

APD 101/201

Understanding the Advance Planning Document Process

December 3, 2020



OFFICE OF CHILD SUPPORT ENFORCEMENT

Purpose

- The purpose of this presentation is to provide an overview of federal requirements for the development, submittal, and review of Advance Planning Documents (APDs)
- Things you will learn:
 - The purpose of an APD
 - Types of APDs
 - Type of APD to submit, and when?
 - Content requirements for APDs
 - How to submit an APD?
 - Federal review process for APDs

Purpose of an APD

- The APD is a device for requesting and obtaining Federal Financial Participation (FFP) for the planning, development, installation, maintenance, and operation of statewide child support systems
 - Provides the Federal Government with the data required to determine funding for a state project
 - Provides the State and Federal Agencies with the kind of high-level data generally used to monitor a project's progress

Types of APDs

There are three major types of Advance Planning Document Submissions:

- Planning APD (PAPD) [45 CFR 95.610(a)]
 - Used to seek reimbursement for planning phase costs
 - Planning phase activities: preliminary, feasibility study, IAPD, and procurement
- Implementation APD (IAPD) [45 CFR 95.610(b)]
 - Used by a state to request FFP and overall approval of an modernization project
- Annual APD Updates (APDU) [45 CFR 95.610(c)]
 - Used to update information from the PAPD or IAPD and to request federal funding for the project on an on-going basis

The Planning APD

Planning APD

- A Planning APD is highly recommended before a state begins the planning phase of a system replacement or modernization project
- This is a brief document - usually not more than 15-30 Pages
- At a minimum, consists of four key sections:
 - Problem Statement
 - Project Management Plan
 - Budget
 - Total Project Cost Estimate
- Template available at <https://www.acf.hhs.gov/css/training-technical-assistance/planning-apd-template>

Planning APD – The Problem Statement

- 1-3 Pages of general discussion of the problem(s) faced by the agency and the need to seek a remedy
- Cite examples of issues/problems being faced
- Sample issue (Excerpt):

Over the past eleven years, NOMADS has been modified and patched to accommodate changing business rules in support of federal and state mandates, resulting in the system becoming fragmented and creating unintended consequences that require inefficient workarounds to meet program requirements. Additionally, it has been increasingly difficult to recruit and hire skilled application staff for the mainframe COBOL environment

Planning APD – The Project Management Plan

- Provide a list of key personnel
- Provide an organization chart for the planning effort
- Provide a task-oriented list of planning activities to be conducted including project schedule information
- Must include commitments to perform the following tasks:
 - Needs Assessment
 - Requirements Definition
 - Feasibility Study
 - Analysis of Alternatives
 - Cost/Benefit Analysis

Planning APD – The Project Management Plan (continued)

- Other task-oriented activities might include:
 - Planning RFPs for services required in the development phase of the project:
 - Software Development and Implementation
 - Quality Assurance (QA)
 - Independent Verification and Validation (IV&V)
 - Project Management Support
 - Hardware Purchasing
 - Installation
 - Planning for Implementation/IAPD

Planning APD – The Planning Budget

- Provide a planning budget by Fiscal Quarter and Year
- The budget categories include:
 - State Staff, Contractors (listed separately)
 - Hardware and Software
 - Training
 - Miscellaneous/Supplies
 - Travel
- Only planning costs should be included in the Planning APD

Planning APD – Total Project Cost Estimate

- This is a short (one paragraph) statement that provides a “ballpark” estimate of what the state expects the total planning, development, and installation of the new system to cost
 - Gives OCSE an assurance the state is aware of the estimated costs it will occur during the development phase
 - Demonstrates that state executive staff who have signed off on the document understand these costs

The Implementation APD

Implementation APD

- At the end of the planning phase of the project, and before beginning procurement activities or starting the development phase, an Implementation Advance Planning Document (IAPD) is submitted for OCSE review and approval
- IAPD is used by a state to request overall approval of modernization project
- Following approval, state submits annual APD to request the next year's funding for the project
- The IAPD replaces the PAPD and the old APD for the legacy system – all costs and tasks are rolled into the single IAPD document, broken out by:
 - Planning – completed and on-going
 - Development of the new system
 - Operations and Maintenance (O&M) of the legacy system
 - O&M for the future years of the new system

Implementation APD – Contents

- Executive Summary
- Results of activities conducted under a Planning APD, if any
- Statement of Needs and Objectives
- Requirements Analysis, Feasibility Study, Analysis of Alternatives, and Cost Benefit Analysis
- Personal Resource Statement
- Detailed description of the nature and scope of the activities to be undertaken and methods to be used to accomplish the project
- Proposed activity schedule for the project
- Proposed budget and cost allocation/distribution to the various funding sources
- Statement indicating the life expectancy of the proposed system
- Project Management Plan
- Security and Interface(s) requirements
- Development Phase contracts

Implementation APD – Executive Summary

- Overview of the Project's Expectations, Goals
- Statement of Executive Support for the Project
- Summary of the Planning Phase Activities
- Summary of Any Requests for Waivers
- Summary of Total Project Cost Estimate
- Summary of Initial Project Funding Requested (annual)

Implementation APD – Statement of Needs and Objectives

- Describe the current environment
- Identify new system needs
- Define objectives of the new system
- Describe anticipated benefits

Implementation APD – Results of Feasibility Study

- The results of the feasibility study includes a high-level discussion of the following:
 - Requirements analysis
 - Alternatives analysis methodology
 - Evaluation criteria
 - Alternatives considered
 - Description of the selected alternative

Implementation APD – Project Management Plan

- Task-Oriented project Activities Listing by Module/Function, Procurements, Including IV&V
- Project Schedule by Lifecycle Phases
 - GANTT, PERT, Microsoft (MS) Project is Administration for Children and Families (ACF) Standard
- Resources Statement
 - Organization charts for the project and umbrella agency
 - Key Personnel, Oversight, QA, State and Contract Staff
- Procurements
 - By type and purpose, including waiver requests
- Scope
 - Detailed description of the nature and scope of the activities and methods to be used to accomplish the project goals

Implementation APD – Sample Project Schedule (Excerpt)

ID	WBS	Task Name	Duration	Start	Finish
1	1	CSEP - Alternative 2 - Transfer CA	1506 days	Fri 9/1/17	Thu 8/31/23
2	1.1	CSEP System Development	857 days	Fri 9/1/17	Wed 2/3/21
3	1.1.1	Management Overhead	857 days	Fri 9/1/17	Wed 2/3/21
21	1.1.2	Project Initiation (included in Management Overhead)	75 days	Fri 9/1/17	Wed 12/20/17
70	1.1.3	Design, Development, and Test (Effort From FPA)	841.1 days	Mon 9/25/17	Wed 2/3/21
71	1.1.3.1	Design	250 days	Mon 9/25/17	Fri 9/21/18
72	1.1.3.1.1	Functional Design	115.28 days	Mon 9/25/17	Wed 3/14/18
163	1.1.3.1.2	Technical Design	139.58 days	Wed 3/7/18	Fri 9/21/18
254	1.1.3.2	Code Construction	532.52 days	Mon 9/10/18	Thu 10/22/20
327	1.1.3.3	Test Case Development	489.84 days	Fri 11/2/18	Thu 10/15/20
328	1.1.3.3.1	Functional Test Case Development	299.22 days	Fri 11/2/18	Wed 1/15/20
419	1.1.3.3.2	System Test Case Development	150.31 days	Tue 12/3/19	Wed 7/8/20
510	1.1.3.3.3	User Acceptance Test Case Development	109.84 days	Mon 5/11/20	Thu 10/15/20
601	1.1.3.4	Test Execution	81.88 days	Fri 10/2/20	Wed 2/3/21
602	1.1.3.4.1	Functional Test Execution	55.05 days	Fri 10/2/20	Wed 12/23/20
693	1.1.3.4.2	System Test Execution	30.98 days	Thu 12/3/20	Wed 1/20/21
784	1.1.3.4.3	User Acceptance Test Execution	24.14 days	Mon 12/28/20	Wed 2/3/21
875	1.1.3.5	Training Materials Development	571.48 days	Mon 10/22/18	Wed 2/3/21
893	1.2	CSEP Training and System Deployment	146 days	Thu 2/4/21	Tue 8/31/21
894	1.2.1	Management Overhead	146 days	Thu 2/4/21	Tue 8/31/21
909	1.2.2	Train support staff	10 days	Thu 2/4/21	Thu 2/18/21
913	1.2.3	Pilot (Reno PAO)	61 days	Fri 2/19/21	Fri 5/14/21
918	1.2.4	Deployment Group 1 (Washoe County DA)	51 days	Fri 4/9/21	Mon 6/21/21
923	1.2.5	Deployment Group 2 (Elko County PAO, Churchill, Douglas, Elko, Humboldt)	51 days	Fri 5/14/21	Tue 7/27/21
928	1.2.6	Deployment Group 3 (Clark County DA, Las Vegas NIO, and DWSS Central C)	51 days	Mon 6/21/21	Tue 8/31/21
933	1.2.7	CSEP Maintenance and Support - Deployment & Rollout	146 days	Thu 2/4/21	Tue 8/31/21
954	1.3	CSEP System Maintenance and Support	503 days	Wed 9/1/21	Thu 8/31/23
955	1.3.1	CSEP Maintenance and Support - Phase 1	121 days	Wed 9/1/21	Mon 2/28/22
956	1.3.1.1	Management Overhead	121 days	Wed 9/1/21	Mon 2/28/22
970	1.3.1.2	Helpdesk	121 days	Wed 9/1/21	Mon 2/28/22
972	1.3.1.3	Application Maintenance (Phase 1: 6 Months 100%)	121 days	Wed 9/1/21	Mon 2/28/22
990	1.3.2	CSEP Maintenance and Support - Phase 2	130 days	Tue 3/1/22	Wed 8/31/22
991	1.3.2.1	Management Overhead	130 days	Tue 3/1/22	Wed 8/31/22
1002	1.3.2.2	Helpdesk	130 days	Tue 3/1/22	Wed 8/31/22
1004	1.3.2.3	Application Maintenance (Phase 2: 6 Months 60%)	130 days	Tue 3/1/22	Wed 8/31/22
1022	1.3.3	CSEP Maintenance and Support - Phase 3	122 days	Thu 9/1/22	Tue 2/28/23
1023	1.3.3.1	Management Overhead	122 days	Thu 9/1/22	Tue 2/28/23
1031	1.3.3.2	Helpdesk	122 days	Thu 9/1/22	Tue 2/28/23
1033	1.3.3.3	Application Maintenance (Phase 3: 6 Months 40%)	122 days	Thu 9/1/22	Tue 2/28/23
1051	1.3.4	CSEP Maintenance and Support - Phase 4	130 days	Wed 3/1/23	Thu 8/31/23
1052	1.3.4.1	Management Overhead	130 days	Wed 3/1/23	Thu 8/31/23
1058	1.3.4.2	Helpdesk	130 days	Wed 3/1/23	Thu 8/31/23
1060	1.3.4.3	Application Maintenance (Phase 4: 6 Months 20%)	130 days	Wed 3/1/23	Thu 8/31/23

Implementation APD – Interface Requirements and Security

- List and describe each interface, including:
 - Purpose
 - Frequency
 - Agency/Corporate Dependencies/Limitations
- Describe security requirements:
 - Summary of Program Risk Analysis
 - Scope, Data Access, Physical Plant, Personnel, Frequency
 - Summary of Program Disaster Recovery and Contingency Planning [NIST SP 800-34]
 - Summary of Anticipated Application Security
 - Identification of Program's Security Officer

Implementation APD – Budget

- Budget line items must reflect tasks in the PMP
 - Each task broken out by state staff and contractors
- Other costs can be separate line items, for example:
 - Data center
 - Hardware
 - Software
 - Quality Assurance
 - IV&V
 - Travel
 - Training
- Budget spreadsheets must include
 - Costs by Federal Fiscal Quarter
 - Summed to Federal Fiscal Year

Sample Project Budget

Project Budget (FYXX)					
Quarter	Q1	Q2	Q3	Q4	1999
Funding	Regular	Regular	Regular	Regular	Regular
Task 1					
State Staff Costs	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Contractor Costs	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Task Total	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Task 2					
State Staff Costs	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Contractor Costs	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Task Total	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Task 3					
State Staff Costs	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Contractor Costs	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Task Total	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Task 4					
State Staff Costs	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Contractor Costs	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Task Total	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Task 5					
State Staff Costs	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Contractor Costs	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Task Total	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Training					
State Staff Costs	\$25,000.00	\$25,000.00	\$25,000.00	\$25,000.00	\$100,000.00
Contractor Costs	\$75,000.00	\$75,000.00	\$75,000.00	\$75,000.00	\$300,000.00
Training Total	\$100,000.00	\$100,000.00	\$100,000.00	\$100,000.00	\$400,000.00
Maintenance Costs	\$45,000.00	\$45,000.00	\$45,000.00	\$45,000.00	\$180,000.00
IV&V Costs	\$125,000.00	\$125,000.00	\$125,000.00	\$125,000.00	\$500,000.00
QA Costs	\$125,000.00	\$125,000.00	\$125,000.00	\$125,000.00	\$500,000.00
Travel Costs	\$100,000.00	\$100,000.00	\$100,000.00	\$100,000.00	\$400,000.00
Miscellaneous Costs	\$40,000.00	\$40,000.00	\$40,000.00	\$40,000.00	\$160,000.00
Hardware Costs	\$100,000.00	\$0.00	\$0.00	\$0.00	\$100,000.00
Software Costs	\$20,000.00	\$0.00	\$0.00	\$0.00	\$20,000.00
Data Center/Processing					
Operational Costs	\$150,000.00	\$150,000.00	\$150,000.00	\$150,000.00	\$600,000.00
Development Costs	\$200,000.00	\$200,000.00	\$200,000.00	\$200,000.00	\$800,000.00
Data Center/Processing Total	\$350,000.00	\$350,000.00	\$350,000.00	\$350,000.00	\$1,400,000.00
TOTALS	\$1,005,000.00	\$885,000.00	\$885,000.00	\$885,000.00	\$3,660,000.00

Implementation APD – Budget

- Provide a budget summary for Federal Fiscal Year (FFY) characterized by FFP rate (if applicable)
 - Separate summary budgets for modernization planning, new system development, new system O&M, legacy system O&M
 - Costs for life of the system modernization as established in the feasibility study: $x + y + 3$ (years)
[Planning Phase (x) + Development Phase (y) + first 3 years of the O&M Phase]
 - Costs for the legacy system prior to the project start date should be placed in a separate table in an appendix or separate historical section – should match most recent legacy system APD

Sample Summary Budget

CATEGORY									
FFY	PLANNING		DEVELOPMENT & IMPLEMENTATION		MAINTENANCE & OPERATIONS FOR NON-DECSS SYSTEMS		MAINTENANCE & OPERATIONS FOR DECSS		TOTAL PROJECT COSTS
	STATE	VENDOR	STATE	VENDOR	STATE	VENDOR	STATE	VENDOR	
FFY 09	43,872	341,825	0	0	1,435,991	748,218	0	0	2,569,905
FFY 10	43,872	123,506	699,179	3,077,018	1,376,159	1,318,497	0	0	6,638,231
FFY 11	0	0	2,398,600	10,665,637	1,215,679	825,322	0	0	15,105,238
FFY 12	0	0	3,091,309	21,363,159	1,342,253	895,334	0	0	26,692,054
FFY 13	0	0	3,589,958	18,003,856	1,448,601	445,420	0	0	23,487,835
FFY 14	0	0	2,156,217	10,413,493	1,580,916	0	2,789,830	11,945,241	28,885,696
FFY 15	0	0	1,849,482	1,246,101	0	0	3,696,838	5,450,120	12,242,541
FFY 16	0	0	502,950	25,000	0	0	3,869,830	0	4,397,780
FFY 17	0	0	0	0	0	0	4,555,527	0	4,555,527
FFY 18	0	0	0	0	0	0	4,582,014	0	4,582,014
FFY 19	0	0	0	0	0	0	4,679,507	0	4,679,507
FFY 20	0	0	0	0	0	0	4,715,516	0	4,715,516
FFY 21	0	0	0	0	0	0	4,752,353	0	4,752,353
FFY 22	0	0	0	0	0	0	4,790,037	0	4,790,037
FFY 23	0	0	0	0	0	0	4,828,588	0	4,828,588
FFY 24	0	0	0	0	0	0	4,868,025	0	4,868,025
FFY 25	0	0	0	0	0	0	4,908,370	0	4,908,370
FFY 26	0	0	0	0	0	0	4,949,643	0	4,949,643
FFY 27	0	0	0	0	0	0	4,991,865	0	4,991,865
FFY 28	0	0	0	0	0	0	5,035,058	0	5,035,058
TOTAL	87,744	465,331	14,287,696	64,794,264	8,399,598	4,232,791	68,012,999	17,395,361	177,675,782

Implementation APD – Budget (continued)

- Program Cost Distribution
 - Factors: Budget costs by year, program, and FFP rates
 - Overview of Cost Allocation Methodology Calculation Algorithm(s)
- Cost Allocation Plan (CAP) – For Multi-Program Requests
 - Briefly discuss departmental/project cost pools affecting overhead, data center, telecommunications, etc.
 - Cite U.S. Department of Health and Human Services (DHHS) Division of Cost Allocation Plans

Implementation APD – Contracts

- All contracts related to development, operations and maintenance of a statewide system must be reported in the APD
- We recommend use of a table to report contract information in the APD (template on next page)
- Include all contracts – large and small – whether they were submitted for federal prior approval or not
- Include any requests (and justification) for waivers of prior approval of contracts in text accompanying the contract table

Contract Table Template

Contract Name	Type	Scope	Procurement Strategy	Total Cost Est/Actual	Timeframe		
					Base Start	Base End	Option Years
Include Vendor (or TBD if procurement not completed) and purpose.	Ex: Firm Fixed Price, Labor Hours, Time and Materials	Ex: O&M, application software development, COTS software, hardware, service contract, licenses	Ex: Full & Open Competition, Limited Competition (Master Services Contract), Non-Competitive (Sole Source)				
Examples:							
Alpha Company – workstations for county office upgrades	Firm Fixed Price	Hardware	Non-competitive	\$10 million	Est 2 nd Quarter SFY 2011	Authority to use this contract ends 6/30/2011	NA
Beta Company – GUI front end	Firm Fixed Price	Application Software Development	Full and Open Competition	Estimated \$6.5 million (in Negotiations)	Estimated 1/1/2011	9/30/2011	None
O&M (Vendor TBD)	Time and Materials	O&M	Master Services Agreement	Variable based on workload, not to Exceed \$20 million	10/1/2008	9/31/2012	2
MS Office Upgrade	Firm Fixed Price	COTS	Sole Source license	\$3.5 million	1/31/2011	NA	NA
Image Backfile Scanning - Vendor TBD	Fee Based – per page scanning fee	Service Contract	Full and open competition	Per transaction, estimated total cost of \$7 million	In procurement – estimated start 7/1/2011	1 year – estimated 6/30/2012	Up to 3, exercised annually

APD Updates

APD Updates

- The Implementation APD is a one-time submittal sent to OCSE for review and approval prior to beginning the development phase of an entire project
- After that, the state must submit updates either annually or on an as-needed basis as discussed in the following slides

Three Types of APD Updates

- Annual - Submitted annually to provide the official project status updates, request continued project funding, and report post-implementation costs and benefits
- As-Needed - Used to uniquely report significant changes to the project approach, procurement, methodology, schedule, or costs. Also used to provide detailed information on project and/or budget activities if required, as an approval condition of a prior APD
- Operational – Submitted annually when no development projects are being done to provide a summary of Operations and Maintenance (O&M) activities, annual funding, and an acquisition plan

APD Updates – The Annual APDU

Annual APDU Submittal Requirements

- Submittal to OCSE is required 60 days before the FFP authority for the project is set to expire
- Failure to submit in a timely fashion may lead to suspension of the APD and/or may trigger an Independent Verification and Validation (IV&V) project oversight

Annual APDU Content

- Each Annual APDU Must Include:
 - An updated executive summary that reports on project status of major tasks, milestones, and organization charts (if any major changes)
 - A reference to the initial approved APD and all subsequently approved changes as a baseline against which any new or additional changes are now being proposed
 - An updated Project Management Plan (PMP) that reports on new tasks, tasks completed, degree of completion of unfinished tasks, changes in resources, organization, etc.

Sample Task-Oriented Activity

Task xxx: Modify Status Aging and Overaged Statuses Report

Description: To address federal certification findings of reporting alerts to caseworkers in advance of the due dates

Design/Development: November 1, 2015 – March 31, 2016 (2 Contract months \$34,000), (3 State months \$30,000)

Testing: April 2016 (Half month Contractor \$8,500) (Half month State \$5,000)

Implementation: May 1, 2016

Cost: \$77,500 (\$42,500 – Contractor; \$35,000 – State)

Current Status: Completed

Annual APDU Content (continued)

- Each Annual APDU Must Include:
 - An updated project schedule with revised completion dates for all tasks (new, complete, unfinished)
 - An updated procurement plan, including a revised procurement waiver request, if applicable
 - An updated project budget reflecting (includes the multi program):
 - Expenditures status detailing costs incurred to date by fiscal year (broken out by quarters)
 - Narrative explaining the difference between projected and actuals for the previously approved APD
 - An updated budget spreadsheet including requests for additional federal funding

Annual APDU Content (concluded)

- Each Annual APDU Must Include:
 - An updated contract table
 - A report of any approved or anticipated change to allocation basis in the APD's approved cost methodology
 - Updates to any remaining sections (interfaces, security, etc.). If there are no updates to be made, either re-submit same sections or state in the summary that no changes to these sections exist
 - Most recent date for the Biennial APD System Security Review (45 CFR 95.621), Disaster Recovery and Contingency Plan (NIST SP 800-34), and Risk Management Plan review/update

APD Updates – The As-Needed APDU

As-Needed APDU Submittal Requirements

- Submittal of an As-Needed APDU is required whenever a significant change in: system concept or scope; procurement approach or scope; or the approved Cost Allocation Plan methodology
- Also required when the State anticipates a schedule extension of more than 60 days for major milestones, or a projected cost increase of \$1 million or more
- Can also be used to clarify project information requested as an approval condition of the Planning APD, Annual APDU, or Implementation APD
- Due no later than 60 days after the occurrence of the change being reported

As-Needed APDU Content

- The As-Needed APDU must contain a revised schedule and/or budget to show the change in schedule, cost, or cost allocations
- The As-Needed APDU must contain supporting documentation to justify the need for changing a previously approved project schedule, cost, milestone, tasking, or procurement approach
- The contract table must be updated with any new or terminated contracts as a result of the change of scope in the project

APD Updates – The Operational APDU

Operational APDU

- The Operational APDU is a shorter version of the APDU that may optionally be used when there are no significant software development tasks for the project
 - If, at a later date, development work begins for the state system, a full APDU (annual or as-needed) must be submitted
- The Operational APDU is submitted annually and includes the following:
 - A Summary of Operations and Maintenance (O&M) Activities
 - Summary of Acquisitions
 - Annual Budget for O&M
 - Cost Allocation (if applicable)
- A template is available on the OCSE website at the following link:
<https://www.acf.hhs.gov/css/training-technical-assistance/operational-apd-instructions-and-template>

Operational APDU – Summary of O&M Activities

- Describe activities sufficiently to show they are O&M activities, not development:
 - Corrective changes are tasks to correct minor errors or deficiencies in software
 - Adaptive changes are minor revisions to existing software to meet changing requirements
 - Perfective changes are minor improvements to application software so it will perform in a more efficient, economical and/or effective manner
- Remember, any significant software development activities require submission of an Annual APDU

Operational APDU – Summary of Acquisitions

- Use the contract table template (link in the previous slides)
- Provide a list of planned O&M procurements and current O&M contracts including:
 - Type and Scope of Contract
 - Procurement Strategy
 - Estimated Cost
 - Expected Period of Performance
- Provide written affirmation that the procurement meets Federal and State procurement standards
- Sole-source contracts also require an affirmative statement that the acquisition is justified under state procurement law/regulations

Operational APDU – Annual Budget for O&M

- Provide sufficient information for the Federal program office to approve FFP for operational activities for the year covered by the OAPDU
- Project budget details estimated operational expenditures by category:
 - State Staff
 - Contract costs, by contract, for the year covered by the OAPDU
 - Hardware
 - Software
 - Training
 - Overhead
 - Miscellaneous/Supplies
 - Travel
- Costs should be broken out by quarter and totaled for the year

Sample Annual Budget for O&M

Cost Category	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total for Year
State Personnel					
Contract (not otherwise listed, by contract)					
Hardware purchases (by contract)					
Operational Software purchases (by contract)					
Training					
Overhead					
Supplies					
Other (Explain)					
TOTAL					

Operational APDU – Cost Allocation (if applicable)

- Cost allocation for operational activities is different from cost allocation for system development activities
- If cost allocation across multiple programs is necessary, use methodology and percentages for operational activities as approved by the Health Human Service (HHS)/ Program Support Center (PSC)/Division of Cost Allocation (DCA)
- Include a section indicating the approved cost allocation percentage for each program involved

Sample Cost Allocation Table

Programs	Total Request	Percent Allocation	Federal Share %	Federal Share \$	State Share \$
IV-D	\$2,100,000	21%	66%	\$1,386,000	\$714,000
TANF					
SNAP					
Child Care					
IV-E					
Title XIX					
Other (List each)					
State Only					
Totals		100%	NA		

APD Submission

Cover Letter

- Include a cover letter addressed to:

Commissioner
Office of Child Support Enforcement
330 C Street SW
Washington, DC 20201

- Letter must be signed and dated by the State IV-D Director, the head of the umbrella agency, or a designee that is on record as an “Approved Requestor” at OCSE

Cover Letter

- If a state's APD is for a multi-program system that must be submitted to multiple federal program offices, address to:

Deputy Assistant Secretary
for Planning, Research and Evaluation
Administration for Children and Families
330 C Street SW
Washington, DC 20201
ATTN: Christi Dant, State Systems Coordinator

- Letter must be signed and dated by the appropriate State official(s)

Electronic Submittal

- OCSE does not require a hard copy. Electronic version of the APD document and cover letter are recommended
- Send the electronic version via email to the DSTS mailbox OCSE.DSTS@acf.hhs.gov and the state's federal analyst in the OCSE Division of State and Tribal Systems
- For multi-program submittal, send it to:
 - 1) HHS Multi-Program APD Submissions mailbox HHSMulti-ProgramAPDSubmissions@acf.hhs.gov and
 - 2) The state's federal analyst of each of the federal program offices

Electronic Submittal (concluded)

- Certain large files (e.g. MS Project) may not be accepted by the OCSE email system – work with the federal analyst to submit
- Upon receipt of the document, OCSE will send a letter acknowledging the receipt

OCSE Review and Approval

Approval of APDs

- The State will receive a response from:
 - Commissioner, OCSE/ACF (for IV-D-specific APDs)
 - Deputy Assistant Secretary for Planning, Research and Evaluation OPRE/ACF (for multi-program APDs)
- ACF's response will:
 - Grant approval (with or without conditions)
 - Disapprove the request
 - Defer decision pending submission of additional information
 - Provide decision on the State's request for waiver of prior approval for contracts and RFP's (if applicable)

The Approval Decision Letter

- If the document is approved, the approval decision letter will provide the approval amount and term (usually one year)
 - Adjustments will be made, if necessary, to account for actual expenditures compared to prior year estimates
 - If the state requested a waiver of prior approval of any contracts in their APD, the approval decision letter will also provide OCSE's decision
- If more information is needed, OCSE defers approval, or conditionally approves, dependent on submission of the additional information

Approval of APDs – Provisional Approval

- If no written response from OCSE is received by the State within 60 days:
 - The response is “Provisionally Approved” from the 61st day following acknowledged (written) receipt of the State’s submission to HHS (45 CFR 95.611(d))
 - This means that the State can proceed with the project, at the State’s own risk, without waiting for HHS written prior approval
 - Once HHS approves the project, it will be eligible for funding from the date of provisional approval
 - However, if approval is deferred (or if the APD is disapproved) the date of provisional approval is no longer applicable

APD Disapproval

- An APD may be disapproved if:
 - The Computerized Support Enforcement System (CSES) ceases to comply with the APD
 - Not enough resources allocated to the project (including Quality Assurance (QA))
 - Poor or inadequate project management
 - Ill-conceived project plan
 - Requested budget in cover letter and APD budgets do not agree
 - Required IV&V assessment not completed

APD Disapproval

- When OCSE disapproves an APD:
 - CSES implementation project is suspended
 - Previously approved FFP for the project ceases for the entire period of the suspension of the APD
 - No additional FFP will be approved until the APD is re-authorized

Waiver of APD Requirements

- Provides a Waiver process for any APD requirement
- Must demonstrate:
 - why meeting regulatory provision is unnecessary or inappropriate
 - alternative approach will ensure the State and Federal Governments' interest are addressed, and enable the State to be in substantial compliance with appropriate federal requirements and regulations
- Waiver and alternative approach can be all or portion of APD regulatory provisions

Waiver of APD Requirements (concluded)

- Secretary (or designee) will review to assure that all processes provide for effective and efficient program operation
- If approved,
 - waiver becomes part of State's APD
 - State must have IV&V assessment to determine degree of IV&V needed
- If disapproved, the entire APD will be disapproved. The APD disapproval is a final administrative decision and is not subject to administrative appeal

References

References

- Title 45 Public Welfare and Human Services Code of Federal Regulations (CFR), Part 307--Computerized Support Enforcement Systems
- Title 45 Public Welfare and Human Services Code of Federal Regulations (CFR), Part 92--General Administration-Grant Programs (Public Assistance and Medical Assistance)
- Title 45 Public Welfare and Human Services Code of Federal Regulations (CFR), Part 95--General Administration-Grant Programs (Public Assistance, Medical Assistance and State Children's Health Insurance Programs)

References

- U.S. Department of Health and Human Services, Administration for Children and Families and Health Care Finance Administration – State Systems APD Guide, October 2010
- U.S. Department of Health and Human Services, Administration for Children and Families, Office of Child Support Enforcement – Addendum to State Systems APD Guide for Child Support Enforcement Systems, March 1999
- U.S. Department of Health and Human Services, Administration for Children and Families, Office of Child Support Enforcement – Annual Operational Advance Planning Document Instructions and Template, 12/29/2010
- Action Transmittal OCSE-AT-06-03, Policy Clarification Relating to Planning, Design, Development, Installation, and Operation of Automated Systems in the Title IV-D Child Support Enforcement Program, August 11, 2006
- Information Memorandum (IM) 11-18, Revision to the Methodology for Allocating Costs to Programs Participating in Information Systems (IS) Development Projects

References

- U.S. Department of Health and Human Services, Administration for Children and Families, Office of Child Support Enforcement –Automated Systems for Child Support Enforcement: A Guide for States, Updated September 2017
- U.S. Department of Health and Human Services, Administration for Children and Families – Feasibility, Alternatives, and Cost/Benefit Analysis Guide, July 1993 (In the process of being updated)
- U.S. Department of Health and Human Services, Administration for Children and Families, Office of Child Support Enforcement – Cost/Benefit Companion Guide, August 1994 (In the process of being updated)
- U.S. Department of Health and Human Services, Administration for Children and Families - Companion Guide 3: Cost/Benefit Analysis Illustrated for Child Support Enforcement Systems, September 2000 (In the process of being updated)
- Dear Colleague Letter (DCL-19-05)– Streamlining Feasibility Studies <https://www.acf.hhs.gov/css/policy-guidance/streamlining-feasibility-studies>