

Generic Clearance for the Comprehensive Child Welfare Information System (CCWIS) Review and Technical Assistance Process

**OMB Information Collection Request
0970 – NEW COLLECTION**

Supporting Statement Part A - Justification

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Children's Bureau
Administration for Children and Families
U.S. Department of Health and Human Services

SUPPORTING STATEMENT A – JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

The Comprehensive Child Welfare Information System (CCWIS) requirements at 45 CFR §1355.55 require the review, assessment, and inspection of the planning, design, development, installation, operation, and maintenance of each CCWIS project on a continuing basis. The Advance Planning Document (APD) regulations at 45 CFR §95.621 require periodic reviews of state and local agency methods and practices to ensure that information systems, including CCWIS, are utilized for purposes consistent with proper and efficient administration. CCWIS is a new regulation, enacted in 2016. The regulation included a two year transition period ending in July 2018 for states to determine whether they planned to build a new system, transfer a legacy system or opt out of the CCWIS program. States are still in the process of developing their systems and while some are nearing partial completion, most are still in early- to mid-life-cycle of system development. As such, there have been no formal CCWIS compliance reviews since the new regulation was enacted.

The Children’s Bureau (CB), Administration for Children and Families (ACF), U.S. Department of Health and Human Services (HHS), is proposing to establish a new overarching generic clearance to collect information to assess regulatory requirements of title IV-E agencies’ CCWIS and ensure that the CCWIS is utilized for purposes consistent with the efficient, economical, and effective administration of the title IV-B and IV-E plans per 45 CFR 1355.52(a). This proposed umbrella generic is the result of work by CB to design a process for reviews that will work well to identify and address state and tribal agency needs in a responsive manner. CB currently provides technical assistance (TA) based on observed needs, informal discussions, and CB priorities. The previous version of the regulation was in effect for 20 years and a different, less responsive tool (OMB #: 0970-0159) was used to assess state agencies during that time period. The previous tool could not quickly be adapted to agency needs as it assumed only one model of a single large system design with one set of requirements while CCWIS regulations allow states to choose among a wide variety of system architectures to meet program needs. Flexibility is needed to support title IV-E agencies use of self-assessment tools quickly and in direct response to emerging technology needs and changing program requirements. This generic clearance will allow CB to pilot tools and provide support to IV-E agencies who choose to use them. Continuous feedback and ongoing dialogue will assist IV-E agencies in building capacity and identifying risk areas as technology systems are developed. The pilot process of using the self-assessment tools will support improvement efforts and ultimately inform the development of a future CCWIS compliance review process. Use of the self-assessment tools should reduce the likelihood of future compliance issues and provide opportunities to “self-correct” early as systems are being planned and developed.

2. Purpose and Use of the Information Collection

This proposed CCWIS Review and Technical Assistance umbrella generic clearance aims to provide title IV-E agencies with several tools to self-assess their project progress and proactively identify risks and mitigation strategies and allow CB and agencies to identify TA needs. CB and agencies will also be able to use the information to share best practices and to make system modifications as a system is being built rather than after the system is fully designed and implemented. The goal is to ensure the CCWIS meets program needs and aligns with CCWIS project and design requirements at 45 CFR §1355.52-3.

Title IV-E agencies will have the opportunity to use these tools. It is anticipated that agency staff directly involved with the development and regular use of the agency's CCWIS will complete the information collections approved under this umbrella generic. The information collected will be shared within agencies and with CB to inform system development and TA needs. Agencies and CB will have the opportunity to identify changing needs for self-assessment and this umbrella generic will allow CB to tailor information collections to collect relevant information quickly. As part of this initial request to establish an overarching generic, CB is submitting a set of initial self-assessment tools (see Table 1 below for an overview of these tools). As CCWIS system design varies widely depending upon program needs and agency technology choices, this generic mechanism will allow CB to quickly adapt self-assessment tools to apply to an agency's system and program needs. The approach also supports CB's need to tailor review tools and activities to meet unique and emerging needs. CB envisions updating these tools based on needs identified by agencies through the self-assessment processes. CB may also submit requests for very similar tools on additional topics, as needs are identified.

Information collections directly related to agency satisfaction may also be developed and submitted under this umbrella generic to ensure CB is meeting the needs of agencies through and during the CCWIS development process.

The tools will assist the agency with developing evidence of compliance (i.e., system documentation, design standards, user-feedback/observation, data quality automation, improved business/outcome performance, data exchange standards etc.) early in the software development life cycle so that each module incorporates "lessons learned" as the system is being built.

Table 1: Initial Self-Assessment Tools

Topic	Purpose/Use
Intake	Used to self-assess functions that track a report of child abuse and neglect from the point of initial contact with the reporter to the time the report is assigned to a worker for investigation or assessment.
Investigation	Used to self-assess functions that allow agencies to assess child abuse and neglect reports to determine the severity of allegations, which may cause one of several investigative tracks and associated response times.
Case Management	Used to self-assess functions that allow title IV-E agencies to collect and update information such as child and family histories, contact notes, calendars events, safety and functional assessments, case planning, services recommended and delivered, eligibility for programs and services, and client outcome activities. These functions enable the title IV-E agency to comply with federal reporting requirements and supports the title IV-E agency's ability to track case management provided to children and families to either prevent placement in foster care, or for those children in foster care, to achieve permanency and ensure safety and well-being.
Adoption	Used to self-assess functions that allow title IV-E agencies to collect and update information on adoption activities and enables the title IV-E agency to comply with federal reporting requirements, make accurate eligibility determinations, support the title IV-E agency's diligent recruitment plan, and support timely decisions about adoptive placements.
Foster Care and Service Provider Management	Used to self-assess functions that allow the title IV-E agency to collect data to ensure that a child or youth in foster care is in a safe and stable placement. Data collected include demographic information and background checks about foster care providers, title IV-E expenditures, and information to make informed decisions when creating a case plan and/or assessing systemic service needs. Information collected is also used to determine the availability, effectiveness, and cost of services that reduce risk, strengthen families, and prevent the need for out-of-home placement.
Administration	Used to self-assess system-wide functions that include processes that provide the ability to configure reference data such as pick lists, role-based security mappings, organizational structure, staff information, office automation, online documentation, archive, records purge, and workflow/workload management. The administration function may be a singular component of the CCWIS solution, or multiple components working together to provide the needed functions.

The information collections will provide agencies with:

- Best practice recommendations to inform system development while the CCWIS is being planned or developed;
- Data element recommendations to support the IV-E agencies understanding of CCWIS data;
- Program goals the CCWIS must consider in developing an efficient, economical and effective technology system.

IV-E agencies have evolving TA needs while CCWIS systems are being developed to ensure systems achieve expected program goals and meet the needs of end-users. Use of the self-assessment tools will provide information to IV-E agencies to work with system development vendors while vendor contracts are still active and resources are allocated to identify and resolve project risks that could cause schedule, cost or scope over runs. The tools will also assist the IV-E agency in identifying focus areas where additional resources or federal guidance is needed to resolve project barriers. The intent of the tools is to assist IV-E agencies proactively while systems are in development to avoid costly future compliance findings.

A generic clearance supports flexibility CB and title IV-E agencies need to identify project barriers and tailor TA to respond to evolving program and technology needs as child welfare information systems are developed. This is important to support:

- responsive TA activities that align with critical project priorities,
- quick understanding of and remediation of project-specific issues,
- changes in project plans and resource needs,
- greater capacity for IV-E Agencies to assess the economy, efficiency and efficacy of the project approach as the CCWIS is being developed,
- documentation of promising practices and innovative automation,
- flexible and responsive oversight of federal funds.

The information collected under this generic clearance is intended to be used by CB for review and TA processes to meet the requirements of 45 CFR §95.621.

The following are some example data collection activities that might be submitted as a GenIC:

- Information collections about proposed approaches that align with CCWIS options such as: architecture design, data quality, data exchanges, and modular design.
- User-feedback to inform system development, enhancement priorities, and change management activities.
- Interview data with grantee staff about usability and efficiency of system functionality.
- Focus group information about system availability, performance and reliability.

- New self-assessment tools, similar to the tools submitted in the original submission of the umbrella, as new program needs are identified such as prevention programs.

A program-specific GenIC will be submitted to the Office of Information and Regulatory Affairs (OIRA) for each individual request, along with the CCWIS GenIC submission template (**Attachment A**).

3. Use of Improved Information Technology and Burden Reduction

ACF encourages title IV-E agencies to submit the information collection electronically (e.g., as email attachments) because:

- it follows ACF's guidance for submitting other documentation, such as APDs, electronically; and
- it is more efficient than mailing multiple hardcopies of documents and reduces the burden on agencies.

ACF is modifying the review process to support continuous improvement and early feedback to title IV-E agencies that can be utilized while the system is in development. For example, the self-assessment tools can assist the state with identifying strengths and potential challenges in complying with CCWIS regulations early and supports the agency's need to build systems that meet specific program and community needs. Utilizing the self-assessment tools to target technical assistance activities and to collaboratively problem solve to address the most problematic issues prior to a formal compliance review reduces system re-work, the need for multi-year corrective actions and additional redesign costs. The self-assessment tools and technical assistance review process:

- supports agencies at critical times during the project lifecycle to build upon lessons learned as future functions are developed,
- provides opportunities for agencies to utilize existing artifacts, system documentation and user feedback methods as systems are developed rather than creating additional and duplicative information for formal compliance reviews after a system is deployed,
- supports an agency's need to identify potential problems early in the software development life cycle and to self-correct prior to full system development/implementation,
- encourages strong project governance and partnership between technology and program staff to support the most critical business needs and changing technology approaches.

4. Efforts to Identify Duplication and Use of Similar Information

ACF encourages title IV-E agencies to incorporate existing policy, plans, and processes into the self-assessment tools. Leveraging existing resources will eliminate duplicate efforts and lessen the reporting burden. To further reduce the reporting burden, ACF encourages title IV-E agencies to use existing system documentation, screen shots, survey data, and training materials as evidence when sharing information used in this collection.

The information to be collected in this effort is not currently available. While title IV-E agencies provide annual updates through the Advance Planning Document (APD) process noted in 45 CFR § 95.610, there is no current process to collect information to support review and TA processes.

5. Impact on Small Businesses or Other Small Entities

This information collection does not affect small businesses or other small entities.

6. Consequences of Collecting the Information Less Frequently

Title IV-E agencies may submit the self-assessment information voluntarily. There is no consequence to the title IV-E agency if the information is not submitted but without the information, it will be difficult for ACF to collaborate with states proactively to identify project risks and potential compliance barriers which could ultimately result in losing federal financial participation (FFP) for state child welfare technology projects.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

The collection of information involves no special circumstances.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

Under the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on June 05, 2020, Volume 85, Number 109, page 34637, and provided a sixty-day period for public comment. During the notice and comment period, 115 comments were received from six states. A summary of the comments and how ACF considered each is attached (**Attachment B**).

9. Explanation of Any Payment or Gift to Respondents

No payments or gifts to respondents are proposed for the information collections under this generic clearance.

10. Assurance of Confidentiality Provided to Respondents

The information collected is not considered confidential. No Personally Identifiable Information is requested or provided. No assurance of confidentiality is provided to respondents.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

This section presents estimated burden for future GenICs under this generic clearance, as well as burden associated with an initial set of GenICs. The total estimated burden for future GenICs is 6,600 hours over a three-year period. The total estimated burden associated with the initial set of self-assessment tools is 3,300. The total burden request for this generic is 9,900 hours over a three-year period.

The assumptions made for these estimates are presented following the two tables.

Burden for Future GenICs

Information Collection Title	Total Number of Respondents	Total Number of Responses per Respondent	Average Burden Hours Per Response	Total Burden Hours	Average Hourly Wage	Total Cost
CCWIS TA Self-Assessment Tools	55	10	12	6,600	\$91.88	606,408
Estimated Burden Total:				6,600	Estimated Cost Total:	\$606,408

Burden for Initial GenICs

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Cost
CCWIS Self-Assessment – Intake	55	1	10	550	\$91.88	\$50,534
CCWIS Self-Assessment – Investigation	55	1	10	550	\$91.88	\$50,534
CCWIS Self-Assessment – Case Management	55	1	10	550	\$91.88	\$50,534
CCWIS Self-Assessment – Adoption	55	1	10	550	\$91.88	\$50,534
CCWIS Self-Assessment – Foster Care and Service Provider Management	55	1	10	550	\$91.88	\$50,534
CCWIS Self-Assessment – Administration	55	1	10	550	\$91.88	\$50,534
Estimated Burden Total:				3,300	Estimated Hourly Cost Total:	\$303,204

Burden Estimates

We applied these assumptions and estimates for the reporting burden estimates:

We assume that all 50 states plus the District of Columbia, territories, and tribes eligible to implement a CCWIS may each submit up to 16 self-assessment tools during the CCWIS project. We estimate, based on experience, 55 respondents.

a. Initial Collection

For the initial collection, we estimate an average 10-hour burden per response. This estimate accounts for the extra time agencies may need for analysis and information gathering before completing the self-assessment tools. We also estimate six (6) self-assessments per respondent. This accounts for projects of varying complexities.

We multiplied our estimate of 10 burden hours by 55 respondents and 6 self-assessments per respondent to arrive at a total burden of 3,300 hours (10 burden hours x 55 respondents x 6 responses per respondent).

b. Future Collection

We estimate an average 12-hour burden per response for future self-assessments that are to be determined. This estimate accounts for the extra time agencies may need for analysis and information gathering before completing the self-assessment tools. We also estimate 10 responses per respondent. This accounts for projects of varying complexities.

We multiplied our estimate of 12 burden hours by 55 respondents and 10 responses per respondent to arrive at a total burden of 6,600 hours (12 burden hours x 55 respondents x 10 responses per respondent).

Cost Estimates

We applied these assumptions and estimates for the reporting cost estimates:

We used Bureau of Labor Statistics 2019 wage data to derive our estimated total annualized burden costs. We assume that staff with the job role of Management Analyst (13-111) with a mean hourly wage estimate of \$45.94 will be completing the automated function list updates and the data quality plan updates. We doubled this wage estimate (\$45.94 x 2 = \$91.88) to ensure we considered overhead costs associated with labor costs. Our estimated annualized costs for each reporting requirement are calculated as:

- Formula: (Burden: Total Hours) x (Burden: Hourly Wage) = (Burden: Total Cost)
- 9,900 x 91.88 = 909,612
- Total Cost = \$909,612

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no other costs to respondents and record keepers.

14. Annualized Cost to the Federal Government

Information Collection	Annual Responses	Review Hours per Response	Total Federal Review Hours	Federal Hourly Wage	Annualized Cost to The Federal Government
CCWIS TA Self-Assessment Tools	293	2	586	\$107.70	\$63,112
Annual Total			586		\$63,112

We applied these assumptions and estimates for determining the annualized cost to the federal government:

We estimate two (2) hours per response. We multiplied our estimate of two (2) hours per response by the 293 responses (annualized) to arrive at an annual Federal review of 586 hours (annualized).

Our estimated annualized reporting costs are based on:

- We use the hourly rate from the Office of Personnel Management’s Salary Table 2019-DCB, which provides an hourly rate of \$53.85 for a full-time Grade 13, Step 5 employee. We doubled this wage estimate ($\$53.85 \times 2 = \107.70) to ensure we considered overhead costs associated with labor costs.
- We use the Annual Responses from section #12 above.
- Our estimates for Federal Review Hours per Response include time to review documents and for follow-up consultation with the submitting title IV-E agency.

Our estimated annualized costs for each reporting requirement are calculated as:

- Formula: (Annual Responses) x (Federal Review Hours per Response) x (Federal Hourly Rate) = (Annualized Cost to The Federal Government)
- Automated function list update: $293 \times 2 \times \$107.70 = \$63,112$
- Total: \$63,112

15. Explanation for Program Changes or Adjustments

This is a request for a new overarching generic clearance.

16. Plans for Tabulation and Publication and Project Time Schedule

There are no plans for tabulation or publication.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.