

<h1>ACF</h1> <p><b>Administration for Children and Families</b></p>	<p align="center"><b>U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES</b> <b>Administration for Children and Families</b></p>	
	<p><b>1. Log No:</b> ACYF-CB-IM-15-06</p>	<p><b>2. Issuance Date:</b> August 11, 2015</p>
	<p><b>3. Originating Office:</b> Children’s Bureau</p>	
	<p><b>4. Key Words:</b> Title IV-E of the Social Security Act; Comprehensive Child Welfare Information Systems (CCWIS); Notice of Proposed Rulemaking</p>	

**INFORMATION MEMORANDUM**

**TO:** State, Tribal and Territorial Agencies Administering or Supervising the Administration of Titles IV-B and IV-E of the Social Security Act, State, Tribal and Territorial Information Technology (IT) Leadership, and Other Interested Parties.

**SUBJECT:** Notice of Proposed Rulemaking (NPRM) for CCWIS authorized under Title IV-E of the Social Security Act.

**RELATED REFERENCES:** Title IV-E of the Social Security Act; 45 CFR 1355

**PURPOSE:** The purpose of this Information Memorandum (IM) is to inform State, Tribal and Territorial Title IV-E agencies of a NPRM on CCWIS.

**BACKGROUND:** The existing Statewide Automated Child Welfare Information System (SACWIS) regulations published in 1993 (at 45 CFR 1355.50 through 57) provided states with funding to build a single comprehensive system supporting all child welfare case management activities for public and private child welfare workers in the state. This was in response to 1993 amendments to the Social Security Act (the Act) which provided title IV-E funding for SACWIS systems. The regulations were amended in January 2012 to include tribal title IV-E agencies in response to the Fostering Connections to Success and Increasing Adoptions Act of 2008.

The current regulations provide title IV-E agencies with the *option* to implement a S/TACWIS. If a title IV-E agency elects to implement a S/TACWIS, the system must be a comprehensive automated case management tool that meets the needs of all staff (including case workers and their supervisors, whether employed by the state, tribe, county or contracted private providers) involved in foster care and adoptions assistance case management. The S/TACWIS must be the sole automated child welfare case management tool used by staff. Staff must enter all case management information into S/TACWIS so that it holds the title IV-E agency’s “official case record” – a complete, current, accurate, and unified case management history on all children and families serviced by the agency.

In the intervening years since the SACWIS rules were published, both child welfare practice and information technology (IT) has changed considerably. It became challenging for title IV-E agencies (as defined at 1355.20) to support practices that may vary within a jurisdiction with a single

comprehensive information system. Additionally, information technology (IT) has advanced. The advancements in IT provide title IV-E agencies with tools to rapidly share data among systems supporting multiple health and human service programs with increased efficiency. To address these practice challenges and IT changes on August 11, 2015 we published an NPRM in the Federal Register (<http://www.gpo.gov/fdsys/pkg/FR-2015-08-11/pdf/2015-19087.pdf>) that removes the requirement for a single comprehensive system and supports the use of improved technology to better support current child welfare practice. With this flexibility, title IV-E agencies can build less expensive modular systems that more closely mirror their practice models while supporting quality data. Furthermore, IT tools now can be effectively scaled to support smaller jurisdictions such as federally-recognized Indian tribes, tribal organizations, and tribal consortia (tribes) at a reasonable cost. Because these proposed changes permit title IV-E agencies to build systems fundamentally different from S/TACWIS, we propose a new name for systems meeting the proposed requirements: Comprehensive Child Welfare Information System (CCWIS).

**INFORMATION:** This NPRM is the first proposed comprehensive revision of S/TACWIS regulations since 1993. In the NPRM, we propose to: (1) promote data sharing with other agencies; (2) require data quality plans; (3) reduce mandatory functional requirements; and (4) allow agencies to build systems tailored to their needs.

**1. Promote Data Sharing with Other Agencies:** The proposed rule requires that, if practicable, a CCWIS include data exchanges with other health and human service agencies, education, and child welfare courts. Data exchanges will help coordinate services, eliminate redundancies, improve client outcomes, and improve data quality.

**2. Require Data Quality Plans:** We propose that title IV-E agencies with a CCWIS develop and implement data quality plans and processes to monitor data quality. The proposed rule requires agencies with a CCWIS to take corrective action to address identified problems and also requires agencies with a CCWIS to annually submit the data quality plan, including the current status of data quality, to the Children's Bureau for review.

**3. Reduce Mandatory Functional Requirements:** While the S/TACWIS regulations require that the system supports a minimum of 51 functional requirements, the proposed CCWIS rule has only 14 functional requirements, including data exchanges, reporting, and the determination of title IV-E eligibility. The reduction in functional requirements allows agencies to build smaller systems at lower cost. The proposed rule permits agencies with a CCWIS to add additional functionality as needed, or acquire data collected from other systems.

**4. Allow Agencies to Build Systems Tailored to Their Needs:** The proposed rule does not require title IV-E agencies to build an automated comprehensive child welfare case management information system. The proposed rule allows the title IV-E agency to build systems that align with their unique business needs in the most cost-effective strategy available.

The NPRM published on August 11, 2015 in the Federal Register is available at <http://www.gpo.gov/fdsys/pkg/FR-2015-08-11/pdf/2015-19087.pdf>. Additional explanatory information on the NPRM is available at <https://www.acf.hhs.gov/programs/cb/laws-policies/whats-new>.

**COMMENTS:** Please submit comments on the NPRM to [www.regulations.gov](http://www.regulations.gov) on or before October 13, 2015.

/s/

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Administration on Children, Youth, and Families

/s/

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Associate Commissioner  
Children's Bureau

**Attachment:**

[Children's Bureau Regional Program Managers](#)