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SUBJECT: State Agency Model (SAM) Systems Transfer Requirements

TO: Regional Directors
Supplemental Food Programs
All Regions

In March 2007, WIC State agencies and Regional Offices received a memorandum that provided guidance on the process for State Agency Model (SAM) transfers. That guidance included: 1) the priority for funding, 2) the components of the streamlined Implementation Advance Planning Document (IAPD), and 3) examples of justification for non-SAM transfers. It has come to our attention that there is some confusion as to what is required to justify adoption of a non-SAM system.

The requirement, as stated in the March memorandum, is that each WIC State agency that embarks on planning for a new system must look at the available SAM systems to see if one of them would be a possible transfer candidate. The Food and Nutrition Service (FNS) has stressed that an in-depth Feasibility Study, to include an alternatives analysis and gap analysis, needs to be done so that each State agency can determine if indeed a SAM system is right for them. The intention is to keep costs lower by transferring a system that requires minimal changes. This can be accomplished by determining up front that a particular system has the functionality that is needed by a specific State agency.

No State agency should feel that they have to take a SAM system if there is clearly another system available that would be more cost-effective.

The previous memorandum also gave examples of acceptable justification for a non-SAM transfer. The guidance listed four examples of why a State agency may not be able to adopt a SAM system. This was intended to provide examples only, not an all inclusive list. We presented these examples at the request of State agency and regional office staff that asked for some guidance on what kind of justification would be accepted.

A justification to transfer a non-SAM system is still required and may include any of these examples or other State-provided rationale:
None of the SAM systems meet the software or hardware requirements of the State agency or will not run on the State agency supported architecture. Costs associated with the replacement of existing infrastructure necessary to support a SAM system are prohibitive to both the State agency and to FNS.
The State agency requires that the WIC component be developed as part of a larger, integrated health care system that is not compatible with any existing SAM.

The WIC State agency plans on becoming a sub-state, such as the case of the Virgin Island's WoW system that is being run on Maryland's management information system.

The result of each State agency's alternatives and gap analyses will determine whether or not they should pursue a SAM system transfer. The gap analysis will demonstrate the extent of changes, functional and technical, required to the system alternatives to meet the State's needs. Should the gap analysis show that substantial functional changes would be required of a SAM system, these should be weighed carefully before proceeding with the transfer of a SAM. Substantive system changes could possibly demonstrate that a SAM system is not the most cost-effective system for the State agency.

Any questions concerning the process outlined above should be directed to Terri Kessler of my staff at 703-305-2720 or the FNS State Systems Unit.

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