

June 24, 2025

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 25-44

The purpose of this All County Letter is to inform the counties and Tribes with a California Title IV-E Agreement of a moratorium on the acceptance of Advance Planning Documents for new and expanded child welfare electronic data processing ancillary systems external to the State of California's child welfare information system.



JENNIFER TROIA
DIRECTOR

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GAVIN NEWSOM
GOVERNOR

June 24, 2025

ALL COUNTY LETTER NO. 25-44

TO: ALL COUNTY WELFARE DIRECTORS
ALL TRIBES WITH A CALIFORNIA TITLE IV-E AGREEMENT
ALL CHIEF PROBATION OFFICERS

SUBJECT: MORATORIUM ON PROCUREMENT OR DEVELOPMENT OF
EXTERNAL SYSTEMS DUPLICATIVE OF THE STATEWIDE CHILD
WELFARE INFORMATION SYSTEM

REFERENCE: CODE OF FEDERAL REGULATIONS (CFR) SECTION [200.1](#);
2 CFR [200.208](#), AND [200.339](#); 45 CFR SECTION [1355.52](#);
ALL COUNTY LETTER [18-47](#) AND [23-55](#);
COUNTY FISCAL LETTER [23/24-12](#);
[DIVISION 28 – MANUAL OF POLICIES AND PROCEDURES](#);
WELFARE AND INSTITUTIONS CODE [16501.5\(d\)](#) AND [16501.9](#)

The purpose of this All County Letter (ACL) is to inform the counties and Tribes with a California Title IV-E Agreement of a moratorium on the acceptance of Advance Planning Documents (APDs) for new or expanded child welfare electronic data processing (EDP) ancillary systems external to the State of California's, hereinafter referred to as the "State," child welfare information system, with functionality duplicative of the planned Child Welfare Services-California Automated Response and Engagement System (CWS-CARES) Version 1 (V1) scope.

BACKGROUND

The Comprehensive Child Welfare Information System (CCWIS) regulations described in the [45 Code of Federal Regulations \(CFR\) §1355.52](#), require that the State's CCWIS application maintain all child welfare program data required by federal, state, or Tribal law or policy. These regulations also require the State's CCWIS to support the "efficient, economical, and effective" administration of the Title IV-B and IV-E plans, meaning the State must avoid duplicative application system development or software maintenance and counties and Tribes with a California Title IV-E Agreements shall not develop or maintain external systems that duplicate functionality contained in the State's CCWIS.

The State's transitional CCWIS is the Child Welfare Services/Case Management System (CWS/CMS). The statewide child welfare information system or CCWIS planned to replace CWS/CMS is the CWS-CARES, as referenced in the [Welfare and Institutions Code \(WIC\) §16501.9](#). The implementation of CWS-CARES V1 is planned for October 2026, followed by the implementation of CWS-CARES Version 2 (V2), which is currently planned for April 2028. When the State implements CWS-CARES statewide, organizations such as counties, Tribes with a California Title IV-E Agreement, and probation shall fully utilize the functionality provided by the system (see [WIC §16501.9 \(d\)](#)), and external systems that are duplicative of CWS-CARES must be decommissioned in accordance with [ACL 18-47](#).

Additionally, the completion of an APD is necessary whenever counties or Tribes with a California Title IV-E Agreement are planning to acquire child welfare related EDP hardware, software, or services as described in [ACL 23-55](#) and County Fiscal Letter [\(CFL\) 23/24-12](#). The California Department of Social Services (CDSS) Child Welfare System Branch (CWSB) is responsible for reviewing all child welfare related APD requests. Counties and Tribes with a California Title IV-E Agreement are required to submit an APD for all EDP equipment, software, and services that benefit a child welfare program, regardless of whether the funding source is federal, state, or county only.

Formal written approval or acknowledgement must be obtained from CDSS CWSB **prior** to any acquisition. This requirement applies to all EDP purchases, without exception, and is mandated by the State's [Division 28 – Manual of Policies and Procedures \(MPP\)](#) and relevant federal regulations, as further detailed in [ACL 23-55](#).

The State will issue a formal response, with approval, acknowledgement, or denial, for all EDP requests, including those funded using federal, state or county only funds. Federal financial participation (FFP) is not available to enhance, modify, or purchase an EDP external system duplicative of planned CWS-CARES functionality.

What is considered an External System or Expansion of an External System?

An ancillary (external) system is a tool or technology used by organizations to deliver child welfare services in addition to, or outside of, the statewide child welfare information system. Examples of external systems include Commercial Off-The-Shelf (COTS) and county-developed systems. This includes EDP systems that may directly or indirectly impact the delivery of child welfare services. Per the [WIC §16501](#), child welfare services are defined as public social services that are not limited to, but directed toward the accomplishment of the following: protection and promotion of the welfare of all children; prevention of the unnecessary separation of children from their families by identifying family problems and assisting families in resolving their problems; identification of children to be placed in suitable adoptive homes, in cases where restoration to the biological family is not possible or appropriate; and ensuring the adequate care of children away from their homes, in cases where the child cannot be returned home or cannot be placed for adoption.

The EDP systems limited to child welfare may impact one or more child welfare services programs including, but not limited to, projects that will benefit the CWS/CMS or the child welfare program, generally. For instance, a county may plan to purchase a Zoom

subscription for a unit working with families receiving Foster Care services. This is an example of an EDP system that does not duplicate CWS-CARES V1 functionality. See [CFL 23/24-12](#) for additional child welfare EDP examples.

The expansion of an external system refers to the addition of new features, enhancements, and functionalities to a tool or technology used by an organization. Additionally, an expansion also includes improvement of process performance, modification of an input or output, or augmentation of an input or output per the [State's Division 28 - MPP](#). An example of a system expansion may include the addition of a new module to an existing system. The State will not approve or acknowledge expanded or new functionality duplicative of CWS-CARES V1 beyond the moratorium effective date.

MORATORIUM

Effective August 1, 2025, in preparation for CWS-CARES V1 implementation, the **procurement of any external systems utilized by a county or Tribe with a Title IV-E Agreement that is duplicative of the CWS/CMS and/or CWS-CARES V1 scope will not be permitted.** This includes the acquisition, purchase, and the expansion of any external system not already approved by CWSB for fiscal year 2024-2025. The CDSS is implementing a moratorium on the acquisition of new external systems or expansion of existing external systems that duplicate CWS/CMS, or the planned functionality of CWS-CARES V1. Further, the State understands some EDP external systems may not be fully duplicative of CWS-CARES V1. The CWSB is actively engaged with counties and Tribes with a California Title IV-E Agreement to validate which external systems have functionality fully in-scope and partially in-scope with CWS-CARES V1. Counties and Tribes with a California Title IV-E Agreement are encouraged to review their current and planned activities to ensure compliance with this directive. For questions related to an external system with partial duplication, please reach out to the CWSB External Stakeholder and Coordination Unit (ESCU) at cwds-externalstakeholder@osi.ca.gov.

This moratorium is being implemented now to limit the number of new external systems or modules the project must evaluate for decommissioning, continued operations, data conversion activities, and to ensure compliance with CCWIS regulations. At this stage of CWS-CARES V1 development, the State does not have the time necessary to incorporate the additional data conversion, training, Organizational Change Management, and/or decommissioning activities that would be required for new and/or expanded external systems. This moratorium applies directly to EDP software duplicative of the CWS-CARES V1 scope. It does not preclude counties or Tribes with California Title IV-E Agreements from completing software modifications to existing functionality necessary to allow external systems to continue operations, if it has been determined jointly by the State and county or Tribe that the system's functionality is not duplicative of CWS-CARES V1. A subsequent erratum will address V2 scope updates.

End Date of Funding Availability

Following the moratorium effective date, any child welfare related APD requesting to utilize FFP to enhance, modify, or purchase a new and/or existing EDP external system that is duplicative of CWS-CARES V1 planned functionality will be denied. Note, this does not

include the Binti and Efforts to Outcomes Resource Family Approval recruitment and licensing functionality covered under the COTS Waiver previously approved in August 2020, by the Administration for Children and Families; these waivers will remain active until CWS-CARES V1 is implemented in October 2026.

Further, in preparation for CWS-CARES development beyond V1, all CWSB approval and acknowledgement letters for external system APDs not duplicative of the CWS/CMS or CWS-CARES V1 scope will contain language requiring the county or Tribe with a California Title IV-E Agreement to include early termination and decommissioning criteria in their agreements to prepare for statewide implementation of the CWS-CARES. Counties and Tribes with a California Title IV-E Agreement are 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. Finally, for county planning purposes, the CWSB plans to issue an erratum to this letter in Spring of 2026, to enact a moratorium for systems or system expansions duplicative of CWS-CARES V2 scope.

Federal Compliance Implications

Furthermore, counties acquiring EDP systems without prior State approval or acknowledgement via an APD may be subject to the regulations outlined under 2 CFR §[200.339](#). The State as a “pass-through entity” (defined in [2 CFR §200.1](#)), may implement specific conditions if the counties or Tribes with a California Title IV-E Agreement fail to comply with Federal statutes or regulations (See [§ 200.208](#) for additional information on specific conditions). In order for the State to fulfill its responsibilities described in the aforementioned criteria, CDSS is permitted, but not limited, to take the following actions: temporarily withhold payments until the recipient or subrecipient takes corrective action, disallow costs for all or part of the activity associated with the noncompliance of the recipient or subrecipient, and/or suspend or terminate the Federal award in part or in its entirety.

If you have any questions or need additional guidance regarding the information in this letter, please contact the CWSB ESCU at cwds-externalstakeholder@osi.ca.gov.

Sincerely,

Original Document Signed By

DIANNA WAGNER
Assistant Deputy Director
Children and Family Services Division