

CCWIS Final Rule Cost Allocation



August, 2016

What requirements are covered in this webinar?

- 1355.50 – Purpose
- 1355.51 – Definitions
- 1355.52 – CCWIS project requirements
 - 1355.52(a) – Efficient, economical, and effective
 - 1355.52(b) – CCWIS data
 - 1355.52(c) – Reporting
 - 1355.52(d) – Data quality
 - 1355.52(e) – Bi-directional data exchanges
 - 1355.52(f) – Data exchange standard
 - 1355.52(g) – Automated eligibility determination
 - 1355.52(h) – Software provision
 - 1355.52(i) – Submission ✓
 - 1355.52(j) – Other applicable requirements
- 1355.53 – CCWIS design requirements
- 1355.54 – CCWIS options
- 1355.55 – CCWIS reviews and assessment
- 1355.56 – Transition period ✓
- **1355.57 – Cost allocation**
 - 1355.58 – Failure to meet APD conditions
 - 1355.56.60 & 45 CFR 95, Subpart F – Conforming regulations

Agenda

- CCWIS Definitions
- Cost Allocation Overview
- Available Cost Allocation Scenarios
- System and Automated Function Cost Allocation
- Automated Function Cost Allocation Examples
- Next Steps
- Take-Aways

CCWIS Definitions

The following terms are defined at the end of this slide deck:

- Automated function
- Child Welfare Contributing Agency-CWCA
- S/TACWIS project
- Non-S/TACWIS project
- New CCWIS
- Notice of Intent

Cost Allocation Overview: S/TACWIS vs. CCWIS

- S/TACWIS - All automated functions of the system must meet S/TACWIS requirements for the whole system to qualify for S/TACWIS cost allocation
- CCWIS – If the title IV-E agency’s system meets the requirements for a CCWIS, then each automated function in the CCWIS is separately evaluated to determine if it qualifies for CCWIS cost allocation

Cost Allocation Overview: CCWIS and Non-CCWIS

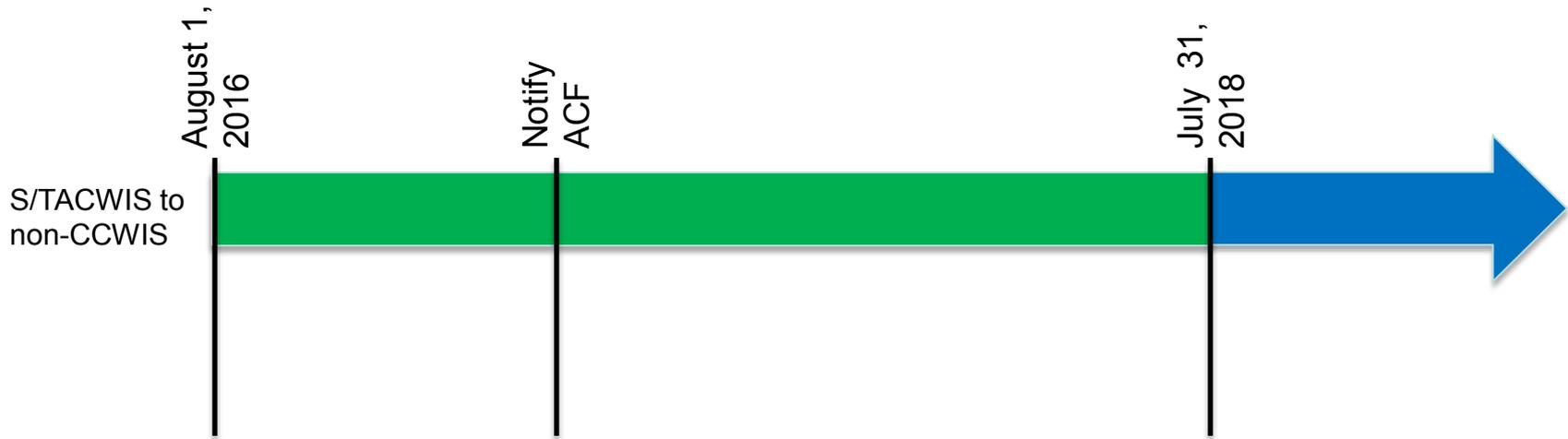
Cost Allocation Methodology	Applicable regulations for each methodology	Allocate costs to title IV-E, if costs benefit...			
		title IV-E funded participants in title IV-E programs and activities.	state or tribal funded participants of programs and activities described in title IV-E.	title IV-B programs	both title IV-E and child welfare related programs (at this time, ACF only classifies juvenile justice and adult protective services as child welfare related programs).
CCWIS development	1355.57(a)(2), (b), (c), (e)(1), & (e)(2)	✓	✓	✓	✓
CCWIS operational	1355.57(a)(2), (b), (c), & (e)(1)	✓	✓	X	X
Non-CCWIS (development and operational)	1355.57(f)	✓	X	X	X

Table from CCWIS NPRM (80 FR 48200 at 48220)

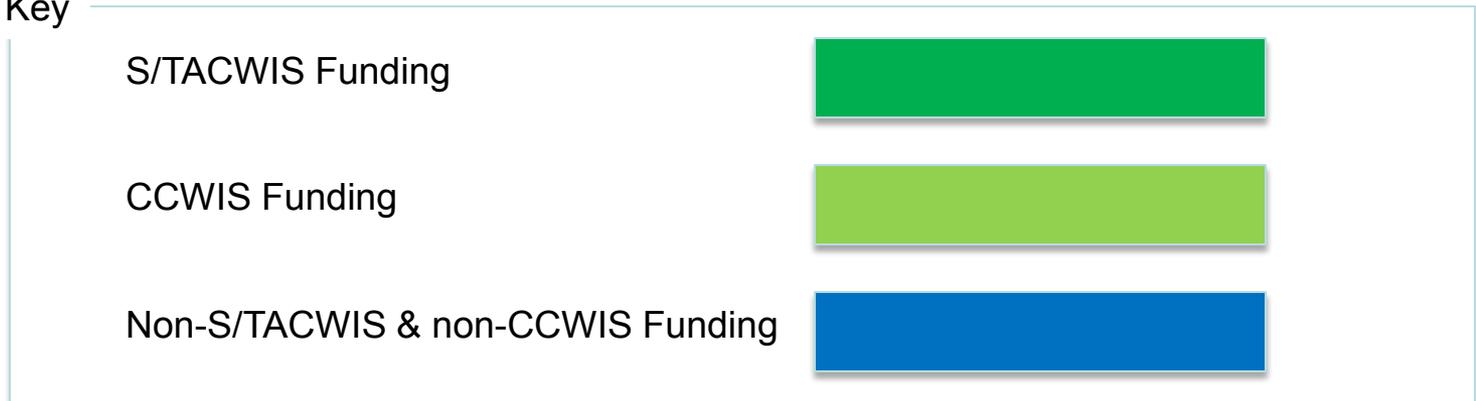
Cost Allocation Overview: CCWIS and Non-CCWIS (Simplified)

Cost Allocation Methodology	Allocate costs to title IV-E, if costs benefit...			
	title IV-E cases	Non IV-E child welfare cases	title IV-B programs	title IV-E and either juvenile justice or adult protective services
CCWIS development	✓	✓	✓	✓
CCWIS operational	✓	✓	X	X
Non-CCWIS (development and operational)	✓	X	X	X

Available Cost Allocation Scenario 1: 1 System: S/TACWIS to non-CCWIS



Key

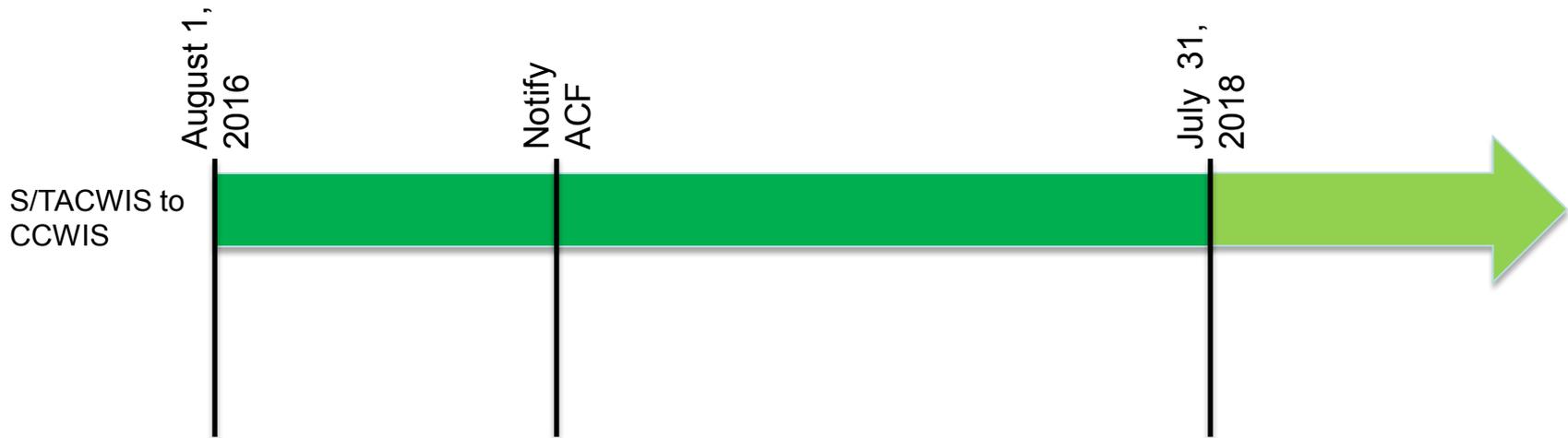


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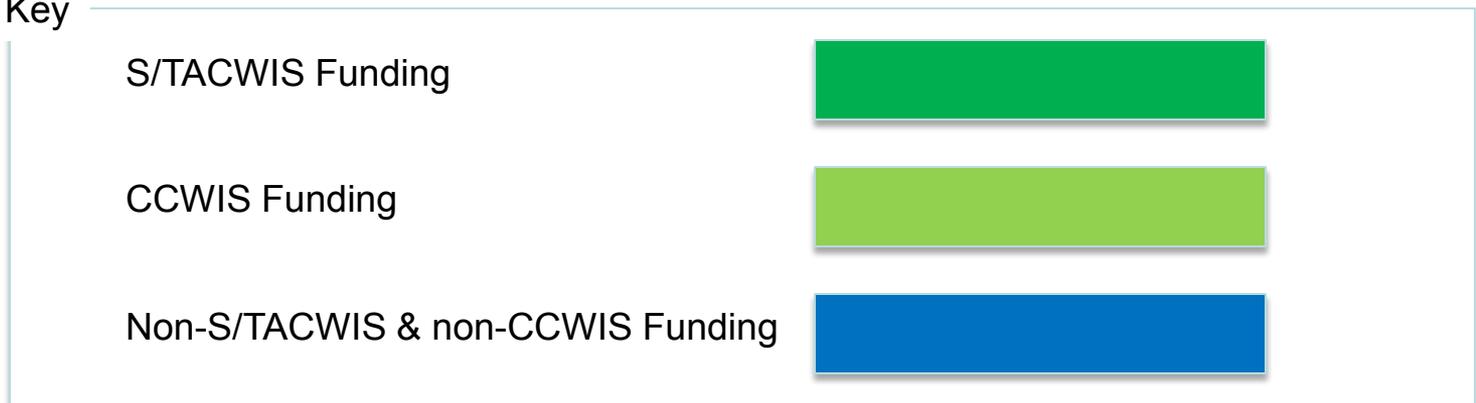
Description of Available Cost Allocation Scenario 1: 1 System: S/TACWIS to non-CCWIS

- The scenario features one project: a S/TACWIS project with S/TACWIS funding available to it throughout the transition period, which is August 1, 2016 through July 31, 2018.
- During the transition period, the title IV-E agency notifies ACF of their intent to transition the S/TACWIS project to a Non-CCWIS, which does not change funding during the transition period.
- After July 31, 2018, the project has Non-CCWIS Funding available to it.
- S/TACWIS Funding is represented in dark green, CCWIS Funding is represented in light green (not applicable), and Non-S/TACWIS and Non-CCWIS Funding is represented in dark blue.

Available Cost Allocation Scenario 2: 1 System: S/TACWIS to CCWIS



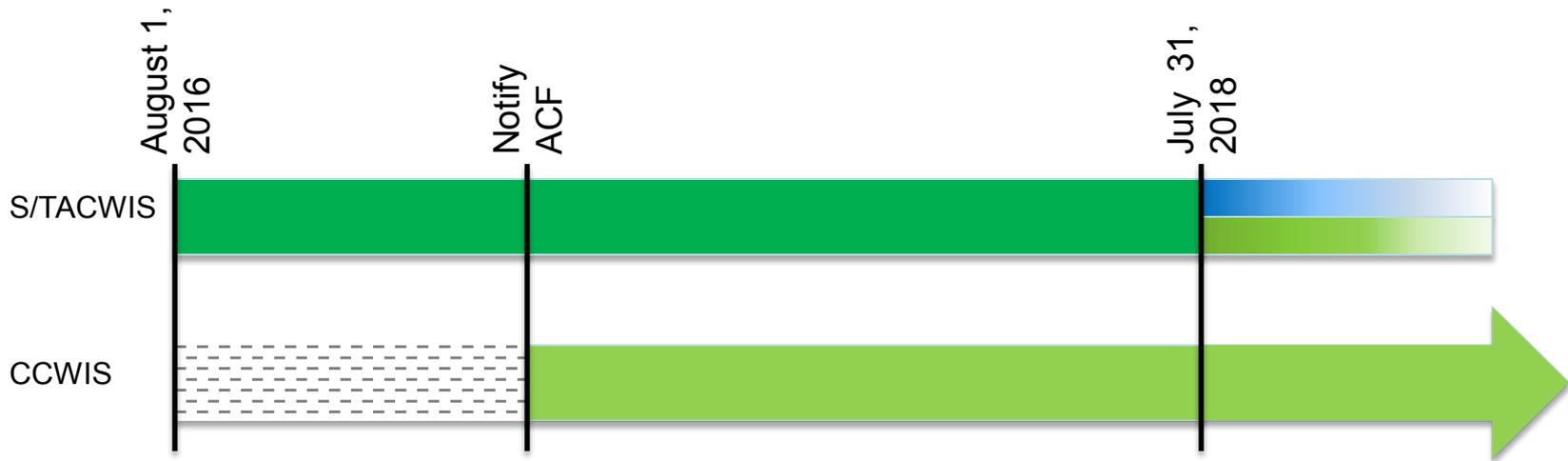
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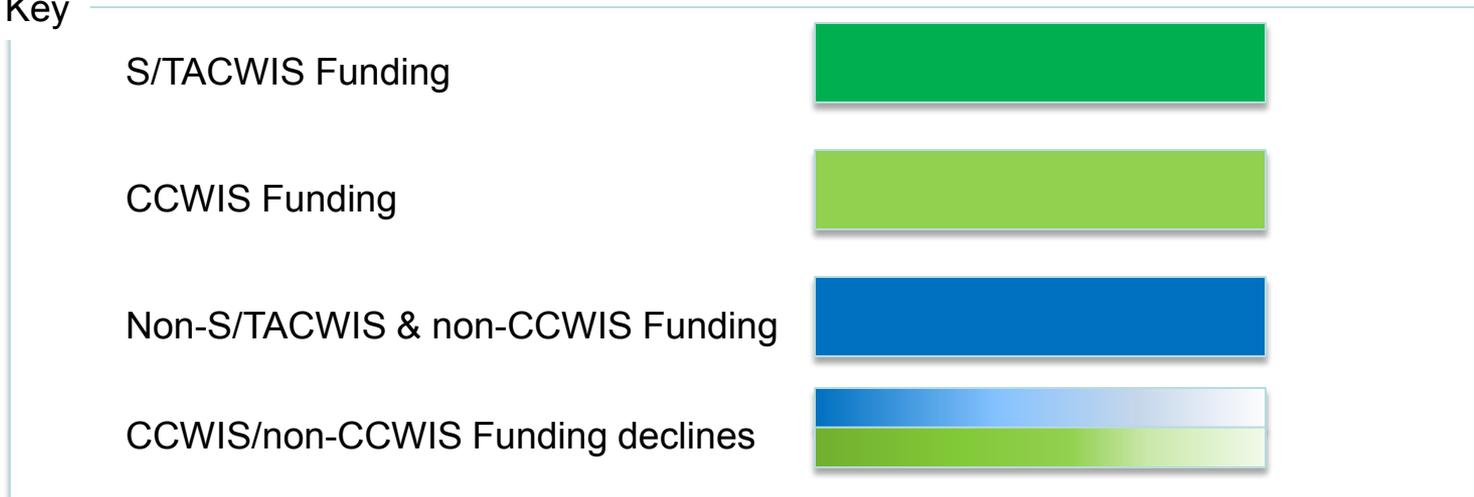
Description of Available Cost Allocation Scenario 2: 1 System: S/TACWIS to CCWIS

- The scenario features one project: a S/TACWIS project with S/TACWIS funding available to it throughout the transition period.
- During the transition period, the title IV-E agency notifies ACF of their intent to transition the S/TACWIS project to a CCWIS, which does not change funding during the transition period.
- After July 31, 2018, the project has CCWIS Funding available to it.
- S/TACWIS Funding is represented in dark green, CCWIS Funding is represented in light green, and Non-S/TACWIS and Non-CCWIS Funding is represented in dark blue (not applicable).

Available Cost Allocation Scenario 3: 2 Systems: S/TACWIS, New CCWIS



Key

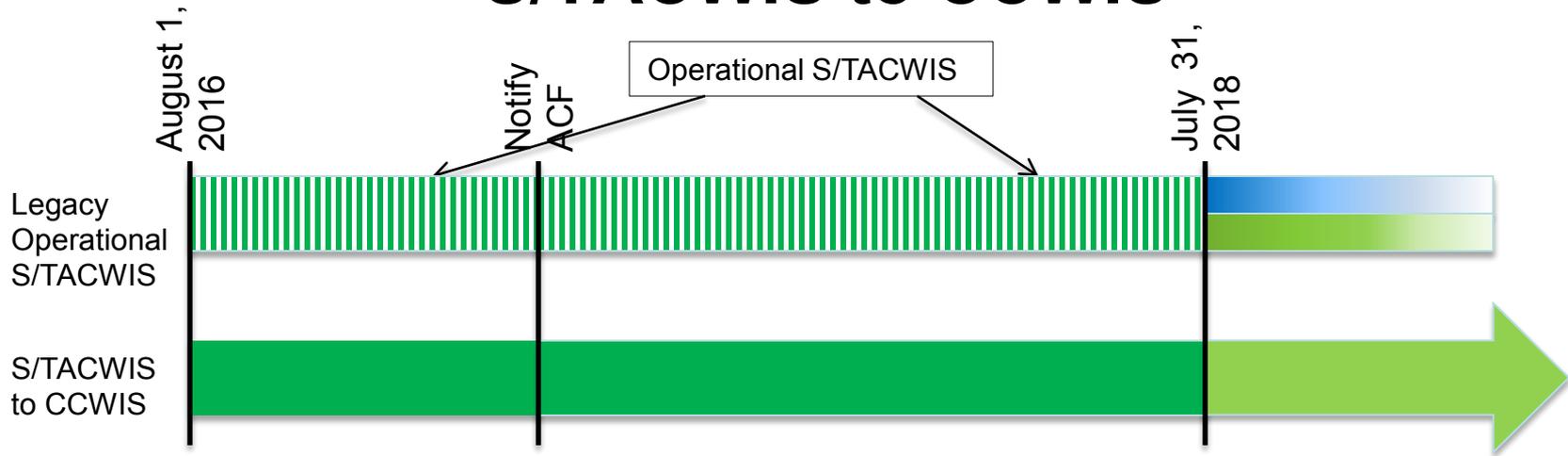


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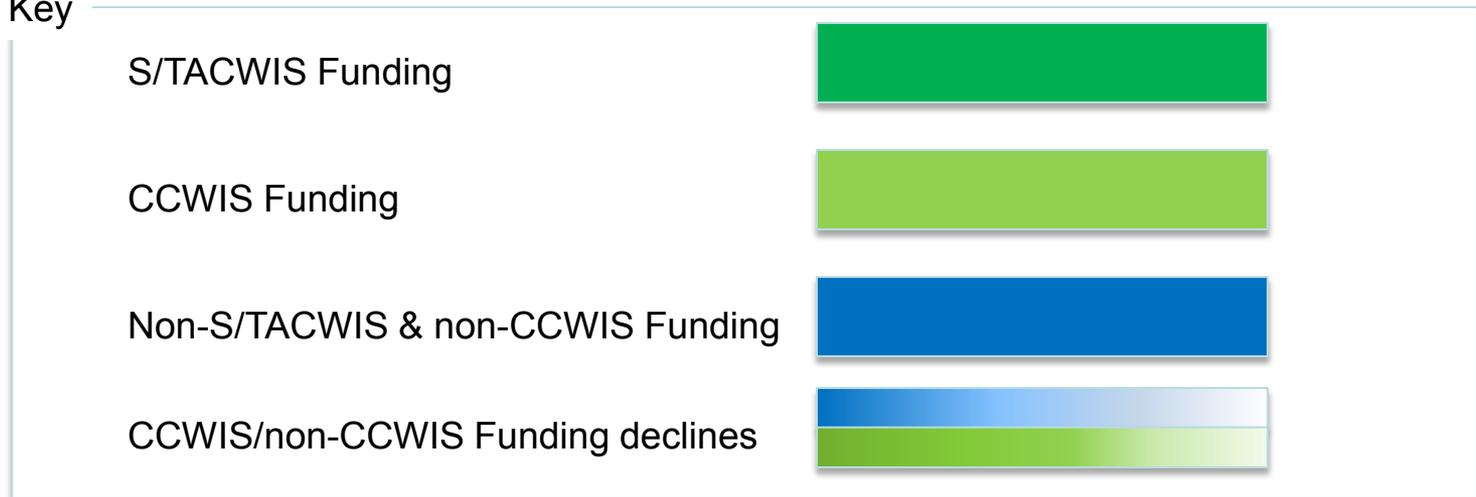
Description of Available Cost Allocation Scenario 3: 2 Systems: S/TACWIS, New CCWIS

- The scenario features two projects: Project A, a S/TACWIS project, which has S/TACWIS funding available to it throughout the transition period, and Project B, a New CCWIS, which has CCWIS Funding available to it once it starts through the transition period.
- For Project A, during the transition period, the title IV-E agency notifies ACF of their intent to build Project B, which does not change funding for Project A during the transition period.
- For Project A, after July 31, 2018, the project has CCWIS Funding or Non-CCWIS Funding available to it, depending upon the relevant circumstances (which are not discussed during the presentation). This funding fades and eventually ends as Project B becomes operational.
- For Project B, during the transition period, the title IV-E agency notifies ACF of their new CCWIS project, which begins CCWIS Funding for Project B at the time of notification.
- For Project B, after July 31, 2018, the project continues to have CCWIS Funding available to it.
- S/TACWIS Funding is represented in dark green, CCWIS Funding is represented in light green, and Non-S/TACWIS and Non-CCWIS Funding is represented in dark blue (not applicable). The alternative of CCWIS or Non-CCWIS Funding is represented by dual dark blue and light green that fades.

Available Cost Allocation Scenario 4: 2 Systems: Legacy Operational S/TACWIS, S/TACWIS to CCWIS



Key

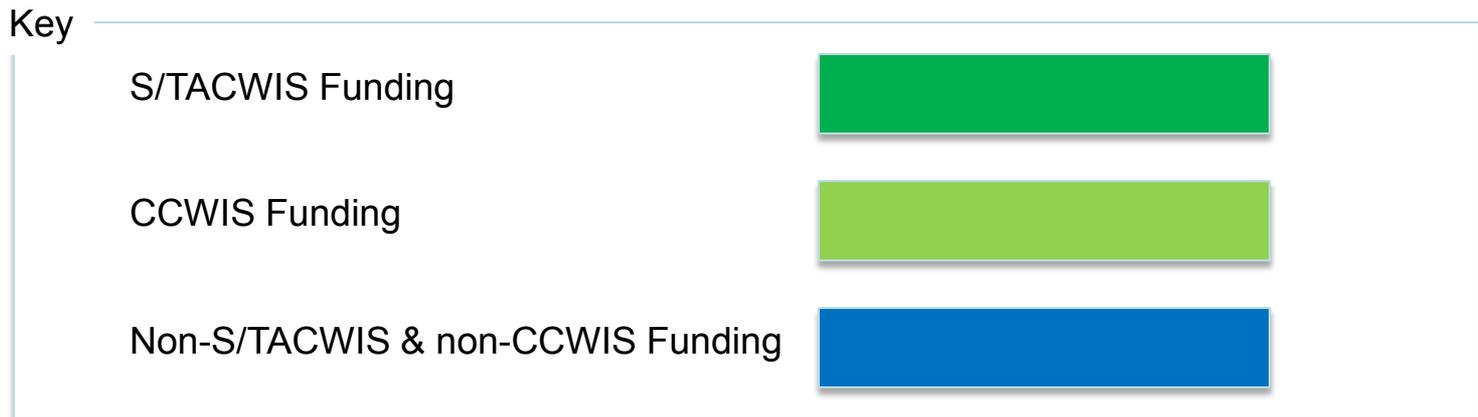
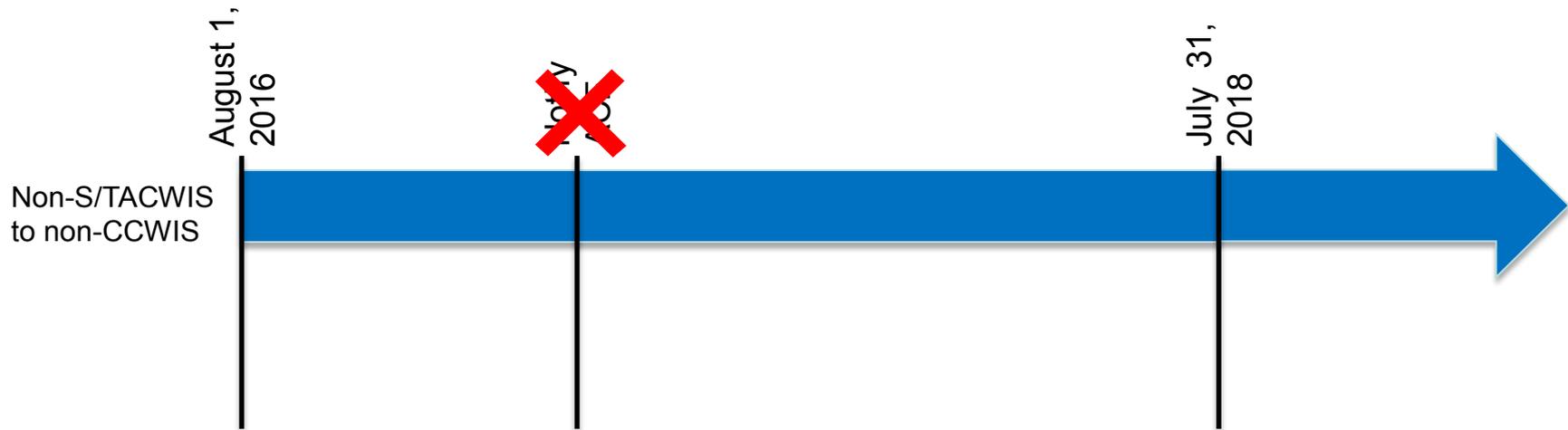


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Description of Available Cost Allocation Scenario 4: 2 Systems: Legacy Operational S/TACWIS, S/TACWIS to CCWIS

- The scenario features two projects: Project A, a Legacy Operational S/TACWIS project, which has only operational S/TACWIS funding available to it throughout the transition period, and Project B, a transitional CCWIS, which has S/TACWIS Funding (both development and operational) available to it throughout the transition period.
- For Project A, during the transition period, the title IV-E agency notifies ACF of their intent transition Project B to a CCWIS, which does not change funding for Project A during the transition period.
- For Project A, after July 31, 2018, the project has CCWIS operational Funding or Non-CCWIS operational Funding available to it depending upon the relevant circumstances (which are not discussed during the presentation). This funding fades and eventually ends as Project B becomes operational.
- For Project B, during the transition period, the title IV-E agency notifies ACF of their transitional CCWIS project, which does not change funding for Project B during the transition period.
- For Project B, after July 31, 2018, the project has CCWIS Funding available to it.
- S/TACWIS Funding is represented in dark green, CCWIS Funding is represented in light green, and Non-S/TACWIS and Non-CCWIS Funding is represented in dark blue (not applicable). The alternative of CCWIS or Non-CCWIS Funding is represented by dual dark blue and light green that fades.

Available Cost Allocation Scenario 5: 1 System: non-S/TACWIS to non-CCWIS

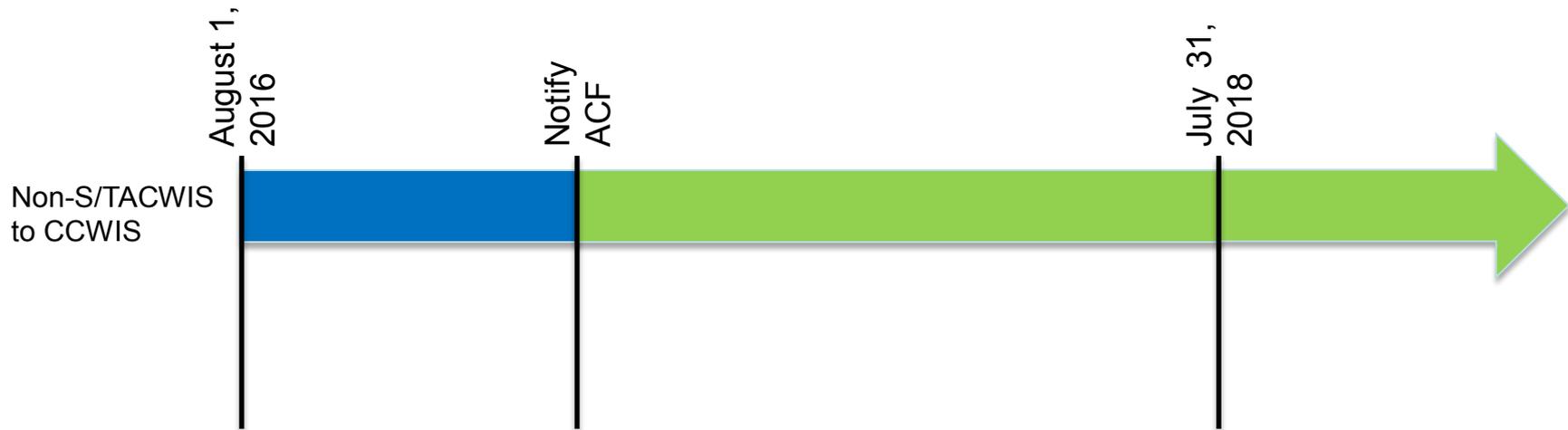


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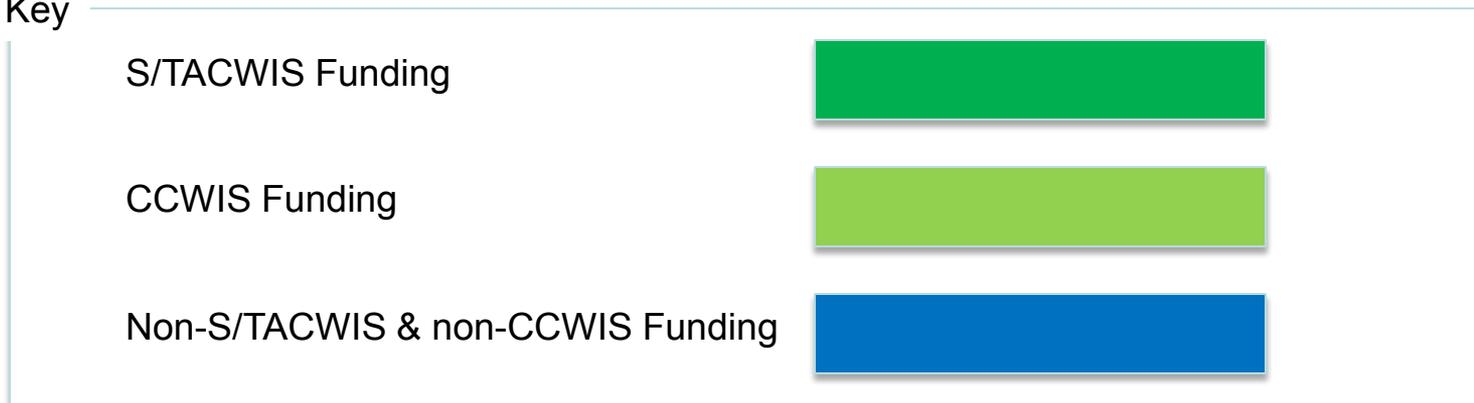
Description of Available Cost Allocation Scenario 5: 1 System: non-S/TACWIS to non-CCWIS

- The scenario features one project: a Non-S/TACWIS project with Non-S/TACWIS funding available to it throughout the transition period.
- During the transition period, the title IV-E agency does not notify ACF of their intent with the Non-S/TACWIS project.
- After July 31, 2018, the project has Non-CCWIS Funding available to it.
- S/TACWIS Funding is represented in dark green (not applicable), CCWIS Funding is represented in light green (not applicable), and Non-S/TACWIS and Non-CCWIS Funding is represented in dark blue.

Available Cost Allocation Scenario 6: 1 System: non-S/TACWIS to CCWIS



Key

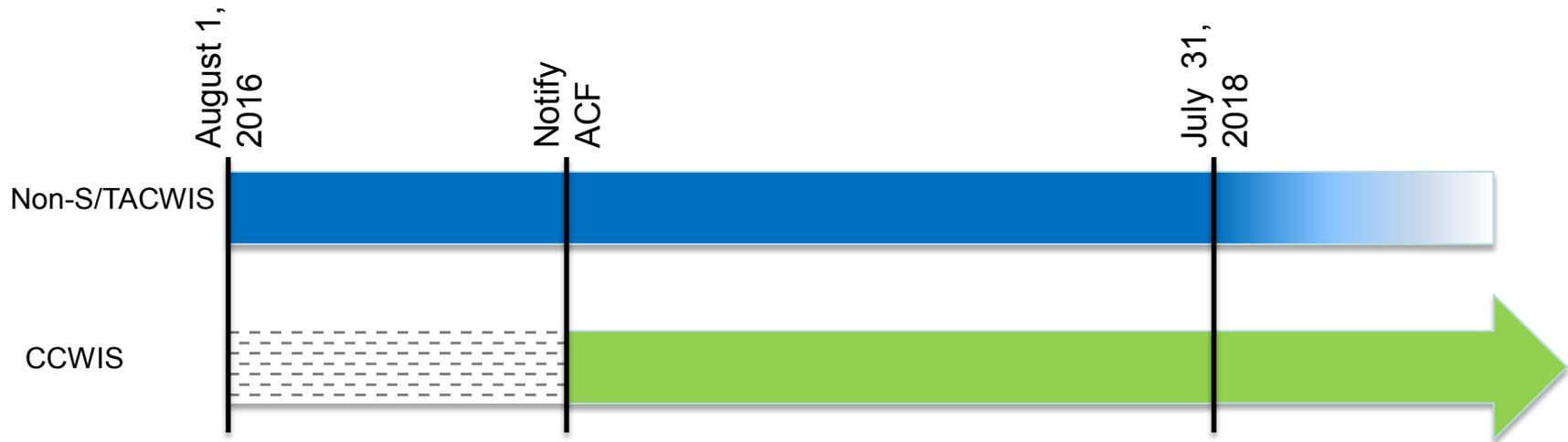


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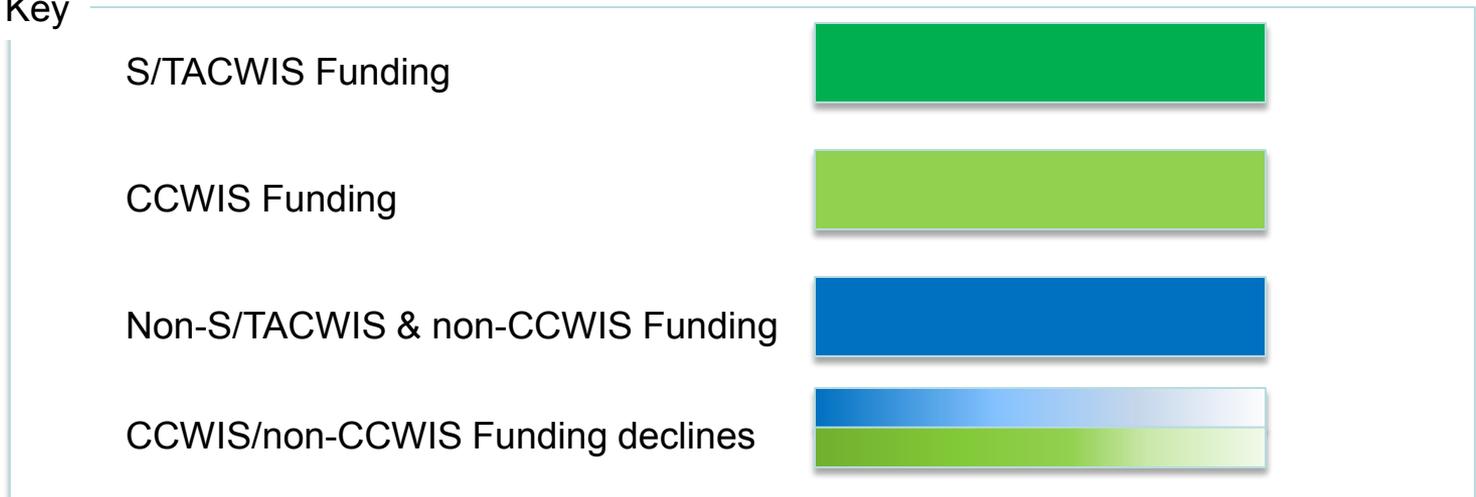
Description of Available Cost Allocation Scenario 6: 1 System: non-S/TACWIS to CCWIS

- The scenario features one project: a Non-S/TACWIS project with Non-S/TACWIS funding available to it for part of the transition period.
- During the transition period, the title IV-E agency notifies ACF of their intent to transition the Non-S/TACWIS project to a CCWIS, which changes funding during the transition period from Non-STACWIS Funding to CCWIS Funding.
- After July 31, 2018, the project has CCWIS Funding available to it.
- S/TACWIS Funding is represented in dark green (not applicable), CCWIS Funding is represented in light green, and Non-S/TACWIS and Non-CCWIS Funding is represented in dark blue.

Available Cost Allocation Scenario 7: 2 Systems: non-S/TACWIS, New CCWIS



Key

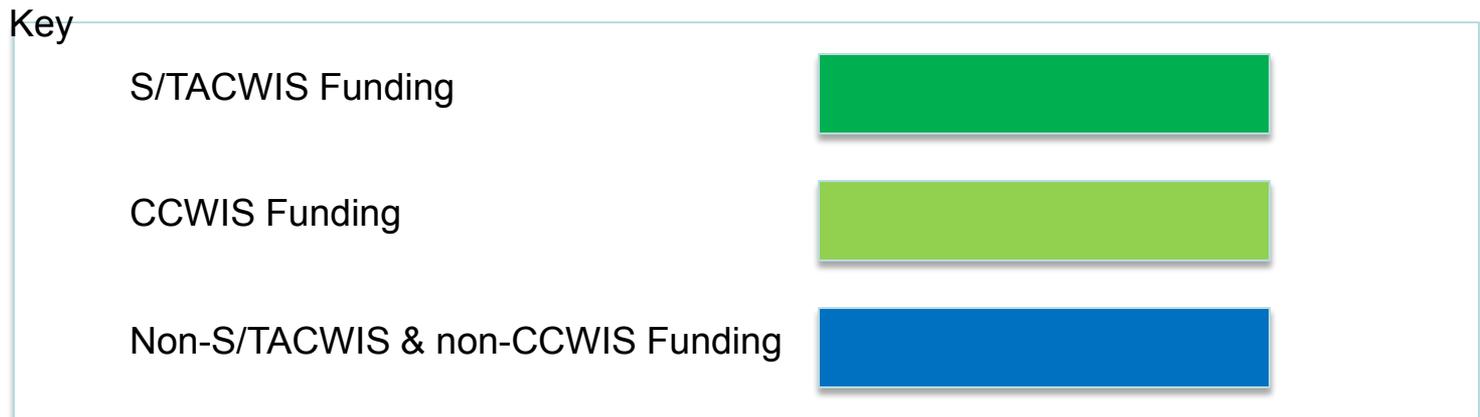
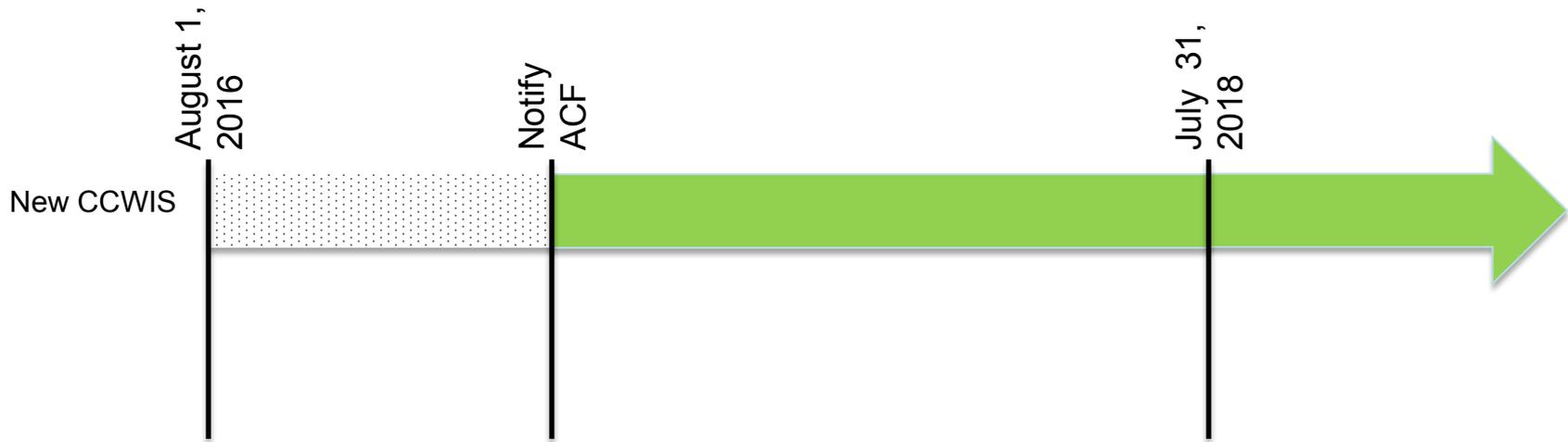


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Description of Available Cost Allocation Scenario 7: 2 Systems: non-S/TACWIS, New CCWIS

- The scenario features two projects: Project A, a Non-S/TACWIS project, which has Non-S/TACWIS funding available to it throughout the transition period, and Project B, a new CCWIS, which has CCWIS Funding available to it after notifying ACF of their new CCWIS during the transition period.
- For Project A, during the transition period, the title IV-E agency notifies ACF of their intent to build Project B, which does not change funding for Project A during the transition period.
- For Project A, after July 31, 2018, the project has Non-CCWIS Funding available to it. This funding fades and eventually ends as Project B becomes operational.
- For Project B, during the transition period, the title IV-E agency notifies ACF of their new CCWIS project, which begins CCWIS Funding for Project B.
- For Project B, after July 31, 2018, the project has CCWIS Funding available to it.
- S/TACWIS Funding is represented in dark green (not applicable), CCWIS Funding is represented in light green, and Non-S/TACWIS and Non-CCWIS Funding is represented in dark blue (not applicable). Joint CCWIS and Non-CCWIS Funding is represented by dual dark blue and light green that fades (not applicable).

Available Cost Allocation Scenario 8: 1 System: New CCWIS (at any time)



Description of Available Cost Allocation Scenario 8: 1 System: New CCWIS (at any time)

- The scenario features one project: a new CCWIS project with no funding available to it through part of the transition period.
- During the transition period, the title IV-E agency notifies ACF of their intent to build a new CCWIS, which begins CCWIS Funding for the project.
- After July 31, 2018, the project has CCWIS Funding available to it.
- S/TACWIS Funding is represented in dark green (not applicable), CCWIS Funding is represented in light green, and Non-S/TACWIS and Non-CCWIS Funding is represented in dark blue.

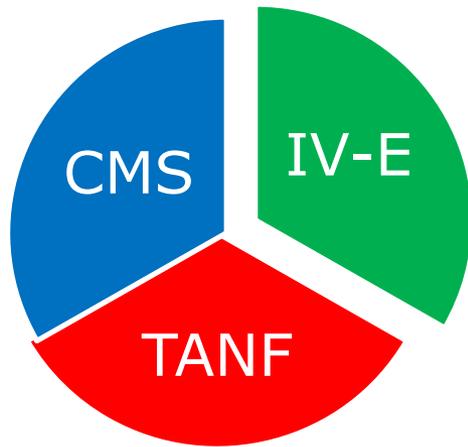
Cost Allocation: System Requirements

- CCWIS must meet 1355.52 – the CCWIS project requirements
- For transitioning S/TACWIS or non-S/TACWIS – All CCWIS automated functions developed after July 31, 2018 must meet CCWIS design requirements
- For new CCWIS – All automated functions must meet CCWIS design requirements

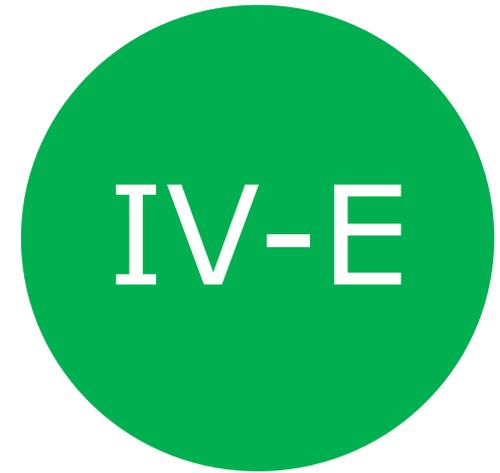
Cost Allocation: Automated Function Requirements

- Supports programs authorized under titles IV-B or IV-E, and at least one requirement of § 1355.52 or, if applicable § 1355.54;
- Is not duplicated within the CCWIS or systems supporting child welfare contributing agencies; and
- Is consistently used by all child welfare users responsible for the area supported by the automated function.

Cost Allocation: Enterprise vs. Stand-alone System

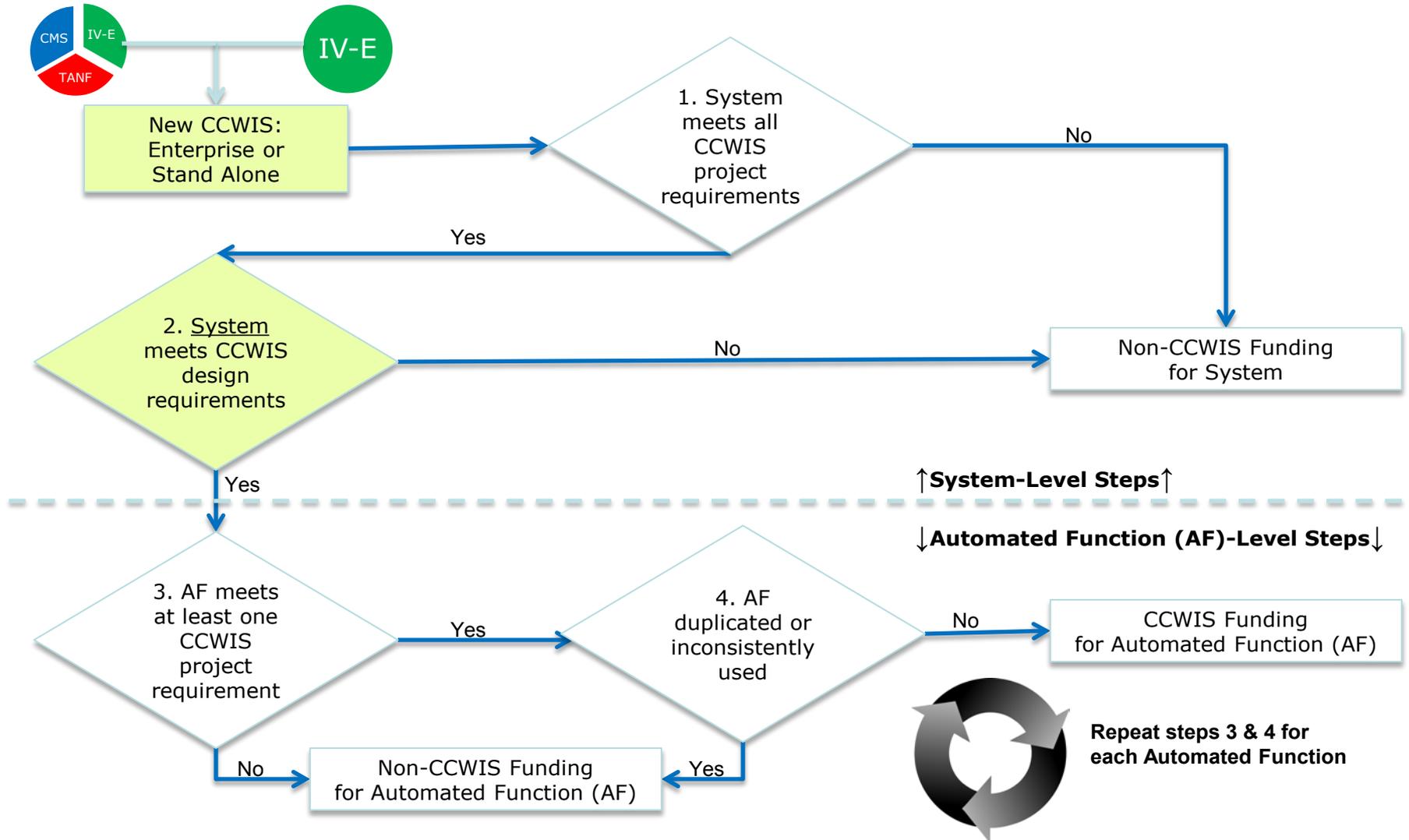


Enterprise System
Child welfare costs may
be allocated to IV-E



Stand-alone System
Child welfare costs may
be allocated to IV-E

Cost Allocation Overview: New CCWIS

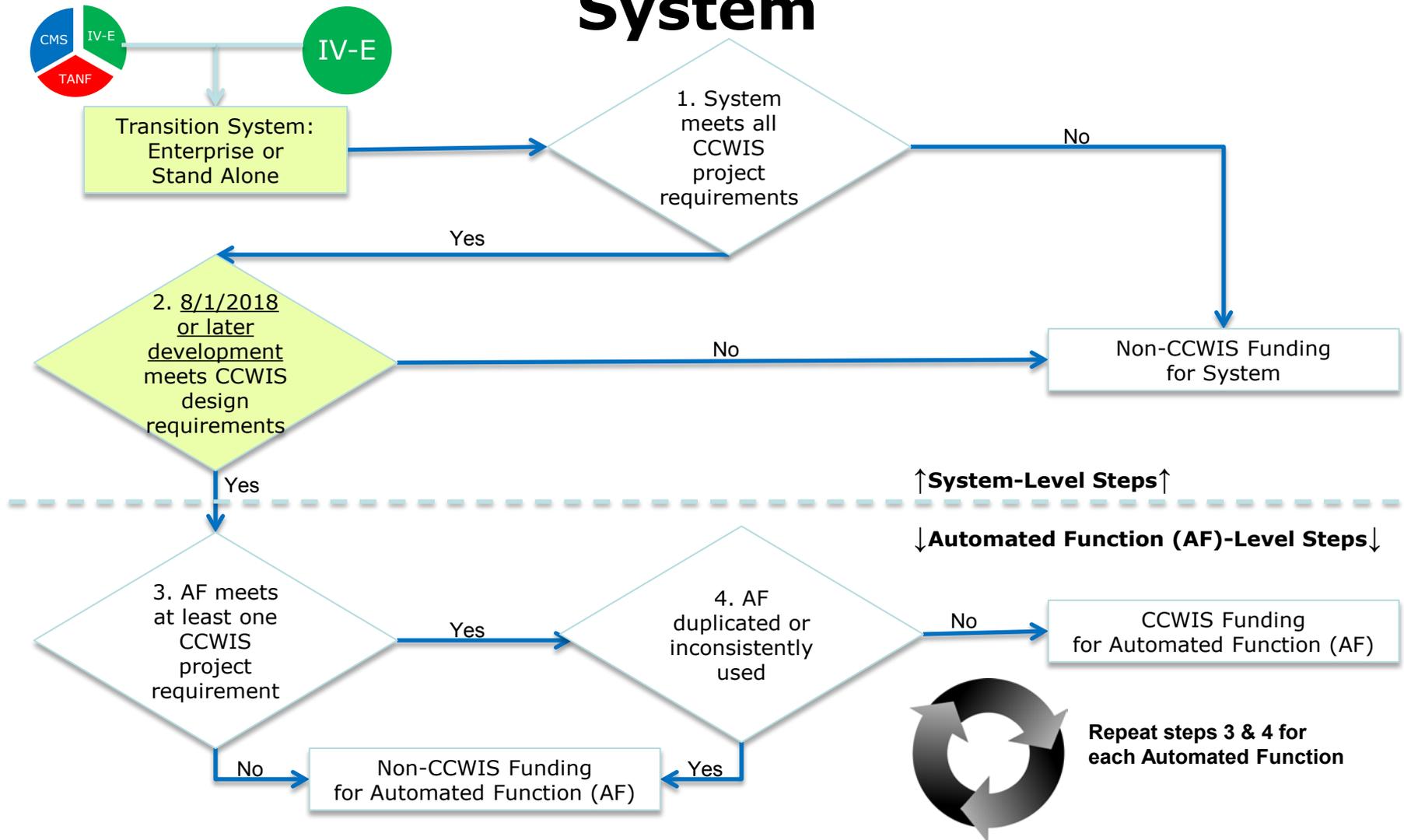


Description of Cost Allocation

Overview: New CCWIS

- The overview of cost allocation for building a new CCWIS is represented in a workflow, beginning with either an Enterprise or Stand-Alone System.
- If the new system does not meet all CCWIS project requirements, then it will be eligible for Non-CCWIS funding. If the new system does meet all CCWIS project requirements, then design requirements are checked.
- If the new system does not meet all CCWIS design requirements, then it will be eligible for Non-CCWIS funding. If the new system does meet all CCWIS design requirements, then automated function requirements are checked.
- If the automated function does not meet at least one CCWIS project requirements, then it will be eligible for Non-CCWIS funding. If the automated function does meet at least one CCWIS project requirements, then duplication and consistency requirements are checked.
- If the automated function does not meet all duplication and consistency requirements, then it will be eligible for Non-CCWIS funding. If the automated function does meet duplication and consistency requirements, then CCWIS Funding is available for the automated function.
- Repeat the last two steps for each automated function in the system.

Cost Allocation Overview: Transitioning System



Description of Cost Allocation

Overview: Transitioning System

- The overview of cost allocation for transitioning an existing system to a CCWIS is represented in a workflow, beginning with either an Enterprise or Stand-Alone System.
- If the new system does not meet all CCWIS project requirements, then it will be eligible for Non-CCWIS funding. If the new system does meet all CCWIS project requirements, then design requirements are checked.
- If the new system development on or after August 1, 2018 does not meet all CCWIS design requirements, then it will be eligible for Non-CCWIS funding. If the new system development on or after August 1, 2018 does meet all CCWIS design requirements, then automated function requirements are checked.
- If the automated function does not meet at least one CCWIS project requirements, then it will be eligible for Non-CCWIS funding. If the automated function does meet at least one CCWIS project requirements, then duplication and consistency requirements are checked.
- If the automated function does not meet all duplication and consistency requirements, then it will be eligible for Non-CCWIS funding. If the automated function does meet duplication and consistency requirements, then CCWIS Funding is available for the automated function.
- Repeat the last two steps for each automated function in the system.

Automated Function Cost Allocation: Example 1

Scenario: A CCWIS case management module used by all case management workers in the state/tribe.

- Meets CCWIS design requirements at 1355.53? Yes
- Meets 1355.52 or 1355.54 requirements? Yes
- Only module in the state/tribe and used by all case management workers per 1355.57(a)(2)(ii)? Yes

May qualify for CCWIS cost allocation

Function List Submission to ACF: Example 1

Please list all automated functions included in the CCWIS as required at §1355.52 (i)(1)(ii) and note whether each automated function meets, or when implemented will meet the requirements at §1355.52 (i) (1) (iii) (A) (B) and (C). For additional entries, go to page 5

Function Name <i>List all automated functions that will be part of your CCWIS</i>	Supports at least one requirement section 1355.52 and/or 1355.54	The function is duplicated	Function is consistently used	The function complies with the CCWIS design requirements defined at 1355.53 (a), unless exempt by 1355.53 (b)
Case Management	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> Exempt
	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> E
	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> E

From Notice of Intent Template

Automated Function Cost Allocation: Example 2

Scenario: A CCWIS case management module used by all workers in the IV-E agency. CWCA workers use their own CWCA systems for case management. CWCA systems exchange data with CCWIS.

- Meets CCWIS design requirements at 1355.53? Yes
- Meets 1355.52 or 1355.54 requirements? Yes
- Only module in the state/tribe and used by all case management workers per 1355.57(a)(2)(ii)? No

May qualify for non-CCWIS cost allocation

Function List Submission to ACF: Example 2

Please list all automated functions included in the CCWIS as required at §1355.52 (i)(1)(ii) and note whether each automated function meets, or when implemented will meet the requirements at §1355.52 (i) (1) (iii) (A) (B) and (C). For additional entries, go to page 5

Function Name <i>List all automated functions that will be part of your CCWIS</i>	Supports at least one requirement section 1355.52 and/or 1355.54	The function is duplicated	Function is consistently used	The function complies with the CCWIS design requirements defined at 1355.53 (a), unless exempt by 1355.53 (b)
Case Management	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> Exempt
	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> E

Automated Function Cost Allocation: Example 3

Scenario: An eligibility automated function/module in a county system used by all eligibility workers (including title IV-E agency and all county staff) in the state.

- Meets CCWIS design requirements at 1355.53? Yes
- Meets 1355.52 or 1355.54 requirements? Yes
- Only module in the state/tribe and used by all eligibility workers per 1355.57(a)(2)(ii)? Yes

May qualify for CCWIS cost allocation

Automated Function Cost Allocation: Example 4

Scenario: A CCWIS child assessment module used by all workers in the IV-E agency. CWCA workers use CWCA systems for child assessments. CWCA systems provide hardcopy data which is entered into CCWIS.

- Meets CCWIS design requirements at 1355.53? Yes
- Meets 1355.52 or 1355.54 requirements? No
- Only module in the state/tribe and used by all workers per 1355.57(a)(2)(ii)? No

System is not a CCWIS

Automated Function Cost Allocation: Example 5

A S/TACWIS transitioning to CCWIS with enhancements after 7/31/2018 that does not follow a state or industry development standard. Includes a CCWIS intake module used by all intake workers (including CWCA intake workers) in the state.

- Meets CCWIS design requirements at 1355.53? No
- Meets 1355.52 or 1355.54 requirements? Yes
- Only module in the state and used by all intake workers per 1355.57(a)(2)(ii)? Yes

Operational funding is available for enhancements

Automated Function Cost Allocation: Example 6

Scenario: CCWIS has an electronic data exchange with the National Electronic Interstate Compact Enterprise (NEICE) system.

- Meets CCWIS design requirements at 1355.53? Yes
- Meets 1355.52 or 1355.54 requirements? Yes
- Only module (data exchange) in the state to collect ICPC data and used by all ICPC workers, per 1355.57(a)(2)(ii)? Yes

Electronic data exchange may qualify for CCWIS
cost allocation

Next Steps

- Discuss how the cost allocation rules affect you with your federal analyst
- Participate in upcoming webinars
- Submit questions to CCWIS.Questions@acf.hhs.gov
- Sign up for announcements (<https://www.acf.hhs.gov/programs/cb/resource/ccwis-announcements-listserv>) to learn about:
 - Upcoming webinars
 - Updates to the Child Welfare Policy Manual
 - Other technical assistance

Take-Aways

- If transitioning a S/TACWIS, do as much as possible before July 31, 2018
- CCWIS cost allocation is not “All or Nothing”
- The Function Checklist, available in the Notice of Intent Information Memorandum, may be used by agencies submitting an APD

We will not have a CCWIS webinar in September

Questions?

CCWIS Definition: Automated Function

Automated function is defined in the CCWIS regulations at 45 CFR 1355.51 and means a computerized process or collection of related processes to achieve a purpose or goal.

CCWIS Definition: Child Welfare Contributing Agency

Child welfare contributing agency (CWCA) is defined in the CCWIS regulations at 45 CFR 1355.51 and means an entity that, by contract or agreement with the title IV-E agency, provides child abuse and neglect investigations, placement, or child welfare case management (or any combination of these) to children and families.

CCWIS Definition: S/TACWIS Project

S/TACWIS project is defined in the CCWIS regulations at 45 CFR 1355.51 and means an active automated data processing system or project that, prior to the effective date of these regulations [August 1, 2016], ACF classified as a S/TACWIS and for which:

- (i) ACF approved a procurement to develop a S/TACWIS; or
- (ii) The applicable state or tribal agency approved a development procurement for a S/TACWIS below the thresholds of 45 CFR 95.611(a).

CCWIS Definition: Non-S/TACWIS Project

Non-S/TACWIS project is defined in the CCWIS regulations at 45 CFR 1355.51 and means an active automated data processing system or project that, prior to the effective date of these regulations [August 1, 2016], ACF had not classified as a S/TACWIS and for which:

- (i) ACF approved a development procurement; or
- (ii) The applicable state or tribal agency approved a development procurement below the thresholds of 45 CFR 95.611(a); or
- (iii) The operational automated data processing system provided the data for at least one AFCARS or NYTD file for submission to the federal system or systems designated by ACF to receive the report.

CCWIS Definition: New CCWIS project

New CCWIS project is defined in the CCWIS regulations at 45 CFR 1355.51 and means a project to build an automated data processing system meeting all requirements in § 1355.52 and all automated functions meet the requirements in § 1355.53(a).

CCWIS Definition: Notice of Intent

Notice of intent is defined in the CCWIS regulations at 45 CFR 1355.51 and means a record from the title IV-E agency and signed by the governor, tribal leader, or designated state or tribal official and provided to ACF declaring that the title IV-E agency plans to build a CCWIS project that is below the cost threshold requiring the submission and approval of an APD (45 CFR 95.611(a)).

- The NOI is a brief document
- We offer a NOI template that addresses all submission requirements.
- The NOI is used for projects below the cost threshold requiring an APD (45 CFR 95.611(a)).