

# CCWIS Final Rule Transition Requirements



July, 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

- Transition Period Milestones
- Options for agencies with a S/TACWIS project
- Options for agencies with a non-S/TACWIS project
- Options for agencies without a S/TACWIS or non-S/TACWIS project
- Selecting an Option
- Next Steps

# Transition Period Milestones

- On August 1, 2016:
  - S/TACWIS regulations no longer apply
  - CCWIS regulations are effective
  - Other than simple “conforming” changes, the APD regulations remain unchanged
- August 1, 2016 – July 31, 2018<sup>‡</sup>:
  - Agencies may continue to enhance S/TACWIS projects and receive IV-E funding using the current cost allocation
  - Agencies are encouraged to review CCWIS regulations and ask questions in order to make informed decisions about how it will proceed
  - Agencies evaluate options and notify ACF of CCWIS transition decision
  - Agencies may begin work on a new CCWIS
- After July 31, 2018<sup>‡</sup>:
  - S/TACWIS cost allocation ends
  - All systems will be classified as CCWIS or non-CCWIS

<sup>‡</sup>August 1st corrected to July 31st

# Options for agencies with a S/TACWIS Project

# What is a 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).

# S/TACWIS project options

- A S/TACWIS project may continue to claim IV-E funding using the approved S/TACWIS cost allocation methodology during the transition period (1355.56)(a).
- A S/TACWIS project has 3 options:
  1. Transition the S/TACWIS to CCWIS – but must inform ACF by July 31, 2018<sup>‡</sup>
  2. Elect to use the legacy S/TACWIS as non-CCWIS – but must inform ACF by July 31, 2018<sup>‡</sup>
  3. Build a new CCWIS – no deadline
- An agency may maintain a legacy S/TACWIS during the transition period while building a new CCWIS.

<sup>‡</sup>August 1st Corrected to July 31st

# **S/TACWIS project options: Transition S/TACWIS to CCWIS**

Before claiming CCWIS funding, a title IV-E agency must inform ACF of the decision to transition S/TACWIS to CCWIS by submitting a required APD, or if applicable, a Notice of Intent (NOI). (1355.52(i)(1))

To be exempt from the CCWIS design requirements (1355.53), the agency must inform ACF of the decision to transition S/TACWIS to CCWIS by the end of the transition period. (1355.56(b))

There is not a CCWIS final rule deadline to complete the transition from S/TACWIS to CCWIS, but as of July 31, 2018<sup>‡</sup> the project must follow all rules including the CCWIS cost allocation rules at 1355.57.

<sup>‡</sup>August 1st Corrected to July 31st

# What documents must be submitted?

As appropriate, either an APD or Notice of Intent that includes (1355.52(i)):

1. A description of how the system will meet CCWIS requirements and planned options
2. A list of automated functions included in the CCWIS and
3. For each automated function on the list an indication of whether it:
  1. will meet a CCWIS requirement at 1355.52 or 1355.54;
  2. is not duplicated within the CCWIS or a child welfare contributing agency (CWCA) system;
  3. is used consistently by all users; and
  4. meets CCWIS design requirements at 1355.53(a) or (b).

\*Automated functions may change; updates are reported in Annual or Operational APDs.\*

# What is a Notice of Intent (NOI)?

*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)).

# **S/TACWIS project options: Do not transition S/TACWIS to CCWIS**

A title IV-E agency that does not transition a S/TACWIS to CCWIS must (1355.56(d)):

- inform ACF in an APD or NOI by July 31, 2018<sup>‡</sup> of that decision; and
- continue using the system through its life expectancy as defined in the APD.

If these requirements are not met, the title IV-E agency is subject to funding recoupment (1355.56(e) and 1355.58(d)). APD regulations continue to apply to the non-CCWIS.

<sup>‡</sup>August 1st Corrected to July 31st

# **S/TACWIS project options: Build a new CCWIS**

Before claiming CCWIS funding, a title IV-E agency must inform ACF of the decision to build a new CCWIS by submitting a required APD, or if applicable, a Notice of Intent (NOI). (1355.52(i)(1))

\*A new CCWIS project may begin at any time. There is no deadline for the decision to build a new CCWIS.\*

# What is a 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).

# Options for agencies with a non-S/TACWIS Project

# What is a 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.

# Non-S/TACWIS project options

A title IV-E agency with a non-S/TACWIS project has 3 options (1355.56):

1. Transition the non-S/TACWIS to CCWIS – must inform ACF by July 31, 2018<sup>‡</sup>
2. Do not transition the non-S/TACWIS to CCWIS and continue to use the legacy system as a non-CCWIS (do not build a CCWIS) – no deadline
3. Build a new CCWIS – no deadline

\* Agencies that use their legacy non-S/TACWIS application as the basis for a CCWIS, may be exempt from the design requirements listed at 1355.53, if they notify ACF by July 31, 2018. \*<sup>‡</sup>

<sup>‡</sup>August 1st Corrected to July 31st

# Non-S/TACWIS project options: Transition Non-S/TACWIS to CCWIS

Before claiming CCWIS funding, a title IV-E agency must inform ACF of the decision to transition a non-S/TACWIS to CCWIS by submitting a required APD, or if applicable, a Notice of Intent (NOI). (1355.52(i)(1))

The decision to transition a non-S/TACWIS to CCWIS must be submitted during the transition period [August 1, 2016 – July 31, 2018<sup>‡</sup>] (1355.56(f)(1)) if the IV-E agency wishes to be exempt from the CCWIS design requirements. (1355.53)

\*There is not a CCWIS final rule deadline to complete the transition from non-S/TACWIS to CCWIS, but as of July 31, 2018<sup>‡</sup> the project must follow all rules, including the CCWIS cost allocation rules at 1355.57.\*

<sup>‡</sup>August 1st Corrected to July 31st

# **Non-S/TACWIS project options: Do not transition non-S/TACWIS to CCWIS**

- There are no CCWIS requirements applicable to a title IV-E agency that decides not to transition a non-S/TACWIS to CCWIS.
- APD regulations continue to apply to the non-CCWIS.

# **Non-S/TACWIS project options: Build a new CCWIS**

Before claiming CCWIS funding, a title IV-E agency must inform ACF of the decision to build a new CCWIS by submitting a required APD, or if applicable, a Notice of Intent (NOI). (1355.52(i)(1))

\*A new CCWIS project may begin at any time.  
There is no deadline for the decision.\*

# **Options for agencies without a S/TACWIS or non-S/TACWIS Project**

# What if we do not have a S/TACWIS or non-S/TACWIS?

A title IV-E agency without a system (S/TACWIS or non-S/TACWIS) project has 2 options:

1. May build a new CCWIS – no deadline
2. May build a non-CCWIS – no deadline

# **Agencies without a system options: Build a new CCWIS**

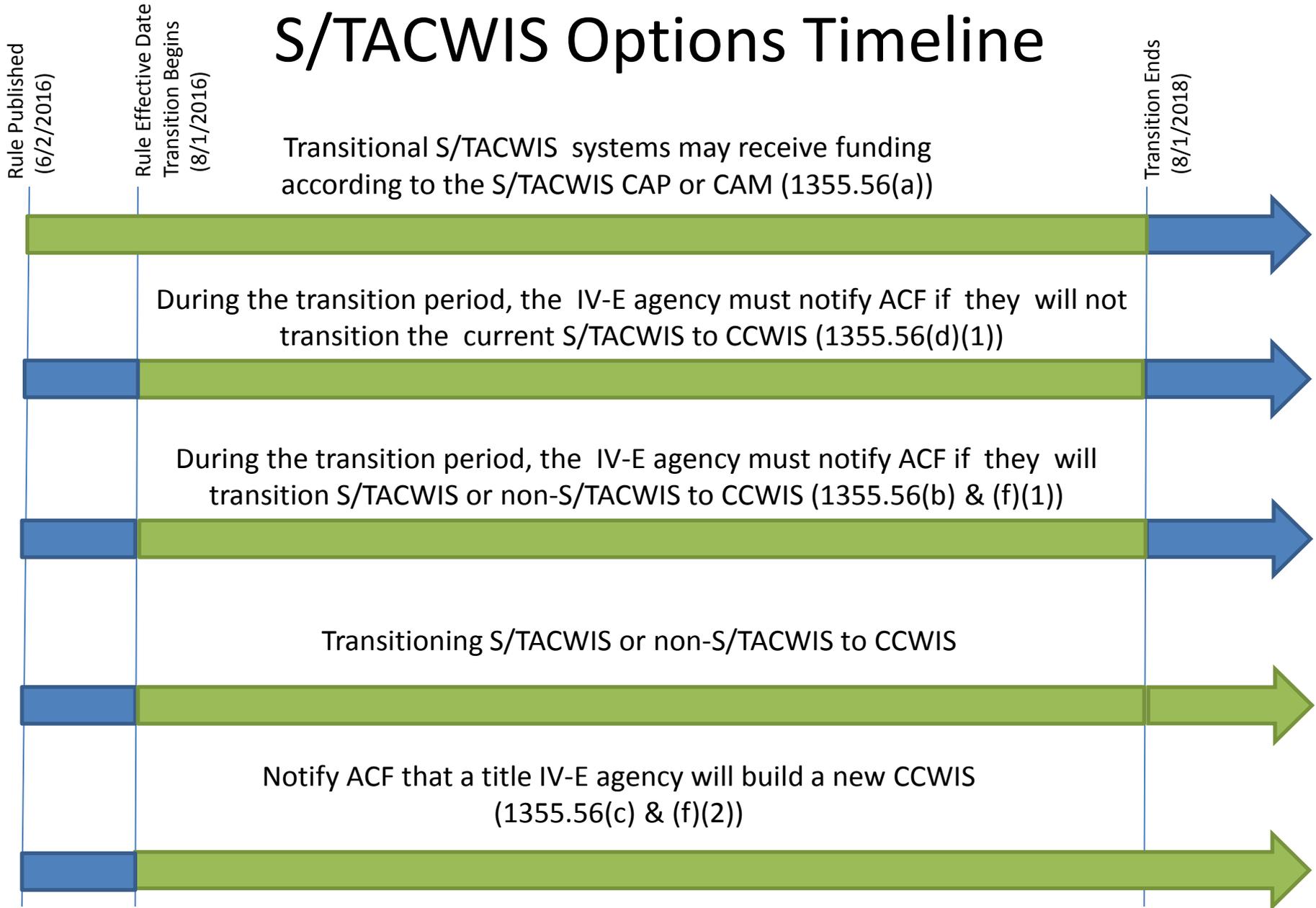
Before claiming CCWIS funding, a title IV-E agency must inform ACF of the decision to build a new CCWIS by submitting a required APD, or if applicable, a Notice of Intent (NOI). (1355.52(i)(1))

\*A new CCWIS project may begin at any time.  
There is no deadline for the decision.\*

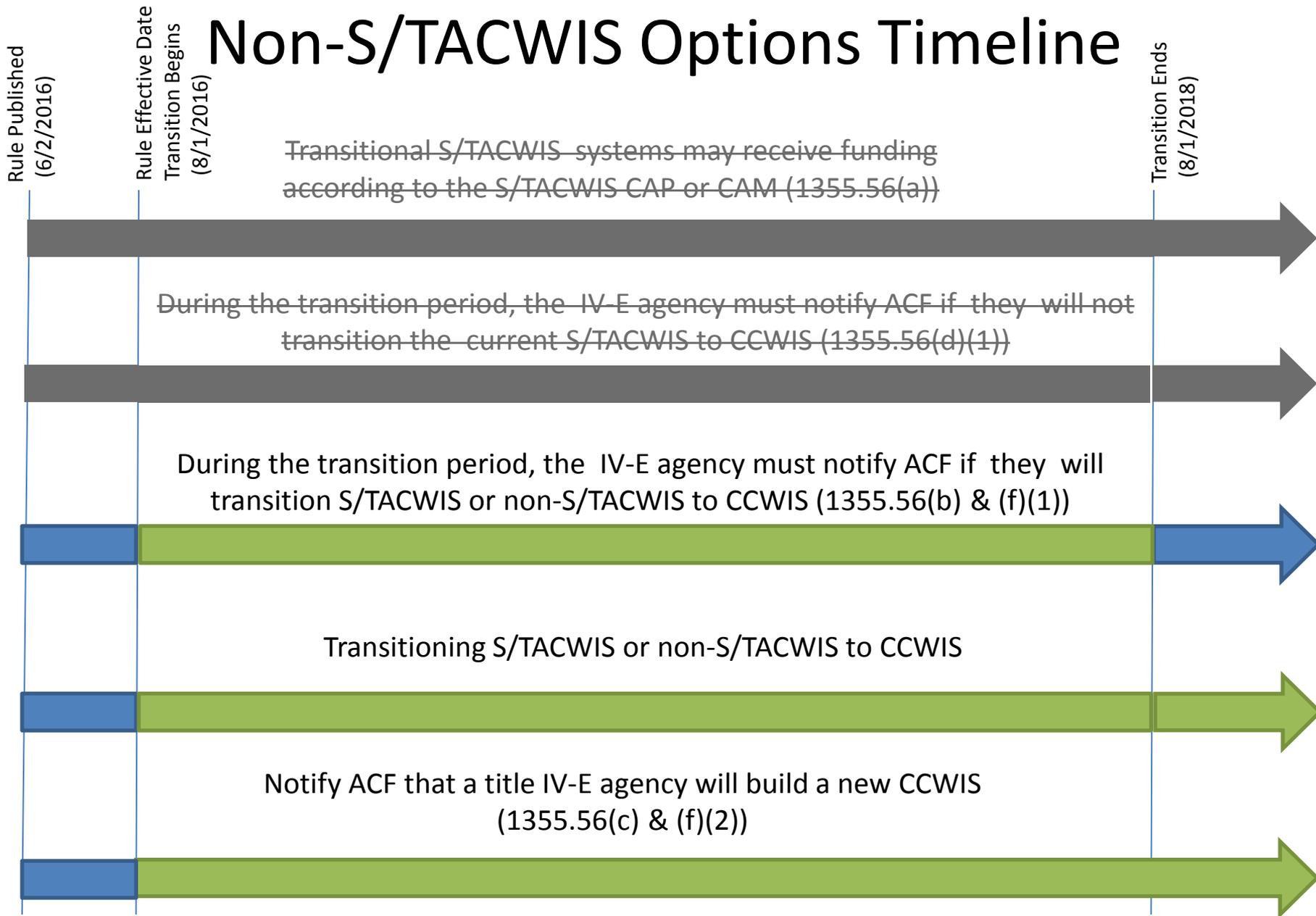
# Agencies without a system options: Do not build a CCWIS

- There are no CCWIS requirements applicable to a title IV-E agency without a system that decides not to build a CCWIS.
- The agency may build a non-CCWIS
- APD regulations apply if the agency builds a non-CCWIS over APD thresholds at 45 CFR 611.

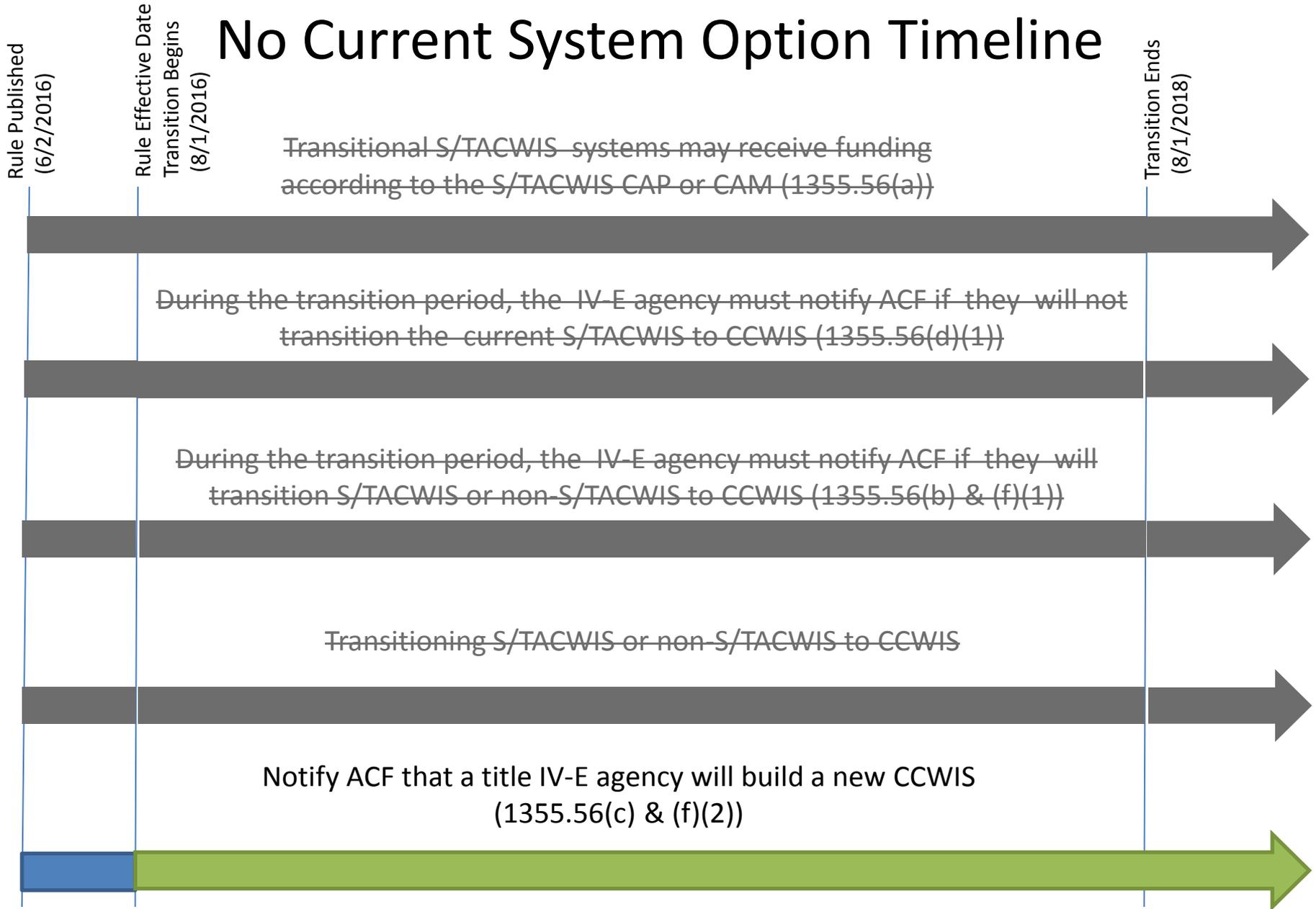
# S/TACWIS Options Timeline



# Non-S/TACWIS Options Timeline



# No Current System Option Timeline



# Selecting an Option

Select the option appropriate for your agency:

- What are your agency's needs?
- Will your legacy system meet your agency needs?
- Are you planning a system replacement or upgrades?
- Will CCWIS meet the identified needs?

\*Changes to the agency's plans should be discussed with your state systems analyst, and reported in the applicable APD\*

# Next Steps

Learn about CCWIS before selecting an option:

- Participate in upcoming webinars
- Submit questions to [CCWIS.Questions@acf.hhs.gov](mailto: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

By August 1, 2018:

- Inform ACF if your agency will or will not transition your S/TACWIS to CCWIS
- Inform ACF if your agency will transition your non-S/TACWIS to CCWIS

\*A new CCWIS project may begin at any time. There is no deadline for this decision.\*

Until August 1, 2018:

- Work on legacy S/TACWIS and non-S/TACWIS applications may qualify for title IV-E funding under the approved cost allocation methodology

# Questions?