

June 28, 2023

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 23-55

The purpose of this All County Letter is to remind and provide updated guidance to the counties about the Advance Planning Document process for Electronic Data Processing hardware, software, or services specific to the Child Welfare Services/Case Management System or limited to child welfare services.



KIM JOHNSON
DIRECTOR

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GAVIN NEWSOM
GOVERNOR

June 28, 2023

ALL COUNTY LETTER NO. 23-55

TO: ALL COUNTY WELFARE DIRECTORS

SUBJECT: ADVANCE PLANNING DOCUMENT PROCESS FOR
ELECTRONIC DATA PROCESSING EQUIPMENT AND
SERVICES RELATED TO CHILD WELFARE SERVICES

REFERENCE: [COUNTY FISCAL LETTER 20/21-59, DATED JANUARY 13, 2021,](#)
[COUNTY FISCAL LETTER 22/23-54, DATED JANUARY 26, 2023;](#)
[ALL COUNTY LETTER 18-47, DATED MAY 3, 2018;](#)
[WELFARE AND INSTITUTIONS CODE 16501.5\(d\);](#)
[45 CODE OF FEDERAL REGULATION SECTION 1355.52\(a\)\(3\);](#)
[MANUAL OF POLICIES AND PROCEDURES – CHAPTER 28](#)

The purpose of this All County Letter (ACL) is to remind the counties of and provide updated guidance for the Advance Planning Document (APD) acquisition process for hardware, software, and services, referred to as Electronic Data Processing (EDP). The process described in this letter is limited to EDP purchased for child welfare services (CWS) programs and/or specific to the Child Welfare Services/Case Management System (CWS/CMS). Guidance related to APDs for Title IV-E Agreement Tribes is forthcoming and will be issued in a future ACL. Guidance regarding EDP that benefits a wider range of programs apart from only CWS will be communicated through a forthcoming County Fiscal Letter (CFL).

The completion of an APD is necessary whenever counties are purchasing or renewing an agreement for child welfare related EDP hardware, software, or services. When submitting an APD, a county may request to receive approval for Comprehensive Child Welfare Information System (CCWIS) and/or non-CCWIS federal funding, or request to receive acknowledgement for the use of county only funds. Regardless of the funding source, all CWS APDs must be submitted to CMSAdminSvcUnit@osi.ca.gov and approved by the California Department of Social Services (CDSS), Child Welfare System Branch (CWSB) prior to county acquisition. This letter details the three steps of

the county APD business process: Annual Planning, Submission of an APD, and Completion Report reconciliation.

Step 1 - Annual Planning:

The CDSS typically issues an annual CFL in the month of March notifying counties of the planning and reporting requirements necessary for submitting the County Annual Planning Document Update (CAPDU) report. The State requires counties to submit the CAPDU report each year in order to notify the CDSS and Administration for Children and Families (ACF) of planned CWS/CMS (CCWIS funded) eligible hardware, software, and services for the upcoming two fiscal years (FYs). The State uses the CAPDU estimate to project upcoming FY expenditures and seek approval for CCWIS funding from CDSS' Federal partners, the ACF.

Examples of eligible County Annual Planning Document Update requests are:

- Computer workstations, such as laptops, desktops, and black and white printers
- System Support Staff activities for the CWS/CMS including but not limited to: CWS/CMS Image, Device User Support, Printer/Server Configuration, Network Access Configuration, and Ticket Support related to county connectivity issues

Annual Planning Best Practices:

- Submit the CAPDU report to CWSB within 60 days of the annual CFL posting
- Include only CCWIS (CWS/CMS) eligible estimates
- Use the most current templates
 - Templates can be accessed through the [Child Welfare Digital Services \(CWDS\)](#) webpage by selecting the following: Stakeholder Resources, [CWS/CMS Users](#), [CWS/CMS Guides](#), APD Information (note: to access internal CWDS links, the county user will need to create an account and log in)

Step 2 – Submission of an Advance Planning Document:

Once the need for a CWS acquisition has been identified, the county must determine the FY timeline the procurement will span and prepare to submit an APD. In preparation for an APD submission, the county may collaborate with their respective Fiscal Department in order to obtain specific financial information required in the APD submission by the CDSS CWSB. The submission of an APD is required for any EDP that benefits CWS programs, regardless of funding source as the state is accountable to various oversight agencies for all county expenditures and procurements related to child welfare EDP.

An Advance Planning Document must be submitted to the Child Welfare System Branch for the following but not limited to:

- Purchase and/or renewal of hardware, software, or services
- Requests already approved by the ACF such as the current year's CAPDU
- All External systems benefitting child welfare such as:
 - Software covered under the Commercial Off The Shelf (COTS) Product Waiver issued by the ACF on June 30, 2020, allowing the State to approve federal funds at the administrative rate for two select modules of the proprietary software BINTI and Efforts to Outcomes to support the recruitment and licensing functions for the Resource Family Approval Program
 - Proprietary software such as the BINTI Placements and Family Finding modules and Sacramento County Office of Education Foster Focus data system used specifically for public assistance programs and not covered under a COTS waiver. Note: proprietary software not eligible for federal funds must be submitted for review and acknowledgement as the external system may have an impact on the current and/or new statewide child welfare information system
- Support Staff Services for county EDP staff who directly assist in the ongoing maintenance and operations of the State's current system, the CWS/CMS

Please note that external system approval and/or acknowledgement letters now contain language requiring agreements to include early termination and decommissioning criteria for systems that are duplicative of the CWS-CARES in preparation for the implementation of the new statewide child welfare information system.

Counties must provide the following when submitting an Advance Planning Document:

1. County APD Standard template: describes the business need for the acquisition
2. Appendix A Cost Detail template: breaks down the cost of the planned purchase or renewal
3. Supporting documentation such as quotes, bids, and proposed contract agreements for the planned purchase: one quote is necessary when utilizing a vendor from the Department of General Services Statewide Purchasing Contract, and a minimum of three quotes are required for vendors not included in the Statewide Contract
4. Self-Certification form: needed if the county is utilizing a vendor not included in the Statewide Contract

All APD templates are available upon request via email at
CMSAdminSvcsUnit@osi.ca.gov.

Once an Advance Planning Document is received, the Child Welfare System Branch will:

1. Confirm receipt of the submission via email within three to five business days.
 - Note: if confirmation is not received within the five business days, we encourage the county to reach out to CMSAdminSvcsUnit@osi.ca.gov for the APD status.
2. Review the APD submission and verify the request is eligible for CCWIS, non-CCWIS, county only, or no funds.
3. Reach out to the county for further clarifications if needed.
4. Provide final notice of approval, acknowledgement, or denial
 - Approval: the county can proceed with the planned purchase; the approval letter includes the total amount of federal funds approved.
 - Acknowledgement: the county can proceed with the planned purchase with county only funding; no federal funding will be provided.
 - Denial: the county cannot proceed with the planned purchase regardless of funding source (this letter will provide an explanation for the reason of denial).

Decommissioning of External Systems:

It is important to note that the federal CCWIS regulations require the statewide child welfare information system, which is currently the CWS/CMS, to maintain all child welfare program data required by federal, state, and tribal law and policy. If the state's current child welfare information system, the CWS/CMS, does not provide a necessary function, counties may utilize approved software applications other than the CWS/CMS. Once the replacement statewide child welfare information system, the Child Welfare Services-California Automated Response and Engagement System (CWS-CARES), is implemented statewide, counties must fully utilize the functionality provided by the replacement system, meaning external systems that are duplicative of the CWS-CARES must be decommissioned.

Approval and acknowledgement letters for external system APDs contain language requiring the county to include early termination and decommissioning criteria in their agreements to prepare for statewide implementation of the CWS-CARES. Counties are also encouraged to include requirements within their external system contracts that allow for the conversion of data for county use or for conversion to the CWS-CARES when the external system is decommissioned.

Counties who do not utilize the State's child welfare information system as the single system of record not only risk the result of disparate data sources but may also be subject to the recoupment of enhanced funding used thus far in the development of the state CCWIS system and forfeiture of any future enhanced CCWIS funding. In addition, both the State and counties would be subject to this penalty.

Advance Planning Document Best Practices:

1. Child Welfare specific APDs must be submitted to the CWSB. The Office of Systems Integration (OSI), Statewide Automated Welfare System (SAWS)/ Generic APD Team is not authorized to process child welfare service specific APDs. However, APDs deemed to impact both CWS and SAWS programs must be submitted to both the CWSB and the OSI for review. The county will need to indicate the APD type (for example, SAWS, CWS/CMS, Dual) within the APD template. Dual APDs can be emailed separately to the OSI and CWSB for submission, or both the OSI SAWS/Generic APD Team (Project.Approvals@osi.ca.gov) and CWSB (CMSAdminSvcsUnit@osi.ca.gov) mailboxes may be included on the same APD submission.
2. Counties are encouraged to partner with CWSB early in the APD process for potential software purchases. With the development of the CWS-CARES underway, the CWSB is available to work with counties to discuss county needs, identify potential duplication of proposed software with planned CWS-CARES functionality, aid in the development of decommissioning criteria, and identify data conversion considerations to further inform county purchasing decisions.

Step 3 – Completion Report Reconciliation:

Once an approved CCWIS and/or non-CCWIS APD purchase is complete, the county is responsible for submitting a Completion Report to the CWSB detailing final APD expenditures in order to formally close out the APD. This report reconciles the acquisition with supporting documentation such as invoices and/or purchase orders. The county has two FYs from the date of CWSB APD approval to submit the Completion Report. As a courtesy, when providing final notice of APD approval, the CWSB will include a Completion Report template as a reminder for the county to submit the report once the purchases described in the APD have been completed. In the event the county has decided the acquisition is no longer needed at the end of the two FYs, a Completion Report detailing no purchase was made must be submitted.

Completion Report Best Practices:

1. Use the most current template available upon request via email at CMSAdminSvcsUnit@osi.ca.gov.
2. Provide all supporting documentation such as invoices and/or purchase orders.

A corresponding CFL to this ACL will be released to provide guidance regarding general APD requirements, including the definitions of EDP equipment and services, guidance regarding the development of an APD, and resources to ensure that costs requested and approved in an APD are allowable and reasonable to meet program needs. Additionally, Frequently Asked Questions for child welfare related APDs are available on the [CWDS APD Information](#) webpage. Questions or further assistance should be directed to the CWSB at CMSAdminSvcsUnit@osi.ca.gov.

Sincerely,

Original Document Signed By

ANGIE SCHWARTZ
Deputy Director
Children and Family Services Division

cc: All Title IV-E Agreement Tribes