

CCWIS Transition Period & Other Triggers to Change Cost Allocation Plans



January 17, 2018

CAMs & PA-CAPs

- The development cost allocation methodology (CAM) applies to system planning & development costs and is approved through the APD
- The Public Assistance Cost Allocation Plan (PA-CAP) applies to system operational & maintenance costs and is approved by HHS's Cost Allocation Services division.

Certain events trigger the submission of new or updated CAMS & PA-CAPS

Automated Function Checklist & CCWIS CAMS & PA-CAPs

The Automated Function Checklist will be used to guide you in developing the CAM & PA-CAP for your CCWIS.

- Is an automated function:
 - Supporting 1355.52 and/or 1355.54 requirements?
 - Complying with CCWIS Design Requirements?
 - Consistently used by workers?
 - Duplicating functionality in another system?
- Systems that might duplicate CCWIS automated functions and trigger a change in either your CAM or PA-CAP
 - Child Welfare Contributing Agencies (CWCAs)
 - External systems used by agency staff

Automated Function Cost Allocation: Example 1

Scenario: A CCWIS case management module used by all case management workers in the state/tribe.

- Meets CCWIS design requirements at 1355.53?
Yes
- Meets 1355.52 or 1355.54 requirements? Yes
- Only module in the state/tribe and used by all case management workers per 1355.57(a)(2)(ii)?
Yes

May qualify for CCWIS CAM and PA-CAP

Function List Submission to ACF: Example 1

Please list all automated functions included in the CCWIS as required at §1355.52 (i)(1)(ii) and note whether each automated function meets, or when implemented will meet the requirements at §1355.52 (i) (1) (iii) (A) (B) and (C). For additional entries, go to page 5

Function Name <i>List all automated functions that will be part of your CCWIS</i>	Supports at least one requirement section 1355.52 and/or 1355.54	The function is duplicated	Function is consistently used	The function complies with the CCWIS design requirements defined at 1355.53 (a), unless exempt by 1355.53 (b)
Case Management	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> Exempt
	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> E
	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> E

From Notice of Intent Template

Automated Function Cost Allocation: Example 2

Scenario: A CCWIS case management module used by all workers in the IV-E agency. CWCA workers use their own CWCA systems for case management. CWCA systems exchange data with CCWIS.

- Meets CCWIS design requirements at 1355.53? **Yes**
- Meets 1355.52 or 1355.54 requirements? **Yes**
- Only module in the state/tribe and used by all case management workers per 1355.57(a)(2)(ii)? **No**

May qualify for non-CCWIS CAM and PA-CAP

Function List Submission to ACF: Example 2

Please list all automated functions included in the CCWIS as required at §1355.52 (i)(1)(ii) and note whether each automated function meets, or when implemented will meet the requirements at §1355.52 (i) (1) (iii) (A) (B) and (C). For additional entries, go to page 5

Function Name <i>List all automated functions that will be part of your CCWIS</i>	Supports at least one requirement section 1355.52 and/or 1355.54	The function is duplicated	Function is consistently used	The function complies with the CCWIS design requirements defined at 1355.53 (a), unless exempt by 1355.53 (b)
Case Management	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> Exempt
	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> E

Triggers: CAM

- The transition period end date (7/31/2018).
 - S/TACWIS: CAM due by 7/31/2018
 - Non-S/TACWIS: Not applicable
- Building a new CCWIS. For all systems, CAM due with APD
- Transitioning an existing system to CCWIS.
 - Transitioning S/TACWIS: CAM due by 7/31/2018
 - Transitioning non-S/TACWIS: CAM due with APD
- A change to APD/Automated Function List. For all systems, CAM due with APD
- CCWIS scope changes. For below-threshold projects, CAM due at time of scope changes.

Triggers: PA-CAP

- Once any CCWIS functionality is operational. For all systems (new CCWIS, transitioning S/TACWIS, non-S/TACWIS, & below threshold), PA-CAP due at that time.
- The transition period end date (7/31/2018). For S/TACWIS.
- A change to APD/Automated Function List. For all systems, PA-CAP due when the change is operational.
- Agencies operating former S/TACWIS systems will probably need to update their PA-CAP at the end of the transition period.

CAM & PA-CAP Submissions

- Development CAM – Submit with an Advance Planning Document (APD). See instructions at: <https://www.acf.hhs.gov/cb/research-data-technology/state-tribal-info-systems/managers/submit>
- Operational PA-CAP – Submit to the DHHS Cost Allocation Services division.*

DSS will issue additional guidance, consistent with 45 CFR 95, Subpart E, on deadlines for the PA-CAP

Take-Aways

- Most agencies must update their CAMs and PA-CAPs.
- Begin working on both now; DSS will issue further guidance on both and submission dates for Operational PA-CAPs.
- Complete your Automated Function Checklist prior to developing CCWIS CAM & PA-CAP
- Contact your federal analyst for guidance:
<https://www.acf.hhs.gov/cb/resource/state-tribe-assignments>

References: Automated Functions

- Information Memorandum (IM) ACYF-CB-IM-16-04 provides title IV-E agencies submission instructions for a Notice Of Intent (NOI) as described at 45 CFR 1355.52(i)(1). This IM also provides an optional NOI checklist that agencies may use.
<https://www.acf.hhs.gov/cb/resource/im1604>
- IM ACYF-CB-IM-16-07 provides agencies that choose to develop a CCWIS and expect expenditures to meet or exceed APD thresholds with information on the use of an optional checklist to document automated functions as described at 45 CFR 1355.52(i)(1). <https://www.acf.hhs.gov/cb/resource/im1607>
- CCWIS Technical Bulletin #1 provides agencies that choose to develop a CCWIS with information on identifying and reporting automated functions with either an APD or NOI.
<https://www.acf.hhs.gov/cb/resource/ccwis-tb1>

References: Cost Allocation

- CCWIS Cost Allocation Presentation. This DSS presentation describes CCWIS cost allocation as defined by 45 CFR 1355.57 & provides examples.
<https://www.acf.hhs.gov/cb/resource/ccwis-cost-allocation-presentation>
- Cost Allocation Methodology (CAM) Toolkit. The Toolkit models a simple, consistent, and objective CAM for agencies that must allocate system development costs under an approved Advance Planning Document.
<https://www.acf.hhs.gov/css/resource/cost-allocation-methodologies-cam-toolkit>