



CCWIS Executive Guide

- **ACF issues a new regulation for Comprehensive Child Welfare Information Systems**
- **New regulation takes effect 8/1/2016; replaces SACWIS and TACWIS guidance**

The Administration for Children and Families has replaced the Statewide and Tribal Automated Child Welfare Information System (S/TACWIS) regulation with a new Comprehensive Child Welfare Information System (CCWIS) regulation. The new regulation is effective August 1, 2016, and governs the way in which state and tribal title IV-E agencies will claim federal funding for child welfare information systems that support the administration of title IV-E and IV-B programs. The CCWIS regulation includes new requirements around design, data quality, and data exchange standards, and aligns with current and emerging technology.

If a title IV-E agency wishes to use its current system as the basis of a CCWIS, your agency has 24 months to determine how you will respond to the new CCWIS regulation. Your child welfare and technology leadership should use the two-year transition period to determine what actions make the most business sense for your agency. This overview explains the key provisions that your staff must consider in making a decision about CCWIS.

The Comprehensive Child Welfare Information System final rule was published in the Federal Register on Thursday June 2, 2016 and is available here:

<http://www.gpo.gov/fdsys/pkg/FR-2016-06-02/pdf/2016-12509.pdf>

What changes with CCWIS?

- The focus changes to data and quality, rather than mandatory system functionality.
- CCWIS requires new data exchanges with education agencies, the courts, and Medicaid claims processing systems.
- The new regulation requires a data exchange standard for interfaces with service providers and other agency systems.
- The IV-E agency must develop a data quality plan, continue to monitor data quality, and implement responsive actions to address findings found in data quality reviews.
- Finally, the CCWIS regulations encourage agencies to build a child welfare information system tailored to their business needs rather than to federal functional requirements.

What does not change?

- Building a CCWIS, like SACWIS or TACWIS, remains optional. You may continue to use your current system for the rest of its expected lifespan as a CCWIS (with some changes) or a non-CCWIS.
- The CCWIS system serves as the primary data resource for case tracking, federal reporting, and program management and administration.
- Federal funding may be claimed for system development, or operations and maintenance at rates specified in the regulation.
- Whether a IV-E agency elects to build a new system, modify an existing system to meet CCWIS requirements, or continue to use an existing system as a non-CCWIS, the system should operate efficiently, with reasonable and appropriate project costs.

Why is a new regulation needed?

SACWIS regulations were published in 1993 and reflected then-current child welfare practice and technology. Changes in practice and service delivery models, advances in technology, and the extension of funding to tribal title IV-E programs all pointed to the need for more flexibility to build systems sized to the needs of the IV-E agency that could collect data from a variety of sources. Under CCWIS regulations, states and tribes have the flexibility to determine the size, scope, and functionality of their information system. Your agency can now obtain service and client data directly from other information systems operated by local or private agencies. The regulation also gives your staff more latitude in selecting development and technology approaches.

What immediate action is required by the new regulation?

The child welfare program and information technology staff who support your current child welfare information system should evaluate the new regulation and determine the automation approach that best fits your agency's business needs and available resources. The CCWIS regulation provides a 24-month transition period for states and tribes to decide if they will use an existing system as the starting point for a CCWIS application. Before August 1, 2018 a title IV-E agency considering whether it wants to use an existing system as the basis for a CCWIS must decide whether it will:

- transition its existing S/TACWIS or non-S/TACWIS system to a CCWIS; or
- designate its current system as a non-CCWIS.

Timing is important: if you elect to initiate a transition of an existing system to a CCWIS before the end of the transition period, your system will be exempt from the new CCWIS design requirements. If you delay the decision until after August 1, 2018, a new CCWIS project must meet all requirements, including the design requirements described 45 CFR 1355.53. Before the end of the 24-month transition period, your agency must inform ACF in writing of its decision to transition an existing system to a CCWIS, or non-CCWIS. System modification or development activity does not have to be completed within that transition period. If your agency's decision is to replace your current system with a CCWIS, that new system may be built at any time during or after the transition period.

How does the new regulation affect our federal claims for our SACWIS or TACWIS expenses?

CCWIS cost allocation and federal financial participation rules are at 45 CFR 1355.57

During the transition period, agencies with a former S/TACWIS application may continue claiming title IV-E funding according to the agency's approved S/TACWIS cost allocation methodology for system development, and operations and maintenance. After August 1, 2018, revised cost allocation provisions will apply to all systems depending on whether they meet the CCWIS regulations or not. Your agency should examine the cost allocation differences between the two models, and evaluate agency resources as you make your decisions during the transition period. It is important to remember that title IV-E funding at the 50% rate is available for both CCWIS and non-CCWIS applications, and a new CCWIS project may be started during or after the transition period. The advantage of a CCWIS is that eligible system cost may be claimed as title IV-E without considering the eligibility ratio of the foster care children in care. You should talk to your federal state systems analyst if you have questions about CCWIS and non-CCWIS cost allocation methodologies.

How can we get assistance in understanding the new regulation?

Throughout the transition period, ACF will deliver webinars, develop technical assistance briefs, and offer guidance responsive to state and tribal concerns and emerging issues. Your program and technology staff are encouraged to contact their assigned federal analyst within the Division of State Systems to discuss any questions and concerns, and to explore your agency's available options.

Please send your CCWIS questions to: CCWIS.Questions@acf.hhs.gov