# Financial Self-Assessment Tool v1.0

## Introduction

The regulations for CCWIS require that CCWIS maintain certain financial information essential for administering the child welfare program. This includes data required to claim federal financial participation (FFP) for qualifying expenditures and data to support the state/tribal child welfare programs.[[1]](#footnote-3) This information may be collected by CCWIS or by other financial systems and provided to CCWIS via a bi-directional data exchange.[[2]](#footnote-4) This flexibility permits the agency to choose whether to process financial transactions within CCWIS or other systems.

We encourage agencies to complete this tool even if other systems perform all financial processes. Completing the tool will help agencies determine if the data exchanges between CCWIS and the financial systems are providing CCWIS with the required financial data.

## 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 [Technical Bulletin #7: CCWIS Technical Assistance and Compliance Review Process](https://www.acf.hhs.gov/cb/training-technical-assistance/ccwis-technical-bulletin-7) or contact your federal analyst if you have questions about the tool or a specific element.

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| **Section** | **Element #** |
| Overview | O.A.xx |
| Self-Assessment – Part 1 – *Program Goals* | O.B1.xx |
| Self-Assessment – Part 2 – *Foundational Requirements* | O.B2.xx |
| Resources and Additional Considerations | O.Cx.xx |

A title IV-E agency may use this self-assessment tool to collect information to describe the CCWIS’s financial processing, including service authorization, payments, claims, the users, and any external systems associated with these functions. Agencies may cross-reference information if it is already contained in another self-assessment tool, APD, or project artifact. *Please answer each question fully. If a question is not applicable to your system, indicate “N/A” and provide a reason it is not applicable.*

**System Overview**

**O.A.01** Date this assessment was completed.

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**O.A.02** Name(s) of the CCWIS module(s) included in this self-assessment. In addition to CCWIS modules that process or generate financial data, include CCWIS modules that provide data needed to initiate transactions (such as a case management module that provides service authorizations, a placement module that authorizes placements, or a title IV-E eligibility module that provides information needed for financial claims).

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**O.A.03** Name(s) of other systems that currently exchange data with CCWIS to process or initiate financial transactions.

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O.A.04 Name(s) of other systems processing child welfare data that do not currently exchange data with CCWIS but may contribute to financial transactions in the future, for example, a planned modernization or replacement of a statewide financial system.

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**O.A.05** Overview of financial processes. Describe how the systems (CCWIS and other systems such as state, tribal, county, child welfare contributing agency (CWCA), or private provider systems) involved in financial processing perform the tasks below. Also describe any manual steps. We encourage agencies to simplify their responses if details are documented elsewhere by referencing submitted documents such as requirements documentation, design documents, APDs, or by attaching screenshots, system documentation, training materials, survey data, self-assessment tools, financial audits/reviews, and agency policies or procedures. Agencies are also encouraged to append a workflow diagram to clarify the financial processes and data flows between different systems.

* Authorizing placements and other services for specific clients.

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* Processing client-specific payments to providers.

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* Generating ad-hoc payments.

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* Processing payment reconciliations.[[3]](#footnote-5)

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* Correcting, stopping, or recouping erroneous payments.

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* Allocating claims/costs for multiple funding sources (for example, federal, state, tribal, and county sources).

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* Generating federal claims.

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**O.A.06**Do users who are not employees of the title IV-E agency or counties in a county-administered state access financial functions in the CCWIS or external systems, for example, an external licensing system? *If so,* *please identify external user groups that have access to this function. Please add more rows, as needed.*

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| **User Group** | **Purpose of Use** |
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**O.A.07** Are there any additional comments you would like to provide as background to this function?

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**Part 1 – Program Goals**

The Program Goals section of this self-assessment tool describes the critical program needs CCWIS must support, as defined at 45 CFR § 1355.52(a) and (b)(1)(ii). These program needs apply whether staff enter data directly into the CCWIS or data are imported through an exchange. Agencies should continually assess changing policy and practice needs to ensure CCWIS aligns with program priorities and remains relevant to support program outcomes. The goals noted below are required by policy or federal law or are common child welfare program needs.

In this section, the title IV-E agency may document components, factors, processes, and design elements of the function(s) or exchanges that support financial processing. We encourage agencies to simplify their responses by referencing submitted documentation such as APDs, or by attaching screenshots, system documentation, training materials, survey data, self-assessment tools, and agency policies or procedures. Agencies may reference sections of O.A.04 – Overview of Financial Processes, if the response describes how the agency meets a program goal. 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.

In the **Evidence that Supports the Goal** column, include information such as:

* how the CCWIS supports agency policies and practices;
* feedback from end users;
* how the module was designed to be user-friendly and streamline work;
* data CCWIS maintains to support the goal;
* reports CCWIS provides; and
* components, factors, and design elements of the function(s), or exchanges, that support the goal.

We also encourage agencies to consider cross-referencing responses in self-assessment tools that document processes closely tied to financial processes such as:

* Case Management – This tool includes information on service authorizations.
* Foster Care and Service Provider Management – This tool includes information on placements and service authorizations.
* Title IV-E Foster Care Maintenance Eligibility – This tool includes information on title IV-E eligibility determinations.
* Exchanges – This tool includes information on financial data exchanges.

If the title IV-E agency has additional program goals, please include them below and add new rows, as needed.

*If a question is not applicable to the eligibility function, indicate “NA” and explain why it is not applicable. For example, other functions in the CCWIS may address the program goals.*

| **#** | **Program Goal** | **Evidence that Supports the Goal** |
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| **O.B1.01** | Ensure federal funds are distributed and claimed in accordance with federal statutes, regulations, and policy. | System processes accurate data to assist agencies with timely claims and payments as evidenced by summary data and system requirements/training guides.  Agency provides historical payment and claims data establishing timely and accurate processing of financial information.  Agency used system to successfully pass recent IV-E review and/or financial audit showing history of successful management of IV-E claims and expenditures.  System data used to track and process financial data for prevention services. |
| **O.B1.02** | Support the efficient and correct calculation (and recalculation, if necessary) of authorized expenditures and claims. | May be demonstrated by summary reports showing a history of accurate and timely claims and payments based upon CCWIS data.  May be demonstrated with documentation describing automated functionality that monitors the correct and complete collection of information needed for the authorization and processing of payments, such as placement location, start/end dates, service units authorized/provided, and correct rates for placements/services. Documentation may include CCWIS processes that automatically correct and recalculate transactions when information is updated. The agency may have reports that flag payments that are atypical.  May be demonstrated by automation that supports assessing the quality of financial data and proactively assists users with managing payments and claims. |
| **O.B1.03** | Support stopping payments or correcting over-/underpayments to providers. | The system proactively identifies/flags payments that may need to be corrected and supports recoupment plan set-up, tracking and monitoring.  The system automation supports referential data integrity when users modify source data utilized to administer payments or claims (for example, when a placement episode must be modified or corrected, the system supports integrity/accuracy of related source data). |
| **O.B1.04** | Track and maintain information on payments/claims for clients for authorized units of services. | System provides actionable data to assist program in monitoring service utilization and related costs as evidenced by timely payment processing, summary service cost data by service type, and service delivery data. |

**Part 2 – Foundational Requirements**

Foundational requirements identify the conditions that must be met to comply with CCWIS project, data, and reporting requirements at 45 CFR § 1355.52. These apply whether staff enter data directly into the CCWIS or data are imported through an exchange.

In this section, the title IV-E agency may document components, factors, and design elements of the function(s) or exchange(s) that support CCWIS foundational requirements. We encourage agencies to simplify their responses by referencing submitted documentation, such as APDs, or by attaching screenshots, system documentation, training materials, and agency policy or procedures. Agencies may also reference sections of O.A.04 – Overview of Financial Processes if the response describes how the agency meets a foundational requirement.

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 to the financial function, 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** |
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| **O.B2.01** | *Data quality.* Financial data, whether entered directly into CCWIS or provided via a data exchange, meets or exceeds CCWIS data quality standards for completeness, timeliness, and accuracy. | Typically demonstrated with reports showing that financial data met the data quality standards established in the CCWIS Data Quality Plan. |
| **O.B2.02** | *Financial data collection is uniform and consistent.* The agency and other partners and entities collecting and using financial data share a common understanding of the data so that data collected by one entity is understood by all users of the data. | Typically demonstrated with reports from the most recent data quality review showing that the financial data is uniform and consistent. |
| **O.B2.03** | *Data relevance.* CCWIS/financial system data exchanges provide each partner with all relevant data needed for processing payments. | May be demonstrated by providing system logic for reducing erroneous and/or incorrect payments.  May be demonstrated by user feedback that payment process is effective/smooth. |
| **O.B2.04** | *Financial data security.* Financial data residing on other tribal, state, county, or provider systems is maintained and shared in compliance with CCWIS data confidentiality requirements. | May be demonstrated by a security plan that documents policies obligating other systems to protect data in compliance with CCWIS confidentiality requirements.  May be demonstrated with reports documenting security audits confirming that CCWIS data in other systems is maintained and shared in compliance with CCWIS requirements. |
| **O.B2.05** | *Financial reporting.* CCWIS generates or contributes to required title IV-B and IV-E federal reports. CCWIS also generates or contributes to agency reports needed to monitor financial transactions and manage the program. | Typically demonstrated with examples of:   1. submitted federal reports that include financial data, such as the CB-496, AFCARS, and the title IV-E Prevention Plan Program Data; and 2. agency reports needed to manage costs and evaluate program effectiveness, such as reports on the total cost of care for children and families, and reports comparing the costs of services and the impact of different services upon outcomes.   Financial reporting may be demonstrated by cross-referencing the Reporting Self-Assessment Tool. |
| **O.B2.06** | *Financial data is available for audits/reviews*. Financial data maintained in CCWIS and other systems is provided to authorized reviewers and auditors as requested and in accordance with agency security protocols. Histories of all transactions (including audit logs and erroneous and corrected transactions) are securely maintained to prevent unauthorized access and revision. | Typically demonstrated with documentation describing that CCWIS maintains complete histories of all transactions, including audit logs and erroneous transactions with links to updates and corrections. If information on some processes is not required to be maintained in CCWIS (such as confirmation that providers have received payments), note how auditors access the systems in which such information resides. The data security may be demonstrated by cross-referencing to relevant information about the security and access controls described in the Security Self-Assessment Tool. |

The resources and additional considerations below are examples, not an exhaustive list of functional requirements, that title IV-E agencies may consider in developing financial functions. Title IV-E agencies are encouraged to collect data required to support child welfare program outcomes, respective users’ needs, and CCWIS and program regulations.

Resource 1 – External Links

Resource 2 – Additional Considerations

**Resource 1 – External Links**

Following are links to resources related to title IV-E financial reporting and title IV-E reviews.

* Form CB-496: [Renewed Form for Title IV-E Programs Quarterly Financial Report | The Administration for Children and Families (hhs.gov)](https://www.acf.hhs.gov/cb/policy-guidance/pi-21-08)
* Information concerning title IV-E reviews: [Title IV-E Reviews | The Administration for Children and Families (hhs.gov)](https://www.acf.hhs.gov/cb/monitoring/title-ive-reviews)
* Child Welfare Policy Manual question related to financial information that is not required in CCWIS (Section 6.3A – Question #3): [CW Policy Database - Section 6.3A Policy Questions & Answers (hhs.gov)](https://acf.hhs.gov/cwpm/public_html/programs/cb/laws_policies/laws/cwpm/policy_dsp.jsp?citID=621)

**Resource 2 – Additional Considerations**

The Additional Considerations section describes useful features agencies may wish to incorporate into the CCWIS design/features. *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** |
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| **O.C2.01** |  | *Examples of reports that support child welfare program management.* The CCWIS provides reports that the agency uses to analyze placement and service costs and the funding sources supporting those activities. Some examples of reports agencies have found useful include:   * Average and total cost of placements per child * Average and total costs of all placement types * Analysis and comparison of costs for foster care vs. relative care * Average and total cost of specific services per child * Average and total costs per county and/or unit * Costs allocated to different funding sources (such as titles IV-A, IV-B, IV-E, Social Security insurance, Social Security disability, state or tribal funds) per child * Total IV-E vs. non-IV-E costs * Adoption subsidy by age of child * Total cost per child for each foster care episode * Total cost of prevention services per child * Total and average costs of foster care episodes * Analysis of costs for enhanced services and intensive placements * Average and total prevention title IV-E expenses per child and family * Aggregate and longitudinal analysis of costs for youth over the life of a case * Correlations for case and specific variables associated with long length of stay and/or high costs * Cost information by service type and service trends over time |
| **O.C2.02** |  | *CCWIS includes information on the full cycle of financial processing from service authorization and payment initiation to confirmation that individual service providers have received payment.* Including the complete financial cycle on all transactions can assist auditors as all information is available in one place; auditors do not have to access multiple independent systems and match records to complete their reviews. Case workers report that having access to complete payment information helps them answer questions when providers contact them requesting information on expected payments. |

We encourage agencies to add examples of additional considerations from their financial functions they wish to highlight. We may add agency contributions to the CCWIS body of knowledge to benefit other agencies.

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| **#** | **Agency-Submitted Additional Considerations** |
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1. 45 CFR 1355.52(b)(1) defines categories of federal data CCWIS must maintain.

   45 CFR 1355.52(b)(2) requires CCWIS to maintain “data to support state or tribal child welfare laws, regulations, policies, practices, reporting requirements, audits, program evaluations, and reviews.”

   Child Welfare Policy Manual (CWPM), Section 6.3A, Question #3 notes that some financial information, such as information confirming that a service provider processed a payment for a child, is not required to be maintained in CCWIS. [↑](#footnote-ref-3)
2. 45 CFR 1355.52(e)(1)(i). [↑](#footnote-ref-4)
3. CWPM, Section 6.3A, Question #3 notes that some financial information, such as information confirming that a service provider processed a payment for a child, is not required to be maintained in CCWIS. However, we encourage agencies to include such information in CCWIS as it may be useful for many purposes, such as assisting case workers responding to providers’ questions about the status of their payments or providing a complete audit trail of financial processing. [↑](#footnote-ref-5)