

Is CCWIS just the beginning?

How regulation is changing the data game for Health and Human Services agencies



Table of contents:

Methodology.....	III
Introduction.....	1
History of data quality regulation in HHS.....	2
CCWIS regulation at a glance.....	2
Why the regulation came about.....	2
Data quality requirements.....	3
The benefits of CCWIS.....	4
The impact of regulation on data in the public sector.....	5
How Experian can help.....	6
Data quality management.....	6
Address verification.....	7
Conclusion.....	8

Methodology

For Experian's 2018 state of data management in the public sector report, we surveyed 200 public sector professionals in the United States to understand the importance of data to their agencies and how certain trends are shaping the way data is used.

Produced by Insight Avenue in November 2017, the study polled individuals from public sector agencies, including federal, state, and local government, health and human services, motor vehicles, labor and unemployment, and law enforcement. The survey included staff from a variety of roles across these agencies, such as chiefs and administrators, directors, managers, and non-managerial staff. Respondents were chosen based on their visibility into their agency's data management practices.



Introduction

The Health and Human Services industry is constantly evolving to deliver better outcomes for citizens across the United States. Recently, new regulation surrounding the Comprehensive Child Welfare Information System (CCWIS) has defined new standards for child welfare agencies and their data. While it is not yet mandatory for all agencies to adhere to these standards, many agencies are opting in to reap the benefits of better data, along with federal funding for complying.

With the possibilities that come from better data—such as improving the safety of children, or providing more appropriate benefits to individuals in need—it's no wonder that child service agencies are looking to capitalize on the many opportunities that high-quality data can provide.

Is the emergence of CCWIS just the beginning of regulation and available funding that will set higher standards for quality data within the Health and Human Services (HHS) sector?

Data is crucially important to Health and Human Services agencies, and making sure that the data they use is high quality is essential to securing desirable outcomes. Accurate data can mean the difference between someone receiving the right services, or getting lost or ignored in the system. While data often drives decision-making, many agencies have trouble trusting their data. By taking advantage of the funding available through CCWIS, agencies can create a strong foundation of data to help streamline internal processes and power the best results for children and families.



History of data quality regulation in HHS

The current CCWIS regulation is an update to the original Statewide and Tribal Automated Child Welfare Information System (S/TACWIS) regulation. This regulation was created in 1993. It goes without saying that a great deal has changed since then. Agency practices, challenges, and needs have shifted. Major technological advancements over the past 25 years have changed the way organizations operate, and that means there is opportunity to streamline processes to work more efficiently and more effectively.

S/TACWIS regulation, like CCWIS, was voluntary, federally funded, and set guidelines for a comprehensive and automated case management tool. In order to be S/TACWIS-compliant, there were 51 mandatory federal requirements. The current CCWIS regulation allows for far more flexibility, including only 14 requirements.¹

The new CCWIS regulation was proposed back in 2015 via a notice of proposed rule making. The final ruling passed the next year, and over the course of 2017, the Administration for Children and Families (ACF) established requirements for reporting on automated functions and data sharing and data exchanges through technical bulletins. By mid-2018, another technical bulletin stipulated the need for modular design, and all states across the country were expected to declare CCWIS, non-CCWIS, or transitional CCWIS, which means the state will transition its existing S/TACWIS to CCWIS.²

CCWIS regulation at a glance

The CCWIS regulation that passed includes five key goals and objectives:

1. Promote data sharing within and across agencies
2. Require data quality plans
3. Reduce mandatory functional requirements of S/TACWIS
4. Allow agencies the flexibility to meet their own needs
5. Require modularity within systems

There are a few things worth highlighting here. First being the major focus on data exchange. We all know that knowledge is power, and that means that more information means more insight. By sharing data within and across agencies and other organizations, child welfare agencies will be equipped with more information and more insight to inform the decisions they make and the actions they take.

Next is the emphasis on data quality. The only data that leads to strong decisions is accurate, reliable data. By requiring data quality plans as part of CCWIS, the ACF is emphasizing the importance of having a base of accurate, actionable data to support child welfare services.

The third piece is the reduction of requirements and built-in flexibility. Recognizing that different agencies may have different specific needs, they provided for the flexibility to build or purchase a system that meets those needs while still complying with the regulation.

Why the regulation came about

In the ACF's CCWIS Overview, it states:

Innovations in practice and service delivery models, advances in technology, and the extension of funding to tribal title IV-E programs have occurred since the issuance of the S/TACWIS regulations in the early 1990s. These changes have pointed to the need for more flexible, right sized information systems that could collect data from a variety of sources and service providers.³

This highlights three essential reasons why the regulation came about: innovation, technological advancements, and funding. As practices evolve and technology advances, it is crucial that the welfare agencies have the right tools and processes to support the delivery of the best service and best possible outcomes.

The regulation takes advantage of available funding and, though it is voluntary, it still encourages agencies to take a look at their systems and evaluate how well-suited they are to serve their needs. For some agencies, this provides a much-needed reminder to review their legacy systems. In some cases, those systems may be 25 years old or older!



Data quality requirements

In addition to prompting agencies to take a look at their systems and update the technology they use, the CCWIS regulation includes a number of stipulations surrounding data quality.

According to the *CCWIS Final Rule Data Quality Requirements* webinar that covered the requirements set forth by the Children's Bureau, "high quality data supports the efficient, economical, and effective administration of the child welfare program by providing complete, timely, and accurate data..."⁴ It goes on to emphasize the importance of "consistent and uniform" data across programs, and that the data "must meet the most rigorous of applicable federal, state or tribal standards for completeness, timeliness, and accuracy."

These requirements help to ensure that agencies are working with high-quality, accurate, and complete information. The Adoption and Foster Care Analysis and Reporting System requires a 90 percent completion rate, for example, while other agencies have even higher standards for rate of completion for many elements.

The CCWIS data quality standards provide certain questions to define completeness, timeliness, and accuracy of data, including:

Completeness

- Is all required data captured?
- Does CCWIS capture all data needed to make a decision or take an action?
- Does CCWIS provide a full picture of the person or event?
- Is any data missing for a critical business need?

Timeliness

- Is data entered in expected timeframes?
- Is data available to stakeholders when needed for decision or action?

Accuracy

- Does the data correctly describe an event or observation?
- Does the data describe the "real world" clearly and unambiguously?

Additionally, the CCWIS regulation provides guidance surrounding consistency and uniformity, along with confidentiality regarding data exchanges:

Consistency and uniformity

- Are data definitions understood by all workers?
- Do CCWIS and CWCA systems collect the same data?
- Are there varying data collection procedures that result in different data?
- Do workers have a common, shared understanding of clients and cases?

Confidentiality

Data must be exchanged and maintained in accordance with confidentiality requirements, using techniques such as:

- Signed confidentiality agreements
- Data encryption
- Access control
- Specific permissions for sharing with other partners
- Established schedules for archiving and purging data

Some other requirements include the relevancy of the data (does the data support child welfare programs, such as policies, goals, and practices?) and measures to ensure that information is not defaulted inappropriately, meaning information is not pre-filled with common values nor is a value chosen automatically should a worker fail to select a value. There are also requirements surrounding monitoring data quality, including:

- Automated functions to evaluate the quality of data from data exchanges, and
- Using third-party tools for address verification, record de-duplication, and data profiling.

Together, these requirements create strong data practices that ensure the collection and maintenance of high-quality information to support positive outcomes. The CCWIS regulation reflects the recognition by the ACF and Children's bureau of just how crucial data quality is to the delivery of the best results for agencies across the child welfare system.

The benefits of CCWIS

The potential benefits of CCWIS are many. Beyond the obvious benefit of having better data quality and accurate information off which to base important decisions, agencies that opt for CCWIS will be well-positioned to take advantage of the more advanced trends in data that will allow them to continue to operate more efficiently, economically, and effectively.

Some of the more immediate benefits of CCWIS include having a flexible, modular system built to fit the specific needs of the agency. This allows them to have a centralized data repository with the capabilities they need to collect, process, store, and analyze the information in their database. Having a centralized system of data also helps to ease data governance efforts.

The data exchange requirements for CCWIS also opens up a number of possibilities for the child welfare agencies, as well as agencies across the entire Health and Human Services system. Flexible systems containing high-quality information set these agencies up for effective data exchanges for data within the agency, as well as data that sits in adjacent state agencies. With the wealth of knowledge sitting across agencies in every state, CCWIS could be the door to unlocking that untapped resource.

Many agencies currently struggle to utilize their data due to data quality issues or outdated data stores that only highly technical staff are capable of accessing. As the need for data to inform decisions across the agency continues to grow, data is no longer considered just an IT responsibility. Increasingly, case workers and program managers and business analysts across the agency turn to data to help achieve their goals.

With accurate data, the agencies can improve their reporting, not only on the quality reports required by the ACF, but also internal reports on home visits, cases, and clients. The flexible, modular system should ease the entry of data, while also requiring that certain fields be completed. The requirements for complete, timely, and accurate data to comply with the regulation and expectations of ACF will positively impact the overall operation of the agencies.

Finally, a major benefit of CCWIS is that a strong foundation of quality data prepares these agencies to adopt more advanced data trends and techniques. Before talking about advanced technology like visualization, analytics, artificial intelligence, or machine learning, it is essential to get the basics of data quality correct. With the adoption of CCWIS, child welfare agencies will be ahead of the curve in implementing strong data quality processes that will enable them to take advantage of more cutting-edge data techniques and tools.

Ultimately, all of these improvements will benefit not only the agencies, but, more importantly, the children and families for whom they work so diligently to deliver positive outcomes.

Before talking about advanced technology like visualization, analytics, artificial intelligence, or machine learning, it is essential to get the basics of data quality correct.

The impact of regulation on data in the public sector

Even with CCWIS being voluntary, rather than mandatory regulation for child welfare agencies, it still provides guidance and funding to encourage agencies to improve the quality of their data. In our [2018 state of data management: A public sector benchmark report](#), we found that regulation is a key driver behind data strategies for public sector agencies. In fact, regulation is a key factor influencing how data strategy is shaped for nearly half of agencies (47%).

Agencies across the public sector recognize the importance of data and see how high-quality data correlates to outcomes. For example, 93 percent of agencies say accurate data helps them to achieve their citizen mandate.

Regulation like CCWIS adds incentive to these agencies to create and implement strategies to achieve and maintain high-quality data. This incentive comes from both the regulation and the funding available to help put the right tools and processes into place.

If child welfare agencies see better outcomes from improved data quality as prompted through CCWIS regulation, perhaps other divisions of Health and Human Services will follow suit in passing similar regulation that includes data quality standards. Ninety percent of public sector agencies see improving data quality as important to achieving their strategic objectives. Regulation like CCWIS could provide the necessary push to make these agencies pay closer attention to their data quality programs.

While 87 percent of agencies say they consider data to be one of their greatest strategic assets, they suspect that approximately a fifth (18%) of their citizen data is inaccurate. Understanding the value of data as a strategic asset, even a fifth of citizen information being inaccurate is too high. With explicit levels of data quality required through regulation, agencies will be held to a higher standard. This will allow them to truly maximize the value of their data, using accurate information to inform decisions and outcomes.

With stronger foundations of data, these agencies will be prepared to deliver better services and results for their constituents, while also being ready to adopt more advanced data practices that will continue to evolve how agencies operate. Open data, for example, is a trend that has started to catch on in the public sector. It refers to creating a framework to provide public access to government data, as well as sharing data within and across agencies.

The vast majority of agencies (90%) are looking to grant access through open data, and the top motivation behind granting access is complying with regulation (42%). Considering that 69 percent of agencies believe open data will transform public services in the next five years, it is

clear that regulation could be a key driver behind innovative data practices that will transform public services within a relatively short time frame.

It is clear that regulation could be a key driver behind innovative data practices that will transform public services

Data-driven practices are on the rise in both the public and private sectors. This means that the value of data continues to increase, and the data that truly matters is the high-quality information that leads to results. Agencies acknowledge the importance of accurate data in achieving their citizen's expectations and strategic objectives. And that's where regulation can play a crucial role.

As a primary driver behind data approaches in the public sector, regulation like CCWIS can make a meaningful difference in the lives of the constituents. For that reason, CCWIS may be just the beginning of regulation across the public sector that specifically stipulates data quality standards.

How Experian can help

Launching an effective data quality strategy or improving the strategy you currently have is no easy feat. We have experience working with organizations across many different organizations to build and implement strong data quality programs. We also have a strong track record of working with agencies in the health and human services sector to improve their data and service delivery. As far as CCWIS requirements go, we can help you to address many of the specific data quality requirements called out by the regulation.

Data quality management

There are many ways that a strong data quality management tool can help an agency that has declared CCWIS. If creating your CCWIS system entails a migration or if you are assembling a software stack that will be CCWIS-compliant, Experian's data quality management capabilities can help fit your needs. Our data quality management tools are built with business users in mind and provide a majority of the functionalities specifically called for in the CCWIS regulation.

Experian's data quality management tools allow you to take control of your data, giving you the ability to analyze and improve information across its lifecycle. Some of the specific capabilities we provide that can help you manage your data quality to comply with CCWIS requirements include:

- Profiling
- De-duplication
- Cleansing
- Standardization
- Monitoring
- Audit trails

These capabilities will significantly ease compliance efforts. Data profiling will allow you to profile your own data and make discoveries of where challenges may exist, so you know what to prioritize. It will also give you the ability to quickly evaluate the quality of data you receive in exchanges, to make sure that only quality data informs your most important decisions. De-duplication will enable you to reduce the number of records you have to get a more complete view of your clients and cases. Cleansing will help you to achieve accurate, up-to-date information for each record.

Standardization helps to create uniformity across records, to ensure that your standards for consistency are met by all the data in your CCWIS, and any information that is entered. Monitoring allows you to keep tabs on the accuracy and completeness of your data on an ongoing basis. With dashboards and customizable alerts, you can gain real-time insight into the quality of your data. Our solutions also provide audit trails, which help you to understand how data has been transformed within your system throughout its lifecycle. This gives you a way of tracking your data, while also providing transparency during reviews of your data quality plans.

If you will be undergoing a modernization or data conversion as part of your CCWIS implementation, Experian can help you to rethink the traditional approach to data migrations to ensure a full cut-over of your information occurs on time and on budget. Our on-premise solutions provide strong data quality capabilities that help you to control your data and manage risk.

With a user-friendly interface and drag-and-drop functionality, the tool also fosters collaboration. The role-based security permissions helps technical and non-technical users work together, which ensures the delivery of high-quality, useful data that fulfills the business requirements of your agency. The tool also allows you to conduct a full-volume analysis of your data and prototype your mapping specifications to allow you to test the migration at the outset. Through the prototyping, you can avoid surprises at the user acceptance testing phase, because you have already tested that the information from the old system will pass all requirements and quality thresholds in the new system.

Overall, our data quality management tool will help you to automate your data quality procedures and maintain accurate information around the clock. While complying with CCWIS may seem overwhelming, we have both the tools and the expertise necessary to help.



Address verification

Given how important it is to know where to find and check on the children who fall under your agency's jurisdiction, it is not surprising that address verification capabilities are specifically called out in the CCWIS requirements. Experian's address verification solutions have evolved throughout the years to keep up with the needs of our customers.

We provide solutions that work both in real-time and in batch to validate addresses down to the sub-unit level. Our solutions are based on delivery point validation by the United States Postal Service, so you can feel certain that the addresses entered into your system are real and correct. With our real-time solutions, you can rest assured that the mailing addresses you collect for the children and families in your system are accurate, complete, and formatted correctly.

Conclusion

CCWIS regulation provides agencies with specific standards and requirements for the quality of their data. The regulation arose from the need for agencies to adapt their information systems to keep up with evolutions in service delivery models and technological advancements. For agencies that declare CCWIS and modernize their systems, they will have the opportunity to significantly improve the accuracy and completeness of their data. This helps to streamline agency operations, while also positively impacting their ability to deliver services and positive outcomes for the children and families that they serve.

Despite CCWIS being voluntary, rather than mandatory, a majority of states have opted to comply with the regulation and have declared CCWIS. This demonstrates that regulation and funding are powerful forces that can drive change in the Health and Human Services space, and across the entire public sector. They can help agencies improve efficiency, while improving the lives of the citizens under their jurisdictions. Ultimately, higher quality data can lead to higher quality ways of life.

Between our solutions and expertise working in Health and Human Services, Experian can help you check all the boxes for your CCWIS data quality requirements.

[Get started](#)

Sources:

1. Notice of Proposed Rulemaking (NPRM) for The Comprehensive Child Welfare Information System Frequently Asked Questions. Administration for Children and Families. <https://www.acf.hhs.gov/sites/default/files/cb/ccwis_nprm_faq.pdf>
2. Child Welfare IT Federal Guidance. Children's Bureau: An Office of the Administration for Children and Families. <https://www.acf.hhs.gov/sites/default/files/cb/ccwis_nprm_faq.pdf>
3. CCWIS Final Rule Overview. Children's Bureau: An Office of the Administration for Children and Families. < https://www.acf.hhs.gov/sites/default/files/cb/ccwis_overview_presentation.pdf>
4. CCWIS Final Rule Data Quality Requirements. Children's Bureau: An Office of the Administration for Children and Families. < https://www.acf.hhs.gov/sites/default/files/cb/ccwis_data_quality_reqs.pdf>



Experian
53 State Street
Boston, MA 02109
T: 1 888 727 8822
www.edq.com

© 2018 Experian Information Solutions, Inc. • All rights reserved
Experian and the Experian marks used herein are trademarks or registered trademarks of Experian Information Solutions, Inc. Other product and company names mentioned herein are the property of their respective owners.