

CCWIS Final Rule: CCWIS Reviews A Status Update



September 27, 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
- CCWIS Design, Software Repository, and CCWIS Options

Agenda

- CCWIS Reviews – Concepts & Objectives
- CCWIS Reviews – Overview
- CCWIS Reviews – Tools
- CCWIS Reviews – Pilots
- Pilot State Reflections
- Next Steps
- Take-Aways
- Questions

CCWIS Review Requirement: 1355.55

ACF will review, assess, and inspect the planning, design, development, installation, operation, and maintenance of each CCWIS project on a continuing basis, in accordance with APD requirements in 45 CFR part 95, subpart F, to determine the extent to which the project meets the requirements in §§ 1355.52, 1355.53, 1355.56, and, if applicable, § 1355.54.

CCWIS Reviews – Concepts

- Partner with agencies to ensure CCWIS supports agency goals & objectives using approaches such as:
 - Incremental targeted reviews
 - Cross functional/program collaboration
 - Advance Planning Document (APD) alignment
 - Independent Verification & Validation
 - Technical Assistance services
 - Guidance on managing multiple vendors in enterprise engagements
- Reduce agency review effort by incorporating existing project activities & documentation into CCWIS reviews
- Conduct targeted stage reviews (remote or on-site) to observe progress & discuss adjustments before significant resource commitments

CCWIS Review – Concepts (continued...)

- Develop success factors for CCWIS support of major child welfare activities (e.g., child abuse & neglect investigations; case management; title IV-E eligibility determination; foster care placements) vs. specific functions that CCWIS must implement
- Actively collaborate with title IV-E agencies in the development of CCWIS review tools & processes through pilot CCWIS reviews & other feedback mechanisms, such as the release of beta versions of tools for agency use.
- As CCWIS reviews may vary depending up on the program and technical architecture of the agency under review, we will develop both standard & tailored CCWIS review activities

CCWIS Reviews – Objectives

Assess CCWIS system to:

- determine alignment with title IV-E agency goals & objectives
- provide technical assistance, including customized technical assistance at the agency's request
- confirm conformance with CCWIS & APD requirements
- view demonstrations of completed automated functions
- assess CCWIS use & performance with field observations & interviews
- determine how CCWIS design supports continuous quality improvement in child welfare
- identify needed enhancements

CCWIS Reviews – Objectives (continued...)

Assess CCWIS project* to:

- promote strong & consistent project management structures, staffing, & practices
- Identify project risks early & encourage the implementation of risk mitigation strategies
- Identify promising practices & tools to share with other title IV-E agencies

*CB plans to address these objectives in the early stages of the CCWIS review cycle

CCWIS Reviews – Overview

Standard Review Activities

- Confirm compliance with APD
- Evaluate stakeholder involvement in design & implementation
- Confirm compliance with CCWIS data & data quality requirements
- Confirm implementation of agency's approved data quality review
- Review mandatory data exchanges
- Review federal & agency reports
- Evaluate CCWIS functionality with demonstrations & interviews to confirm:
 - System usability
 - Support for child welfare polices, processes, & workflows
 - Efficient, economical & effective requirement

CCWIS Reviews – Overview Standard Review Activities (continued...)

- Review title IV-E eligibility determination functions
- Review CCWIS design
- Evaluate CCWIS support for program outcomes

CCWIS Reviews – Overview

Standard Review Approaches

- Conduct staff interviews
- Virtual/on-site review components
- Schedule review debriefs
- Provide sufficient time to address findings

CCWIS Reviews – Overview

Tailored Review Activities

- Review of specific CCWIS functions
- Review data sharing with Child Welfare Contributing Agencies. (CWCAs)
- Review data sharing with external child welfare systems
- Review of optional functionality/data exchanges
- Independent Verification & Validation, if CB requires, per 45 CFR 95.626
- **Under consideration:** Teaming with other programs to review:
 - Enterprise systems
 - Data exchanges
 - AFCARS, NYTD, & NCANDS reporting

CCWIS Reviews - Tools

- Purposes of tools:
 - For use by title IV-E agencies:
 - for project management
 - during CCWIS plan, design, implementation & operational activities
 - to guide the drafting of materials for internal use & submission to CB
 - For use by CB:
 - while reviewing submitted APDs, RFPs, contracts & other documentation
 - during CCWIS review stages (virtual & on-site)
- Types of Tools
 - Checklists & templates
 - Guidance documents (Information Memoranda, Program Instructions, technical bulletins, & webinars)

CCWIS Reviews – Tools (Under Development)

- Data quality plan guidance matrix
- Intake Success Factors Module Tool
- New data exchanges:
 - Education
 - Courts
 - Medicaid Management Information Systems
 - Child Welfare Contributing Agency Systems
- A project management tool covering topics, such as cost management, change management, risk management & communication management

We will seek volunteers to test tools

CCWIS Reviews – Pilots

The pilot CCWIS reviews:

- allow CB to learn in depth about the questions agencies have, and the challenges they face, as they develop a CCWIS
- Collect comments from agencies participating in the pilot CCWIS reviews
- allow testing of CCWIS review tools, processes, & activities
- are a forum for detailed feedback on what to keep, change, or drop from CCWIS reviews
- are an opportunity for on-site or remote technical assistance
- helps CB identify opportunities to reduce review burden by incorporating information from other reviews, such as AFCARS, NYTD, & IV-E reviews.

CCWIS Reviews – Pilots

Pilot Activities

Pre-visit

- Developed a joint agenda

On-site

- Shared tools under development
- Meetings targeting project needs
- Reviewed project management structures
- Discussed procurement approaches
- Evaluated staffing and agency support
- Identified barriers and challenges
- Reviewed completed CCWIS modules
- Provided agile training (on two visits)

Post Visit

- Debrief & a summary letter/report

CCWIS Reviews – Pilots Completed & Planned Pilots

- ✓ Hawaii: 7/12 – 14
- ✓ California: 7/18 – 21
- ✓ Washington: 8/22 – 24 (with Agile TA vendor)
- ✓ New Mexico: 9/12 – 14 (with Agile TA Vendor)
- Florida: 11/17 (virtual visit)
- West Virginia: 2018
- Other agencies are under consideration for a pilot CCWIS review

Contact your federal analyst to be considered for a pilot CCWIS review

CCWIS Reviews – Pilots Observations

- Negotiated agenda tailored to state current needs while meeting federal requirements
 - Lots of preliminary work to define the tailored review
- Agenda topics determined by project stage, state-identified needs, & federal requirements
- Early stages of review are more focused on risk management (not compliance oriented)
- An opportunity to step back from the day-to-day and consider larger issues & over-arching goals
- Easier to bring up difficult topics in a “safe space”

CCWIS Reviews – Pilots Observations (continued...)

- A chance to assess:
 - Strengths: What are we been doing well?
 - Improvements: What can we do better?
- Collaborative planning to minimize disruption to the agency
- Other federal programs participated in some reviews. The added perspectives improved program collaboration & coordination.
- Agency feedback is helping us to define the CCWIS review process (which is still a work in progress)

CCWIS Reviews – Pilots

Common Themes

- Strengths
 - Strong, committed sponsors
 - Highly motivated staff
 - Commitment to CCWIS as a program support tool
 - Continuous learning
 - Flexible procurements
 - Agencies engage in on-going consultation in areas such as:
 - Agile coaching
 - Change management

CCWIS Reviews – Pilots Common Themes (continued...)

- Challenges
 - Sufficient & dedicated project resources
 - CCWIS project owned by child welfare program
 - Risk management
 - Readiness for change
 - Transition from legacy system to CCWIS
 - Managing project scope
 - Working with CWCAs to share data
 - Building data exchanges

Pilot State Reflections Speakers

- Hawaii

- Rosaline Tupou, CCWIS Business Lead
- Jim Teson, CCWIS Project Manager
- Donny Lote, CCWIS Technical Lead

- New Mexico

- Karla Young, Research Assessment & Data Bureau Chief

Pilot State Reflections

- Project overview
- Site visit activities & topics
- Works well/things to keep
- Needs improvement/things to change

Next Steps

Participate in the development of pilot CCWIS reviews:

- Contact your federal analyst if you want to be considered for a pilot CCWIS review
- Provide review feedback:
 - to your federal analyst and CB/DSS
 - to CCWIS.Questions@acf.hhs.gov with the subject line "CCWIS Reviews"
- Attend upcoming webinars on CCWIS reviews
- Network & share ideas with the Child Welfare Technical Working Group: <https://www.acf.hhs.gov/cb/research-data-technology/state-tribal-info-systems/managers/cwtwg>
- CB will announce other opportunities on the child welfare IT managers' listserv

Next Steps (continued...)

Access training & technical assistance:

- Review other CCWIS review tools & technical assistance materials as they are posted on our website here:
<https://www.acf.hhs.gov/cb/research-data-technology>
- Participate in upcoming webinars
- Submit other 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

- The CCWIS review process is currently under development.
- CB encourages agency feedback through our pilot CCWIS reviews
- Volunteer to be a pilot state/tribe or otherwise contribute to the review process.

Questions?