

CCWIS NPRM Overview



July, 2015

Current Status: S/TACWIS

- Legislation passed August 1993 amending sections of the Social Security Act
- Philosophy - A single, large system used by all public & private child welfare workers
- Requirements - efficient, economical, & effective
- Prior to the legislation, we had worked with ten states to identify functional components that should be included in a "model" CW information system

Current Status: S/TACWIS

- S/TACWIS is, and CCWIS will be, an option – ***It is not required***
- Favorable cost allocation methodology
 - Primary program
 - Eligibility ratio

Current Status: S/TACWIS

- Functional support for child welfare:
 - Intake & assessment
 - Case management for: adoption, foster care, guardianship, family preservation, independent living, ICPC
 - Title IV-E eligibility
 - Resource management
 - Financial & contract management
 - Federal & agency reporting
 - Data exchanges w/ IV-A, IV-D, and XIX
 - Agency selected optional components

NPRM Overview

- Accommodates changes in CW practice
- Leverages IT advances since 1993
- Focuses on quality data & not functions
- Provides the flexibility to “right size” CW systems for states & tribes
- Allows states and tribes to leverage existing systems

NPRM Overview

- Reduces costs for system development and maintenance
- Encourages interoperability through new data exchanges
- Support interoperability through standard exchange protocols
- Maximize flexibility

NPRM Walkthrough

- 1355.50 Purpose
 - Summary of the NPRM

1355.51

Definitions

- Terms specific to the NPRM
 - Approved activity
 - Automated function
 - Child welfare contributing agency
 - Data exchange
 - Data exchange standard
 - Project type (new CCWIS, S/TACWIS, non-S/TACWIS)

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Definitions (continued...)

- Terms specific to the NPRM
 - Notice of intent
 - Transition period
- Preamble notes where definitions with wider applicability are found:
 - 1355.20 (applicable to 1355, 1356, & 1357)
 - 95.605 (APD regulations)

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System Requirements

- This is the “heart” of the CCWIS NPRM; this section defines what a CCWIS is – what states and tribes must build if they select the option to build a CCWIS
- Requirements organized into 10 categories. [1355.52(a) – (j)]

1355.52(a)

1: Efficient, Economical, & Effective

Goal: State CCWIS statutory goals

- Statutory basis – 474(a)(3)(C)(iv)
- General requirements:
 - improve program management and administration;
 - appropriately apply technology;
 - avoid duplicate development & maintenance; and
 - cost are reasonable, appropriate, & beneficial.

1355.52(b)

2: Required Data

Goal: CCWIS must maintain data needed to support federal & agency data requirements

- IV-B/IV-E data for federal and agency reports, audits, reviews, & monitoring
- IV-B/IV-E data to support federal and agency laws, regulations, & policy
- IV-B/IV-E data for IV-E eligibility determinations, service authorizations, and expenditures
- Data to support ICWA (states only)
- NCANDS data for federal audits, reviews, & reports (states only)

1355.52(c)

3: Reporting

Goal: CCWIS data must be used to support federal and agency reporting

- Ongoing federal reports (e.g., AFCARS, NYTD, etc.)
- Generate reports or provide CCWIS data as needed by other federal reports
- Generate reports or provide CCWIS data as needed by agency defined reports

1355.52(d)

4: Data Quality Requirements

Goal: Quality data is vital for all program activities

- The agency is responsible for ensuring that data is:
 - complete, timely, accurate, and consistent;
 - maintained and exchanged in accordance with confidentiality laws & requirements
 - Validated to ensure that it supports child welfare policies, goals & practices
 - not created by default

1355.52(d)

4: Data Quality Requirements (continued...)

- Support data quality with CCWIS automation that:
 - monitors data quality;
 - provides data quality alerts;
 - prompts child welfare contributing agencies for needed data;
 - does not require duplicate data entry; and
 - reports data quality problems.

1355.52(d)

4: Data Quality Requirements (continued...)

- Annually review data quality:
 - Confirm required data is collected;
 - Confirm data meets quality standards;
 - Confirm CCWIS supports data quality; and
 - Confirm data exchanges work as required and are standardized, if required.
- Correct any review findings
- Develop & submit a data quality plan

1355.52(e)

5: Required Data Exchanges

Goal: support program collaboration

- Keep current data exchanges:
 - title IV-A;
 - title IV-D;
 - title XIX eligibility;
 - child abuse/neglect, if external to CCWIS;
 - financial systems, if external to CCWIS;
 - systems for determining title IV-E eligibility, if external to CCWIS.

5: Required Data Exchanges Continued

- Add new data exchanges:
 - child welfare courts;
 - Education;
 - Medicaid claims;
 - child welfare contributing systems, if any; and
 - ancillary child welfare systems used by agency staff, if any.

1355.52(f)

6: Electronic Data Exchange Standard

Goal: Improve efficiency, promote interoperability & provide a common understanding of data

- One data exchange standard
- Applies to exchanges:
 - with child welfare contributing agencies;
 - with new CCWIS automated functions & exchanges; and
 - with ancillary systems used by agency staff.

1355.52(g)

7: Title IV-E Eligibility Requirements

Goal: Support a standard automated title IV-E eligibility determination process

- Eligibility determination steps may be completed outside of CCWIS
- State agencies must have a single automated process (no redundancy across systems) for title IV-E eligibility determination
- Tribal agencies have greater flexibility and may present a case for exemption

1355.52(h)

8: Federal Software Library

Goal: Consistent with ACA, this requirement promotes the sharing & re-use of technology between states & tribes

- Upon ACF's request, agencies must provide software modules & documentation to ACF

1355.52(i)

9: Submission of CCWIS Plans

Goal: Notification of CCWIS Plans

- Before claiming funding, submit an APD or Notice of Intent (for small projects) including:
 - A project plan
 - If each automated function:
 - meets requirements of 1355.52 or 54;
 - is not duplicated & is consistently used by all; &
 - complies with 1355.53.

1355.52(i)

9: Submission of CCWIS Plans

Goal: Inform ACF of CCWIS Plans

- Annual and operational APDs must include an updated automated function list that, for each listed function:
 - notes if it is not duplicated & is consistently used by all; and
 - describes changes to the function's scope or compliance with the CCWIS design requirements of 1355.53.

1355.52(j)

10: Applicable APD requirements

Goal: Large & small CCWIS projects must follow ACF's APD project management requirements in Part 95

- Under threshold CCWIS projects must meet 45 CFR 95.613 – 621 & 626 – 641
- Projects exceeding APD thresholds must meet *all* APD requirements per 1355.30(k)

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CCWIS Design Requirements

Goal: Promote the faster & less expensive development of reliable systems

Automated functions must:

- be modularly designed & separate business rules from core programming;
- be documented with plain language;
- follow a IT standard promoting efficient, economical, and effective development; and
- be capable of being shared & reused by other states, tribes, and agencies.

CCWIS Design Requirements Continued

Automated functions may be exempted from design requirements if:

- The automated function is part of a transitioning S/TACWIS or non-S/TACWIS system; or
- ACF approves an agency proposal for an even more efficient, economical, and effective design.

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CCWIS Options

Goal: Provide agencies with additional flexibility to customize CCWIS for specific program needs

- Must be building a CCWIS meeting all requirements of 1355.52 to receive CCWIS funding for options
- Agency provides a business case for optional automated functions or data exchanges

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CCWIS Reviews

Goal: Confirm CCWIS projects comply with requirements

- CCWIS subject to reviews on a continuing basis to ensure compliance with APD and CCWIS requirements

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Transitioning a system to CCWIS

Goal: Allow agencies to use legacy systems as the basis of a CCWIS

- All S/TACWIS projects receive S/TACWIS funding for 24 months to finish “in-flight” development or enhancements
- S/TACWIS projects transitioning to CCWIS must submit an APD or Notice of Intent meeting requirements of 1355.52(i)(1) within 24 months to receive CCWIS funding after 24 months

Transitioning to CCWIS Continued

- To avoid possible recoupment, S/TACWIS projects not transitioning to CCWIS, must:
 - notify ACF with an APD or Notice of Intent within 24 months; and
 - use the system through its life expectancy.

Transitioning a system to CCWIS (continuing...)

- To use a non-S/TACWIS project as the basis of a CCWIS, a IV-E agency must submit an APD or Notice of Intent meeting the requirements of 1355.52(i)(1) within 24 months to receive CCWIS funding after 24 months
- A title IV-E agency may build a new CCWIS at any time by submitting an APD or Notice of Intent meeting the requirements for 1355.52(i)(1)

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CCWIS Cost Allocation

Goal: Define CCWIS funding

CCWIS design requirements apply to:

- All new development in an existing S/TACWIS or non-S/TACWIS transitioning to CCWIS, unless exempted by 1355.53(b)(2)
- All automated functions of a new CCWIS...unless exempted by 1355.53(b)(2)

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CCWIS Cost Allocation (continued...)

- For all systems (S/TACWIS transitioning; non-S/TACWIS transitioning; new CCWIS), an automated function may receive CCWIS cost allocation if it:
 - supports requirements of 1355.52 or 1355.54; and
 - is not duplicated and is used consistently by all users.

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CCWIS Cost Allocation (continued...)

- CCWIS approved activities may receive CCWIS cost allocation for projects meeting requirements described in 1355.57(a) or (b)
- Project costs must be allocated according to HHS regulations & guidance

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CCWIS Cost Allocation (continued...)

- CCWIS cost allocation is available for activities and automated functions that are:
 - approved by HHS;
 - meet 1355.57(a), (b), or (c); &
 - benefit state or tribal funded participants in programs and allowable activities described in title IV-E of the Act to the title IV-E program.
- Non-CCWIS cost allocation is available for costs not meeting the above requirements

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Failure to meet APD conditions

- Consistent with current rules, APD may be suspended if:
 - agency does not comply with CCWIS requirements; or
 - agency does not comply with other commitments made in APD.
- ACF may recoup all title IV-E funds claimed for the CCWIS project

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Failure to meet APD conditions (continued...)

- The suspension begins the date ACF determines:
 - agency does not comply with CCWIS requirements; or
 - agency does not comply with other commitments made in APD.

1355.58

Failure to meet APD conditions (continued...)

- The suspension remains in effect until the date ACF determines:
 - agency complies with CCWIS requirements; or
 - agency complies with APD.

Conforming Regulations

Goal: Update other regulations

- Eliminate repetition
- Change “S/TACWIS” to “CCWIS”
- Remove enhanced funding references
- Update regulatory cross-references
- Applies to:
 - 1356.60(e) IV-E Fiscal Requirements
 - 45 CFR 95 Subpart F APD Requirements

Questions?