

<h1>ACF</h1> <p>Administration for Children and Families</p>	<b>U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES</b> <b>Administration on Children, Youth and Families</b>	
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**TO:** Federally recognized Indian Tribes, Tribal Organizations and Consortia (tribes) Administering or Supervising the Administration of Title IV-E of the Social Security Act

**SUBJECT:** Automated child welfare information system options for Tribal title IV-E agencies.

**LEGAL & RELATED REFERENCES:** Title IV-E of the Social Security Act (the Act) section 479B of the Act; 45 CFR 1355; Program Instruction ACYF-CB-PI-08-05; Information Memorandum ACYF-CB-IM-08-03; P.L. 110-351.

**PURPOSE:** This Information Memorandum (IM) provides information to tribes that are operating a title IV-E program pursuant to section 479B of the Act (“tribe”, “tribal title IV-E agency” or “agency”) and explores the optional implementation of an automated child welfare information system (system). The IM provides information about how an automated system can support a tribal title IV-E agency’s child welfare program, implementing and maintaining systems, title IV-E funding, and the Comprehensive Child Welfare Information System (CCWIS). It is intended to provide introductory information. For more detailed information refer to our [Federal Guidance for Child Welfare IT Systems webpage](#) or reach out to us directly using the **Contact information** found at the end of the IM.

**INFORMATION:** Title IV-E of the Act does not require tribal title IV-E agencies to develop automated information systems. If a tribal title IV-E agency chooses to develop such a system, federal reimbursement of a share of the tribe’s allowable expenditures may be available.<sup>1</sup> Allowable expenditures may include costs of a case management information system to administer child welfare activities under an approved title IV-E plan.

**Automated information systems support child welfare programs**

Although implementation of an automated information management system is optional for a tribal title IV-E agency, it can support the agency’s administration of child welfare programs in many ways. A system can support efficient, economical, and effective operations; provide decision support tools; aid staff and supervisors with reports and tools to help them serve

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<sup>1</sup> 45 CFR 1355.30(k) applies 45 CFR 95 Subpart F to Indian Tribe operated title IV-B and IV-E programs.

children and families; enable administrators to monitor and manage programs; and serve as a rich data source for program analysis and research. Tribes may want to build robust automated systems that provide functions beyond the federal reporting requirements to achieve these advantages.

CB encourages tribes to develop and/or select systems appropriate to their child welfare programmatic needs. Tribes may want to consider how system functionality supports the following four categories of child welfare activities common to most title IV-E agencies.

These categories are offered as a starting point for tribes to consider as they evaluate alternatives for implementing systems. Because child welfare terminology varies among agencies and organizations, each category includes a brief description of the related activities. These descriptions are included to clarify the terminology and are not an endorsement of any child welfare practice model. Each description is followed by examples of related child welfare processes currently automated in other jurisdictions.

#### Category 1. *Child abuse and neglect intake/referrals*

A child abuse/neglect report is usually the initiating event in a child welfare case. A neighbor, family member, teacher, doctor, or other concerned party will contact the child welfare agency to report observations or an incident of possible abuse/neglect.

#### *Child abuse and neglect intake/referrals automated processes*

Agencies log in the automated information system when the report was received and record information such as the child's demographics and location, the alleged perpetrator's identity, incident details, and the reporter's name and available contact information. Agencies search current and historical records to determine whether: 1) the child, family, or alleged perpetrator is known to the agency; 2) there have been previous allegations of abuse/neglect; or 3) any of the individuals have been involved in a previous case or are involved in a current case. The compiled information is evaluated, and a determination made as to whether the report merits investigation or assessment. Staff record or the system calculates dates of all activities and decisions to document the expeditious handling of the report.

#### Category 2. *Abuse/neglect investigations and risk assessment*

If the agency determines that the allegation(s) of child abuse/neglect merit investigation or assessment, an investigator is dispatched to explore the allegation(s). Often the severity and credibility of the intake report will determine how promptly an investigation must begin. Staff will meet with the child, family, and other persons involved in, or with knowledge of, the allegations, evaluate the child's current condition, determine if the child's environment is safe, and assess risks to the child's health, safety, and well-being.

#### *Abuse/neglect investigations and risk assessment automated processes*

Staff document findings of the reported allegation(s) in the system. During the investigation, if previously unreported incidents of abuse/neglect are discovered, they are documented in the system. Staff document all investigation contacts, interviews, and the dates these activities occurred. The agency supplements the initial intake report with the information gathered during the investigation. In addition, the agency may search other agency(ies) records (and other

records, such as law enforcement databases) for information that may have a bearing on the investigation.

Child welfare agencies often automate risk assessment tools or processes to support the assessment of the child and family on a range of risk factors. The system will either present the information in an organized manner or tally the results and report if the child is at low/medium/high risk of abuse or neglect. The system frequently collects both discrete data elements and detailed narratives.

The investigation's findings are documented in the system. Findings can range broadly across a continuum that includes unfounded or unsubstantiated allegations, substantiated allegations, the child is safe, the child/family require services in the home, and the child's health, safety, and well-being necessitate removal from the home.

### Category 3. *Child welfare case management*

The findings arising from the abuse/neglect investigation and risk assessment process often determine whether the agency opens a child welfare case. Staff managing a case will develop case plans and establish goals for the child and family members based on investigation/assessment results, the expressed needs and desires of the child and family, court directives, and other agency assessments. Staff develop case plans for services provided to children maintained in their own home, in foster care, being considered for adoption, receiving independent living services, or transferred to another jurisdiction. The agency will offer services (which may include out of home placement) to address needs and to help children and families reach defined goals. Staff, supervisors, case reviewers, and courts will monitor children, families and services and review/modify case plans as needed to meet changing circumstances and goals.

#### *Child welfare case management automated processes*

Staff document the details of the case plan, such as participants, needs, services, and goals in the system. Staff record contacts with children, families, and other parties. Staff recommend services that are authorized by supervisors, or the staff may directly authorize services. Staff track service provision in the system. The agency may also document details on children, including out of home placement, health, special needs, and education. The staff periodically review the case plan and update any changes in the system to reflect case activities and changing circumstances, goals or objectives, new assessments, and service strategies.

A tribe that is considering implementing a system should remember that case documentation is sometimes used to inform court proceedings and may need to meet certain legal standards of admissibility for this purpose. For example, for a case note to meet legal standards of admissibility, it may be necessary to include an audit trail of any modifications made to the original note.

### Category 4. *Financial management*

The title IV-E agency should manage all costs to ensure continuous operations and that resources are allocated as intended to provide adequate, timely, and appropriate services to vulnerable children and families.

### *Financial management automated processes*

The agency tracks all financial transactions arising from serving children and families in the system, including placements, on-going services, and special one-time payments made on behalf of children. The tribal title IV-E agency authorizes payments and disburses funds from the correct funding sources (e.g., various federal funding sources, local funding sources, grants, etc.) in the system. The system tracks placement and service contracts. The agency calculates and records title IV-E eligibility in the system. Payment histories (including information on payees and clients, approvals, costs, and transaction numbers) are maintained in the system and audited. The agency may build into the system accounting and financial controls that support CB's review of title IV-E claiming, including reports, history and an audit trail of title IV-E eligibility and reimbursement determinations.

### **Planning activities, supported by adequate staffing, help tribes implement and maintain systems that support their unique needs**

Tribes may consider automating some or all the activities listed above and consider automating additional activities.<sup>2</sup> These are complex decisions, and we encourage tribal title IV-E agencies to conduct a planning phase to evaluate the benefits of automating federally required child welfare activities and any additional activities appropriate to their child welfare programmatic needs.

Planning is critical before the agency buys a complete system or hires a vendor to build a system. During planning the tribe should analyze multiple alternatives, determine the feasibility of each approach, and conduct a cost/benefit analysis of the feasible alternatives. Including child welfare staff in the system planning helps the tribe prioritize what is needed to support the program by separating critical "must have" functions from "nice to have" features. In this phase the tribe develops system requirements by clearly specifying the program's needs, child welfare business processes, reporting needs, and desired program outcomes. These requirements communicate the tribe's needs to vendors and serve as criteria to evaluate vendor proposals and system demonstrations. In the planning phase, the tribe can estimate the budget needed to buy/build/maintain a system as well as resources needed for tasks such as testing a new system and ensuring the system generates the high-quality data that is the foundation of case work, supervision, and decision-making.

Planning to purchase and implement a system is complex and requires child welfare program experience as well as expertise in diverse fields such as current information systems architecture, testing, training, data management, procurement, contracting, negotiations, and project management. The tribe's planning should also look beyond the initial system implementation and factor in the resources needed to maintain and update the system to keep it current with changing requirements and program needs.

Such purchases may occur only once or twice in one's professional career, which means that the purchaser may be inexperienced and need experts to help manage the process. While vendors bring experienced staff to assist with the implementation of their systems, those staff represent

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<sup>2</sup> Please contact your federal analyst for more information on implementing an automated child welfare system. Our [Federal Guidance for Child Welfare IT Systems page](#) also provides detailed guidance on implementing both CCWIS and non-CCWIS systems.

the vendor's interests. Therefore, we encourage tribes to ensure they have an experienced tribal team to assist with the planning, procurement, implementation, and on-going maintenance of the system to ensure the technology investments meet the tribal child welfare program's needs. While some tribes have staff with the needed expertise, other tribes may need to hire staff, or procure the expertise from an independent vendor(s) contractually obligated to represent tribal interests.

#### **Title IV-E funding may be available for tribal child welfare systems.**

The tribal title IV-E agency may be able to claim federal financial participation for the costs of system planning activities, such as those described above. In addition, tribal title IV-E agencies with an approved Advance Planning Document (APD) may be eligible to claim title IV-E reimbursement for technology expenses.<sup>3</sup>

#### **Tribes may implement a CCWIS**

Tribes may implement a CCWIS that supports a wide range of child welfare activities beyond the four common categories discussed above.<sup>4</sup> Implementation of a CCWIS provides flexibility and allows tribes to support their entire child welfare program with a single large system or a network of software products that each supports a different child welfare activity.

If a tribe decides to implement a CCWIS, the development and operational costs may qualify for a more favorable cost allocation that permits the tribe to receive more title IV-E reimbursement than for a system that is not a CCWIS.

#### **Contact information**

If you have questions about any of the topics covered in this IM or need assistance with a child welfare information system technology project, please contact the Division of State Systems (DSS). The DSS website lists [the federal analyst assigned to each state and tribal title IV-E agency](#). If the tribal title IV-E agency is not included on the list, please inform the federal analyst assigned to a state(s) in which your tribe is located.

Tribes are invited to subscribe to the Child Welfare Information Technology Managers' Listserv to receive announcements of upcoming webinars and new technical assistance documents. Our [Communications webpage](#) describes how to sign up.

**INQUIRIES:** HHS – Director, Division of State Systems, Children's Bureau,  
Administration for Children, Youth and Families, Administration for Children and Families

Rebecca Jones Gaston, MSW (she|her|hers)  
Commissioner  
Administration on Children, Youth and Families

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<sup>3</sup> 45 CFR 95 Subpart F

<sup>4</sup> The regulations for CCWIS are found at 45 CFR 1355.50 – 58. Tribes can access our resources on child welfare information systems, including CCWIS, at our [Federal Guidance for Child Welfare IT Systems](#) webpage.

Disclaimer: Information Memoranda (IMs) provide information or recommendations to states, Indian tribes, grantees, and others on a variety of child welfare issues. IMs do not establish requirements or supersede existing laws or official guidance.