



Comprehensive Child Welfare Information System

Technical Bulletin #1:

Identifying and Reporting CCWIS Automated Functions

September 29, 2017

This technical bulletin provides title IV-E agencies that choose to develop a Comprehensive Child Welfare Information System (CCWIS) with information on identifying and reporting automated functions with either an Advance Planning Document (APD) or Notice of Intent (NOI).



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1. Purpose of the Technical Bulletin

This technical bulletin provides title IV-E agencies that choose to develop a CCWIS with information and examples for identifying and reporting automated functions on the Automated Function List that is required as part of the agency's APD or NOI submission.

2. Background

On June 2, 2016, The Administration for Children and Families (ACF) published the CCWIS final rule.¹ The CCWIS final rule replaces the Statewide and Tribal Automated Child Welfare Information System (S/TACWIS) regulations at 45 CFR 1355.50 – 59.² A CCWIS is a case management information system that title IV-E agencies may, at their option, develop to support their child welfare program needs. If a state or tribe elects to build a CCWIS, the federal government will provide a more favorable cost allocation than is provided for non-CCWIS systems.

The CCWIS final rule: (1) promotes data sharing with other agencies; (2) requires data quality plans; (3) reduces mandatory functional requirements; (4) allows agencies to build systems tailored to their needs; and (5) requires systems to be built modularly. The final rule also provides a transition period beginning on the effective date of the rule, August 1, 2016, and ending on July 31, 2018. The 24 month transition period allows title IV-E agencies time to decide if they want to use an existing system as the basis of a CCWIS application. Agencies may also decide to implement a new CCWIS either during or after the transition period.

If the total CCWIS project cost for transitioning an existing system or building a new CCWIS meets or exceeds the APD thresholds at 45 CFR 95.611,³ the title IV-E agency must submit the appropriate APD documents before claiming federal financial participation (FFP) in accordance with CCWIS cost allocation. If the total project cost falls below APD thresholds, the agency does not submit an APD but is required to submit a NOI.

Regardless of whether a title IV-E agency submits an APD or an NOI, the submission must include the CCWIS-specific content required by 1355.52(i)(1). The agency's submission must include an overview of the system and a list of the automated functions (Automated Function List) within the system. This Technical Bulletin provides guidance on identifying and reporting automated functions on the Automated Function List.

¹ The CCWIS final rule is available here: <https://www.gpo.gov/fdsys/pkg/FR-2016-06-02/pdf/2016-12509.pdf>

² Links to the current text of 45 CFR 1355.50 – 59 are available here:

<https://www.gpo.gov/fdsys/browse/collectionCfr.action?collectionCode=CFR&searchPath=Title+45%2FSubtitle+B%2FChapter+XIII%2FSubchapter+G%2FPart+1355&oldPath=Title+45%2FSubtitle+B%2FChapter+XIII%2FSubchapter+G&isCollapsed=true&selectedYearFrom=2016&ycord=1897>.

³ The text of 45 CFR 95.611 is available here: <https://www.gpo.gov/fdsys/pkg/CFR-2016-title45-vol1/xml/CFR-2016-title45-vol1-sec95-611.xml>



3. Identifying Automated Functions

Federal regulations at 1355.51(a) defines an “automated function” as “a computerized process or collection of related processes to achieve a purpose or goal.” This general definition may apply to a simple discrete process (e.g., conducting edit checks, or searching a list of persons), up to a complex collection of processes working together to support common child welfare activities (e.g., an intake automated function, or an investigation automated function). We believe that identifying each simple process as a CCWIS automated function would likely result in a very large, unwieldy Automated Function List for a CCWIS system.

We therefore encourage agencies to identify automated functions as collections of related processes (or independent modules), on their Automated Function List. It is important to understand that each such automated function will be made up of one or more simple processes (or independent modules).⁴ While it is possible to share smaller independent modules, we believe it is more efficient to share larger automated functions that connect related processes (or modules) to achieve a purpose or goal. Therefore, the title IV-E agency is not required to list all the simple computerized processes that make up a collection of related processes supporting a common child welfare activity (e.g., an intake automated function) because each simple computerized process (or independent module) alone is unlikely to be reusable by another title IV-E agency.

Title IV-E agencies are encouraged to list their automated functions by the child welfare business area the function supports, such as intake, investigation, eligibility determination, case planning, foster care placements, adoptions, and contract management. Agencies report that grouping components by the child welfare business area is helpful as it produces a smaller, more easily managed Automated Function List of easily recognizable business areas. Examples of grouping components that make up a single child welfare business area automated function are provided below:

- A title IV-E agency’s automated intake function can include a number of independent automated processes that collect data or contribute to its availability elsewhere in the system, such as: an automated search for prior history, an automated recording of voluntary or information-only contacts for workload documentation, an automated referral tracking capability, or an automated window that collects family demographics and relationships.

As noted above, the agency is not required to list all of the related processes (or modules) used to achieve the purpose or goal that make up the complex automated function. Therefore, on the Automated Function List, we encourage the title IV-E agency to group the related intake processes together and report them as part of a single potentially transferrable CCWIS intake automated function.

⁴ 45 CFR 1355.53(a) lists the CCWIS design requirements.



- Similarly, a title IV-E agency's automated case plan function may include a number of independent processes that: record and track client goals, manage case plan forms, or support outcome reporting.

On the Automated Function List, we encourage the title IV-E agency to group the related case plan processes together as part of a single potentially transferable CCWIS case plan automated function.

Title IV-E agencies may find it helpful to refer to historical documents⁵ that defined child welfare business functions for S/TACWIS when identifying their list of automated functions as many of the same business functions will need to be supported in CCWIS.

We note that other programs follow this practice of identifying and grouping automated functions according to an agency's major business areas. For example, the Centers for Medicare and Medicaid Services' (CMS) Medicaid Information Technology Architecture (MITA)⁶ defines business-aligned modules, which CMS summarized in its August 16, 2016 letter to State Medicaid Directors (SDM # 16-010)⁷, as follows:

- | | |
|------------------------------------|----------------------------|
| • Business Relationship Management | • Care Management |
| • Contractor Management | • Eligibility & Enrollment |
| • Financial Management | • Member Management |
| • Operations Management | • Performance Management |
| • Plan Management | • Provider Management |

We also note that some independent processes may support multiple automated functions and therefore are not easily grouped with a single automated function, such as automated routines that operate in the "background" supporting multiple automated functions. Examples include: a person search module used by both the intake and case planning automated functions, or the application program interface (API) routines and protocols that govern how the CCWIS modules and software processes will interact.

Title IV-E agencies are not required to separately list such modules in the Automated Function List. Instead, we encourage agencies to group and report modules used by multiple automated functions with other related processes, as discussed above. For example, a person search module used by both the intake and case planning automated functions would be included in the group of modules for each of these potentially transferrable automated functions.

However, a single module that does not support other automated functions is not grouped with

⁵ See Action Transmittal ACT-OISM-001 (issued: February 24, 1995), Part IV for a detailed listing of child welfare business function. It is available here: <https://www.acf.hhs.gov/cb/resource/at9501>

⁶ Information about MITA is available at: <https://www.medicaid.gov/medicaid/data-and-systems/mita/index.html>.

⁷ This letter is available at: <https://www.medicaid.gov/federal-policy-guidance/downloads/smd16010.pdf>



other modules and must be listed separately on the Automated Function List. We believe this will be a rare occurrence as modular systems, which are required by the CCWIS regulations, consist of modules interacting to support processes.

Finally, we remind agencies that the Automated Function List includes all automated functions in the CCWIS. This includes all new automated functions planned for development as well as existing automated functions of a transfer system that the agency intends to use in the CCWIS.

4. Reporting Automated Functions in the Automated Function List

Once you have identified the CCWIS automated functions, you must report them to ACF in the Automated Function List. Title IV-E agencies may develop their own format for the Automated Function List or use the formats ACF developed for agencies submitting an APD⁸ or an NOI.⁹ Regardless of whether the title IV-E agency plans to implement a new CCWIS or transition an existing system to a CCWIS, 1355.52(i)(1) requires the title IV-E agency to include in the Automated Function List all automated functions in the CCWIS and describe whether or not each function:

- Supports at least one requirement as described in 1355.52 or 1355.54;
- Is or is not duplicated within the CCWIS or systems supporting child welfare contributing agencies;
- Is consistently used by all child welfare users responsible for performance of that particular activity supported by the automated function; and
- Complies with CCWIS design requirements at 1355.53(a), or is exempt from the design requirement, by meeting conditions defined at 1355.53(b).

This information allows ACF to determine which automated functions may qualify for CCWIS cost allocation throughout the development and operation of the CCWIS.

The Automated Function List should not include automated functions in systems exchanging data with CCWIS, including:

- External systems developed by the title IV-E agency;
- Systems that support other mandatory CCWIS data exchanges or functions; and
- Systems supporting child welfare contributing agencies.

Systems that are external to the CCWIS are not eligible for CCWIS cost allocation.

⁸ The APD checklist is included with Information Memorandum (IM) ACYF-CB-IM-16-07 (issued: November 7, 2016) available here: <https://www.acf.hhs.gov/cb/resource/im1607>.

⁹ The Automated Function List for use with an NOI is included with IM ACYF-CB-IM-16-04 (issued: August 8, 2016) available here: <https://www.acf.hhs.gov/cb/resource/im1604>.