OMB # 0970-0568 Expiration Date: 04/30/2024

# **CWCA SELF-ASSESSMENT TOOL**

v1.0

#### Introduction

The regulations for CCWIS define a child welfare contributing agency (CWCA) as a public or private entity that, by contract or agreement with the title IV-E agency (agency), provides child abuse and neglect investigations, placement, or child welfare case management (or any combination of these) to children and families.<sup>1</sup> The regulations for CCWIS do not require title IV-E agencies (agencies) to work with CWCAs. However, many agencies have integrated CWCAs into their child welfare service delivery models. Data sharing between agencies and CWCAs, supports such models by promoting collaboration, coordinating service delivery, and eliminating redundancies.

The regulations for CCWIS permit two approaches for data sharing between the agency's CCWIS and CWCAs to promote the efficient, economical, and effective administration of the title IV-B and IV-E programs. CWCAs may enter data documenting child welfare services and activities:

- 1) directly into the agency's CCWIS; or
- 2) into CWCA systems, which provide data to and receive data from CCWIS via an electronic bidirectional data exchange.<sup>2</sup>

This CWCA Self-Assessment Tool helps agencies assess compliance with CCWIS requirements regarding CWCAs and the effectiveness of data-sharing practices in supporting improved outcomes for children and families. Also see <a href="CCWIS Technical Bulletin #2">CCWIS Technical Bulletin #2</a>: Data Sharing between CCWIS and Child Welfare <a href="Contributing Agencies">Contributing Agencies</a> for guidance on CWCA-related topics such as identifying CWCAs, data sharing, data exchanges, and cost allocation. In this tool, "information" refers to investigation, case management, and placement information.

#### Tool Format

This self-assessment tool is divided into sections as outlined on the chart below. Unique Element #s are assigned to every question for reference. Please refer to the instructions in <u>Technical Bulletin #7: CCWIS Technical Assistance</u>, <u>Self-Assessment Tools</u>, <u>and Monitoring Reviews</u> or contact your federal analyst if you have questions about the tool or a specific element.

PAPERWORK REDUCTION ACT OF 1995 (Pub. L. 104-13) STATEMENT OF PUBLIC BURDEN: Through this information collection, the Administration for Children and Families (ACF) is collecting information to document that title IV-E agencies have planned and developed their system's conformity to federal CCWIS and Advance Planning Document requirements. Public reporting burden for this collection of information is estimated to average 10 hours per title IV-E agency choosing to develop and implement a CCWIS system, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information. This is a voluntary collection of information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information subject to the requirements of the Paperwork Reduction Act of 1995, unless it displays a currently valid OMB control number. The OMB # is 0970-0568 and the expiration date is 04/30/2024.

<sup>&</sup>lt;sup>1</sup> 45 CFR 1355.51(a); examples provided in CCWIS Technical Bulletin #2: Data Sharing between CCWIS and Child Welfare Contributing Agencies

<sup>&</sup>lt;sup>2</sup> 45 CFR 1355.52(e)(1)(ii), 81 FR 35450 at 35463, and 80 FR 48200 at 48212.

Section	Element #
Overview and Background Information – System Overview	N.A.xx
Self-Assessment – Part 1 – Interagency Coordination, Child and Family Outcomes, and Worker Efficiency Goals	N.B1.xx
Self-Assessment – Part 2 – Foundational Requirements	N.B2.xx
Additional Considerations	N.C.xx



# A. Overview and Background Information

In the Overview and Background Information section, agencies document information on the overall CCWIS (or collection of modules if appropriate) and its environment. Agencies may cross-reference information if it is already contained in another self-assessment tool, APD, or project artifact. If a question is not applicable to CWCAs, indicate "NA" and provide the reason it is not applicable.

System Overview
N.A.01 Date this assessment was completed.
N.A.02 Name of the CCWIS module(s) included in this self-assessment. These are CCWIS modules that
are either 1) used directly by CWCAs to enter data into CCWIS, or 2) used to electronically exchange
information with CWCAs.

**N.A.03** Name of the CWCAs included in this self-assessment. For each CWCA, note if it provides investigation, case management, or placement services, or any combination of the three. Agencies may enter the information below or attach the list or reference documents previously submitted, such as the APD.

**N.A.04** For each CWCA type, list the responsibilities and the activities CWCAs undertake to support the child welfare program. Also report the number of CWCAs providing or not providing data to CCWIS for each CWCA type. List a CWCA in all applicable rows. For example, a CWCA that 1) provides both case management and placement services or 2) performs investigations in one county and case management in another county would be listed in the counts for both rows. If needed, attach or reference documents to provide details. Examples of reference documents include APDs, CWCA contracts or memoranda of understanding (MOUs), and responses provided in other CCWIS self-assessment tools.

		Number of CWCAs		
CWCA Type	List of Responsibilities/Activities	entering CCWIS data into CCWIS	ccwis data into electronically exchanging entering nor exchanging ccwis data with ccwis	
Investigation				
Case Management				
Placement				

A. Overview and Background Information
N.A.05 Describe the reasons that CWCAs listed as "neither entering nor exchanging CCWIS data with CCWIS" do not share data with CCWIS and the agency's approach for integrating these CWCAs into CCWIS.
N.A.06 Are CWCA contracts/MOUs with the agency, the counties, or both?
<b>N.A.07</b> Do contracts/MOUs establish data quality requirements for timeliness, completeness, accuracy, consistency, and uniformity?
N.A.08 Are there any additional comments you would like to provide as background to this function?

## Part 1 - Interagency Coordination, Child and Family Outcomes, and Worker Efficiency Goals

This section of the self-assessment describes general goals applicable to the agency and all CWCAs. The goals focus on the collaboration between the entities and the role data plays in supporting the relationships between the agency and the CWCAs.

The title IV-E agency may document components, factors, and design elements of the function(s) or exchanges that support the agency's collaboration with CWCAs. We encourage agencies to simplify their responses by referencing submitted documentation, such as APDs, or attach screenshots, system documentation, training materials, survey data, self-assessment tools, and agency policy or procedures. To ensure the CCWIS is supporting program goals, engagement with end users during all stages of the system development life cycle is critical. Likewise, continuous user feedback is often important to ensure the system responds to program changes after implementation.

#	Program Goal	Evidence that Supports the Goal
N.B1.01	Children and families benefit from rapid, secure, and seamless case transfers. Information is transferred with complete and reliable data to enable workers to promptly work on the next stage of a case. CCWIS facilitates transfers between the agency and the CWCAs, and transfers between CWCAs.	Typically demonstrated with policy documents defining the data and timelines required to transfer a case, children, or family information; CCWIS documents demonstrating how the system supports the transfer policy; documentation of the frequency of data exchanges (if applicable); and the procedures for rectifying cases transferred with missing or erroneous information. May also be demonstrated by regular feedback from CWCA and agency staff indicating case transfers are timely and complete. Additional evidence from audit reports showing timely transfer of cases over time may also be helpful.
N.B1.02	Agency and CWCA cooperation supports worker efficiency. Agency and CWCA collaboration eliminates duplicate data capture.	Typically demonstrated by a shared governance process where CWCAs and agencies identify efficiencies and develop plans to standardize business processes and data sharing to improve service delivery and data integrity. May also be demonstrated with documents describing access and the CCWIS data shared (through an exchange and/or entered directly into CCWIS). Additional evidence may be the identification of manual processes that have been automated and the benefits of the automation, such as more accurate, timely data.
N.B1.03	Agency and CWCAs collaborate to provide coordinated, consistent, and appropriate services to children and families. All partners have needed and relevant data to determine and deliver appropriate services. Partners share complete information to support the assessment, tracking, and provision of	Typically demonstrated with reports that track service delivery linked to assessed needs and child and family outcomes.  Also demonstrated by agency monitoring of data use, such as reports on user activity, such as accessing data from the data exchange partner.

#	Program Goal	Evidence that Supports the Goal
	services. If the child/family are served by multiple CWCAs, the agency consolidates complete information from all CWCAs to develop comprehensive case histories of children and families.	
N.B1.04	Agency can determine if services are available and provided to children and families to meet needs. Agency effectively monitors CWCA performance and identifies strengths and weaknesses in service delivery.	Typically demonstrated with CCWIS data quality review findings and other documentation (i.e., IV-B plans, CFSR Needs Assessment) demonstrating how CCWIS data and reports support assessment of service delivery and need, and relevant data are shared to comply with data quality standards for accuracy, completeness, and timeliness.



#### Part 2 - Foundational Requirements

Foundational requirements identify conditions to comply with CCWIS project requirements at 45 CFR § 1355.52.

In this section, the title IV-E agency may document components, factors, and design elements of the function(s) or exchanges that support CCWIS foundational requirements. We encourage agencies to simplify their responses by referencing submitted documentation, such as APDs, or attach screenshots, system documentation, training materials, survey data, self-assessment tools, and agency policy or procedures.

In the Evidence that CCWIS Supports the Foundational Requirement column, include information such as:

- feedback from end users:
- how the module was designed to be user-friendly and streamline work;
- data the CCWIS maintains;
- reports the CCWIS generates or contributes to;
- user-interface features; and
- automated processes and other design features.

If a question is not applicable, indicate "NA" and explain why it is not applicable. For example, other functions in the CCWIS may address the relevant foundational requirements.

#	Foundational Requirement	Evidence that CCWIS Supports the Foundational Requirement
N.B2.01	Data quality. CWCA data, whether entered directly into CCWIS or provided via a data exchange, meets or exceeds CCWIS data quality standards <sup>3</sup> .	Typically demonstrated with sample contracts and MOUs, reports documenting that CWCA collected data meets the agency's data quality standards, and CCWIS biennial review findings related to CWCAs. May also be demonstrated by system demonstrations showing edits, corrective prompts, and user-friendly functionality to identify and correct data entry errors/inconsistencies.
N.B2.02	Data collected by CWCAs is uniform and consistent. Agency and CWCA workers share a common understanding of the data so that data collected by one entity is understood by all users of the data. <sup>4</sup>	Typically demonstrated with information from data dictionaries, training plans that document consistent training for agency and CWCA staff, and CCWIS biennial review findings related to CWCAs.
N.B2.03	CWCA system security. CCWIS data	Typically demonstrated with the system security plan, reviews, and security, privacy, and

<sup>&</sup>lt;sup>3</sup> 45 CFR 1355.52(d)(5)(i); CCWIS Technical Bulletin #6: CCWIS Data Quality Plan.

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<sup>4 45</sup> CFR 1355.52(d)(1)(ii)

#	Foundational Requirement	Evidence that CCWIS Supports the Foundational Requirement
	residing on CWCA systems (if applicable) is maintained and shared in compliance with CCWIS data confidentiality requirements. CWCA workers entering data into CWCA systems or into CCWIS follow title IV-E agency security protocols to protect the systems and data from unauthorized access.	confidentiality training for workers. May also be demonstrated with strong disaster recovery tools and practices, requirements/restrictions on re-sharing of data, and evidence of following data retention policies.
N.B2.04	Data relevance. CCWIS/CWCA data exchanges provide all relevant data, as determined by the agency. <sup>5</sup>	Typically demonstrated with information from data dictionaries, documentation of information in the data exchange, and policy documents describing the data required to satisfy child welfare business practices. May be documented by meeting minutes where data needs are identified and project plans to develop and deploy functionality to support identified needs.
N.B2.05	CCWIS/CWCA data exchanges follow a single data exchange standard. The agency has established common data definitions, data formats, data values, and other standard data exchange guidelines. <sup>6</sup> See the Data Exchange and External Systems Self-Assessment Tool for goals	Typically demonstrated with documentation of the data exchange standard and descriptions of the operation and processes comprising the data exchange.

<sup>&</sup>lt;sup>5</sup> 45 CFR 1355.52(d)(5)(i); CCWIS Technical Bulletin #2: Data Sharing between CCWIS and Child Welfare Contributing Agencies

<sup>&</sup>lt;sup>6</sup> 45 CFR 1355.52(f)(1).

## **Additional Considerations**

The Additional Considerations section describes useful features agencies may wish to incorporate into the CCWIS design/features. Agencies are encouraged to work with CWCAs to identify data to share that will support improved outcomes for children and families. *If the agency is including these additional considerations in the CCWIS*, *please write "Yes" in the "Included in Agency's CCWIS?" column.* 

#	Included in Agency's CCWIS?	Additional Considerations
N.C1.0 1		<ul> <li>Establish communications with CWCAs. The agency builds relationships with CWCAs by educating them on CCWIS benefits, requirements, logistics for working together, and the proposed implementation plan. The agency takes steps to:</li> <li>Explain the CCWIS requirements.</li> <li>Involve advocacy groups representing CWCAs.</li> <li>Share ACF resources with CWCAs.</li> <li>Explain how enhanced collaboration will improve outcomes for children and families.</li> <li>Outline the operational benefits, such as enhanced interagency communication and worker efficiency.</li> <li>Explain the implementation options (i.e., using CCWIS vs. a bi-directional data exchange).</li> <li>Consult with CWCAs on the approach for incorporating CWCAs into the CCWIS.</li> <li>Establish ongoing communication channels, such as: <ul> <li>CWCA representation on CCWIS governance groups.</li> <li>CWCA representation in CCWIS design sessions.</li> <li>Email accounts for CWCA recommendations and feedback.</li> <li>Websites or portals to track progress, share ideas, and report issues.</li> </ul> </li> </ul>
N.C1.0 2		Assess the scope of work needed to support the best approach for CWCAs and CCWIS to share data. The agency gathers information needed to develop its plan for meeting CCWIS requirements regarding CWCAs. A common approach is to survey entities to understand their business processes and learn about the information systems they use.  Once the agency identifies the CWCAs, the agency investigates each CWCA to determine:  The investigation, placement, and case management activity data (if any) that must be shared with the CCWIS.  The information systems it uses to collect CCWIS data.  The current process for sharing information and working with the agency.  The effort required to implement a data exchange or support direct data entry into CCWIS.  The level of effort and costs to support the chosen data sharing approach.
N.C1.0 3		Establish a CWCA workgroup. The agency builds relationships with CWCAs by sponsoring a user group of CWCA representatives. The group may

# C. Additional Considerations

#	Included in Agency's CCWIS?	Additional Considerations
		<ul> <li>provide input into activities such as:</li> <li>Identifying data to exchange.</li> <li>Developing data quality requirements.</li> <li>Drafting data exchange/data quality MOUs.</li> <li>Developing training materials.</li> <li>Testing data exchanges and CCWIS functionality developed for CWCA staff use.</li> <li>Determining how to involve CWCAs in CCWIS biennial data quality reviews and ongoing continuous quality improvement efforts.</li> <li>Assessing the effectiveness of service delivery and service delivery needs.</li> <li>Identifying efficiencies that may benefit the CWCA and agency</li> </ul>
N.C1.0 4		processes.  Specify data requirements: The agency works with CWCAs to ensure compliance with data quality standards with agreements, such as MOUs. MOUs may address topics such as:  Data CCWIS provides the CWCA.  Data the CWCA provides the CCWIS.  Data quality standards.  The data exchange standard.  The frequency of data exchanges.  Confidentiality requirements.  CWCA certification of data accuracy.  Timelines and procedures for correcting poor data quality.  Timing, scope, and procedures for data audits.  Applicability of data quality standards to CWCA subcontractors.  Applicability of data quality requirements in the MOU to any CWCA subcontractors or entities.
N.C1.0 5		<ul> <li>Establish a data exchange workgroup with agency and CWCA program representatives. The content of the data exchange must be guided by program needs to develop an effective exchange of data. Agency and CWCA program staff:</li> <li>Understand the goals, issues, and processes of each other's agency.</li> <li>Discuss reporting requirements and data sharing needs.</li> <li>Explicitly set forth the definitions and values of all exchanged data.</li> <li>Understand and approve the mapping/conversion of each other's data to the data exchange to avoid ambiguities in or misinterpretations of exchanged data.</li> <li>Develop a flexible design that accommodates the needs of different CWCAs, such as allowing CWCAs that collect different data to submit different data sets.</li> <li>Develop a process for identifying and resolving barriers and conflicts that impact data sharing.</li> </ul>
N.C1.0 6		Ensure the data exchange standard accommodates the child welfare program's needs. For example:  • When selecting a standard, consider that it must accommodate all external systems title IV-E agency staff use to collect CCWIS data and all CWCAs exchanging data with CCWIS. <sup>7</sup>

<sup>7</sup> 45 CFR 1355.52(f).

# C. Additional Considerations

#	Included in Agency's CCWIS?	Additional Considerations
		<ul> <li>Ensure the standard accommodates different exchange purposes, such as opening a case, providing updates, reporting, and resolving data quality issues.</li> <li>Assist all partners on mapping partner system data elements to the data exchange standard.</li> <li>Ensure that data is exchanged frequently enough to meet program needs.</li> </ul>
N.C1.0 7		<ul> <li>Motivate CWCAs to improve data quality. The agency can develop performance-based contracts that include incentives/sanctions tied to data quality, such as:         <ul> <li>Financial rewards tied to data quality that meets or exceeds agency benchmarks.</li> <li>CWCAs that demonstrate their commitment to data quality may receive additional children/families/cases.</li> <li>Develop data quality metrics to evaluate CWCA performance.</li> <li>Codifying data entry, data quality, and data sharing requirements in state/tribal statute, regulation, or policy.</li> </ul> </li> </ul>

We encourage agencies to add examples of additional considerations from their work with CWCAs they wish to highlight.

#	Agency-Submitted Additional Considerations