CCWIS Final Rule Data Quality Requirements

Children's Bureau

December 01, 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

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

Agenda

- CCWIS Definitions – 1355.51
- Data Quality Overview
- Data Quality Standards – 1355.52(d)(1)
- Automating Data Quality – 1355.52(d)(2)
- Agency Data Quality Reviews – 1355.52(d)(3)
- Data Quality Review Findings – 1355.52(d)(4)
- Data Quality Plan – 1355.52(d)(5)
- How will ACF Evaluate Data Quality
- 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)

Data Quality Overview

High quality data supports the efficient, economical, & effective administration of the child welfare program (1355.52(a)) by:

- providing **complete, timely, & accurate** data for:
  - stakeholders such as clients, case workers, supervisors, program administrators, state/tribal governments, federal partners, advocates, & the public
  - purposes such as client services, program monitoring, government oversight, accountability, program evaluation, policy formulation, budgeting, & research.

Data Quality Overview (continued…1 of 2)

- supporting ***consistent & uniform*** data among all programs and users to:
  - promote comprehensive & coordinated services
  - ensure workers have a common, shared understanding of cases & clients
  - support interoperability with CWCAs & other programs
  - provide continuity as children & families are served by different workers & agencies
  - identify & eliminate duplicate or unnecessary services
  - reduce duplicate data capture with CWCAs & other programs

Data Quality Overview (continued...2 of 2)

- High quality data ensures that CCWIS is a tool that promotes good child welfare practice and positive outcomes for children and families.

- High quality data requires contributions from the whole title IV-E agency, for example:
  - CCWIS enforces, manages, & maintains data quality
  - staff at all levels value quality data and understand its role in effective child welfare practice and administration and positive outcomes
  - workers are trained on the collection of quality data
  - stakeholders use CCWIS data to inform actions & decisions
  - agency leaders demonstrate a commitment to quality data

Data Quality Standards
1355.52(d)(1)(i)

- CCWIS data must meet **the <u>most rigorous </u>of the applicable federal, state or tribal standards for completeness, timeliness, & accuracy**, for example:
  - AFCARS currently sets a 90% completion rate for many elements; if the agency sets a 97% completion rate, CCWIS data must meet the more rigorous standard

- Completeness, timeliness, & accuracy may overlap

Data Quality Standards (continued…1 of 5)

- CCWIS data must be **complete**:
  - Is all required data captured?
  - Does CCWIS capture all data needed to make a decision or take an action?
  - Does CCWIS provide a full picture of the person or event?
  - Is any data missing for a critical business need?

Data Quality Standards (continued…2 of 5)

- Examples of incomplete data:
  - Home visitation described in narrative but data affirming child safety & confirming case plan goals discussed is missing
  - Narrative outlining risks does not address all required risk factors
  - Assessment risk factors ranked, but explanatory narrative missing
  - Placement end date missing when child exits care or moves to new placement
  - Incomplete conversion of legacy data
  - Required data available in a data warehouse but not provided to CCWIS

Data Quality Standards (continued…3 of 5)

- **"Complete"** does not mean that all data on every screen must be entered. For example data may:
  - only be required for certain cases or circumstances (e.g. ICWA data may only be required for Native American children)
  - not be required at an early case stage (e.g. case plan goal may not be required until 60 days after removal)

Data Quality Standards (continued…4 of 5)

- CCWIS data must be **timely**. Is data:
  - entered in expected timeframes?
  - available to stakeholders when needed for decision or action?
- Examples of possible agency timeliness measures:
  - expectation that placement data be entered with 24 hours of child placement
  - case plan goals entered within 60 days of child's removal
  - requirement that a child abuse & neglect report is provided to investigator within 2 hours
  - records are time-stamped for audit purposes

Data Quality Standards (continued…5 of 5)

- CCWIS data must be **accurate**:
  - Does the data correctly describe an event or observation?
  - Does the data describe the "real world" clearly and unambiguously?
- Possible examples include:
  - Do reasons for removal document: 1) information known at time of removal, or 2) information learned during assessments done after removal?
  - Is termination of parental rights (TPR) date the: 1) court hearing date, 2) TPR order signing date, or 3) date TPR order filed date?
  - Is removal address: 1) the child's home or 2) removal location?
  - Are child assessments updated with new information?
  - Are there duplicate clients, reports, or cases in CCWIS?

Data Quality Standards: 1355.52(d)(1)(ii)

- CCWIS & CWCA systems must collect CCWIS data **consistently & uniformly**:
  - Are data definitions understood by all workers?
  - Do CCWIS and CWCA systems collect the same data?
  - Are there varying data collection procedures that result in different data?
  - Do workers have a common, shared understanding of clients & cases?

- Examples:
  - Are reports of home visits from all CWCAs consistent?
  - Are court findings to be collected from 1) court orders; or 2) case worker notes?

Data Quality Standards: 1355.52(d)(1)(iii) & (iv)

- **Exchanged & maintained in accordance with confidentiality requirements**, with tools such as:
  - signed confidentiality agreements
  - encrypting data
  - controlling access
  - specifying permissible sharing with other partners
  - establishing schedules for archiving & purging data

- **Support child welfare policies, goals, & practices**
  - Is the data relevant for the program?

Data Quality Standards: 1355.52(d)(1)(iv)

- **Not defaulted or inappropriately assigned:**
  - Is CCWIS prefilling data with common values?
  - Does CCWIS select a value from a list if a worker does not pick a value?

- Examples of defaulted or inappropriately assigned:
  - defaulting AFCARS special needs data to "No"
  - defaulting US citizenship to "Yes"

Data Quality Standards
Tips

Support complete, timely & accurate data:

- Determine & correct causes of data quality problems, <u>such as</u>:
  - incorrect data mapping during data exchanges
  - CWCA systems submitting data not meeting data quality standards
  - workers applying different definitions or misunderstanding tools
  - pick lists with values that are wrong or applicable in only certain circumstances
  - duplicate clients or cases

Data Quality Standards
Tips (continued…1 of 3)

Maintain consistent & uniform high quality data by:

- training all users on data definitions & data collection procedures
- confirming CWCA systems collect CCWIS data or convert collected data to CCWIS data prior to exchanging
- clarifying planned uses for exchanged data
- adding data quality requirements to CWCA contracts, such as:
  - data definitions & formats
  - data quality standards
  - submission schedules
  - data updates & correction timelines
  - data transition plan upon contract termination
  - data archive & audit requirements

Data Quality Standards
Tips (continued…2 of 3)

Other contractual data quality requirements to consider:

- require CWCA's to certify that data are complete, timely, & accurate

- assign CWCAs responsibility for sub-contractor data

- link contact performance to data submissions & quality:
  - establish incentives & sanctions
  - strengthen incentives & sanctions over time to support continuous data quality improvement

- structure contracts to support success:
  - define minimum data & data quality baselines
  - incrementally raise standards:
    - over time (i.e. standards become more rigorous as CWCAs gain experience)
    - with incentive ranges (e.g., low, medium, high incentives for low, medium, high data quality)

Data Quality Standards
Tips (continued…3 of 3)

Support complete, timely & accurate data:

- Implement automated data quality tools, such as:
  - improved search & record matching techniques to find & merge duplicate cases & clients
  - automatic spell check for narratives
  - visual aids such as highlighting required fields or flagging missing data
  - consistent field labeling throughout CCWIS
  - real-time feedback on data quality
  - see following section on Automated Data Quality for more discussion of automated tools...

Automating Data Quality
1355.52(d)(2)(i)

- **Regularly monitor CCWIS data quality** with tools, such as:
  - edit checks
  - reports
  - automated functions to evaluate quality of data from data exchanges
  - on-line help to assist staff with data collection
  - Third party tools for tasks such as address verification, record de-duplication, and data profiling
  - banners to workers when data quality goals are reached

Automating Data Quality 1355.52(d)(2)(ii)

- **Alert staff to collect, update, correct, & enter CCWIS data** with user-friendly and effective methods, such as:
  - alerts
  - ticklers
  - emails
  - on-line reports
  - text messages & notifications to mobile devices

Automating Data Quality
1355.52(d)(iii), (iv), & (v)

- Automatically request CWCA systems to submit current & historical CCWIS data to CCWIS, *if applicable:*
  - for example, ensuring monthly home visit data is submitted according to agency standards
- Prevent duplicate data capture:
  - capturing data in one place & automatically displaying it as needed
- Generate reports of continuing or unresolved CCWIS data quality issues.

Agency Data Quality Reviews 1355.52(d)(3) (1 of 2)

- The title IV-E agency is responsible for the data quality review:
  - title IV-E agency may conduct the review itself; or
  - partner with another agency or CWCAs on the review; or
  - contract with a vendor to conduct the review

Agency Data Quality Reviews
1355.52(d)(3) (2 of 2)

- Reviews are conducted, at a minimum, biennially:
  - all review activities defined in the data quality plan must be completed at least once in the biennial cycle.
  - it may be advantageous to conduct some activities more frequently, such as:
    - periodic review of agency data quality reports
    - at a minimum, 6-month reviews of federal data quality reports (e.g., AFCARS & NYTD)
    - involvement of an agency data or research team on an on-going or as-needed basis

Agency Data Quality Reviews (continued...1 of 4)

- Reviews assess the data quality and related activities of:
  - the title IV-E agency
  - child welfare contributing agencies, *if applicable*
- Reviews assess:
  - current status with CCWIS data requirements (1355.52(b)):
    - collecting all defined CCWIS data
    - identifying non-CCWIS data

Agency Data Quality Reviews (continued…2 of 4)

- Reviews assess:
  - current status with data quality standard requirements (1355.52(d)(1)):
    - complete, timely & accurate data
    - consistently & uniformly collected
    - meets confidentiality requirements
    - supports child welfare policies, goals, & practices
    - not defaulted or inappropriately assigned

Agency Data Quality Reviews (continued…3 of 4)

Reviews assess:

- current status with CCWIS data quality automation requirements (1355.52(d)(2)):
  - regularly monitor CCWIS data quality
  - alert staff to collect, update, correct, & enter CCWIS data
  - send electronic requests to CWCAs to submit current & historical CCWIS data *if applicable*
  - prevent duplicate data entry
  - generate data quality reports

Agency Data Quality Reviews (continued...4 of 4)

Reviews assess:

- current status of mandatory bi-directional data exchanges (1355.52(e)):
  - exchanging relevant data
  - CWCA's & external title IV-E systems use data "exchange standard" to exchange the data with the CCWIS, *if applicable*

Agency Data Quality Reviews Tips

Title IV-E agencies may adopt existing tools & procedures for the CCWIS data quality review, such as:

- S/TACWIS automated data quality features such as edit checks & alerts
- tools & procedures to validate federal data (e.g., AFCARS)
- internal data quality audits
- CFSR Program Improvement Plan activities related to data quality
- Continuous quality improvement (CQI) activities for data
- data quality procedures developed by data/research teams

Routine data quality activities, whether automated or manual, support CQI and simplify the data quality reviews

Data Quality Review Findings 1355.52(d)(4)

The agency **must correct any findings from reviews**, such as:

- data failing data quality standards
- automated functions not effectively supporting data quality
- data exchanges not working as intended
- workers needing training on assessment & case management tools

Data Quality Review Findings (continued...1 of 3)

The agency determines approaches to address data quality review findings, such as:

1. modifying CCWIS screens
2. enhancing CCWIS automated data quality tools
3. enhancing data exchanges to include all relevant data
4. providing training on child welfare procedures & tools
5. modifying case management forms & tools
6. modifying MOUs and data governance procedures
7. clarifying definitions
8. revising procedures & schedules to review data quality
9. revising data exchange agreements
10. revising data quality standards

Data Quality Review Findings (continued…2 of 3)

Agencies are not required to address all findings at once, but should develop a strategy to prioritize findings, such as:

- addressing data quality problems affecting child & family outcomes (e.g., outdated immunization records; missing court orders)

- rectifying issues that contribute to duplicate or inefficient work (e.g. home address errors, SSN validation, duplicate records)

- correcting errors that may lead to penalties (e.g. NYTD data errors)

Data Quality Review Findings (continued...3 of 3)

If data quality findings do not improve in subsequent data quality reviews, the agency:

- re-analyzes data quality issues & determines causes;

- adjusts approach to address finding; and

- reports new approach in the data quality plan

Data Quality Plan
1355.52(d)(5)

The agency **develops, implements, & maintains a CCWIS data quality plan** that:

- is submitted with an Annual or Operational Advance Planning Document (APD)

- describes the plan to promote data quality, including:

  - complying with data quality standards of 1355.52(d)(1)

  - meeting automated CCWIS data quality requirements of (1355.52(d)(2))

  - conducting data quality reviews as described in (1355.52(d)(3))

- reports current compliance with data quality standards of 1355.52(d)(1)

Data Quality Plan
(continued…1 of 1)

Agencies report data quality plan updates in the annual or operational APD. Updates may include:

- adding new CCWIS data
- changing data standards
- modifying data exchanges
- enhancing data quality automated functions
- developing more efficient, economical, & effective strategies to ensure data quality

Data Quality Plan Tips

The data quality plan may include:

- your strategy for automating data quality
- the applicable data quality standards
- the data quality review plan & activity schedule, such as:
  - manual processes (e.g., interviews with staff)
  - automated processes (e.g., data quality reports)
  - periodic processes (e.g., AFCARS data quality reports)
  - biennial processes (e.g., CWCA system audits)
- data quality requirements from of CWCA contracts
- overview of CQI workgroup data quality activities

Data Quality Plan Tips (continued...1 of 1)

- Agencies are encouraged to incorporate existing data quality plans & materials in the CCWIS data quality plan, such as:
  - data governance agreements
  - data quality reports
  - data quality procedures

- Include CWCAs in plan development & implementation
- Consult with your federal analyst & provide drafts for review
- ACF intends to provide further guidance on data quality plan development

How will ACF Evaluate Data Quality?

ACF will:

- monitor the data quality on submitted federal reports

- review data quality reports submitted annually with the data quality plan (1355.52(d)(5)(ii))

- evaluate progress on data quality review findings

- incorporate findings & recommendations from other reviews (e.g. AFCARS, NYTD, CFSR, & title IV-E)

- conduct other activities in collaboration with the agency

How will ACF Evaluate Data Quality? (continued…1 of 1)

During the data quality component of the CCWIS review ACF will:

- review metrics on data completeness, timeliness, & accuracy
- verify that the agency is following the activities described in the data quality plan
- determine if the data quality plan is effective in improving data quality
- assess if the data quality plan contributes to the increased efficient, economical, & effective administration of the program

We expect the data quality plan to change over time

Next Steps

- Determine applicable data quality standards

- Develop data quality standards for CCWIS data

- Draft data quality plan with guidance from your federal analyst

- Review data quality 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

Next Steps (continued...1 of 1)

- 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

- Good data quality ensures that CCWIS is a tool that promotes good practice

- CCWIS alone cannot provide good quality data; it requires contributions from the whole agency

- CCWIS data quality requirements promote continuous improvement in data quality

Take-Aways
(continued...1 of 1)

- CCWIS data quality standards are goals; agencies are not required to meet all goals immediately

- Agencies are encouraged to incorporate, as appropriate, existing data quality activities & procedures into CCWIS & the data quality plan

- ACF's guidance on data quality standards, reviews & plans continue to evolve and we welcome your contributions & feedback

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.