CCWIS Modernization Industry Day Customer Service Feedback

Formative Data Collections for Program Support

0970 – 0531

Supporting Statement

Part A - Justification

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A1. Necessity for the Data Collection

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval to request feedback from Comprehensive Child Welfare Information Systems (CCWIS) vendors and gather insights on feedback, insights, challenges, and concerns of implementing CCWIS with state partners.

Background

ACF provides federal oversight and technical assistance to support state and tribal Title IV-E agencies in the planning, development, implementation, and ongoing operation of CCWIS. CCWIS modernization efforts are complex, multi-year initiatives that require close alignment among federal policy, state and tribal program priorities, and the vendor community that designs and implements child welfare technology solutions.

To strengthen its program support and guidance for CCWIS modernization, ACF is convening a CCWIS Modernization Industry Day to engage child welfare technology vendors in an open, transparent, and non-procurement forum. The Industry Day is designed to inform vendors of ACF's current CCWIS modernization priorities and direction and to gather formative input on vendor experiences, challenges, and perspectives across the CCWIS lifecycle, including planning, implementation, and maintenance and operations.

The information collected through this formative engagement will help ACF better understand common themes across vendor and state experiences and identify opportunities to improve clarity, alignment, and effectiveness of federal CCWIS guidance, resources, and technical assistance offerings.

Legal or Administrative Requirements that Necessitate the Collection

There are no legal or administrative requirements that necessitate the collection. ACF is undertaking the collection at the discretion of the agency.

A2. Purpose of Survey and Data Collection Procedures

Overview of Purpose and Use

The purpose of this formative data collection is to obtain qualitative, non-generalizable feedback from child welfare technology vendors who participate in the CCWIS Modernization Industry Day. The data will be used by ACF for internal program improvement purposes only and will not be used to inform regulatory actions, funding determinations, or procurement decisions. Specifically, the information collected will support ACF in:

- Gaining insight into vendor perspectives on CCWIS modernization challenges, risks, and enabling factors across different lifecycle phases.
- Identifying areas where federal guidance, tools, or technical assistance may be clarified, strengthened, or better aligned with implementation realities.
- Informing the refinement of CCWIS program support strategies, resources, and future engagement approaches with states, tribes, and the vendor community.

The collected information will be analyzed in aggregate to identify themes and trends. No attempt will be made to produce statistically valid results or to generalize findings beyond the participants in this engagement.

Processes for Information Collection

The CCWIS Modernization Industry Day will be held virtually. Information will be requested from participants through a combination of:

- **Registration and Pre-event survey:** The registration and pre-survey (Instrument 1) will be posted on the Industry Day announcement on the Child Welfare Technology Incubator website in advance of the meeting to all potential participants. This will serve to register participants and provide ACF with relevant information and questions to inform the planning of the open forum.
- **Facilitated virtual large-group open forum:** During this time, ACF will answer questions already posed by participants. ACF will also ask for feedback and additional questions from participants based on a set of topic areas (Instrument 2), with the emboldened items below the focus for discussion:
    - Procurement and Funding Flexibility
    - Modular Modernization and Solution Strategy
    - Interoperability and Data Exchange
    - Compliance and Federal Policy Clarity
    - Workforce Adoption and User Experience
    - Outcomes, Value, and Practical Success
    - AI and Emerging Technology Governance
    - State Support, Guidance, and Lessons Learned

Post-event survey: This survey (Instrument 3) will be emailed to participants following the meeting and will gain session satisfaction and capture additional topics not discussed during the open forum.

Participation in all data collection activities is voluntary. Respondents may choose which questions to answer and may skip any question without penalty. No personally identifiable information will be requested beyond basic organizational context (e.g., vendor role or general area of expertise) or information required for session registration (e.g. name and email for invitation purposes).

A3. Improved Information Technology to Reduce Burden

To minimize respondent burden, we will leverage commonly used, low-burden information technologies including virtual meeting platforms and web-based survey tools that allow participants to provide feedback efficiently during or shortly after the event. The use of electronic data collection methods eliminates the need for paper submissions and allows respondents to participate remotely using existing technology.

All instruments are concise, clearly worded, and structured to align with the discussion topics introduced during the Industry Day.

A4. Efforts to Identify Duplication

The formative data collection associated with the CCWIS Modernization Industry Day is designed to complement, not duplicate, existing information by focusing specifically on unique vendor insights. ACF has reviewed existing sources of information related to CCWIS modernization, including feedback from states, and they do not capture vendor-specific perspectives or experiences from the technology provider community in a structured, program-specific manner.

A5. Involvement of Small Organizations

Some respondents may represent small businesses or small organizations that provide child welfare technology services or components. ACF has designed the data collection to minimize burden on these organizations by keeping participation voluntary, limiting the number and complexity of questions, and allowing feedback to be provided orally or electronically based on respondent preference.

No special reporting, recordkeeping, or staffing requirements will be imposed as a result of this data collection

A6. Consequences of Less Frequent Data Collection

This is a one-time request. If it were not conducted, ACF would have limited insight into vendor-identified challenges and implementation realities related to CCWIS modernization. This would reduce ACF's ability to:

- Identify emerging issues early in the CCWIS lifecycle.
- Align federal guidance and technical assistance with current market conditions and vendor capabilities.
- Proactively address areas of confusion or misalignment that can contribute to delays, rework, or increased risk for states and tribes.

Periodic formative engagement with the vendor community is therefore important to maintaining effective, responsive CCWIS program support

A7. Special Circumstances

There are no special circumstances for the proposed data collection efforts.

A8. Federal Register Notice and Consultation

Federal Register Notice and Comments

In accordance with 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 request to extend approval of the umbrella generic with minor changes. The notice was published on April 28, 2025, (90 FR 17603), and provided a sixty-day period for public comment. ACF did not receive any comments on the first notice. A second notice was published, allowing a thirty-day period for public comment (90 FR 42248, in conjunction with submission of the request to OMB. ACF did not receive any comments on the second notice.

Consultation with Outside Experts

ACF conducted informal consultation with child welfare technology subject matter experts during routine program planning to inform the design of the CCWIS Modernization Industry Day and associated formative data collection. These consultations were advisory in nature and focused on ensuring relevance and appropriate scope. No formal outside review was conducted.

A9. Tokens of Appreciation for Respondents

No tokens of appreciation for respondents are proposed for this information collection.

A10. Privacy of Respondents

Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private.

Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals' personal identifier.

A11. Sensitive Questions

There are no sensitive questions in this data collection.

A12. Estimation of Information Collection Burden

Burden Estimates

We expect about 200 participants in CCWIS Modernization Industry Day. Participants will complete a 5-minute registration and pre-event survey. The open forum will take place over about 1.5 hours, but the majority of that time will be spent with ACF addressing questions already received. ACF will request submission of additional questions during the forum and the estimate time per respondent to submit these questions is about 45 minutes. Following the event, a 5-minute post-event satisfaction survey will be available for completion. Participants who participate in all potential data collections will spend 55 minutes total.

Cost Estimates

To estimate the total annual cost burden to respondents, an hourly wage rate was developed using Bureau of Labor Statistics Occupational Employment Statistics data for representative

occupations expected to participate (e.g., management, technical, and business roles). A simple average of these hourly wages was calculated to derive a blended base wage of $66.67. Consistent with standard PRA practices, a multiplier of 2 was applied to account for fringe benefits and overhead costs (e.g., health insurance, retirement, and paid leave), which is $133.34. This results in a fully loaded hourly wage that more accurately reflects the total cost of respondent time.

Instrument	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Average Hourly Wage	Total Annual Cost
Event Registration and Pre-Event Survey	200	1	.083	16.6	$133.34	$2,213.44
CCWIS Industry Day Open Forum Question Topics	200	1	.75	150	$133.34	$20,001.00
Post-Event Survey	200	1	.083	16.6	$133.34	$2,213.44
Totals:	200	1	.916	183.2	$133.34	$22,427.88

A13. Cost Burden to Respondents or Record Keepers

There are no additional costs to respondents.

A14. Estimate of Cost to the Federal Government

The total cost for the data collection activities under this current request will be $9,334.

A15. Change in Burden

This is for an individual information collection under the umbrella formative generic clearance for program support (0970-0531).

A16. Plan and Time Schedule for Information Collection, Tabulation and Publication

Information collection will occur during and immediately following a one-time CCWIS Modernization Industry Day. Responses will be reviewed in aggregate for internal program improvement purposes only. No data will be published.

A17. Reasons Not to Display OMB Expiration Date

All instruments will display the expiration date for OMB approval.

A18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.

Attachments

- Instrument 1: Event Registration and Pre-Event Survey
- Instrument 2: Open Forum Question Topics
- Instrument 3: Post-Event Survey