



COMMONWEALTH of VIRGINIA
DEPARTMENT OF SOCIAL SERVICES
Office of the Commissioner

Danny TK Avula MD, MPH
Commissioner

September 12, 2023

MEMORANDUM

TO: The Honorable Janet D. Howell
Chair, Senate Finance and Appropriations Committee

The Honorable Barry D. Knight
Chair, House Appropriations Committee

Michael Maul
Director, Virginia Department of Planning & Budget

FROM: Danny TK Avula MD, MPH

A handwritten signature in black ink, appearing to read "TK Avula".

SUBJECT: Semi-Annual Report on Comprehensive Child Welfare Information System

This report is submitted pursuant to Item 354.M. of the 2022 Appropriation Act, which states:

(1) "Out of this appropriation, \$7,517,668 the first year and \$7,517,668 the second year from the general fund and \$2,500,000 the first year and \$2,500,000 the second year from nongeneral funds shall be available for the reinvestment of adoption general fund savings as authorized in title IV, parts B and E of the federal Social Security Act (P.L. 110-351)."

(2) "Of the amounts in paragraph M.1. above, \$3,078,595 the first year and \$3,078,595 the second year from the general fund shall be used to develop a case management module for a comprehensive child welfare information system (CCWIS). In the development of the CCWIS, the department shall not create any future obligation that will require the appropriation of general fund in excess of that provided in this Act. Should additional appropriation, in excess of the amounts identified in this paragraph, be needed to complete development of this or any other module for the CCWIS, the department shall notify the Chairmen of the House Appropriations and Senate Finance Committees, and Director, Department of Planning and Budget."

(3) "Beginning September 1, 2018, the department shall also provide semi-annual progress reports that includes current project summary, implementation status, accounting of project expenditures and future milestones. All reports shall be submitted to the Chairmen of the House Appropriations and Senate Finance Committees, and Director, Department of Planning and Budget."

Please contact me if you have questions at (804) 726-7011.

DA:kc
Attachment

cc: The Honorable John Littel, Secretary of Health and Human Resources

Virginia Department of Social Services
Semi-Annual Report on the Compliant Comprehensive Child Welfare System
Reporting Period July 1, 2022 – December 31, 2022

Report Mandate

The Virginia General Assembly included the following in the 2022 Appropriation Act:

Item 345 (L) and (M)

(L)(1) “Out of this appropriation, \$10,017,668 the first year and \$10,017,668 the second year from the general fund and \$2,500,000 the first year and \$2,500,000 the second year from nongeneral funds shall be available for the reinvestment of adoption general fund savings as authorized in title IV, parts B and E of the federal Social Security Act (P.L. 110-351).”

(2) “Of the amounts in paragraph L.1. above, \$3,078,595 the first year and \$3,078,595 the second year from the general fund shall be used to develop a case management module for a comprehensive child welfare information system (CCWIS).”

(M)(1) “Out of this appropriation, \$3,460,195 the first year and \$7,121,181 the second year from the general fund and \$3,460,195 the first year and \$7,121,181 the second year from nongeneral funds shall be available for the development of a compliant comprehensive child welfare information system (CCWIS).”

(2) “In the development of the CCWIS, the department shall not create any future obligation that will require the appropriation of general fund in excess of that provided in this Act. Should additional appropriation, in excess of the amounts identified in this paragraph and paragraph L.2., be needed to complete development of this or any other module for the CCWIS, the department shall notify the Chairmen of the House Appropriations and Senate Finance and Appropriations Committees, and Director, Department of Planning and Budget.”

(3) “Beginning September 1, 2018, the department shall also provide semi-annual progress reports that includes current project summary, implementation status, accounting of project expenditures and future milestones. All reports shall be submitted to the Chairmen of the House Appropriations and Senate Finance and Appropriations Committees, and Director, Department of Planning and Budget.”

This report is intended to meet the reporting requirement set forth in Item 345 (M)(3).

Background

On June 2, 2016, the Administration for Children & Families (ACF), a division of the U.S. Department of Health & Human Services (HHS) published the Comprehensive Child Welfare Information System (CCWIS) final rule, replacing the Statewide and Tribal Automated Child Welfare Information System (S/TACWIS) regulations at 45 CFR 1355.50 – 59. ACF defined CCWIS requirements in 45 CFR 1355.50, which outlines the need for a CCWIS system to ensure the safety and well-being of children and all family members, strengthen and preserve families in order to promote the healthy development of children, and focus on prevention, protection, or other short or long-term interventions to meet the needs of the family. In December 2018, the Joint Legislative Audit Review Committee (JLARC) released the report “Improving Virginia’s Foster Care System” to the Virginia General Assembly. Many of the challenges identified in the JLARC reports would be addressed by meeting the requirements of the CCWIS final rule.

A CCWIS is a case management information system that title IV-E agencies must develop to support their child welfare program needs. The CCWIS final rule: (1) promotes data sharing with other agencies; (2) requires data quality plans; (3) reduces mandatory functional requirements; (4) allows agencies to build systems tailored to their needs; and (5) requires systems to be built modularly.

Specific CCWIS requirements mandate that data be available to support the efficient, effective, and economical administration of the programs. Specific data reporting requirements include:

- Data for ongoing federal child welfare reports;
- Data to support implementation and monitoring of federal child welfare laws, regulations, and policies;
- Case management data to support federal audits and reviews;
- Data to support implementation and monitoring of state or tribal child welfare laws, regulations, policies, practices, reporting requirements, audits, program evaluations, and reviews; and,
- Data for the National Child Abuse and Neglect Data System.

Current CCWIS Project Summary

The Virginia Department of Social Services (VDSS) has been in the planning phase for CCWIS implementation since SFY 2019.

In September 2021, VDSS prepared a budget request package that resulted in the appropriation of funding for FY 2023/2024 for the design, development, and implementation of CCWIS. Also included in the appropriation is the ongoing funding for staff to support this effort and for license costs. This funding will give VDSS the ability to build a full CCWIS within approximately three years from the date the project is initiated and deploy it so that staff will be able to use one system to manage client cases. The costs associated with the design and development of a CCWIS compliant case management system are eligible for federal reimbursement at a rate of 50%. As was reported in the June 2022 Semi-Annual Report on CCWIS, VDSS has determined that the CCWIS will be built on an enterprise-wide platform with shared components across Department divisions. Due to this change, guidance from The Children's Bureau (a Division of the ACF) indicated that the Advanced Planning Document (APD) should be a Multiple Operating Divisions (MultiOpDiv) APD that will include a cost allocation study to determine the proper cost share for each federal entity within the HHS Secretariat (Children's Bureau, Centers for Medicare and Medicaid Services, and Office of Child Support Enforcement) as well as the U.S. Department of Agriculture Food and Nutrition Services (FNS). Due to this, VDSS is required to submit a MultiOpDiv APD to our federal partners.

VDSS is continuing to actively engage with The Children's Bureau to reinstate the Implementation Advanced Planning Document (IAPD) for CCWIS development and implementation. Since the last CCWIS Semi-Annual Legislative Report (January 2022 – June 2022), VDSS has submitted the MultiOpDiv APD. The APD was conditionally approved on September 21, 2022. The Children's Bureau requested an updated budget to include a quarterly

cost breakdown and the addition of an acquisition summary. The updated MultiOpDiv APD was submitted on December 8, 2022.

The APD was submitted without a cost allocation study to determine the proper cost share for each federal entity within the HHS Secretariat as well as FNS because the Virginia Case Management System (VaCMS) migration to Salesforce was not funded for SFY 2023. VDSS is progressing with the MultiOpDiv APD to set the stage for the possibility of shared components and shared costs of the project when VaCMS is funded. VDSS will update the APD with the proper cost allocation, once it is determined. The APD outlines the project plan and costs associated with building a CCWIS compliant case management system. Once approved, the APD will guide the development of the CCWIS system so that it complies with the federal requirements (final rule) related to data sharing and data quality while allowing VDSS to develop a modular system that meets their business needs. Additional information regarding the planning process, the resources needed, the deliverables, and the plan for the modular delivery of components for the new system is included in the MultiOpDiv APD.

The VDSS Information Technology Investment Council has approved this project (PR3684) and the project charter. VDSS has developed a Request for Proposals (RFP) for this work, which is still under review by the Virginia Information Technologies Agency (VITA) and the Office of the Attorney General (OAG).

The MultiOpDiv APD process will require increased oversight and approval at both the state and federal levels, which means that work will not begin on the CCWIS system as quickly as originally anticipated. This may mean that some of the funds in the current appropriation for SFY 2022/2023 shift to SFY 2023/2024 for completion of the project. At the time of this report, the Virginia General Assembly had passed House Bill 1400, which included the transfer of funds to SFY 2023/2024, but the bill has not been signed by the Governor.

COMPASS|Mobile: Transitioning Front Line Workers to CCWIS

COMPASS|Mobile (Comprehensive Permanency, Assessment and Safety System) is a modern technical solution being used to prepare front line workers for the transition to CCWIS. The solution also has a web-based user interface referred to as COMPASS|Portal. From July to December of 2022, VDSS continued to support Family Services Specialists (FSS) with resources related to the COVID-19 pandemic and continued to provide virtual capacity-building opportunities. VDSS has started to offer in-person sessions when requested. The implementation of the Structured Decision-Making tools and Genogram in the COMPASS|Mobile-Portal resulted in changes to business processes for some agencies and VDSS has continued to support the agencies throughout the process. Updates were made to OASIS and the COMPASS|Mobile-Portal to allow for data collection as required by the Adoption and Foster Care Analysis and Reporting System (AFCARS) 2020 final rule. VDSS updated COMPASS user access to allow for licenses for Quality Assurance and Benefit Program staff that are responsible for Title IV-E eligibility determinations and monitoring.

Implementation Status

Funding to develop and implement CCWIS is included in the FY 2023/2024 budget. The new CCWIS system will adhere to the agency established enterprise architecture which is built to leverage a low code application platform (LCAP) and reuse of components. The automated system will meet the new federal Family First requirements, allowing the system to manage the requirements of the program, interface with the courts and mandated court processes, interface with the licensing process for foster homes and licensed facilities, comply with the federal AFCARS reporting requirements, and manage expenditures.

The new CCWIS system will also adhere to ITRM Policy EA 300-01, dated January 26, 2022, which requires all state agencies to ensure all new IT solutions proposed for development are cloud-enabled. The intent of this policy is to minimize development of custom IT solutions and applications and instead leverage cloud solutions.

Accounting of Current and Future Project Expenditures

As previously reported, monies appropriated for CCWIS have been expended as follows: \$583,333.93 in SFY 2019 for COMPASS|Mobile-Portal deliverables and administrative project costs and \$1,770,291.67 in SFY 2020 for COMPASS|Mobile-Portal design, testing, implementation and administrative project costs. In SFY 2021, design, testing and administrative project costs totaled \$2,092,767.03. For SFY 2022, design, testing, and administrative project costs totaled \$1,039,411.54. VDSS is on track to spend approximately \$2,100,000.00 for SFY 2023.

CCWIS Financial Expenditures by State Fiscal Year				
	SFY 2019	SFY 2020	SFY 2021	SFY 2022
Project Expenditures	\$ 583,334.00	\$ 1,770,292.00	\$ 2,092,767.00	\$ 1,039,411.00

CCWIS Financial Expenditures			
July 1, 2022 to December 31, 2022			
Category	General Fund	Federal Fund	Total
Mobility Vendor	\$1,011,416.00	\$0.00	\$1,011,416.00
Subtotal	\$1,011,416.00	\$0.00	\$1,011,416.00

Conclusion

The approved funding in Item 345(M) of the 2022 Appropriation Act will cover the one-time expense to support the design, development and implementation of a CCWIS-compliant case management system. The requested monies will allow VDSS to maximize the federal match funding available. VDSS will continue to utilize the funding in Item 345(L) of the 2022 Appropriation Act to maintain and operate our current legacy system, OASIS, and the companion COMPASS|Mobile-Portal application. Upcoming work includes updates and

changes to OASIS and COMPASS|Mobile-Portal to comply with security requirements and any required updates related to the 2023 Session of the Virginia General Assembly. Work is continuing on the AFCARS reporting format to ensure that VDSS is in compliance by May 2023 as required by ACF. This funding will also be utilized for the conversion of data from OASIS and COMPASS|Mobile-Portal to the new CCWIS compliant case management system. VDSS is developing an Operations and Maintenance agreement with the COMPASS vendor to better support data conversion and the upkeep of the application during CCWIS development.

The decision has been made to continue with the current branding for the updated case management system. COMPASS|Mobile-Portal will simply be COMPASS once the CCWIS compliant system is developed. There will be no need to distinguish between the mobile user interface and the web-based user interface as the components will be fully integrated.