

| <b>IV-E Agency</b> | <b>Category</b>           |
|--------------------|---------------------------|
| New Jersey         | Move Goal to another Tool |
| New Jersey         | Move Goal to another Tool |
| Indiana            | Positive                  |

|            |                  |
|------------|------------------|
| Washington | Positive         |
| New Jersey | Suggested Edit   |
| Washington | General Question |

| Feedback   | Edits Made (or reason why no edits were made)  |
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| <p>Within each assessment they are collecting the same background information in each subject matter area. I understand that this may be specific to the subject matter being assessed (adoption, case management, etc.) but it may be more efficient to collect this information all at once. Create one separate assessment where the agency identifies their user base, shared data systems, status of the CCWIS, target dates, and possibly even their governance body/team that makes decisions for the direction of the CCWIS</p>  | <p>No edits. The decision to duplicate some of the background information is purposeful as agencies may be completing individual tools rather than the whole suite of tools.</p> |
| <p>The other option would be to consolidate all the sections into one tool and agencies can still use each section independently, then the universal collection of the background information mentioned in the first note would appear at the beginning of the one singular tool broken into sections. Some of the redundant exposition and instruction at the beginning of each tool could be eliminated too</p>  | <p>No edits. The decision to duplicate some of the background information is purposeful as agencies may be completing individual tools rather than the whole suite of tools.</p> |
| <p>the Indiana Department of Child Services (DCS) views the CCWIS self-assessment tools as helpful checklists, providing guidance for the overall compliance to CCWIS requirements. This is a good way for Indiana DCS to memorialize our CCWIS plan and share updates with the Administration for Children and Families (ACF) during monthly touch points. Indiana DCS appreciates the self-assessment tools being optional and voluntary. The high level program goals and requirements provided in the attachments may need some additional clarification, but that can be obtained through the ACF TA collaboration.</p> <p>Indiana DCS looks forward to any additional information on the CCWIS Assessment Review (CAR). If the self-assessment tools will be incorporated in the final CAR, Indiana DCS would like to know as early as possible in order to modify our CCWIS plan and approach to incorporate the documents.</p> | <p>No edits.</p>   |

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| <p>In review of the initial six proposed self-assessment tools, along with the DRAFT Technical Bulletin (TB) #7, CCWIS Technical Assistance and Compliance Review Process, DCYF supports the collaborative approach and partnership with the ACF.</p>  | <p>No edits.</p>   |
| <p>I think some of the non-specific info can be consolidated to make it less lengthy....also, too wordy and busy. Charts are okay.”</p>  | <p>No edits. The agency may use the particular background sections that are repetitive on each tool as preferred by the project. As some projects will have different background information for each of the modules and others may have similar information, we left those sections "as is" to support either agency scenario. Agencies may format information as applicable to the project. If an agency prefers to use charts rather than narrative boxes to respond to questions, it is free to do so. Subject matter/words were not deleted as information is needed to understand the particular module.</p> |
| <p>DCYF would like to understand if TA reviews and CAR will include transitional systems (grandfathered and known to not be developed under new CCWIS rules) beyond the newly required CCWIS interfaces and DQ plan; or will TA reviews and CAR be limited to new development (e.g. new modules developed under CCWIS regulations as needed to meet program/business need and/or new CCWIS systems)?</p> | <p>No edits. Question not specific to these documents. Will be addressed through regular technical assistance with this state.</p>   |

| <b>IV-E Agency</b> | <b>Category</b>          | <b>Goal/Requirement #</b> |
|--------------------|--------------------------|---------------------------|
| Pennsylvania       | Better Define or Clarify | G.A.02                    |
| California         | Suggested Edit           | G.A.02                    |
| Washington         | Positive                 | G.A.03                    |
| Washington         | Suggested Edit           | G.A.02                    |
| Pennsylvania       | Better Define or Clarify | G.B1.01                   |
| Pennsylvania       | Change Format            | G.B1.02                   |
| Pennsylvania       | Change Format            | G.B1.03                   |

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|--------------|--------------------------|--|
| Washington   | Suggested Edit           | G.B1.04                                  |
| Pennsylvania | Better Define or Clarify | G.B1.05<br>G.B1.06<br>G.B1.07<br>G.B1.08 |
| Washington   | General Question         | G.B1.08                                  |
| Washington   | Suggested Edit           | G.B1.08                                  |
| Washington   | Suggested Edit           | G.B2.01                                  |
| Kentucky     | Better Define or Clarify | G.B2.02                                  |

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|--------------|---------------------------|---------|
| Kentucky     | Better Define or Clarify  | G.B2.03 |
| Washington   | Suggested Edit            | G.B2.04 |
| Pennsylvania | General Question          | G.B2.05 |
| Pennsylvania | Better Define or Clarify  | G.C3.01 |
| Pennsylvania | Suggested Edit            | G.C3.10 |
| Pennsylvania | Comment                   | G.C3.11 |
| Pennsylvania | Comment                   | G.C3.12 |
| Kentucky     | Move Goal to another Tool | G.C1.02 |
| Kentucky     | Move Goal to another Tool | G.C1.04 |
| Kentucky     | Move Goal to another Tool | G.C1.05 |
| Kentucky     | Move Goal to another Tool | G.C1.06 |
| Kentucky     | Better Define or Clarify  | G.C1.09 |
| Kentucky     | Better Define or Clarify  | G.C1.11 |
| Kentucky     | Better Define or Clarify  | G.C3.01 |

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| Kentucky     | Better Define or Clarify | G.C3.02       |
| Kentucky     | Better Define or Clarify | G.C3.03       |
| Kentucky     | Better Define or Clarify | G.C3.04       |
| Kentucky     | Better Define or Clarify | G.C3.05       |
| Washington   | Suggested Edit           | G.C3.11       |
| Kentucky     | Better Define or Clarify | G.C3.13       |
| Washington   | Suggested Edit           | Overview      |
| Pennsylvania | Change Format            | Program Goals |
| Pennsylvania | Comment                  | Resource 1    |
| Pennsylvania | Suggested Edit           | Resource 1    |
| Washington   | Suggested Edit           | Resource 2    |







### Feedback

Due to PA having an Enterprise Case Management System, of which the Child Welfare Case Management System will be a part, how is ACF expecting PA to respond? There will be an Administration module used by multiple Program Offices, but the Admin module for Child Welfare should be different than that used by other Programs.

California suggests adding a list of examples of "programs beyond the child welfare program."

"Please identify external user groups that will access this function", this is very helpful to have this documented.

spelling of the word "publically". While "publically" has become an acceptable spelling and included in some dictionaries with the same meaning, "publicly" is actually the correct spelling,

This goal specific response doesn't provide sufficient details. There are many IT control instruments available e.g. COBIT that provide a comprehensive assessment of IT controls which includes people, processes and technology. For example a locked door at the computer room is a control not related to a module.

Hardware security is not a module or exchange. These program goals should not be tied to a module or exchange. These program goals would be better addressed at a system level.

This is not part of a module, it is disaster recovery and continuity of operations. Potentially need to reconsider this whole section in order to achieve what ACF is looking for.

Suggest breaking these in to 3 goals:

- o Purging/Archiving
- o Sealed records (archived or not)
- o Auditing/Action Logging

Not sure if this is the correct tool or location for this comment, but another function goal should be that it allows for the merging (and Unmerging) of people, cases, and providers to ensure data can be corrected for accuracy. Allow for all merges and un-merges to be tracked (who did the action, what data was changed, allow to trace back to prior to the merge by retaining information on old ID's and new ID's with status). This is a data quality issue found in many of the transitioned SACWIS to CCWIS systems.

Retain minimal information on expunged/deleted records to trace that the record existed and has been expunged/deleted.

Items G.B1.05 - G.B1.08 are confusing, as they are totally different from the preceding items, which all seem to pertain to IT security. These functions seem to be more common functions than Administration functions.

Does search have to be a global admin function or can it be a function within each module with rules specific that module?

add in the capability to identify potential duplications in data/persons to search functions to support data quality.

is very broad and would be easy to overlook some specific requirements that should definitely be included. Maybe at a minimum, adding the federal program goals, outcomes, and reporting requirements to be met in a separate Foundational Requirement, then have state and/or tribal program goals, outcomes, and reporting requirements more broad to allow the title IV-E to add in those that are relevant to their system.

Need to better, more narrowly, define the definitions of federal audits, reviews

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| Need to clarify what this foundational requirement means  |
| We believe duplication functionality is allowed, just not allowable for FFP / CCWIS funding, so should this include something regarding documenting where duplication exists, plan to remove duplication or how the duplication will be addressed to ensure FFP funding is accounted for in that function? (e.g. G.C3.01) |
| Similar comment to Intake and Investigation. What level of information is ACF recommending here to demonstrate compliance?  |
| Please define "comprehensive staff information". What is meant by this?   |
| This requirement implies a structure and sophistication that is not required to accomplish the stated business purpose to assign, route, approve and disposition activities. Should be written as a requirement not a solution "online organizational structure".   |
| This is concerning because not all cases may require assignment, per the business practice (example cases only open for payment purposes).  |
| The term "alert" implies an email or other electronic notice is needed. This can be overwhelming. Visibility on a dashboard may be sufficient.  |
| The workflow of Intake isn't an Administrative function. We don't think this belongs in Administration  |
| Alerts and notification are not part of Administrative function. They are part of intake, case, etc. modules where they are processed   |
| They are part of intake, case, etc. modules where they are processed  |
| They are part of intake, case, etc. modules where they are processed  |
| What office automation tools?   |
| Please clarify  |
| Please clarify why we should have staff training data in CCWIS system   |

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| Please provide details on what staff information (ex. HIPAA/Policy review)  |
| Please Clarify. Why is this in Administration   |
| Please Clarify. Why is this in Administration? Need to understand this better   |
| Please clarify. What office automation tools  |
| Ensure that all OPEN cases and foster home licenses, and contracted provider records are assigned to staff person at all times.   |
| Please clarify  |
| suggest including how Admin functions may be built upon or modified over time as new business modules require (scalability)   |
| This format will be difficult for Administration. As ACF state, there may be multiple modules providing these functions. Suggest instead that there be a section before here that defines the modules used for these functions with an explanation of each module's overall purpose in the architecture. Then add a column for module where the state fills in the module that provides the specific feature. For example, could show 'Active Directory' for 'User Authentication'. |
| The items below are OK, but this is not a comprehensive list.   |
| Why not use a more recognizable term such as 'Recommended Business Functions' or 'Recommended Business Requirements'?   |
| Auditing or logging user actions should be included in G.C2.04 and G.C2.05 to store who granted specific securities to a specific user and when that security was granted.  |







**Edits Made (or reason why no edits were made)**

No edits. Will provide TA directly to the state as this question pertains to the regulations.

Added two examples.

No response needed.

Agree. Edit made.

No edits. We kept the goal high level. Allows different answers depending on the agency. If we added more specificity, it would exclude possibilities. Will provide TA directly to the state.

Agree. We wrote this before the Security tool was complete. Will make sure it is covered in Security.

This is a best fit. It could go in the Design tool but we feel it fits better with the other administrative functions since disaster management is not limited to system design.

Somewhat agree. Separated out "Auditing" into a new Goal.

No edits. Common functions = Administration functions. The functionality included as goals are normally found in an "Administration" module.

No edits. Will provide TA directly to the state as "Search" can be defined by the state during design.

Agree. Language updated.

Need to align with Security/Usability and the other system-wide tools. Fair point.

No edits. Will provide TA directly to the state as this question pertains to the regulations.

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| No edits. Will provide TA directly to the state as this question pertains to the regulations.   |
| Agree.  |
| No edits. Will provide TA directly to the state as this question pertains to the regulations.   |
| Some examples added.  |
| Language tweaked. We believe it is helpful to have this structure to support the stated business purposes.  |
| Agreed. Added language.   |
| No edits. "Alert" could be implemented in the system through a variety of functions (email, electronic notice, icon identifiers, dashboard, "To-Do" list updates) that agencies are encouraged to define based on their user needs and system specifications. |
| Agree. Removed the word "intake".   |
| No edits. Alerts and notifications are generally found in the "Administrative" or "System Admin" module.  |
| No edits. Documentation rules are generally found in the "Administrative" or "System Admin" module.   |
| No edits. Assignment rules are generally found in the "Administrative" or "System Admin" module.  |
| Examples provided.  |
| No edits. Will provide TA directly to the state.  |
| No edits. These are considerations, not requirements. Will provide TA to state.   |

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| Examples provided.   |
| No edits. While these could go elsewhere, this is the best tool to put this in   |
| No edits. While these could go elsewhere, this is the best tool to put this in   |
| No edits, examples were provided. Automation tools will vary by vendor/solution. Will provide TA to state.   |
| Agree, change made.  |
| Some additional language added.  |
| Agree, agencies may incorporate additional lines on the tool as desired and the tool will be modified in a future version once the current version is piloted to better understand scalability needs.  |
| No edits.  |
| No edits. This is not meant to be a comprehensive list. Will provide TA to the state.  |
| We did not use the term, "functional requirement," as we believe states should create their own requirements. We did not use the term, "business processes," as some items do not fall into that category. So we created a new concept and added a definition to help the reader. This section is meant to provide technical assistance and no responses are needed to any of the examples. No changes made. |
| Agree. Changes made to G.C2.05   |





| <b>IV-E Agency</b> | <b>Category</b>           | <b>Goal/Requirement #</b> |
|--------------------|---------------------------|---------------------------|
| California         | Suggested Edit            | D.A.02                    |
| Pennsylvania       | Better Define or Clarify  | D.B2.01                   |
| Pennsylvania       | Change Format             | D.B2.02                   |
| Kentucky           | General Question          | D.B2.06                   |
| Pennsylvania       | Move Goal to another Tool | D.C2.06                   |
| Pennsylvania       | Move Goal to another Tool | D.C2.10                   |

| Feedback   | Edits Made (or reason why no edits were made)  |
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| California suggests listing examples of "programs beyond the child welfare program."   | Added two examples.  |
| Please define the federal practice model.  | No edits. Will provide TA directly to the state as this question pertains to the regulations.  |
| What is meant by this as it pertains to adoptions? Many of these overall requirements seem like they would be better demonstrated at a system level, and not broken out into each module. It only makes sense to call out requirements which are specific to the module at a module level. | This a Program Goal, not a system requirement. And while we agree that it could pertain to other areas of child welfare practice, we placed it here specifically for adoption. Similar goals can be found in other modules. No edits made. |
| Is it OK to have the screen show a default value that the worker reviews and changes as needed?  | No edits. Will provide TA directly to the state as this question pertains to the regulations. Similar question asked on other tools.   |
| Not just adoption. Functionality should be in a separate interstate module to support all placements.  | We have not created a separate ICPC self-assessment tool so this item can be found both here and in the Case Management tool. It may go into the as-yet unwritten Exchange tool as well. No edits made.                                    |
| This is not specific to adoption. It should be for all children, so a separate module may be needed.   | We agree this is not specific to adoption. Similar language is used in the Case Management tool. No edits made.  |



| IV-E Agency  | Category                  | Goal/Requirement #                                  |
|--------------|---------------------------|---|
| California   | Suggested Edit            | C.A.01  |
| Pennsylvania | Better Define or Clarify  | C.A.02  |
| California   | Suggested Edit            | C.A.02  |
| Pennsylvania | Better Define or Clarify  | C.A.03  |
| Pennsylvania | Move Goal to another Tool | C.B2.01<br>C.B2.02<br>C.B2.03<br>C.B2.04            |
| Pennsylvania | Better Define or Clarify  | C.B2.05   |
| Kentucky     | General Question          | C.B2.05   |
| Pennsylvania | Better Define or Clarify  | C.B2.07   |
| Pennsylvania | Move Goal to another Tool | C.C2.04   |
| Pennsylvania | Move Goal to another Tool | C.C1.01<br>C.C1.02<br>C.C1.03<br>C.C1.14<br>C.C2.01 |

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| Pennsylvania | Move Goal to another Tool | C.C1.10 |
| Pennsylvania | Move Goal to another Tool | C.C1.11 |
| Pennsylvania | Move Goal to another Tool | C.C1.12 |
| Pennsylvania | Move Goal to another Tool | C.C1.13 |
| Pennsylvania | Move Goal to another Tool | C.C2.05 |
| Pennsylvania | Move Goal to another Tool | C.C2.07 |
| Pennsylvania | Move Goal to another Tool | C.C2.08 |
| Pennsylvania | Move Goal to another Tool | C.C2.12 |
| Pennsylvania | Better Define or Clarify  | C.C3.04 |







| Feedback   | Edits Made (or reason why no edits were made)   |
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| California suggests that ACF further explain the definition of "function" in this context.   | Added some language to make clearer.  |
| PA is implementing an enterprise case management approach which means the general case functions (open, close, split, assign, reassign, transfer) would be shared by multiple programs while the Child Welfare specific case functions are unique. This question is much more complex. Further clarification is needed so PA knows how to respond to this. | Added two examples. Will also provide TA directly to the state.   |
| California suggests providing examples of "programs beyond the child welfare program"  | Added two examples.   |
| Please define what is meant by a 'user group' in this case. Are we referring to a specific type of user, a specific organization using the CCWIS, a user role as defined by the system security, etc. ACF should also consider what level of a response they want. Higher level user groups would likely be more appropriate for the purpose of the tool.  | No edits as examples are provided. Will provide TA directly to the state.   |
| The first four items are not specific to case management. They are system wide design goals and it would be beneficial for states to respond to them at a system level, rather than a module level.  | No edits. When appropriate, we include these goals in other tools as well. Will provide TA directly to the state.   |
| Can more guidance be provided regarding what constitutes "inappropriately assigned" default information. It is not clear to us what is and is not permitted to be defaulted.   | No edits. Will provide TA directly to the state as this question pertains to the regulations. Similar question asked on other tools.  |
| Is it OK to have the screen show a default value that the worker reviews and changes as needed?  | No edits. Will provide TA directly to the state as this question pertains to the regulations.   |
| What type of information? This seems unclear.  | No edits. Will provide TA directly to the state as this question pertains to the regulations.   |
| This functionality would be most appropriate in the placement and legal modules, not in case management.   | No edits. This may be added to an exchange tool as well but it is included as a Data Element in this tool because it is important to meet case management related activities. |
| They are not specific to case management.  | Agreed. They are included (when appropriate) in other tools as well. No edits made.   |

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| <p>This is specific to permanency planning. Consider separate module for permanency.</p>  | <p>Many title IV-E agencies include permanency/permanency planning in case management activities. We consider placement in the Case Management tool as "best fit". No edits made.</p>  |
| <p>This is service planning and delivery. May also include provider management and performance management. Not case management.</p> | <p>There is some crossover with the other tools. Similar language added to include states who have different models/names of modules. No edits made.</p>   |
| <p>This is more of a system security function, not necessarily specific to case management.</p>                                     | <p>Agreed. Removed from this tool and updated language in the Security tool.</p>   |
| <p>There should be a separate Interstate module where this is referenced.</p>   | <p>We have not created a separate ICPC self-assessment tool so this item can be found both here and in the Adoption tool. It may go into the as-yet unwritten Exchange tool as well. No edits made.</p>  |
| <p>This seems like it would be more provider management.</p>  | <p>Agreed. Duplicate language was in the Foster Care and Service Provider Management tool so it was removed here.</p>  |
| <p>This seems like it would be better off in a specific placement module.</p>   | <p>This is related to case management of older youth and belongs in this tool. Credit checks are not a function of placement. No edits made.</p>   |
| <p>This is youth in transition, not case management.</p>  | <p>We are not creating a separate "youth in transition" tool. These functions/goals have been included in the Case Management Tool. No edits made.</p>   |
| <p>This seems like it might be better in a Person Management specific tool.</p>   | <p>No changes made. Similar language is used in the Admin tool. Where that tool is about person management, the inclusion of these items in Case Management relates to acts of casework/managing cases and collecting information from participants and providers.</p> |
| <p>Further clarification is needed.</p>   | <p>Added some language to make this clearer.</p>   |

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| <p>This definition of case management doesn't seem to support ACF's stated goal of modular design. The activities described in this section are different business functions and much of the data mentioned under case management is really person management data. There is really only a limited set of data that is truly considered case information. Grouping many different distinct business functions under case management will result in poor system design. ACF should consider moving many of these business functions identified here into their own functions.</p> | <p>We are not able to create separate tools for each of these areas. We combined areas that are most frequently built together or at similar times in state/tribal systems. No changes made.</p>  |
| <p>Will a CAR eventually require states to answer C.A.01-C.A.05 for every product feature or function?</p>   | <p>Very likely. We consider this information to be invaluable in assessing a system's compliance with CCWIS program and design requirements. No changes made.</p>   |
| <p>This list of case management activities spans multiple business functions and should be associated with specific service areas, such as service planning, service delivery, prevention services, performance management, etc.</p>   | <p>We are not able to create separate tools for each of these areas. We combined areas that are most frequently built together or at similar times in state/tribal systems. No changes made.</p>  |
| <p>This term is not familiar. Consider a more commonly recognized term. Perhaps Functional requirement or business process? It is difficult to understand what this is referring to.</p>   | <p>We did not use the term, "functional requirement," as we believe states should create their own requirements. We did not use the term, "business processes," as some items do not fall into that category. So we created a new concept and added a definition to help the reader. This section is meant to provide technical assistance and no responses are needed to any of the examples. No changes made.</p> |
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| IV-E Agency  | Category                 | Goal/Requirement # |
|--------------|--------------------------|--------------------|
| Kentucky     | Better Define or Clarify | Definition         |
| Kentucky     | General Question         | E.A.02             |
| California   | Suggested Edit           | E.A.02             |
| Kentucky     | Better Define or Clarify | E.A.04             |
| Pennsylvania | Change Format            | E.A.04             |
| Kentucky     | Better Define or Clarify | E.A.05             |
| California   | Better Define or Clarify | E.A.05             |
| Pennsylvania | Better Define or Clarify | E.B2.04            |
| Kentucky     | Better Define or Clarify | E.C1.03            |

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|--------------|---------------------------|---------------------------|
| Kentucky     | General Question          | E.C1.07                   |
| Pennsylvania | Move Goal to another Tool | Foundational Requirements |
| Pennsylvania | Change Format             | Program Goals             |

| Feedback   | Edits Made (or reason why no edits were made)  |
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| <p>In the Definition section, the last sentence of the Service Provider Management definition gives examples that include things we only capture in comments. Please define if these examples are requirements.</p>  | <p>These are examples. No edits. Will provide TA directly to the state.</p>  |
| <p>Are Prevention Activities part of the Child Welfare Program?</p>  | <p>Yes. No edits. Will provide TA directly to the state.</p>   |
| <p>California suggests including examples of "programs beyond the child welfare program."</p>  | <p>Two examples added.</p>   |
| <p>Does this refer to external users' access the CCWIS in general or specifically the Foster Care Service Providers information specifically?</p>  | <p>Specifically the functions and external systems related to Foster Care and Service Provider management. Will provide TA directly to the state. No changes made.</p>   |
| <p>This could be very cumbersome to respond to. For example, if states have to call out every single foster care agency individually. How does ACF recommend that states might respond to this in a manner which would provide the level of detail needed, yet not result in multiple pages of listed agencies. Could these possibly be grouped by business area, rather than specific organization?</p> | <p>Agency-specific responses are not necessary, only broad-level user groups. No edits. Will provide TA directly to the state.</p>   |
| <p>Please clarify?</p>   | <p>Added one more example but see next row for more information.</p>   |
| <p>California suggests you define what you mean by "any system(s) external." For example, would we include a mobile app to locate an address and the system saves the address in the system - would that be included in this list?</p>   | <p>No edits. This is addressed in the regulation. Will provide TA directly to the state.</p>   |
| <p>Can ACF elaborate as to what they would consider appropriate versus inappropriate use of defaults, so states can ensure they understand the requirement?</p>  | <p>No edits. Will provide TA directly to the state and will share TB #6.</p>   |
| <p>Please clarify? What is required?</p>   | <p>Nothing is required. In this section, we are providing an example states may wish to include in their CCWIS. For this specific factor, we are highlighting the functions that allow users to see which foster homes are available for placement of children. Specifically, homes that meet the capacity and demographic needs of the child in question.</p> |

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| <p>Is this in addition to the original bi-directional exchanges identified in the APD? If we make one available, do all CWCAs have to use it or will it be up to them.</p>  | <p>No edits. Will provide TA directly to the state and will share relevant TB.</p>   |
| <p>All the requirements within this list are really requirements which should be met at a system-wide level, rather than being specific to foster care. Is it possible to include these types of items into a separate tool for the system as a whole, so these requirements do not have to be broken down by module, and can instead be spoken to at a higher system level when states complete the tools?</p> | <p>We are adding these requirements to each [relevant] tool as agencies are using a variety of methods to build CCWIS. If an agency is using multiple vendors to build different modules, the answers may differ for each module. No changes made.</p>       |
| <p>PA is separating Provider Management from any specific placement type. We recommend ACF consider making this same separation. This recommended change would also involve suggesting that ACF to revise the Foster Care module so it is part of a larger 'Placement' module, which includes all varieties of placement.</p>   | <p>Many of the functions in Provider Management crossover with Foster Care Management. Agencies may indicate "N/A" if a particular program goal is not applicable. Agencies may add program goals if the list provided is not complete. No changes made.</p> |

| <b>IV-E Agency</b> | <b>Category</b>          | <b>Goal/Requirement #</b> |
|--------------------|--------------------------|---------------------------|
| Pennsylvania       | Better Define or Clarify | A.A.02                    |
| California         | Suggested Edit           | A.A.02                    |
| Pennsylvania       | Better Define or Clarify | A.B1.01                   |
| California         | Suggested Edit           | A.B1.01<br>A.B1.03        |
| Pennsylvania       | Suggested Edit           | A.B1.04                   |
| Pennsylvania       | Better Define or Clarify | A.B2.02                   |

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|--------------|--------------------------|---------------------------|
| Pennsylvania | Better Define or Clarify | A.B2.03                   |
| Kentucky     | General Question         | A.B2.05                   |
| California   | Suggested Edit           | A.B2.08                   |
| California   | Better Define or Clarify | A.C1.02                   |
| California   | Suggested Edit           | A.C1.06                   |
| California   | Better Define or Clarify | A.C1.08                   |
| Pennsylvania | Comment                  | Foundational Requirements |
| Pennsylvania | Suggested Edit           | Resource 1                |
| Pennsylvania | Suggested Edit           | Resource 2                |







| Feedback  | Edits Made (or reason why no edits were made)  |
|---|--|
| <p>How is ACF expecting states to respond if an intake module is being leveraged by multiple Program Offices, but not in the same way? For example, Child Welfare would not use the intake module in the same manner that those processing intake for Medicaid would. This level of clarification is not provided, and would be needed.</p> | <p>No edits. Will provide TA directly to the state. This tool is for child welfare only as other Program Offices have different requirements. This question is asking them to name the other programs that may be using some of the functionality built for the CCWIS.</p> |
| <p>California suggests adding examples of programs beyond child welfare.</p>  | <p>Two examples added.</p>   |
| <p>The word accurate could be problematic for Child Welfare, because depending on the reporting source, the information obtained at the time of intake may not be "accurate". We think perhaps what is really being asked is if information is able to be entered as accurately as possible?</p>  | <p>No edits. "Accurate" is language from the regulation. Will provide TA directly to the state.</p>  |
| <p>California points out the use of the term ""caseworkers" in A.B1.01, however, in A.B1.03 the term "intake workers" is used. California recommends using one consistent tem for workers screening calls.</p>  | <p>"Caseworkers" is used consistently throughout the tools. However, in A.B1.03, there was a need to address sub-categories of caseworkers which is why we used "Intake" and "Investigative" workers instead of the more global "Caseworker".</p>                          |
| <p>Suggest re-wording as follows, "Provide case and individual history in a timely and accurate manner". This is suggested because there could be a referral person who is not a case member that you would still want to ensure you are able to collect this for (e.g. perpetrators who are not part of the family 'case').</p>            | <p>Agree. Change made.</p>   |
| <p>What is meant by 'evaluation' in this case? Is this evaluation of referral type? Evaluation of safety and response time?</p>   | <p>This is language from the regulations and we refer to 1355.52 in both the instructions and section header. No changes made. Will provide TA directly to the state.</p>  |

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| <p>What level of detail is ACF expecting would be reflected? If states respond too broadly, ACF could be disappointed with a limited response if states simply fill in some examples of information captured, implying everything is there, but not specifying the completeness of the information. However, the burden of clearly detailing all the specifics could also be very cumbersome for states, who would need to note all relevant requirements and process flows which meet this need. Without being more specific regarding expectations, states will likely not provide consistent feedback.</p> | <p>No edits. Question will be addressed directly with the state on a regular TA call.</p>  |
| <p>Is it OK to have the screen show a default value that the worker reviews and changes as needed.</p>  | <p>No edits. Will provide TA directly to the state as this question pertains to the regulations.</p>   |
| <p>California recommends using "child welfare history" instead of "case"</p>  | <p>Agree. Change made.</p>   |
| <p>California suggests clarifying whether accessibility is in reference to the mandate to meet ADA standards.</p>   | <p>Changed to "connectivity" to avoid confusion.</p>   |
| <p>California suggesting adding "high-profile" to make this consistent with language in the self assessment tool for Investigations.</p>  | <p>Agree. Change made to match language used in the Investigation tool.</p>  |
| <p>California recommends defining "priority level" within this requirement. Is this in reference to response time, alternative response paths, etc?</p>   | <p>It could mean different things to different agencies. Added some clarifying language.</p>   |
| <p>Overall comment related to consistency. It seems there is room for more comprehensive requirements in some of these areas. Additionally, some requirements seem to be more broad, while others are more specific/targeted. Should this be more consistent?</p>   | <p>Most of these requirements are from the regulations to address the CCWIS program requirements. Some requirements are broad, to reflect the flexibility agencies have to develop a CCWIS. Others are targeted/narrow to address specific program requirements. No edits.</p> |
| <p>Suggested additions:</p> <ol style="list-style-type: none"> <li>1. Supports document management</li> <li>2. Support required notification of appropriate parties as per federal, state and tribal statutory requirements.</li> </ol>   | <p>Added new row for notifications. Document management covered in Resource 3.</p>   |
| <p>This list seems incomplete, possibly due to the granular level of some of this. ACF should consider avoiding detailed data requirements and instead address higher level information requirements.</p>   | <p>No changes. The categories are high-level already.</p>  |





| IV-E Agency  | Category                 | Goal/Requirement # |
|--------------|--------------------------|--------------------|
| California   | Suggested Edit           | B.A.02             |
| Pennsylvania | Better Define or Clarify | B.A2.02            |
| Pennsylvania | General Question         | B.A2.03            |
| Pennsylvania | Suggested Edit           | B.B1.05            |
| Kentucky     | General Question         | B.B2.05            |
| Pennsylvania | Better Define or Clarify | B.B2.09            |
| California   | Suggested Edit           | B.C1.02            |
| California   | Suggested Edit           | B.C1.09            |
| California   | Suggested Edit           | B.C1.11            |

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|--------------|----------------|---------------------------|
| Pennsylvania | Suggested Edit | B.C2.07                   |
| Pennsylvania | Comment        | Foundational Requirements |
| Pennsylvania | Comment        | Resource 1                |



| Feedback  | Edits Made (or reason why no edits were made)   |
|---|---|
| California suggests adding a list of examples of "programs beyond the child welfare program."   | Two examples added.   |
| The same comment applies here which was made for intake question of a similar nature. In order to promote modular design, there may be an investigation module used by multiple programs, but not in the same way. For example, the investigation module could be leveraged in one was for Child Welfare, and in another way for an unrelated Program Office. In these situations, how would states be expected to respond to this question? This level of clarity is not provided. | No edits. Will provide TA directly to the state. This tool is for child welfare only as other Program Offices have different requirements. This question is asking them to name the other programs that may be using some of the functionality built for the CCWIS. |
| As a county administered state, this would be an extremely lengthy list. We would most likely reference our stakeholder model. Will that be acceptable?   | No edits as examples are provided. Will provide TA directly to the state.   |
| Suggest also an individual's history, as you may have individuals who are part of investigations (e.g. certain perpetrators) who are not necessarily a case member or family member, depending on how you are defining a "case".  | Agree. Edits made.  |
| Is it OK to have the screen show a default value that the worker reviews and changes as needed.   | No edits. Will provide TA directly to the state as this question pertains to the regulations.   |
| It is unclear what this is referring to.  | Added minor clarification as "special needs" is an AFCARS element.  |
| California suggests clarifying whether this is about access to the application or ADA requirements for users. Consider replacing the word "accessibility" with "connectivity."  | Agree. Changed to "connectivity" to avoid confusion.  |
| California suggests revising this element to better capture the concept of bi-directional data exchanges with law enforcement. Possibly revise this element to state "Informs and collects information from law enforcement, if appropriate and practicable."   | Agree. Changed language.  |
| California suggests that if you are referring to referral disposition please state disposition. "Investigation resolution" is a vague, non-specific, term. Consider replacing "resolution" with "result."   | Agree. Changed language.  |

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| <p>Is it beneficial to also reference the agency decision as to whether or not to accept the case/family for ongoing services following the investigation to this point? Counties may provide services during the investigation/assessment period, but ultimately not accept for ongoing services.</p>   | <p>No edits. The scenario of services offered during the investigative period, for a case not ultimately accepted, is covered by the original language.</p>  |
| <p>Same comment made here as for intake. What level of response is ACF expecting? In order to demonstrate compliance, would states need to provide all relevant business requirements and process flows to map each element to the respective requirements? How are states to show they have the data to support the title IV-E review without getting into all of the information captured and providing detailed requirements showing that all these data elements are being captured?</p> | <p>No edits. Question will be addressed directly with the state on a regular TA call.</p>  |
| <p>This list appears incomplete. Is it possible ACF may consider higher level and more comprehensive requirements, as opposed to such specific requirements where possible?</p>  | <p>This is not intended to be a complete list. We do not consider these factors to be "requirements" and are purposefully not specific. We consider them to be useful processes that help an agency achieve an efficient, economical, and effective CCWIS.</p> |