

March 15, 2024

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

**EXECUTIVE SUMMARY**

**ALL COUNTY LETTER NO. 24-19**

The California Department of Social Services must compile an accurate and complete record of each county's use of Electronic Data Processing systems external to the statewide child welfare information system, the Child Welfare Services/Case Management System. County Child Welfare Agencies must submit a one-time information-only Advance Planning Document reporting all external systems used in the county for child welfare services.



KIM JOHNSON  
DIRECTOR

CALIFORNIA HEALTH & HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
744 P Street • Sacramento, CA 95814 • [www.cdss.ca.gov](http://www.cdss.ca.gov)



GAVIN NEWSOM  
GOVERNOR

March 15, 2024

ALL COUNTY LETTER NO. 24-19

TO: ALL COUNTY WELFARE DIRECTORS  
ALL COUNTY CHILD WELFARE DIRECTORS  
ALL COUNTY CWS/CMS SPOCS

SUBJECT: **CHILD WELFARE SERVICES EXTERNAL SYSTEMS  
RECONCILIATION ADVANCE PLANNING DOCUMENT**

REFERENCE: [2 CODE OF FEDERAL REGULATIONS \(CFR\) SECTION 200.1;](#)  
[45 CFR SECTION 1355.51-SECTION 1355.59;](#) [COUNTY](#)  
[WELFARE DIRECTOR LETTER ISSUED DECEMBER 2, 2009;](#)  
COUNTY FISCAL LETTER (CFL) [20/21-59](#) AND [22/23-91](#); ALL  
COUNTY LETTER (ACL) [18-47](#) AND [23-55](#); [DIVISION 28 –](#)  
[MANUAL OF POLICIES AND PROCEDURES; ADMINISTRATION](#)  
[FOR CHILDREN AND FAMILIES-OFFICE OF INFORMATION](#)  
[SYSTEMS MANAGEMENT-001](#)

## PURPOSE

For the State to compile an accurate and complete record of each county's use of Electronic Data Processing (EDP) systems external to the current statewide child welfare information system, the Child Welfare Services/Case Management System (CWS/CMS), a one-time information-only Advance Planning Document (APD) submission reporting all external systems used in the county for child welfare services is required. This All-County Letter (ACL) also serves as a reminder to counties of State guidance related to the acquisition of external system EDP and Comprehensive Child Welfare Information System (CCWIS) federal regulations that may require the decommissioning of duplicative, ancillary systems used to collect or report child welfare-program information.

## BACKGROUND

The CCWIS regulations in 45 Code of Federal Regulations (CFR) [section 1355.51-section 1355.59](#) govern how state and tribal IV-E agencies will claim federal funding for child welfare information systems that support the administration of the Title IV-E and IV-B programs. The California Department of Social Services (CDSS) is responsible for ensuring the statewide child welfare information system application supports the efficient, economical, and effective administration of the Title IV-B and IV-E plans. The federal CCWIS regulations also require the system to maintain all child welfare program data required by federal, state, or tribal law or policy, and as such, counties shall not develop or maintain external systems that duplicate functionality already contained in the statewide child welfare information system application. Counties may continue to utilize external systems, or the portions of such systems, which are not duplicative of functionality available within the statewide system.

The CWS/CMS is the State's current transitional CCWIS system. The information technology system planned to replace the statewide CWS/CMS is the Child Welfare Services-California Automated Response and Engagement System (CWS-CARES) as referenced in [Assembly Bill 1603 and the Welfare and Institutions Code section 16501.9](#). The implementation of the CWS-CARES Version 1 is planned for October 2026. Until the CWS-CARES is implemented statewide, counties may utilize approved software applications other than the CWS/CMS, if necessary functionalities are not available in the CWS/CMS. However, prior to acquisition, counties must obtain approval for these external system software applications through the submission of an APD to the CDSS Child Welfare System Branch (CWSB).

The CDSS CWSB is responsible for reviewing all child welfare related APD requests (both CWS/CMS and non-CWS/CMS). The State will provide formal approval, acknowledgement, or denial in the form of a letter for all federal or county only funded EDP requests. Therefore, counties must submit an APD for **all** EDP equipment, software, and services benefiting a child welfare program and must obtain prior written approval or acknowledgement required by the State's [Division 28 – Manual of Policies and Procedures](#) and federal regulations (further described in [ACL 23-55](#)).

When the State implements the CWS-CARES functionality statewide, counties must decommission any ancillary (external) system functionality that duplicates the statewide CWS-CARES in accordance with [ACL 18-47](#). The external systems [All County Welfare Director Letter dated December 2, 2009](#), referenced in [ACL 18-47](#) describes an external system as classified to be decommissioned if the system functionality and data will be available in the statewide child welfare information system and the external system is only used by child welfare services. Counties may continue to utilize external systems, or the portions of such systems, which are not duplicative of functionality available within CWS-CARES. 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 subject the Title IV-E agency to recoupment of federal funding used thus far in the development of the State CCWIS system and forfeiture of any future CCWIS funding (see [45 CFR section 1355.58](#)). For more information on decommissioning external systems, please reach out to the CWSB External Stakeholder Coordination Unit at [CWDS-ExternalStakeholder@otsi.ca.gov](mailto:CWDS-ExternalStakeholder@otsi.ca.gov).

### **Why is an APD necessary?**

As outlined in [2 CFR section 200.1, Passthrough Entity](#), and [CFL 22/23-91](#), CDSS, as the passthrough entity for funds provided for federally funded programs, is responsible for the oversight of reimbursements claimed for these programs. To manage these responsibilities and avoid financial penalties and disallowances, the State must review and approve all subrecipient (County and/or Title IV-E Agreement Tribes) acquisitions of EDP, regardless of whether state or federal funding is sought for the acquisition.

Subrecipients of CDSS funding must obtain prior approval by submitting an APD to the appropriate reviewing agency for review and receiving a formal approval or acknowledgement letter with an APD project number prior to completing their purchase(s). If the subrecipient's request is denied, the county cannot proceed with the planned purchase regardless of funding source. **Failure to obtain approval prior to EDP acquisition may result in a disallowance of costs.** Subrecipients should continue to refer to the ["Is an APD Necessary?" Checklist](#) for assistance in determining if an APD is required for a project.

### **EXTERNAL SYSTEMS RECONCILIATION**

For the State to fulfill its responsibilities outlined in [2 CFR section 200.1, Passthrough Entity](#) and [CFL 22/23-91](#), CDSS must compile an accurate and complete record of each county's use of child welfare external systems, including those which have historically been funded with county only funds. To collect this information, counties are required to submit a one-time information-only APD reporting all external systems currently used in the county for child welfare services. This APD submission will be referred to as the External Systems Reconciliation. An external system is a tool or technology used by organizations to deliver child welfare services in addition to, or outside of, the CWS/CMS. This includes EDP systems that may directly or indirectly impact the delivery of child welfare services. Examples of external systems include Commercial Off-The-Shelf (COTS) and County-developed systems. Comma Separated Value (CSV), Access Database, and Excel files do not need to be included in the submission of this reconciliation APD.

The State's intention in collecting this reconciliation information is to ensure CDSS is compliant with the regulations cited above and is supporting counties in submitting external systems APDs appropriately in the future to maintain said compliance. The CDSS does not anticipate any penalties to counties for non-compliance discovered because of this one-time submission. However, the Administration for Children and Families (ACF) requires that CDSS limit the proliferation of duplicative child welfare external systems, so future non-compliance with APD regulations may result in additional scrutiny or penalties.

To streamline submission of this information, the CWSB will provide each county's Single Point of Contact and APD contact with a prepopulated External Systems Reconciliation template containing systems believed to be currently in use in the county. The systems prepopulating each template will be those previously provided by the county to the CWS-CARES External Systems team during their research. Reporting systems to the CWS-CARES External Systems team does not replace the requirement for counties to submit APDs to the CWSB prior to acquisition of said external systems, therefore, completing this reconciliation APD is still necessary. Counties must review and validate that the systems prepopulated on the template are in use, and add any other external systems (this includes EDP systems already in the development or implementation phase) utilized for child welfare on the provided template. Any external systems planned, but not yet in development, must be submitted to the Child Welfare System Branch in a separate information-only APD submission prior to initiating any contractual agreements or development work.

A complete External Systems Reconciliation template must include:

- 1. County Name**
- 2. APD Submission Date**
- 3. County Contact Information**  
This information should include the contact's name, position, department, telephone number, and email address.
- 4. External System Name**  
This field should also include any specific modules (e.g., Binti Licensing and Approvals).
- 5. Description**  
This field should include the nature and scope of the acquisition. It should also include the purchase of software and implementation date.
- 6. Business Justification**  
Select the appropriate business justification from the drop-down list. Business justifications available in the template include: functionality not available in CWS/CMS, county specific business process, or other. If other, the county should specify the business justification in the Notes column.

**7. Prior APD Approval**

Select Yes or No to indicate if the county received prior APD approval or acknowledgement for the identified external system. If Yes, the county should provide the most recent Project Tracking Number in the Notes column. Note: please reach out to the CWSB at [CWSB-Fiscal@otsi.ca.gov](mailto:CWSB-Fiscal@otsi.ca.gov) if uncertain of the county's APD history.

**8. Benefitting Programs**

Select the appropriate benefitting program from the drop-down list. Benefitting programs include: CCWIS (CWS/CMS), Non-CCWIS (non-CWS/CMS), Generic, Resource Family Approval, County-Only, or Other. If Other, the county should specify the benefitting program in the Notes column.

- I. CCWIS (CWS/CMS): The EDP system benefits the CWS/CMS directly, meaning the system is used for primary interaction with, operation of, or functioning of the CWS/CMS application.
- II. Non-CCWIS (Non-CWS/CMS): The EDP system does not directly impact and/or benefit the CWS/CMS. This may include systems that directly or indirectly impact the delivery of child welfare services outside of the CWS/CMS.
- III. Generic: The EDP system indirectly benefits all programs.
- IV. Resource Family Approval: An EDP system benefitting the foster caregiver approval process.
- V. County-Only: The EDP system is not eligible for state or federal financial participation (FFP).
- VI. Other: The EDP system does not benefit the CCWIS, Non-CCWIS, Generic, Resource Family Approval, or County only programs listed above.

**9. Service Agreement Term**

This field should include the service agreement term, if any, for the identified external system.

**10. Average Annual Cost**

This field should include the average annual cost for the identified external system.

**11. Anticipated Benefits**

Select the appropriate anticipated benefits from the drop-down list. Anticipated benefits include: Improved CWS delivery, Operational efficiency, Program or administrative accountability, Other. If Other, the county should specify anticipated benefits in the Notes column.

**12. Notes**

This field should include any additional or relevant information from the previous fields.

Each county will need to complete the provided template and submit their response to [CWSB-Fiscal@otsi.ca.gov](mailto:CWSB-Fiscal@otsi.ca.gov) within 45 days of the date of this letter. If a county anticipates more than 45 days are needed to compile this information, please reach out to the CWSB at [CWSB-Fiscal@otsi.ca.gov](mailto:CWSB-Fiscal@otsi.ca.gov) to coordinate the county's submission. If no external systems are used, the county is responsible to draft and submit a letter to the CWSB certifying no external systems are being utilized; this certification will need to be on county letterhead and signed by the Child Welfare Director. The CWSB will provide a template certification letter for the county to use.

Once a response is received, the CWSB will review the External Systems Reconciliation submission and provide the county with a formal written acknowledgement of the external system(s) by June 30, 2024. This acknowledgement will not constitute approval of state or federal funding, as the State only intends to leverage the information submitted by the county to reconcile all systems in use. Counties should continue to submit an APD to [CWSB-Fiscal@otsi.ca.gov](mailto:CWSB-Fiscal@otsi.ca.gov) for the acquisition of any future external system.

## **ONGOING EXTERNAL SYSTEMS APD SUBMISSION REQUIREMENTS**

The one-time External Systems Reconciliation allows the CDSS CWSB to align the State's record of external systems with the systems currently in use by all counties. After the completion of the External Systems Reconciliation, if a county identifies the need for another external system acquisition to support a child welfare program, which was not previously submitted for review and approval, the county should determine the fiscal year timeline the procurement will span and prepare to submit an APD prior to acquisition. As a reminder, any EDP system renewals following the reconciliation will require submission of a new and separate APD. In preparation for an APD submission, the county may collaborate with their respective fiscal departments to obtain specific financial information required in the APD submission. The FFP is not available for functionality or activities specific to a geographic area ([ACF-OISM-001](#)). However, counties are still required to submit an APD for all EDP purchases, regardless of whether federal or county only funding is requested. If the county is submitting the APD for proprietary software covered under a State COTS waiver, the county may request to receive non-CCWIS funding reimbursement. Regardless of the funding source, all CWS APDs must be submitted to [CWSB-Fiscal@otsi.ca.gov](mailto:CWSB-Fiscal@otsi.ca.gov) and approved by the CDSS CWSB prior to county acquisition.

An APD must be submitted to the CWSB for all external systems benefitting child welfare such as:

- Software covered under the 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 Traverse, used specifically for public assistance programs, are not covered under a COTS waiver. Proprietary software not eligible for federal funds must still be submitted for review and acknowledgement as the external system may have an impact on the statewide child welfare information system.

A complete APD submission must include:

1. County APD Standard or Information Only template describing the business need for the acquisition.
2. Appendix A Cost Detail template breaking 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 for standard APDs is required if the county will utilize a vendor not included in the Statewide Contract.

Please note:

- Counties may include multiple items in an Information Only APD, if there are no items for which funding is being requested; this includes EDP that is county only funded.
- External system approval and acknowledgement letters contain language encouraging counties to include early termination language in their agreements to support decommissioning systems that are duplicative of the CWS-CARES. As a reminder, acknowledgement of an external system is the State's consent to acquire by means of county only funds.

Once an APD is received, the CWSB will:

1. Confirm receipt of the submission via email within three to five business days.
2. Review the APD submission and determine whether the funding requested, if any, is allowable.
3. Reach out to the county for further clarifications, if needed.
4. Provide final approval/acknowledgement so the county can proceed with the planned purchase, or denial of the request.



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 decommissioning an external system ([ACL 23-55](#)).

If you have any questions or need additional guidance regarding the information in this letter, contact the Fiscal Monitoring Unit of the Child Welfare System Branch at (916) 891-3100 or at [CWSB-Fiscal@otsi.ca.gov](mailto:CWSB-Fiscal@otsi.ca.gov).

Sincerely,

***Original Document Signed By***

DIANNA WAGNER  
Assistant Deputy Director  
Children and Family Services Division

cc: County Welfare Directors Association  
All Federally Recognized Tribes

Attachment

Attachment A  
Frequently Asked Questions

**Does my county need to submit an APD?**

Your county needs to submit an APD if it uses an external system to support its child welfare program. If your county determines it does not need to submit an APD because it does not use any child welfare external systems, the county will need to submit a letter to the Child Welfare System Branch certifying that the county does not use any external systems to support their child welfare program. A template certification letter will be provided to the county to use.

**Can I receive reimbursement for the costs associated with my county's external systems?**

For this reconciliation effort, we will only be acknowledging that the county has these systems in use, which does not constitute approval of state or federal funding. A separate APD would need to be submitted for each system for which the county is requesting funding. However, due to prior approval requirements, if the county has already entered a contract or purchased an external system, federal funding would not be available.

**Does an Excel spreadsheet or Access Database count as an external system?**

An external system is a tool or technology used by organizations to deliver child welfare services in addition to, or outside of, the legacy CWS/CMS solution. Examples of external systems include COTS, County-developed system, CSV file, and/or Excel files. For the purposes of this reconciliation effort, CSV, Access Databases, and Excel files do not need to be included in the county's submission. However, these types of external systems should be reported to the CWS-CARES External Stakeholder Coordination Unit so their functionality can be evaluated for inclusion in CWS-CARES.

**What documentation do I need to provide in support of my reconciliation APD?**

The county will need to complete the External Systems Reconciliation template and submit their response to [CWSB-Fiscal@otsi.ca.gov](mailto:CWSB-Fiscal@otsi.ca.gov) within 45 days of the date of this letter. The Child Welfare System Branch will send the template to each county's CWS-CARES Single Point of Contact and APD contact(s). If the county does not use any external systems to support its child welfare program, the county will need to submit a letter to CWSB certifying no external systems are being utilized; this certification will need to be on county letterhead and signed by the Child Welfare Director.