Transitioning to CCWIS Compliance for NYS: Go or No Go?
Executive Summary

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Executive Summary

In June 2016, the federal Administration for Children and Families, Department of Health and Human Services (ACF) published a new federal rule defining the Comprehensive Child Welfare Information System (CCWIS) initiative which governs state and tribal Child Welfare (CW) information systems for the foreseeable future. In general, these CCWIS regulations, which are optional, allows state CW agencies greater flexibility to develop systems consistent with their practices and business needs by moving away from "data capture" to a "data maintenance" philosophy, as long as a copy of the data is stored and maintained in CCWIS, which must be the source of all data and reporting requirements. The primary features of the CCWIS regulations include a new level of emphasis on data exchange capability and data quality (rather than on the specific functionality to be provided) and on modularity as a development principle. The new system places greater emphasis on bi-directional data exchanges between CW-related programs in the state agencies that administer health, justice, labor, education, and local agencies as well as other organizations who provide services to children and families.

Features of the CCWIS Regulations

- Provides states with flexibility to determine the size, scope, and functions of its information system, allowing it to align more closely to business needs and practices.
- Must be the source of ALL data and reports required by both federal and state law, regulation, and policy as well as for child welfare practice and management functions.
- Must support the efficient, economical, and effective administration of child welfare programs.
- May obtain required data from external information systems, (e.g., systems maintained by local departments of social services or voluntary agencies), but that data must then be maintained (stored and managed) in the new CCWIS system.
- Place an emphasis on data quality and require the state to develop a data quality plan. Data quality means the data is valid, consistent, timely, and accurate.
- Require bi-directional data exchanges, with such sister state agencies as the Department of Health and the Office of Temporary and Disability Assistance, as well as, where practical, the courts and education systems. Bi-directional data exchanges refers to the ability of two systems to digitally exchange data with each other, eliminating the need for manual input of information and making it possible for sharing system data with authorized users.

In June of 2017, the New York State (NYS) Office of Children and Family Services (OCFS) launched a nine-month assessment of the investments required for enhanced program development and the impact of CCWIS compliance on NYS CW programs and services. Two primary design principles guided the assessment activities: 1. Learn from the experience of others facing the same decision, and 2. Learn from NYS' CW stakeholders. In adhering to these design principles with respect to NYS' CW community, the assessment engaged over 250 stakeholders to better understand the existing CONNECTIONS system, the CW information system that enables New York State (NYS) to document the delivery of CW services to families and children throughout the state and to capture their perspectives on the potential of CCWICS compliance to meet OCFS' strategic priorities. CONNECTIONS provides support for CW caseworkers as they work with families; these include intake, child protective investigations and case management (assessment, planning and the provision of services). Undertaken in 1993, CONNECTIONS was developed in response to the U.S. Administration for Children and Families (ACF) initiative known as the Statewide/Tribal Automated Child Welfare Information System (S/TACWIS).

NYS' Decision on a Transition to CCWIS Compliance
On February 23, 2018, using information acquired during the assessment activities, OCFS made a decision to continue to examine the investments necessary to achieve compliance with CCWIS and the implications of those investments.

The February 2018 decision by the OCFS Executive Team of "Go" with respect to a transition to CCWIS compliance was unanimous. The decision conference created a new level of understanding of the considerations that must be addressed in the ongoing planning for a transition to CCWIS compliance. It also created new understanding among the participants, about the consequence of a "No Go" decision. Participants in the decision conference agreed that while NYS continues to bear the responsibility and cost for maintaining and modernizing CONNECTIONS, not taking advantage of enhanced federal reimbursement would only add further burden to the state. A "No Go" decision would likely result in minimal improvements over time and increased dissatisfaction with CONNECTIONS as a tool to enable NYS CW programs and services. Participants recognized that NYS currently lags behind other states with respect to technology improvements aimed at reducing the burden on caseworkers and addressing duplicate data entry and the complications such duplications create. The OCFS Executive Team agreed that a transition to CCWIS will provide the opportunity to address these issues and open the door to NYS to take a leadership role nation-wide in data governance and integrity within a complex human services delivery system while also serving to reduce or eliminate penalties for incomplete reporting. To ensure that the implications of both a "Go and a "No Go" decision are continue to be examined and considered by OCFS and NYS CW community, OCFS Acting Commissioner Sheila Poole formed a CCWIS Executive Steering Committee to guide the next phase of planning the transition to CCWIS compliance.

This report, which will be provided to the CCWIS Steering Committee, presents the results of the nine-month assessment undertaken by OCFS to gather information necessary to inform their decision regarding commitment to CCWIS compliance and, given that a "Go" decision was made, to set a course for continued planning and implementation.

The main themes and questions of interest to the OCFS Executives and Project Team were as follows:

1. CCWIS Compliance and OCFS Strategic Priorities
   - Does CCWIS compliance allow OCFS to advance its Strategic Priorities?
   - What benefits does CCWIS compliance offer to populations receiving services from OCFS?
   - What are the benefits to OCFS in becoming CCWIS compliant?
2. Costs Associated with CCWIS Transition and Compliance
   - What are the financial costs?
   - What are the opportunity costs?
   - What are the costs if OCFS does not become CCWIS compliant?
3. CCWIS Impact on End Users
   - How does CCWIS affect the end user issues?
   - How does CCWIS impact end user satisfaction?
   - What is the impact CCWIS compliance to end users' ability to provide services?
4. CCWIS Data Requirements and Implications
   - What impact will CCWIS compliance have on data quality?
   - What impact will CCWIS compliance have on data exchange?
   - What is needed to address CCWIS data quality and exchange requirements?

5. CCWIS Compliance Risks
   - What are the risks associated with attempting to achieve compliance?
6. Resources and Bandwidth
   - Does OCFS currently have the resources to transition to CCWIS?
   - What staffing resources or skills are required to transition to CCWIS?

The assessment involved five primary information gathering activities:

1. Expert Meetings with OCFS Leadership.
2. A Multi-State Environmental Scan involving interviews with 12 states.
3. Stakeholder Engagement involving 269 Individual from across NYS local districts, voluntary agencies and OCFS.
4. OCFS Regional Director's Survey.
5. Local Systems Survey of Local Districts, Voluntary Agencies and NYC ACS.

The analysis of the data collected was presented to the OCFS Executive Team in preliminary form throughout the assessment and in final form during the CCWIS Decision Conference. Analysis of the data collected from the Environmental Scan and the Focus Groups, Interviews and Regional Director's Survey resulted in the identification of 16 considerations for OCFS as they consider a transition to CCWIS compliance. The first eight are threshold considerations; these highlight the most pressing concerns that OCFS must address in their ongoing assessments of a transition to CCWIS compliance. Threshold considerations include possible legal barriers and alignment with OCFS' strategic priorities. The second eight are secondary considerations; these represent additional issues or investments that require specific attention as part of OCFS' ongoing assessment of a transition to CCWIS compliance.

NYS OCFS	
CCWIS Transition Considerations	
Threshold Considerations	1. Advocates settlement (Advocates for Children of New York Settlement)
	2. Securing NYS OCFS Appropriations
	3. Ambiguity of Federal Reimbursement Model
	4. Relationship between ACF and NYS OCFS
	5. Legal Barriers to Data Exchange
	6. Governance Requirements
	7. NYS Readiness and Resources
	8. OCFS Strategic Priorities
Secondary Considerations	9. Leadership and Staffing Requirements
	10. CWCA (Child Welfare Contributing Agencies) Designation
	11. Role of NYS Information Technology Services (ITS)
	12. NYS CW Data Quality Plan
	13. Leveraging Existing CONNECTIONS Investments
	14. Efficiency and Effectiveness
	15. Technical Implications of Required Data Exchanges
	16. Modular Development

Summary statements are provided below in response to the six themes identified by OCFS Executives and the Project Team to give additional insights to help inform the OCFS Executive Steering Committee in their planning for a transition to CCWIS compliance.

CCWIS Compliance and OCFS Strategic Priorities. From the assessment findings, it is clear that the data-centric focus of the CCWIS regulations including the emphasis on bi-directional data exchange and the attention to the role of the CW information systems in generating efficiencies and effectiveness in CW programs in services, in particular for example with respect to data redundancy, presents a significant opportunity for NYS OCFS to increase its capability to meet its strategic priorities. However, to realize the benefits that a transition to CCWIS may offer NYS, in terms of advancing OCFS Strategic Priorities, this assessment has also made clear that significant investments must be made to ensure OCFS has access to fully committed expert staff across a variety of professions including CW, policy, research/reporting, evaluation, quality assurance, management, legal, financial, project management, business analysis, requirements gathering and analysis, cross-boundary information sharing, modular system procurement and development and technology. These human resources must be complemented with a budget that provides localities, voluntary agencies and the state with the necessary hardware and software investments required to be CCWIS compliant.

Costs Associated with CCWIS Transition and Compliance. Stakeholders engaged throughout the assessment noted that while it is reasonable to assume a transition to CCWIS compliance would require significant investments, both in staff and financial resources; developing an estimate of such an investment in NYS was not possible at this time. This assessment did not focus on this specific question, but rather looked at the current environment and worked to develop a good understanding of the nature of the investments that would be required for NYS to transition to CCWIS. The nature of these investments is presented in this report as "considerations". Data gathered from the environmental scan, however, indicates that financial costs estimates range from $154.1M in total cumulative costs to $118M over eight years. It is important to note that these estimates may not be relevant to NYS' transition and are provided here for illustrative purposes. Another consideration in terms of cost is the extent to which enhancements OCFS is currently developing in terms of bi-directional data exchange, among other requirements, will be enough to meet CCWIS requirements and warrant reimbursement from ACF.

CCWIS Impact on End Users. Stakeholders engaged throughout the assessment presented an interesting array of responses when asked to comment on the potential impact on end users (in this case, those who use CONNECTIONS to carry out their CW work) of a transition to CCWIS compliance. Many were concerned that CONNECTIONS, which is valued for its essential role in capturing and providing access to progress notes, might be made slower or more cumbersome; some were worried that the current architecture wouldn't support the requirements and would collapse under the weight of new development. Others were concerned that investments of money, time and energy would be made, with little to show for it; essentially expressing system upgrade fatigue. Others were hopeful that investments in CCWIS compliance would solve a myriad of system performance and ease of use problems, while creating an array of new benefits, including reducing the need for redundant data entry as a consequence of integrated systems and data exchange. Stakeholders consistently noted that an emphasis on bi-directional data exchange and addressing duplicative data entry, as part of a transition to CCWIS compliance, would represent a unique opportunity to improve upon the existing CONNECTIONS system and, in turn, enable better service delivery to children and families throughout NYS. A number of the system enhancements of interest to stakeholders were found to be already planned and in some cases ready for release, by the CONNECTIONS team, such as document scanning. Further, the technical requirements to support a number of the data exchanges of interest have also been developed. Going forward, data exchanges need to be negotiated with external entities and are subject to confidentiality laws.

CCWIS Data Requirements and Implications. While CCWIS regulations make it clear that certain requirements are 'to the extent practicable', there are still mandatory requirements that OCFS must follow. These include mandatory bi-directional exchange between: financial payments and claims for foster and preventative services; Title IV-E eligibility determination (this is a manual process in NYS now); and between Local Districts, Voluntary Agencies and a CCWIS system. The requirements speak directly of the potential to increase efficiencies by reducing, in a variety of ways, the need for redundant data entry. This emphasis makes possible under CCWIS, investment in features and functionality that enable system integration and data exchanges among systems; capabilities that were not supported under S/TACWIS. Further, CCWIS prioritizes data quality and requires states to have a data strategy to ensure that stakeholders from across the NYS CW system are engaging in shared data governance that meets the needs of OCFS and stakeholders within the LDSS and VAs. With respect to data exchange, throughout the assessment, stakeholders emphasized that the legal and policy work around data exchanges would be the most pressing to address. Establishing the data sharing agreements between state agencies, LDSS' and VAs and ensuring that those agreements address a range of issues including access rights, retention of data, data ownership and data use is and could involve stakeholders from a range of agencies including health, courts, education and public safety is, as noted above, a threshold consideration.

CCWIS Compliance Risks. The risk of non-compliance must be made clear as part of the planning for a transition to CCWIS compliance. Addressing considerations mentioned in Section 6, particularly the Ambiguity of the Reimbursement Model and the Relationship between NYS and ACF are imperative to building clear and comprehensive understanding of the risks of achieving a successful transition to CCWIS compliance. One of risks identified most consistently throughout the assessment is the state's ability to comply with CCWIS requirements focused on duplicate data entry and data exchange, particularly at the local level. According to stakeholders, many local systems are used across the state to complement CONNECTIONS. Typically, these complementary (not connected) systems (see Section 5 for details) require duplicate data entry, and as such represent a challenge to CCWIS compliance. From the environmental scan, it appears that states are being provided time to address these challenges and the rate of reimbursement is negotiable.

Resources and Bandwidth. It was clear throughout the assessment that resources and bandwidth are a major concern for OCFS, even in the ongoing operation of CONNECTIONS. Many stakeholders expressed concern about the "lift" that would be required for the state to complete the transition to CCWIS compliance, while also maintaining day-to-day operations, may have the potential to negatively impact existing system challenges (i.e. existing latency issues and access to information). As noted above, significant human resources across a range of disciplines and expertise areas are required if NYS is to successfully transition to CCWIS compliance. Exacerbating this situation is that a number of key staff with both IT and programmatic knowledge of CONNECTIONS are soon or have recently retired. Going forward, OCFS will need to consider, as outlined in Section 5, existing resources within ITS as well as approaching the Division of Budget to look at appropriations for necessary resources.