

PUBLIC SUBMISSION

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Docket: FNS-2009-0020

Revisions to Automated Data Processing and Information Retrieval System Requirements and Principles for Determining Costs Applicable to State Agency Administration

Comment On: FNS-2009-0020-0001

Automated Data Processing and Information Retrieval System Requirements

Document: FNS-2009-0020-0002

Comment on FR Doc # 2011-20796

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Organization: KS Dept of Social and Rehabilitation Services

Government Agency Type: State

Government Agency: KS Dept. of Social and Rehabilitation Services

General Comment

See attached file(s)

Attachments

Comments on proposed rule ADP and Info Retrieval System

1. Due to the magnitude of the data conversion for our implementation of KEES, Kansas will most likely do a big bang implementation of the eligibility portion of system, which will contain Food Assistance. Since Kansas is not a county administered state, it would be very difficult for SRS to just pilot a small area of the state while others are using our old system – it would be very difficult to keep the data in both systems in sync and our timeline does not allow for the building of such complex data synchronization routines. If time permits, Kansas will do parallel testing prior to implementation to ensure both systems produce the same or explainable difference in the results. Perhaps the word “Pilot” as used in the document has multiple meanings, but for Kansas to conduct a pilot for a small sampling of the state will be difficult with the major phase of this project. Smaller phases of the project will allow us to do a pilot. My recommendation is to update the verbiage to allow for either a pilot or parallel testing.
2. We will of course have a very thorough testing plan that we’ll be more than happy to submit to FNS.

The proposed rule makes the statement “FNS views this rule as having minimal impact on State agency workload with regard to additional testing requirements...” Kansas believes this view is not completely accurate. The following are, at a minimum, the number of points where we have observed FNS requires a review of project information:

- State must provide a complete test plan prior to testing;
- State must provide a pre-implementation view of the system to FNS to validate system functionality prior to testing;
- State must provide testing results to FNS for review prior to implementation;
- FNS may require any or all tests to be repeated if major changes or errors prompt repeating; and
- FNS may perform independent testing/validation.

If FNS requires only 30 days for just the ‘must provide’ items, this will prolong every project by 90 days at a minimum. If you include another 30 days for each ‘may’ item, that would involve an addition 60 days, for a cumulative total of 150 days or 5 months. This would, in essence, be down time where not many other project activities can go on. In essence, each of this items would be critical path and incur additional cost from contractors who must be compensated for retaining their resources on the project.

If we assume a conservative development team of 5 contractors at a very conservative rate of \$100 per hour, this would mean an additional cost to every project of \$260,000 to \$433,000 dollars. Not to mention State employee resources who would also be charging time to the project waiting for approval of their ‘go’ decisions. SRS believes the addition of half a million dollars and 5 months to projects of this magnitude is more than ‘minimal impact’ and will seriously impact the planning and execution of projects.

SRS is in no way arguing against effective and reasonable testing practices, however, we believe the number of ‘checkpoints’ required for federal oversight to be excessive, costly, and will potentially inhibit the approval of new information systems desperately required by state agencies.