

CCWIS Final Rule: CCWIS Design Software Repository CCWIS Options



April 13, 2017

What requirements are covered in this webinar?

- 1355.50 – Purpose
- 1355.51 – Definitions
- 1355.52 – CCWIS project requirements
 - 1355.52(a) – Efficient, economical, & 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

Previous CCWIS Presentations

Find CCWIS introductory presentations at:

<http://www.acf.hhs.gov/cb/research-data-technology/state-tribal-info-systems/training>

Available presentations:

- CCWIS Transition Requirements
- CCWIS Cost Allocation
- CCWIS Submission Requirements
- CCWIS Data & Reporting Requirements
- CCWIS Data Quality Requirements
- CCWIS Data Exchange Requirements
- CCWIS Title IV-E Eligibility Determination Requirements
- APD Requirements and Failure to Meet APD Conditions

Coming Soon!

Agenda

- CCWIS Definitions
- Webinar Overview
- Clarify Terms
- CCWIS Design Requirements – 1355.53
- CCWIS Options – 1355.54
- Software Repository Requirements – 1355.52(h)
- Next Steps
- Take-Aways
- Questions

CCWIS Definitions

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

- Automated Function
- New CCWIS Project
- Non-S/TACWIS Project
- S/TACWIS Project
- Transition Period

Webinar Overview

- Clarify Terms:
 - Automated function
 - Module
- CCWIS Design Requirements (1355.53):
 - Review four CCWIS design requirements
 - Discuss exemptions to CCWIS design requirements
- CCWIS Options (1355.54):
 - List conditions
- Software Repository (1355.52(h))

Clarify Terms: Automated Function & Module

- Automated function is a concept for reporting CCWIS components for cost allocation purposes, such as in the automated function checklist (1355.52(i)(1)(ii) & (iii))
- Module & modular are design concepts
- The CCWIS automated functions must meet the CCWIS modular design requirements (1355.53(a)), unless exempted by 1355.53(b)

CCWIS Design Requirements: Modular Design – 1355.53(a)(1)

CCWIS Modular design:

- breaks complex functions into separate, manageable, and independent components
- employs open, documented interfaces
- separates child welfare processes from core system administrative processes

CCWIS Design Requirements: Modular Design (continued...)

Benefits of modular design:

- has the potential to deliver reliable software faster & at lower cost
- promotes ease of maintenance; one module may be changed without widespread system impact
- mirrors business workflows by breaking complex problems & policies into singular, discrete processes each managed by a different module
- supports continuous improvement of child welfare practice
- promotes re-use

CCWIS Design Requirements: Plain Language – 1355.53(a)(2)

CCWIS documentation must be:

- Clear, complete & in English
- Free of jargon unclear to the intended audience; however, it is acceptable to use:
 - child welfare programmatic terms in user documentation
 - information technology terms in technical documentation intended for an audience such as software designers & system administrators

CCWIS Design Requirements: Plain Language (continued...1 of 2)

The plain language requirement applies to all CCWIS documentation, including:

- User documentation, such as:
 - user manuals
 - on-line help aids
 - error messages & system prompts
 - data dictionaries
- Technical documentation needed to administer, modify, & maintain CCWIS, such as:
 - system administrator manuals
 - data dictionaries
 - system schematics
 - internal code documentation
 - pseudo code

CCWIS Design Requirements: Plain Language (continued...2 of 2)

Plain language benefits:

- Promotes understanding of CCWIS & its functions
- Supports training & user independence
- Supports system enhancements & maintenance
- Aids sharing and reusability of modules

CCWIS Design Requirements: Standard Approach – 1355.53(a)(3)

- CCWIS automated functions must adhere to a state, tribal, or industry defined standard approach for the design, development, testing, implementation, maintenance, and documentation of systems
- The standard approach may be selected:
 - by the title IV-E agency
 - by the state or tribe

CCWIS Design Requirements: Standard Approach (continued...1 of 2)

Benefits of a standard approach:

- Supports development, implementation, testing & maintenance with guidance on topics such as:
 - coding nomenclature
 - communication protocols between modules
 - managing interactions with databases
 - documentation standards
 - testing standards
 - user acceptance criteria

CCWIS Design Requirements: Standard Approach (continued...2 of 2)

Benefits of a standard approach:

- Increases competition & choice:
 - standards permit agencies to more easily switch vendors or combine offerings from many vendors into one system
 - agencies have access to external services, such as mapping and GPS, that use the same standard

CCWIS Design Requirements: Reusability – 1355.53(a)(4)

- CCWIS automated functions must be capable of being shared, leveraged, and reused.
- CCWIS automated functions may be shared:
 - between title IV-E agencies
 - between title IV-E agencies and other agencies
 - through the software repository

CCWIS Design Requirements: Reusability (continued...)

Benefits of reuse:

- agencies may save time & development costs
- continuous improvement of modules; shared modules may be enhanced and shared again within the child welfare community

CCWIS Design Exemptions: 1355.53(b)(1) & (2)

- CCWIS automated functions may be exempted from one or more of the four CCWIS design requirements, if the title IV-E agency meets a requirement for an exemption:
 - transitioning systems
 - more efficient, economical, and effective technology

CCWIS Design Exemptions: Transitioning Systems

- The exemption at 1355.53(b)(1) applies only to S/TACWIS or non-S/TACWIS projects notifying ACF of their intention to transition an existing project to CCWIS by July 31, 2018.
- Title IV-E agencies do not have to replace automated functions of a transitioning project if the functions do not meet CCWIS design requirements.

CCWIS Design Exemptions: Transitioning Systems (continued...1 of 2)

- The exemption applies to automated functions that:
 - are operational in the S/TACWIS or non-S/TACWIS at the time of notification; or
 - are developed for the transitioning system before July 31, 2018
- Automated functions developed after July 31, 2018 are not exempt from the CCWIS design requirements

CCWIS Design Exemptions: Transitioning Systems (continued...2 of 2)

Benefits of the transitioning system exemption:

- allows title IV-E agencies to continue using automated functions that meet agency needs
- may reduce the costs of transitioning a legacy system to CCWIS

CCWIS Design Exemptions: Efficient, Economical & Effective Technology

- On a case-by-case basis, an agency may be exempted from the CCWIS design requirements if ACF approves an alternative design that is more efficient, economical, and effective than the CCWIS design requirements.
- The case-by-case exemption applies to all types of CCWIS projects, such as:
 - S/TACWIS transitioning to CCWIS
 - Non-S/TACWIS transitioning to CCWIS
 - New CCWIS

CCWIS Design Exemptions: Efficient, Economical & Effective Technology (continued...)

Benefit of an efficient, economical, & effective technology exemption:

- Allows title IV-E agencies to take advantage of technological advances incorporating approaches different from the CCWIS design requirements

CCWIS Options – 1355.54

- ACF may provide CCWIS cost allocation for components that:
 - are not required by the CCWIS project requirements (1355.52); and
 - are part of the title IV-E agency's business process
- CCWIS cost allocation is not available for modifications to external systems

CCWIS Options (continued...1 of 2)

- CCWIS options may support:
 - title IV-B or IV-E automated functions, such as:
 - Child abuse & neglect intake
 - investigations & assessment
 - case management
 - licensing & placement
 - external data exchanges, such as:
 - the social security administration
 - law enforcement agencies
 - other state or tribal agencies (such as: Departments of Labor or Employment)

CCWIS Options (continued...2 of 2)

- CCWIS cost allocation may be available for CCWIS options, provided the following conditions are met:
 - The CCWIS option will be part of a CCWIS project that meets, or when completed will meet, the requirements of 1355.52 and 1355.53
 - The title IV-E agency has submitted a business case to ACF that explains how the CCWIS option supports a specific title IV-B or IV-E program goal
 - ACF approves the submitted business case
 - The option meets CCWIS cost allocation requirements (1355.57)

Software Repository – 1355.52(h)

- If requested by ACF, title IV-E agencies will provide copies of software (and associated documentation) developed with federal financial participation (FFP) to the designated federal repository
- ACF is provided “a royalty-free, nonexclusive, and irrevocable license to reproduce, publish, or otherwise use and to authorize others to use for Federal Government purposes, such software, modifications, and documentation” funded with FFP (45 CFR 95.617(b))

Software Repository (continued...1 of 3)

- This is similar to guidance in CMS's Enhanced Funding Requirements: Seven Conditions & Standards (MITS-11-01-v1.0)
- Benefits of sharing software and documentation:
 - reduces costs
 - saves development time
 - shares tested modules among multiple users

Software Repository (continued...2 of 3)

- The software repository will contain automated functions & data exchanges that:
 - are developed with FFP
 - meet the CCWIS design requirements
 - Are provided with associated documentation
 - address specific functions
- COTS products are not contained in the software repository
 - 45 CFR 95.617(c) does not grant ACF a license to COTS or third-party utilities not owned by the title IV-E agency

Software Repository (continued...3 of 3)

- Agencies may, with federal approval, receive modules and associated documentation from the software repository
 - Agencies are not required to implement modules that are available in the software repository
 - Agencies that do not implement a module, may derive other benefits, such as adopting processes, code, or other design elements from a module
- ACF has not yet established the software repository, however, title IV-E agencies may share software directly with one another

Next Steps

- If transitioning a system to CCWIS that does not currently comply with CCWIS design requirements, identify work you want to complete by July 31, 2018 that uses your current development approach
- Identify or develop the CCWIS standard approach
- Train staff on (or acquire staff trained on) the CCWIS standard and modular design approach

Next Steps (continued...)

Access training & technical assistance:

- Review other CCWIS design, CCWIS options, and software repository questions & answers at the child welfare policy manual here:
http://www.acf.hhs.gov/cwpm/programs/cb/laws_policies/laws/cwpm/policy.jsp?idFlag=6
- 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

- We encourage all CCWIS (including transitioning systems) to follow CCWIS design requirements
- CCWIS options must follow CCWIS design requirements
- The software repository requirements do not prevent agencies from directly sharing software with one another

Schedule Change!

The CCWIS Review
webinar will be on

Thursday, June 15 at 1:30 – 3:00 EDT

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: 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: 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, 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: 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, 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: Transition Period

Transition Period is defined in the CCWIS regulations at 45 CFR 1355.51 and means the 24 months after the effective date of these regulations.