Providers for Los Angeles County (APPS), JNET (San Bernardino County Juvenile Network)	Example: For LIS, the one-way nightly- batch interface that provides CWS/CMS with placement facilities that are licensed by the State	Vendor staff work with State staff to facilitate the interface and to work out any problems	On-Going – Vendor – Basic M&O	<ul> <li>1355.52(c) –</li> <li>Expenditures for the operation of the automated information system described in paragraph (a) of this section are eligible for FFP at the 50 percent matching rate.</li> <li>1355.53 (c) A system established under paragraph (a) of this section may also provide support in meeting the following program functions:(4) Licensing verification</li> <li>1355.53(d) The system may also provide for interface with other automated information systems, including, but not limited to, accounting and licensing systems, vital statistics and education, as appropriate.</li> </ul>

Function	Description	Provider	2001 Annual Budget Category	Federal citation/ comment
Interfaces (IV-D, IV-E, IV-A, XIX)	Planned two-way interfaces.	Vendor	N/A	<ul> <li>1355.52(c) –</li> <li> expenditures related toa statewide automated child welfare information system, to the extent such system:</li> <li>(3)provides for an interface with and retrieval of information fromsystem that collects information relating to eligibility</li> <li>(4) provides for more efficient, economical, and effective administration of the programs carried out under a State plan approved under title IV-B and IV-E.</li> </ul>
				1355.53(b)(2) Provide, for electronic exchange with(unlessinterfacenot practicable) Systems operated under title IV-A, title XIX,title IV-D.

Function	Description	Provider	2001 Annual Budget Category	Federal citation/ comment
SAS	A commercial-off-the- shelf software package used for defining and running statistical queries from CWS/CMS production data.	Vendor	On-Going – Vendor – Application Maintenance	<ul> <li>1355.52(c)</li> <li>(1) (system) provides for the State to collect and electronically report certain data required by section 479(b)and 1355.40 of this part.</li> <li>1355.52(c) –</li> <li>Expenditures for the operation of the automated information system described in paragraph (a) of this section are eligible for FFP at the 50 percent matching rate.</li> <li>SACWIS Requirement VII-B.2(b) – The system must generate statistical reports needed to assist in the analysis of the program.</li> </ul>
Business Objects	A commercial-off-the- shelf software package used for defining and running ad-hoc queries from CWS/CMS data (within the CAD architecture).	Vendor	On-Going – Vendor – Basic M&O	See above 1355.52(c) and SACWIS Requirement VII-B.2(a) – The system must generate regular and ad-hoc management reports (e.g., workload status, client/case status, performance factors, outcome measures, etc.).

Function	Description	Provider	2001 Annual Budget Category	Federal citation/ comment
CWS Management	Executive program and policy management of the CWS program, including the CWS/CMS. Management of inter- agency agreements and contracts.	CDSS	On-going CDSS	IV-E Administration 45CFR1356.60 (c) CDSS role in oversight
Policy Analysis	Reviewing application change requests for compliance with CWS Policy. Reviewing pending legislation for impact upon CWS/CMS.	CDSS	On-going CDSS	Program oversight needed regardless of existence of an automated system.
Input Devices (e.g. workstations PC's, Laptops )	User interface device used for primary input/interaction with the CWS/CMS application.	HHSDC CDSS County Contractor	On-going – Vendor Counties	Consistent with the federal approved cost allocation plan. Allocated to benefiting programs based on the CAP.

Function	Description	Provider	2001 Annual Budget Category	Federal citation/ comment
WAN	A network that connects by a communications channel LAN's and MAN's together and across a wide geographical area. (development under technical architecture)	HHSDC	On-Going – State – HHSDC WAN Services	1355.52(c) Expenditures for the operation of the automated information system described in paragraph (a) of this section are eligible for FFP at the 50 percent matching rate.
Coexistent County LAN	A group of computers and peripheral devices connected by a communications channel capable of sharing files and other resources between several users. Some costs allocated to SACWIS and some to Non-SACWIS.	County	On-Going – County – User M&O	See above 1355.52(c)
Dedicated County LAN/MAN	A group of computers and peripheral devices connected by a communications channel capable of sharing files and other resources between several users.	Vendor	On-Going – Vendor – Basic M&O	See above 1355.52(c)

Function	Description	Provider	2001 Annual Budget Category	Federal citation/ comment
Coexistent County MAN	A public, high-speed network that usually connects geographically related public LAN's. Some costs allocated to SACWIS and non- SACWIS.	County	On-Going – County – User M&O	See above 1355.52(c)

Function	Description	Provider	2001 Annual Budget Category	Federal citation/ comment
CAD Architecture	County Access to Data – A component of the CWS/CMS, hosted on an AIX (RS-6000) platform, which houses data extracted from CWS/CMS.	Vendor	On-Going – Vendor – Basic M&O	See above 1355.52(c)
Application Servers	CWS/CMS application servers, connected to County LAN. Maintain and operate servers.	Vendor	On-Going – Vendor – Basic M&O	1355.52(c) Expenditures for the operation of the automated information system described in paragraph (a) of this section are eligible for FFP at the 50 percent matching rate.
Data Storage (DASD)	Location and means of storing information.	Vendor	On-Going – Vendor – Basic M&O Additional User M&O	See above 1355.52(c)
Host CPU Usage	Execution of CWS/CMS application and access to CWS/CMS data.	Vendor	On-Going – Vendor – Basic M&O Additional User M&O	See above 1355.52(c)

Function	Description	Provider	2001 Annual Budget Category	Federal citation/ comment
Remote Site Dial-Up	Use of a portable computer (laptop) and modem for "dial-up" via phone lines to a server that resides in another location.	County	On-Going – Vendor – Additional User M&O	See above 1355.52(c)

### **Non-SACWIS Items**

Function	Description	Provider	2001 Annual Budget Category	Rationale
Moves and Changes Services	Moving equipment to a new location, or relocating equipment within a site, closing a site or service to disconnect equipment from a site.	Contracted Vendors County	Program – Administration Facilities On-Going – Vendor – Basic M&O	County-specific activity (not a Statewide activity) Addressed in the County Cost Allocation Plan. OMB A-87, 19.d. – Items of less than \$5000 considered to be supplies. California's Uniform Codes Manual (UCM) classifies this task as a general expense.
MAC Management	A State oversight process for managing the receipt, planning, funding approval, and tracking of requests to change equipment physical location.	HHSDC	Program	Coordination of County-specific activities (not a Statewide activity). See MAC Services above.

### **Non-SACWIS Items**

#### Category: Operations – (Non-SACWIS)

Function	Description	Provider	2001 Annual Budget Category	Rationale
Asset Inventory	The accounting of and disposal of IT property,	State	Program	For Non-SACWIS equipment.
Services	hardware and software.	HHSDC		IV-E Administration 45CFR1356.60(c)
		County		
Coexistent County LAN	A group of computers and peripheral devices connected by a communications channel capable of sharing files and other resources between several users.	County	Program	OMB A-87 C Basic Guidelines, 1.(a)be necessary and reasonable, 3.(a) A cost is allocable to a particular cost objective if the good services involved are chargeable or assignable to such cost objective in accordance with relative benefits received.
Coexistent County MAN	A public, high-speed network that usually connects geographically related public LAN's.	County	Program	See above OMB A-87

#### Category: Training (Non-SACWIS)

Function	Description	Provider	2001 Annual Budget Category	Rationale
	Plan, manage, approve, and procure <i>ongoing</i> Statewide user training ( <i>trainers, material</i> ).	CDSS	Program	Defined as an administrative cost (CFR 1356.60 (b))

### Category: Training (Non-SACWIS)

Function	Description	Provider	2001 Annual Budget Category	Rationale
Training Servers	County LAN servers used in the staff training	Vendor	Program	Defined as an administrative cost (CFR 1356.60 (b))
	of CWS/CMS.	County		

#### **Non-SACWIS Items**

Category: Reviews (Non-SACWIS)

Function	Description	Provider	2001 Annual Budget Category	Rationale
Internal Reviews &	At the direction of State management, perform	State	General Overhead	Not SACWIS related.
Audits	technical/fiscal audits for compliance determination.	Consultant		Allocated to benefiting programs based on the CAP.
External Reviews &	At the direction of external entities (DOF,	State	General Overhead	Not SACWIS related.
Audits	DGS, Leg, Non-ÀCF Federal Entity), perform technical/fiscal audits and report results to external entities.	Consultant		Allocated to benefiting programs based on the CAP.

### Category: Non-CWS Staff Access to the CWS/CMS (Non-SACWIS)

Function	Description	Provider	2001 Annual Budget Category	Rationale
Program Researchers (any user of the system) Equipment utilized is appropriately charged to system application accessed.	Development, management, distribution of ad-hoc reports necessitated by Management, Legislature, County Boards of Supervisors and Federal Outcome Measures.	CDSS UC Berkeley County	Program	Exists due to State requirements, regardless of automated system. Allocated to benefiting programs based on the CAP
Providers (any CWS/CMS user) Equipment utilized is appropriately charged to system application accessed.	Access to CWS/CMS by individuals providing services to CWS children and families, researchers getting data to create reports, etc.	Other IV-E related Service Providers	Program	Service exists independent of SACWIS Allocated to benefiting programs based on the CAP

#### Category: Data Tools (Non-SACWIS)

Function	Description	Provider	2001 Annual Budget Category	Rationale
SDM	A Risk Assessment tool piloted in a limited	County	Program	Non-statewide pilot status
	way in some counties.	Contractor		Allocated in conformance with the CAP

### Category: Data Tools (Non-SACWIS)

Function	Description	Provider	2001 Annual Budget Category	Rationale
County Specific Tools & Geographic Information System (GIS)	Tools that counties have purchased or utilized to enhance management of Child Welfare Services. "Stand alone systems"	County	Program	Non-statewide Allocated in conformance with the CAP
County Specific Data Warehouses	Various Data Warehouses which counties have purchased or utilized to manage CWS/CMS extract data out of production.	County	Program	Non-statewide Allocated in conformance with the CAP
Probation Light	LA-developed application running off their CAD extract. Long term interim system until CDSS policy established for Probation use of CWS/CMS.	LA County	Probation Program	Non-statewide Allocated in conformance with the CAP
Adoption Light	LA-developed application running off their CAD extract. Interim system until replacement by statewide system.	LA County	Adoptions Program	Non-statewide Allocated in conformance with the CAP

#### Category: Data Tools (Non-SACWIS)

Function	Description	Provider	2001 Annual Budget Category	Rationale
County Licensing Systems	Manual or automated systems not connected to CWS/CMS.	County	CCL Program	Non-statewide Allocated in conformance with the CAP
Safe Measures	A data management tool purchased and utilized by some entities to query CWS/CMS for program oversight.	CDSS County	Program	Non-statewide Allocated in conformance with the CAP
County Extracts	Weekly batch extracts to Counties of their data – L.A. has a nightly batch update out of production.	Vendor accommodates the extracts	Program	Non-statewide Allocated in conformance with the CAP

Function	Description	Provider	2001 Annual Budget Category	Rationale
E-Mail Servers	Servers used in support of Exchange/Outlook	Vendor	Program	Non-statewide
	E-mail.	County		Not part of the functions of CWS/CMS
				Allocated to benefiting programs based on the CAP

### Category: Peripheral Equipment (SACWIS and Non-SACWIS)

Function	Description	Provider	2001 Annual Budget Category	Rationale
Printers	A device for putting computer output on paper.	Vendor Counties	On-going – Vendor Counties	Allocated to benefiting programs based on the CAP.
Voice Recognition (Software & Hardware)	Software or hardware on a computer that is capable of executing from verbal commands.	County	On-going - Counties	Does not meet the non-separable definition Allocated to benefiting programs based on the CAP
Assistive Devices	Devices to assist PC use by persons with physical limitations. (ADA)	County	On-going - Counties	Employer (County) issue Allocated to benefiting programs based on the CAP
Digital Cameras (currently non-SACWIS only)	A camera that utilizes digital computer technology-capable of representing information in a discrete form. Used to transfer photographic information into a computer file.	County	Program	Non-statewide, does not meet the non- separable definition. Allocable to benefiting programs based on the CAP.

### Category: Peripheral Equipment (SACWIS and Non-SACWIS)

Function	Description	Provider	2001 Annual Budget Category	Rationale
Scanners (currently non-SACWIS only)	A device that enables a computer to electronically read a printed/handwritten page.	County		Non-statewide, does not meet the non- separable definition. Allocable to benefiting programs based on the CAP.

#### <u>Legend</u>

Parking Lot issues -



Cms common/SACWIS/SAC-nonSAC/SACWIS definitions with Fed cit V10 Last updated 3-7-03 at 7:30 pm

#### **CWS/CMS POLICY DEFINITIONS**

In order to request approval and subsequently claim and allocate costs in accordance with the federal guidelines, counties will need to categorize all CWS/CMS costs as either SACWIS or non-SACWIS and determine whether the costs benefit programs outside of Title IV-E or IV-B State Plans for cost allocation purposes. By using the definitions listed below for both SACWIS and non-SACWIS in the development and operational phases, all counties will be able to correctly define and allocate costs to the benefiting program.

#### <u>SACWIS</u>

A statewide automated system consisting of software, hardware, hardware that interfaces with SACWIS systems, and personnel that is directly associated with the functioning of a single system that meets the requirements imposed by Federal regulations, (45 CFR 1355.50–1355.57) and is capable of interfacing with another system to perform required functions (i.e., collecting information relating to child abuse and neglect). To the extent practicable, is capable of interfacing with and retrieving information from, the State data collection system that collects information relating to the eligibility of individuals under Title IV-A; and is likely to provide more efficient, economical and effective administration of the programs carried out under a State's plan approved under Title IV-B or IV-E of the Social Security Act.

#### NON-SACWIS

Includes EDP systems that are developed to enhance program performance, and interface with other system(s), but are not a requirement for the functioning of a SACWIS system. These systems are not defined, implemented and/or available statewide. This includes the system's hardware, software and personnel.

#### DEVELOPMENT

Includes system requirements, detailing of system and program specifications, programming and testing. Also includes the use of hardware to the extent necessary for the developmental phase (e.g., the equipment needed to support the project staff) or to add new functionality to an existing SACWIS plus any software development costs, (excluding routine maintenance and operations, or minor enhancements and changes that do not significantly increase the functionality of the system).

#### <u>M&O</u>

M&O means the automated processing of data used in the administration of the State plan related to the applicable program. M&O includes the use of supplies, software, hardware, and personnel directly associated with the functioning of the mechanized

information system. A system is considered operational when it is determined to be fully functional. For systems that are being "phased in", parts of the system that are fully functional are considered to be in M&O while other portions of the system not fully functional are considered to be in development (ACF Policy Interpretation (PI), ACYF-CB-PI-01-05, dated April 15, 2001).

To illustrate, M&O costs include routine maintenance, minor enhancements and other changes that do not significantly increase or modify the functionality of the system. This includes but is not limited to routine activities such as:

- updating existing commercial software used in the system;
- table changes adding new reports, edits, alerts or data elements;
- screen reformatting;
- or minor changes in the system.

#### SACWIS AND NON-SACWIS CLAIMING INSTRUCTIONS

After identifying the costs as SACWIS or Non-SACWIS, counties are to follow the instructions below to cost allocate and claim the costs to the appropriate program codes. The following clarifying claiming instructions will help to ensure that SACWIS and Non-SACWIS costs will be appropriately claimed and cost allocated statewide.

Note: counties are required to submit an APD for any SACWIS or Non-SACWIS Development or M&O costs incurred for the CWS/CMS project. If a county does not have an approved APD prepared in accordance with the APD Guidelines, the costs associated with the purchase will be ineligible for Federal or State reimbursement.

#### **SACWIS Claiming Instructions**

Once costs have been identified as SACWIS via the SACWIS matrix, counties are to determine whether the costs must be allocated to other benefiting programs. Typically, most SACWIS costs only benefit the CWS/CMS system as it is a tool used by all counties to capture and disseminate vital case management information for all children in foster care. However, there are certain hardware, software, or EDP personal services costs that benefit other programs. An example would be a KinGAP payment software program that is loaded on CWS/CMS equipment but is not essential for the functioning of the SACWIS system. Under this example the portion of CWS/CMS equipment associated with the running of the software program would need to be allocated to KinGAP. The entire cost of the Kin-GAP software would be direct charged to Kin-GAP eligibility.

#### SACWIS Costs Benefiting Only Title IV-E

The following is a step by step example demonstrating how counties should claim and allocate CWS/CMS expenditures.

County A purchases workstation equipment for \$8,000 that will be used for the sole purpose of entering and retrieving foster case management data into CWS/CMS.

Step 1.

Because the equipment only benefits SACWIS, the entire cost would be claimed on the DFA 325.1A EDP page of the CEC, under the direct to program M&O section, to PC 536, SACWIS M&O. Example:

#### DFA 325.1A Input Screen M&O Direct to Program Costs

Prg	Program	Hours	Direct Personal	Purchase of Services/Operating
Code	Description		Services	Costs Non-CCAP
536	SACWIS M&O			8,000

#### SACWIS Costs Benefiting Other Programs

For SACWIS costs that benefit programs outside of Title IV-E or IV-B, the costs are to be allocated to the appropriate benefiting programs by using case worker time study hours.

Example:

County A purchases software for \$10,000 that will be loaded onto CWS/CMS workstations. The software will be used to enter and retrieve Emergency Assistance and CalWORKS payment information.

Step 1.

Identify all programs, including those outside of IV-E and IV-B that benefit from CWS/CMS Items purchased, i.e. Emergency Assistance and CalWORKS.

- PCs Other Benefiting Programs
- PC 614 CalWORKS Eligibility
- PC 513 EA-ER Referrals

Step 2.

Once all benefiting programs have been identified, go to the DFA 325.1A, Single and Multi Function Development and M&O Input Screen on the CEC and input the following:

Example:

#### DFA 325.1A INPUT SCREEN

Single & Multi-Function Development and M&O

Project # Input HHSDC's Project Approval Letter Number

Project Name Input SACWIS Other Benefiting

Obser Hours: N/A Oper Cost/POS: Input SACWIS Other Benefiting Costs = \$10,000

Total Cost for All Projects : N/A

NOTE: Input 3 Digit Benefiting Program Codes from left to right across the input screen

Total Obser Hours For All Projects: N/A

The EDP page will then automatically calculate the amount of costs that will be allocated to the other benefiting programs using the casework time study hours for each program. If the Non IV-E costs only benefit one program, for example CalWORKs, the costs would be claimed on the DFA 325.1A EDP page under the direct to program M&O section to PC 614, CalWORKs.

#### Non-SACWIS Claiming Instructions

Once costs have been identified as Non-SACWIS via the SACWIS matrix, costs will be allocated using the Nonfederal discount rate. This is because the Non-SACWIS costs do not qualify for enhanced funding. Therefore, the Nonfederal discount rate is applied as the first step to allocate costs to the benefiting program(s). The Non-SACWIS costs should be claimed as follows:

#### Non-SACWIS Benefiting Title IV-E

Step 1.

In order to appropriately allocate non-SACWIS to Title IV-E and other benefiting programs, counties will need to identify all non eligible Title IV-E costs. This is accomplished by retrieving the Nonfederal/CFAP families ratio listed on the second page of the DFA 325.1, Line AH. The Nonfederal percentage will applied as follow:

Example:

Line AH Nonfed/CFAP- Families Ratio

AFDC FC 0.145000

The total Non-SACWIS costs are then multiplied by the Nonfederal percentage to get the amount that is to be claimed to Title IV-E and the amount that is to be allocated to the benefiting program(s).

Example: County A purchases Structured Decision Making software (SDM) for \$5,000. Because the software has not been added to CWS/CMS by all counties statewide, the cost is determined to be Non-SACWIS. The cost of the software will be claimed to Title IV-E and other benefiting programs as follows:

 $5,000 \times 14.5\% = 725.00$  will be allocated to the following benefiting programs:

- PC Benefiting Programs
- 531 EA Case Management 030 KinGAP Case Management
- 614 CalWORKs
- 146 CWS Services

Step 2.

After applying the non-federal discount ratio to the eligible non-SACWIS Title IV-E costs, the federally eligible costs should be claimed to PC 105, Non-SACWIS M&O on the DFA 325.1A M&O Direct to Program Costs on the CEC.

 $5,000 \times 85.5 \% = 4275.00$  will be claimed to Title IV-E using PC 105, Non SACWIS.

#### DFA 325.1A Input Screen M&O Direct to Program Costs

Pg Code	Program Description	Hours	Direct Personal Services	Purchase of Services/ Operating Costs Non CCAP
105	Non SACWIS M&O			\$4,275

The sharing ratio for PC 105 is 50/35/15 (Fed/State/County respectively).

#### Non-SACWIS Benefiting Other Programs

Step 3.

The non-federal share of costs will need to be allocated to the benefiting programs as follows:

Example

#### DFA 325.1A INPUT SCREEN Single & Multi-Function Development and M&O

Project # Input HHSDC's Project Approval Letter Number

Project Name: Input Non-SACWIS Other Benefiting

Obser Hours: N/A

Operating Cost/POS: Input Non-SACWIS Other Benefiting Cost = 850 &

Total Cost for All Projects: N/A

#### Benefiting Program Codes

531 6	14 146	030
-------	--------	-----

Note: If no program benefits directly from the Non-SACWIS, costs will be shifted to PC 146, CWS Services Non-Federal, and will funded at the sharing ratio of 70% State/30% County.