Comprehensive Child Welfare Information System (CCWIS)

Technical Bulletin #7: CCWIS Technical Assistance, Self-Assessment Tools, and Monitoring Reviews

August 26, 2021

This technical bulletin provides title IV-E agencies that develop a CCWIS with information about technical assistance, self-assessment tools, and monitoring reviews.
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1. Purpose of the Technical Bulletin (TB)

This TB provides title IV-E agencies that develop a CCWIS with information about technical assistance (TA), self-assessment tools, and TA monitoring reviews. It is intended to help ensure a CCWIS project completes a successful CCWIS Assessment Review (CAR) while continuing to build technology capacity to support child welfare program and business needs.

This TB and the CCWIS self-assessment tools will be updated periodically to reflect program and technology changes. The most recent versions of these documents may be found at https://www.acf.hhs.gov/cb/research-data-technology/state-tribal-info-systems/federal-guidance.

2. Audience

This TB may assist agency staff responsible for CCWIS project development, implementation, and management. We recommend that child welfare program staff also review the TB to understand how CCWIS TA supports program implementation.

3. CCWIS Background

On June 2, 2016, ACF published the final rule for CCWIS. The CCWIS final rule replaced the rules for Statewide or Tribal Automated Child Welfare Information Systems (S/TACWIS) in 45 CFR § 1355 and provided a 24-month transition period from the rule’s effective date. The transition period, which ended on August 1, 2018, allowed agencies time to make one of the following decisions:

- transition an existing S/TACWIS or non-S/TACWIS system to a CCWIS
- designate a current system as a non-CCWIS
- build a new CCWIS

Ongoing point-in-time review: An agency with a CCWIS project is subject to ongoing point-in-time reviews of a specific module(s), (“TA monitoring reviews”):

ACF will review, assess, and inspect the planning, design, development, installation, operation, and maintenance of each CCWIS project on a continuing basis, in accordance with APD requirements in 45 CFR part 95, subpart F, to determine the extent to which the project meets the requirements in §§ 1355.52, 1355.53, 1355.56, and, if applicable, § 1355.54.\(^1\)

CCWIS Assessment Review (CAR): An agency with a CCWIS is also subject to a CAR (45 CFR part 95, subpart F). A CAR is a holistic and comprehensive CCWIS review and is typically conducted one to two years after the CCWIS is fully operational. The CAR process will be based on federal regulations applicable to CCWIS described at 45 CFR § 1355.50-59.

4. CCWIS TA Process

CCWIS ongoing TA activities and TA monitoring reviews may occur throughout the project lifecycle (planning, development, implementation, and operations) and are largely based on key milestones, automated functions, and scheduled activities approved in the agency’s APD. ACF provides such ongoing reviews, assessments, and inspections through a collaborative TA process that typically occurs

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\(^1\) 45 CFR § 1355.55
during regular monthly teleconferences but may also be offered through webinars, remote system demonstrations, training, agency-specific requests, and scheduled onsite or virtual visits (called hereafter the “TA process,” “TA activities,” and “TA monitoring reviews”).

The goals and functions of TA activities and TA monitoring reviews are not mutually exclusive and may overlap based on timing or type of project. Table 1 below provides some examples of the TA activity categories.

Table 1: Categories of TA Activities

<table>
<thead>
<tr>
<th>TA Activities</th>
<th>Self-Assessment Tools</th>
<th>TA Monitoring Reviews</th>
<th>CCWIS Assessment Review (CAR)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Capacity building</td>
<td>Operationalizes regulations and program requirements</td>
<td>Early identification of potential compliance issues</td>
<td>Compliance and system integration</td>
</tr>
<tr>
<td>• Agency or ACF initiated to explore TA options or training needs</td>
<td>• Voluntary</td>
<td>• Point-in-time, team-based review</td>
<td>• Typically completed one to two years after a CCWIS is fully operational</td>
</tr>
<tr>
<td>• As needed or planned</td>
<td>• Six program tools</td>
<td>• Iterative</td>
<td>• Builds on observations from TA monitoring reviews</td>
</tr>
<tr>
<td>• Technology, project management, and/or program related</td>
<td>• Nine system tools</td>
<td>• Onsite or remote</td>
<td>• Interviews with stakeholders and end users</td>
</tr>
<tr>
<td></td>
<td>• Can be used in planning through post-production</td>
<td>• One module or many</td>
<td>• Focus is on outstanding issues</td>
</tr>
<tr>
<td></td>
<td>• Includes resources and additional considerations</td>
<td>• Design and/or program</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Strengthens the connection between program and technology</td>
<td>• Focus of review is negotiated</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Interviews held when possible</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Summary letter issued</td>
<td></td>
</tr>
</tbody>
</table>

The TA activities, self-assessment tools, and TA monitoring reviews discussed in this TB are applicable to agencies with transitioning systems and those building new CCWIS. ACF has designed the TA and TA monitoring review process to be flexible and some differences will exist in the timing and scope of activities depending on the agencies’ choice to transition or build a new system.

4.1. CCWIS TA Principles

ACF is committed to continuous learning and partnering with agencies as systems are developed. CCWIS TA activities are incremental and collaborative, combining regular self-assessment and APD reporting by the agency, remote system demonstrations and interviews, and onsite or virtual TA monitoring review activities. Agency staff members are encouraged to discuss project progress and TA needs in regular monitoring phone calls with the assigned federal analyst ([https://www.acf.hhs.gov/cb/resource/state-tribe-assignments](https://www.acf.hhs.gov/cb/resource/state-tribe-assignments)).
TA activities are collaborative efforts between the agency and ACF. The primary goal of the CCWIS TA process is to assist agencies with meeting federal CCWIS and APD requirements while continuing to build technology capacity to support child welfare program and business needs. CCWIS self-assessment tools and corresponding TA help ensure the agency is following the federal regulations applicable to CCWIS while meeting the agency’s program needs. Principles that govern the CCWIS TA process include:

- Supporting collaboration between ACF and the agency based on specific project plans and needs and/or high-risk areas affecting project success.
- Supporting ongoing self-assessment by the agency to encourage internal reviews and continuous improvement while ensuring alignment with federal regulations applicable to CCWIS and agency program needs.
- Aligning ACF initiatives, program requirements, and federal reporting systems to leverage shared investments. (Examples of other ACF initiatives, program requirements, and federal reporting systems include the Child and Family Service Reviews (CFSR); title IV-E Eligibility Reviews; the Adoption and Foster Care Analysis and Reporting System (AFCARS); the National Youth in Transition Database (NYTD); and the National Child Abuse and Neglect Data System).
- Involving agency leadership and program staff as well as project and technology teams.
- Supporting continuous open discussions, learning opportunities, and TA to build capacity in child welfare technology systems and to identify, mitigate, or eliminate project risks.
- Encouraging involvement of multiple stakeholders and system users throughout the system lifecycle process to ensure positive and successful user experiences.
- Promoting resources and additional considerations that support the design of an efficient, economical, and effective CCWIS.
- Incorporating “lessons learned” to continually improve TA and support the implementation of an effective CAR process.

4.2. CCWIS TA Activities and Monitoring Reviews

Central to all TA activities and monitoring reviews is an evaluation of how the system supports the efficient, economical, and effective administration of the title IV-B and IV-E plans under 45 CFR § 1355.52(a). ACF expects system development and implementation to align with key agency priorities, which means system support is a continual process as new practice and policy needs occur. In this respect, a CCWIS will need to be updated to support the agency’s evolving child welfare business needs and comply with changes to federal and state or tribal statute and regulations. As technology evolves, the CCWIS should be reevaluated to take advantage of more modern architecture and innovative solutions.

The ACF TA activities and TA monitoring reviews are aimed at helping an agency:

- Document and demonstrate it has planned its system to conform to federal CCWIS and APD requirements.
- Assess if a CCWIS is built modularly and meets CCWIS design requirements.

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2 45 CFR § 1355.52(a) through (c)
• Assess how the system supports continuous improvement in child welfare service delivery, aligns with the agency goals and objectives, and reflects the child welfare business processes and agency workflows.

• Proactively identify risks, system shortcomings, or deficiencies in system planning, design, and/or implementation.

• Identify gaps and determine strategies for improvement, change in scope, risk mitigation, or course correction.

• Identify the need for additional TA or further federal guidance.

• Resolve potential or outstanding compliance issues prior to the CAR.

4.3. CCWIS TA Timing

CCWIS TA activities may occur throughout the project lifecycle and are based on key milestones, automated functions, and scheduled activities approved in the agency’s APD.

CCWIS TA may include a TA monitoring review of the system or module(s) for early identification of gaps, risks, missing elements or components, inadequate or poor design, or any issue that would lead to an agency not meeting the requirements in the federal regulations for CCWIS or its APD. TA activities can be conducted onsite at the state/tribe, virtually, or both. Typically, the TA process includes voluntary activities whereby the agency acknowledges its need for additional training, guidance, or assessment from federal staff to better understand federal regulations applicable to CCWIS and requirements.

TA activities and TA monitoring reviews do not follow a regimented linear process but are cyclical and meant to provide opportunities for continuous assessment, gap identification, ongoing learning, and frequent feedback as technology solutions evolve and business processes change. While project schedules and CCWIS models are unique, a typical TA cycle may occur as highlighted in Figure 1.
Key milestones or triggers for TA activities and TA monitoring reviews may include:

- Agency is in planning stage and seeking approval of a planning APD.
- Agency moves from planning to the development phase or is preparing the implementation APD.
- Agency is in procuring phase and/or planning procurement for a CCWIS vendor.
- Agency is requesting assistance in change management or stakeholder involvement.
- Agency completes development of a module or key automated function.
- Agency is preparing to or has recently implemented/rolled out a module or key automated function to system users.
- Agency is contemplating a shift in project approach or a change in vendor(s).
- Agency has missed a key deliverable or milestone, is over budget, or has identified significant project risks.
- Independent verification and validation (IV&V) and system monitoring activities reveal unmitigated risks, protracted issues, or other management or resource deficiencies.
- Agency or federal analyst requests a review to assess a project need or concern.
- Agency is integrating CCWIS development plans within a shared enterprise project that involves other HHS programs.
- The project is nearing completion or is moving from development to operational phase.
- A CCWIS Data Quality Biennial Review identifies risks, needs, or concerns.
- Significant technical needs or concerns are identified in other federal, state, or tribal reviews (CFSR, title IV-E reviews, AFCARS, NYTD, state/tribal audit, etc.).
The availability of staff, resources, funding, or other factors may affect TA timing and scheduling. However, ACF believes regular TA is an important aspect of federal oversight of shared investments. The APD process and regular contact between the agency project staff and the assigned federal analyst provide opportunities to review project progress and identify and address critical barriers.

ACF may not conduct a TA monitoring review of every automated function developed within the CCWIS. During system development and as part of TA activities, ACF and the agency will agree on a select set of automated functions to be reviewed. ACF may ask agencies to complete a self-assessment to guide TA review activities and to prepare for and simplify the CAR process. However, use of the self-assessment tools is not required.

Agencies should consider the APD documents and accompanying documentation (e.g., data quality plan, other quality assurance/quality control process documents, biennial reviews, contracts, project plans, automated functions list, system requirements, system documentation, system code, risk logs, IV&V reports, security plan) as key artifacts that may support TA and CAR activities. Although APD documents are typically submitted annually, the agency may wish to set aside time midway through the APD cycle to discuss and review accompanying documentation and self-assessment activities.

4.4. CCWIS TA Processes, Activities, and Outcomes

ACF will work with agencies to conduct TA activities and TA monitoring reviews as systems are developed. Use of the self-assessment tools significantly reduces compliance issues and encourages agency staff to regularly discuss methods and evidence documented on the tools with the assigned federal analyst. While TA monitoring reviews of design requirements may require a substantial amount of time and effort, most TA activities will be largely informal and provide staff with an open environment to discuss challenges, risks, and progress.

During the TA process, the agency will:

- Negotiate the timing of TA activities.
- Work with federal and agency staff to clarify the content and scope of activities and TA monitoring reviews, collaborate on agenda development, and define necessary preparations.
- Address any program- or CCWIS-related questions from ACF.
- Establish expectations for the outputs and outcomes.

ACF may provide a summary describing TA activities, challenges, and opportunities. ACF may request the agency to update status and progress for identified challenges in future APD documents. The TA process will inform the development of the CCWIS CAR process ACF conducts under 45 CFR part 95, subpart F and § 1355.55.

The regulations at CFR § 95.621 provide examples ACF may use when reviewing agencies, which may include, but are not limited to TA monitoring reviews during the stages outlined below in Table 2.
<table>
<thead>
<tr>
<th>Stage</th>
<th>Example Questions</th>
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</table>
| Planning (Pre-installation Readiness) | Has the agency conducted a business process review to ensure the future system will meet program needs?  
|                           | Is the agency considering and documenting CCWIS design requirements?              |
|                           | Is the agency collaborating with stakeholders, including any CWCAs?              |
|                           | Does the agency plan describe effective sponsorship, governance, project management, budget controls, and staffing resources?  
|                           | Is the agency addressing data quality during preparatory activities?              |
|                           | How is the agency planning to convert legacy data?                                |
|                           | Does the agency have resources and a plan to effectively evaluate and monitor vendor performance?  
|                           | Does the vendor contract describe reasonable transition, ongoing support plans, warranty language, and system acceptance criteria?  
|                           | Has the agency documented a data model to link automated functions to child welfare program needs and outcomes?  
|                           | Has the agency documented how CCWIS functions will operate as a coordinated/seamless system?  |
| Development               | Are the CCWIS objectives being accomplished?                                     |
|                           | Is federal financial participation used as intended?                             |
|                           | Does the CCWIS meet design and exchange requirements?                            |
|                           | Are stakeholders involved and consulted as the project evolves?                  |
|                           | Are project costs and timelines within agency expectations outlined in the implementation APD and annual APD updates?  
|                           | Is testing automated, adequate, and effective?                                   |
|                           | Is software delivered as planned?                                                |
|                           | Are the data model and data dictionary easy to understand and consistently used?  
<p>|                           | Does the development methodology include a discovery process to understand user needs and share progress incrementally to adapt functionality and ensure user needs are understood and met?  |
| Implementation (Post-Installation &amp; Utilization) | Is the CCWIS used as intended?                                                  |
|                           | Is the CCWIS supporting program requirements?                                    |
|                           | Is the CCWIS efficient, economical, and effective?                              |
|                           | Do reporting tools accurately reflect current and historical data?                |
|                           | Is the agency using an effective change management process?                      |</p>
<table>
<thead>
<tr>
<th>Stage</th>
<th>Example Questions</th>
</tr>
</thead>
</table>
|                              | • Are users adopting the new system to complete their assignments?  
|                              | • Are bugs and defects resolved timely?  
|                              | • Is sensitive data handled appropriately?  
|                              | • Is system training current and effective?  
| Maintenance & Operations     | • Is the CCWIS kept current to meet new data collection, exchange, or practice requirements?  
|                              | • Is the CCWIS kept current to meet the field’s evolving needs?  
|                              | • Is the CCWIS using recognized industry security standards and kept up to date as new risks are identified?  
|                              | • Are efforts ongoing to engage users to prioritize updates and address pain points?  
|                              | • Does the agency use and rely on statewide data from the CCWIS to support program evaluation and outcome performance? |

5. Preparing for CCWIS TA

Preparation for TA activities may vary depending on circumstances, resource availability, and an agency’s project needs. Frequent TA and use of the CCWIS self-assessment tools assist the agency in understanding regulations applicable to CCWIS, resolving issues to strengthen the system, and preparing for the CAR. Ideally, ongoing TA activities will result in early identification and resolution of key issues that would render the system “noncompliant” during a CAR. Preparation activities require vigilance and openness to identify potential issues.

Preparing for TA activities may include:

**Documentation & Product Updates**

• Completing a voluntary assessment utilizing CCWIS self-assessment tools, agency documents, other templates, or processes that may help to identify concerns or issues for which TA might be helpful.

• Sharing relevant and up-to-date system documentation with ACF in advance.

• Providing overviews and guidance to ACF in reviewing artifacts stored in title IV-E agency document repositories well in advance to allow time for questions and follow-up documentation requests.

• Ensuring the system is designed as described in the APDs and noting possible discrepancies or concerns for the federal team.

**Scheduling & Agendas**

• Reviewing agency schedules to anticipate dependencies or constraints that would affect TA activities (e.g., APD due dates, budget cycles, other audits/reviews).

• Negotiating agenda topics and targeting activities to assist the project.
• Anticipating key discussions and decisions that may need to occur.
• Establishing goals and expectations for the TA activities.
• Providing opportunities for questions and dialogue throughout the process to allow agencies to prepare.
• Building in time on the agenda to assess how review activities are progressing and determine if they should be adjusted based on identified issues.
• Modifying ongoing development schedules to free up resources during a TA review to reduce risk of system glitches during a system demonstration.

Participants
• Inviting key participants to participate in TA activities (e.g., system users, agency leadership, project staff, county-based staff, CWCA staff, other stakeholders, departments, agencies) with advance notice.
• Ensuring there is active representation from project and program teams during key conversations and demonstrations.
• Communicating activities with stakeholders and anticipating “what to expect.”
• Reviewing stakeholder and user feedback in advance to anticipate issues that may come up and to demonstrate proactive risk mitigation/project management.
• Clarifying when vendor staff should be present.

Demonstrations
• Preparing examples in advance to demonstrate common business needs.
• Practicing system demonstrations and anticipating questions federal analysts may ask during the demonstrations.
• Providing a description, overview, and crosswalk between business processes and system functionality to demonstrate that the system or module(s) reflects business processes and meets program needs.
• Proactively communicating system shortcomings, missing or incomplete code, processes and procedures not working as planned or designed, and user feedback.
• Reviewing and obtaining any confidentiality/security approvals and/or agency specific documentation before system demonstrations.
• Completing CCWIS self-assessment tools for the functionality being demonstrated to identify potential risks or issues, if the agency so chooses.

Follow-up
• Anticipating additional time after the TA is provided for followup activities (e.g., questions, providing additional documentation, assessing future needs).
5.1. Virtual TA Monitoring Reviews

While preparation for virtual TA monitoring reviews will mirror those of onsite reviews, there are additional considerations:

- Recognizing and planning for time zone differences, if applicable.
- Ensuring connectivity to a virtual meeting platform is available and working properly.
- Creating a plan for technology/communication interruptions.
- Providing the opportunity and technology to host concurrent breakout sessions.
- Anticipating additional time on agendas for discussions and TA that are typically handled with breakout sessions or informal conversations during an onsite visit.
- Sharing artifacts and review documents via multiple methods (email, in appointments, on the screen, etc.) Designating a “note taker” for questions and follow-up items.
- Scheduling adequate time for the staff to understand what to expect. This may require periodic check-ins.
- Limiting virtual activities to reasonable timeframes and ensuring breaks are built into the schedule to eliminate participant fatigue and overload.

5.2. TA Design Reviews

TA may include a TA design review to support the agency’s conformance to CCWIS design requirements at 45 CFR § 1355.53. Due to the technical nature of these design reviews, they may require more time, resources, and specialized knowledge than other TA activities. As with other TA, ACF will negotiate the timing of TA design reviews with agencies. The following table is a non-exhaustive list of artifacts that ACF may request as part of a TA design review.

Table 3: Artifacts for TA Design Reviews

<table>
<thead>
<tr>
<th>API Documentation</th>
<th>Logical Data Models</th>
</tr>
</thead>
<tbody>
<tr>
<td>Architecture Documents</td>
<td>System Design Documents</td>
</tr>
<tr>
<td>Boundary Diagram</td>
<td>System Requirements Specification</td>
</tr>
<tr>
<td>Configuration Management Plan</td>
<td>System Security Plan</td>
</tr>
<tr>
<td>Data Processing Documents</td>
<td>Test Plans</td>
</tr>
<tr>
<td>Interconnection Security Agreements</td>
<td>Unified Modeling Language (UML) Diagrams</td>
</tr>
<tr>
<td>Interface Control Documents</td>
<td></td>
</tr>
</tbody>
</table>

6. Barriers to Compliance With Federal Regulations Applicable to CCWIS

A CCWIS must comply with regulations applicable to CCWIS at 45 CFR § 1355.50-59. The voluntary CCWIS self-assessment tools described in section 7 assist the agency in resolving compliance issues early to reduce burden and potential findings in the CAR process. The following table of CCWIS requirements and examples of possible barriers to a compliant CCWIS (and a successful CAR) is provided as TA and is not an exhaustive list.
### Table 4: Potential Barriers to Successful CCWIS Assessment Reviews (CARs)

<table>
<thead>
<tr>
<th>CCWIS Requirements</th>
<th>Example of Barriers</th>
</tr>
</thead>
</table>
| The system must support the efficient, economical, and effective administration of the title IV-B and IV-E plans.  
*45 CFR § 1355.52 (a) and (b)(1)*                                                   | Example 1: Users must re-enter the same demographic data in multiple modules when a child is adopted or moves to a new placement.  
Example 2: The system design creates duplicate records such as duplicate persons or providers and does not have prompts or controls to assist users with structuring records efficiently.  
Example 3: The system is inefficient and requires manual data entry of all payment records when a placement change occurs due to the lack of automation support for common corrections or expected data changes.  
Example 4: The CCWIS meets functional requirements but due to poor design, users struggle when navigating the system, leading to inefficiencies, lengthy workarounds, or offline processes.  
Example 5: The CCWIS does not maximize automation to support everyday child welfare activities such as easily reviewing historical case information or conducting streamlined and flexible searches.  
Example 6: The CCWIS cannot easily be enhanced to ensure evolving business needs are supported. The system does not support the practice model or program needs. |
| A CCWIS must maintain data needed to support federal and agency requirements.  
*45 CFR § 1355.52 (b) and (c)*                                                      | Example 1: The CCWIS does not maintain all required federal data.  
Example 2: The semiannual AFCARS submission does not meet established data quality standards.  
Example 3: Title IV-E eligibility data is not collected consistently across the agency.  
Example 4: The system does not generate or make readily available data to support CFSR System Factor #1 [Item #19], which asks, “*How well is the statewide information system functioning statewide to ensure that, at a minimum, the state can readily identify the status, demographic characteristics, location, and goals for the placement of every child who is (or within the preceding 12 months, has been) in foster care?”* |

<table>
<thead>
<tr>
<th>CCWIS Requirements</th>
<th>Example of Barriers</th>
</tr>
</thead>
</table>
| An agency with a CCWIS must develop and maintain a comprehensive data quality plan; coordinate with CWCAs to support complete, timely, accurate, and consistent CCWIS data; actively monitor and manage data quality; and complete biennial data quality reviews.  
*45 CFR § 1355.52 (d)* | Example 1: The agency is not developing, implementing, or maintaining a data quality plan.  
Example 2: The system cannot provide user-access to data, or the system reports are outdated and/or provide incorrect information.  
Example 3: The agency has not completed a biennial data quality review as required.  
Example 4: The agency is not documenting or monitoring progress in achieving data standards for completeness, timeliness, or accuracy. |
| An agency with a CCWIS must support collaboration, interoperability, and data sharing through data exchanges, including:  
- Systems generating the financial payments and claims for titles IV-B and IV-E, if applicable;  
- Systems operated by CWCAs performing activities described in 1355.52 (b), if applicable;  
- Each system used to calculate one or more components of title IV-E eligibility determinations, if applicable; and  
- Each system external to CCWIS used by agency staff to collect CCWIS data, if applicable.  
*45 CFR § 1355.52 (e)(1) and (g)* | Example 1: Exchanges are not implemented as planned in the project schedule.  
Example 2: No data-sharing agreement or documentation that describes the data elements, data exchange standards, and/or confidentiality requirements exist.  
Example 3: A CWCA is performing child welfare activities and documenting them in an external system, and the data is not shared with or available in the CCWIS. |
| To the extent practicable, an agency with a CCWIS must also have bi-directional data exchanges with:  
- Child abuse and neglect system(s);  
- Systems operated under Title IV-A of the Social Security Act (the Act);  
- Systems operated under Title XIX of the Act including:  
  - Systems to determine Medicaid eligibility described in 42 CFR §* | Example 1: Exchanges are not implemented as planned in the approved APD project schedule with no clear explanation of the delay and/or barriers.  
Example 2: The agency has not created or maintained a data-sharing agreement and/or other system documentation for each exchange that addresses data elements, data exchange standards, and/or confidentiality requirements.  
Example 3: Exchanges are not bi-directional or sufficiently automated to achieve the expected |
<table>
<thead>
<tr>
<th>CCWIS Requirements</th>
<th>Example of Barriers</th>
</tr>
</thead>
<tbody>
<tr>
<td>433.111(b)(2)(ii)(A); and • Medicaid Management Information Systems, as defined at 42 CFR § 33.111(b)(2)(ii)(B); • Systems operated under Title IV-D of the Act; • Systems operated by the court(s) of competent jurisdiction over title IV-E foster care, adoption, and guardianship programs; and • Systems operated by the state or tribal education agency, or school districts, or both. 45 CFR § 1355.52 (e)(2)</td>
<td>efficiencies in work processes or effectiveness of program service-delivery. Example 4: The agency has taken no concrete steps to establish what is “practicable” or possible to support the exchange or sharing of information to support child welfare program needs. Example 5: The data exchange does not maximize automation and relies on manual processes, duplicate data entry, external access, or fragmented/manual error corrections.</td>
</tr>
<tr>
<td>The CCWIS must improve efficiency and promote common understanding with a data exchange standard that applies to exchanges with CWCAs and with ancillary systems used by agency staff. 45 CFR § 1355.52 (f)</td>
<td>Example 1: The CCWIS is not utilizing an APD-approved data exchange standard in the data exchanges with the CWCAs or other applicable ancillary systems. Example 2: Local child welfare agencies utilize duplicated non-statewide systems and/or automated functions to complete safety assessments.</td>
</tr>
<tr>
<td>Title IV-E eligibility functionality must not be duplicated in the CCWIS and other external systems. 45 CFR § 1355.52 (a)(3) and (i)(1)(iii)(B)</td>
<td>Example 1: Practice in the agency is inconsistent. For example, some local offices use paper eligibility processes while others use the CCWIS. Example 2: The CCWIS has licensing/recruitment functionality duplicated in a third-party external system the agency uses to complete child welfare activities. Example 3: The CCWIS requires duplicate data entry in multiple modules/functions.</td>
</tr>
<tr>
<td>The system must support key program outcomes and agency/stakeholder business needs. 45 CFR § 1355.52 (a) and (b)</td>
<td>Example 1: The CCWIS does not appear to match or meet the agency’s business needs as identified by users or the agency’s program team. Example 2: Users report that the CCWIS business rules do not match established practice and policy. Example 3: Users report that the CCWIS is difficult to use, is inaccurate, or creates unnecessary work for processing day-to-day tasks, such as a case plan.</td>
</tr>
</tbody>
</table>
CCWIS Requirements | Example of Barriers
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Example 4: The agency does not have an established method or ongoing process to identify and incorporate user feedback to ensure the CCWIS stays relevant and meets business needs.

The CCWIS must meet the CCWIS design requirements, including using a modular design.

**45 CFR § 1355.53**

Example 1: The automated functions are not designed and developed utilizing a modular framework. The business rules are not separate from core system programming.

Example 2: Documentation and supporting materials for the automated functions are not written in plain language.

Example 3: A standards-based framework was not used in the design and development of automated functions.

Example 4: The CCWIS automated functions are not shareable or severable.

7. **CCWIS Self-Assessment Activities**

ACF has created a series of voluntary CCWIS self-assessment tools to assist agencies with understanding CCWIS regulations, improving project implementation, and documenting progress as modules, or functions, are developed. These tools include resources and additional considerations agencies may consider when developing their CCWIS.

ACF encourages agencies to utilize the self-assessment tools to document progress as CCWIS modules are developed. CCWIS supports multiple delivery options, therefore applicable TA activities and tools will depend on the agency-selected automated functions, exchanges, and design approach. For example, some tools that describe automated features may not be relevant if the agency’s CCWIS is largely a data repository and CCWIS data is collected in external systems. However, if the CCWIS consists of specific program modules, such as an intake module, ACF encourages the agency to use the self-assessment tools to regularly assess and document progress as system development occurs.

7.1. **CCWIS TA Tools**

CCWIS self-assessment tools assist agency staff with voluntary documentation of CCWIS project progress as the agency plans, develops, and deploys system functions. Agencies may use the self-assessment tools to determine what features will support federal and state or tribal child welfare program needs and document ongoing CCWIS progress. An agency may also use self-assessment tools as part of its ongoing project management practices and stored, as desired, by the project team. Utilizing the self-assessment tools better enables agencies to meet regulatory requirements for a CCWIS and successfully complete the agency’s CAR process ACF conducts under 45 CFR part 95, subpart F and § 1355.55.

When completing a self-assessment tool, an agency may export the questions and goals to another document reformatted if desired to make it easier to complete and/or meet agency needs. Agencies
may find overlap in the self-assessment tools and may provide some answers by referencing the same answer in other tools. Agencies may wish to attach screenshots, state or tribal policy, and other APD documents to describe project progress and demonstrate evidence for the goals noted in the self-assessment tools. If a required feature is not yet in production, the agency may document an expected completion date and/or reference the planned timeframe from the most recent APD update.

Types of Tools

TA self-assessment tools are divided into two categories. The first category includes tools that address overarching CCWIS requirements that include but are not limited to:

- Administration
- Child Welfare Contributing Agencies (CWCAs)
- Data Exchanges
- Data Quality
- Design
- Finance
- Reporting
- User Experience
- Security

The second category includes tools that address child welfare program requirements that include but are not limited to:

- Adoption
- Case Management
- Eligibility
- Foster Care and Service Provider Management
- Intake
- Investigation

Agencies are encouraged to use the self-assessment tools to regularly assess and document system development to identify and resolve potential compliance issues.

Agencies can use the last section of each tool to highlight examples of best practices, resources, or additional considerations. ACF also encourages agencies to document “lessons learned” and engage CCWIS users as part of their ongoing self-assessment process to ensure the CCWIS is user-friendly and meets program and policy expectations.
7.2. Format

The format of the CCWIS self-assessment tools generally comprises several sections, as described below.

Sections Common to All Tools

- **Introduction**: Provides high-level description of the tool, purpose, and scope.
- **Tool Format**: Provides an outline for sections included in the tool.
- **Overview and Background Information**: Summarizes information (users, interfaces, status updates) for automated functions/modules.
- **Goals**: Summarizes how the CCWIS supports core program goals or business needs.
- **Resources and Additional Considerations**: Contains examples of external resources and best practices agencies may want to consider incorporating into their CCWIS design. The examples provided are not exhaustive and are not required. They are a list of system features, automated functions, industry standards, and recommended practices agencies may consider when building a CCWIS. Agencies may add examples of best practices from their system they wish to highlight.

Sections Common to Design, Reporting, and Program-Area Tools

- **Foundational Requirements**: Summarizes mandatory federal regulations applicable to CCWIS and operationalizes compliance requirements.

Sections Common to Program-Area Tools

- **Functional Process Factors**: Contains examples of typical/historical functional process factors related to child welfare program automation needs. Functional process factors are useful features and processes based on typical program needs. These factors are not requirements, but they may be necessary for an agency to achieve an efficient, economical, and effective CCWIS. Functional process factors will evolve, and agencies may include additional factors based on local policies and needs.
- **Data Elements**: Contains examples of useful data elements to achieve an efficient, economical, and effective CCWIS. Data elements will evolve, and agencies may include additional data elements to support local business needs.
Appendices

This TB includes several voluntary self-assessment tools. The tools in this TB's appendices of may be updated periodically based on feedback from agency project staff, ACF's experience with these tools, and changes in law or technology. Additional tool examples may be developed as the TA monitoring review process evolves and this TB will be updated.

Appendix A – Adoption
Appendix B – Case Management
Appendix C – Foster Care and Service Provider Management
Appendix D – Intake
Appendix E – Investigation
Appendix F – Administration
Appendix G – Data Quality
Appendix H – Design Requirements
Appendix I – Design Scoring Sheet
Appendix J – Reporting
Appendix K – Security
Appendix L – User Experience