

# FY 2019-20 Emergency Supplemental IT Request

## Human Services

### Modernizing the Child Welfare Case Management System

**Motion:**

Approve the supplemental request from the Colorado Department of Human Services for \$9,829,233, including \$5,897,540 CCF and \$3,931,693 FF for the Modernizing the Child Welfare Case Management System project.

## GENERAL INFORMATION

2016-012

### 1. Which supplemental criterion does the request meet?

New Data

The Colorado Department of Human Services (DHS) seeks additional state funds and federal funds spending authority to complete the Modernizing Child Welfare Case Management System (Trails) project and incorporate Family First Prevention Services Act (FFSPA) requirements into the system. DHS began gathering data capture and reporting requirements necessary under FFSPA to be incorporated into Trails in May 2019, and this effort was completed this summer.

### 2. Which projects will be restricted to fund the supplemental request?

At the time of this mailing, the department has not yet identified a project to restrict in the event that state funds are not appropriated, as required by state law. The department is aware of this and will provide an update before the meeting.

### 3. Has the request been approved by OSPB?

Yes

## PRIOR APPROPRIATION AND SUPPLEMENTAL REQUEST INFORMATION

The appropriation to be amended was authorized in the following bill: SB 17-254

<u>Fund Source</u>	<u>Prior Appropriations</u>	<u>Supplemental Request</u>	<u>Future Requests</u>	<u>Total Cost</u>
CCF	\$11,398,325	\$5,897,540	\$0	\$17,295,865
FF	\$11,398,325	\$3,931,693	\$0	\$15,330,018
	\$22,796,650	\$9,829,233	\$0	\$32,625,883

## REASON FOR SUPPLEMENTAL REQUEST

DHS seeks additional state funds and federal funds spending authority to complete the Trails Modernization project and incorporate FFSPA requirements into the system. FFSPA, which was signed by the President on February 9, 2019, encourages states to concentrate on prevention services, family support and reunification services, and adoption and care replacements for children and youth in the foster care system. FFSPA requirements that will need to be incorporated into the Trails system include: adding the ability for caseworkers to enter information and report out on a child's prevention plan, tracking the provision of evidence-based child welfare services in accordance with a national clearinghouse, and tracking children and youth within the system who are eligible to remain at home and not be placed in foster care. According to DHS, funds from this emergency supplemental budget request are needed to ensure that FFSPA functionality is implemented into Trails Modernization by January 2020 and to complete Trails Modernization by September 2020.

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## SUMMARY OF PROJECT

This project enhances and modernizes the Trails case management system, which is the state's Statewide Automated Child Welfare Information System. According to the department, this project will facilitate the full development of the Trails Modernization environment that aims to simplify internal workflows, minimize data inconsistencies, and comply with new federal regulations. Additionally, the department states that full implementation of FFPSA requirements in the Trails case management system are needed by January 2020 in order for the state to opt-into FFPSA and take advantage of newly-available federal reimbursements. The department's status as a IV-E waiver state ends on September 30, 2019, so opting into FFPSA as quickly as possible will ensure the state continues to receive federal reimbursement on services not allowed under a traditional IV-E waiver.

**Source of federal funds.** The department will receive 40 percent of the project funding through federal funding, which are available through Title IV-E of the Social Security Act.

## QUESTIONS / OUTSTANDING ISSUES

1. In the table on page 3 of the request document, it mentions needing to systematically track services associated with FFPSA. Please expand on the additional scope now required in the Trails Modernization project to cover the FFPSA development. What will this additional scope entail?

*In order to opt-in to FFPSA, Colorado must be able to capture additional data elements and develop new functionality in Trails to meet Family First Prevention Services Act (FFPSA) reporting requirements. Utilizing federal documentation and technical bulletins, these requirements were gathered, validated, and approved by multiple sets of stakeholders across the state: implementation steering committees, subject-matter experts, Trails end-users, county directors, and CDHS and OIT leadership. The requirements gathering began in May 2019 and was completed during the summer "reset" period.*

*With a focus on prevention and evidence-based service provision, FFPSA will significantly alter the practice of child welfare. The scope of this change is as follows:*

- *Trails will accurately track children and youth within the system who meet candidacy requirements to receive federal funds in an attempt to remain at home and not be placed into foster care;*
- *A prevention plan will be created for each of these eligible children/youth and Trails will need to have the capacity to allow caseworks to enter the necessary information, and subsequently report out on these plans;*
- *Trails will track the provision of evidence-based child welfare services in accordance with a national clearinghouse, such as Results First Clearinghouse Database, Blueprints for Healthy Youth Development, California Evidence-Based Clearinghouse for Child Welfare, Coalition for Evidence-Based Policy, U.S. Substance Abuse and Mental Health Services Administration's National Registry of Evidence-based Programs and Practices. These clearinghouses have multiple tiers of the 'strength' of the body of evidence for each of these practices, and Trails will need to continually update and reflect any changes made to the services and tiers within the clearinghouses;*
- *Qualified Residential Treatment Programs (QRTPs) will be used in lieu of many of the congregate care placement settings used currently. Independent assessments will be conducted for each child/youth removed from their home to determine the appropriateness of a QRTP placement setting. Additional assessments will be administered after placement within a QRTP to determine the continued appropriateness of the placement. Trails will need to coordinate these assessments and timelines in conjunction with removals and placements.*

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• *Queues will be developed so that end-users can appropriately and accurately manage the new tasks and functionality of the aforementioned scope to ensure the safety and security of children and families in accordance with new federal FFPSA requirements.*

2. Please provide a high-level summary of the FY 2019-20 Emergency 1331 operating budget request that is mentioned on page 8 of the request document.

*The department is evaluating the operating and maintenance emergency funding needed to fully support the implementation of the non-Trails portions of the federal Family First Prevention Services Act (FFPSA) and for ongoing operating and maintenance costs to Trails.*

*The majority of the operating and maintenance emergency funding is likely to support new and ongoing FTE that will be required in various areas in order to implement FFPSA, which cannot be absorbed within current resources. The department cannot meet the implementation requirements without these FTEs.*

*The operating and maintenance emergency funding will address new ongoing maintenance such as those recommended by an Administration of Children and Families (ACF) virtual system review in April 9, 2018, for example, increased security and data quality improvements in accordance with the Comprehensive Child Welfare Information System (CCWIS) regulations.*

*Should a request be made, it will be sent to the JBC on September 6, 2019.*

3. How is the state's ability to opt-in to FFPSA dependent on having these changes incorporated into Trails?

*All of the new requested functionality referenced above is required to meet minimum federal FFPSA standards. If this functionality does not exist in Trails, Colorado will not be able to opt-in to FFPSA. Colorado is planning to opt-in to FFPSA in January 2020 to ensure that Colorado may take advantage of newly-available federal reimbursement. Colorado's status as a IV-E Waiver State will end on September 30, 2019, and it is imperative that Colorado be able to access available federal dollars funds through FFPSA. Under the Waiver, Colorado was able to earn IV-E reimbursement on services not allowed under traditional IV-E. The ability to earn this additional IV-E reimbursement ends when the Waiver ends. FFPSA also allows IV-E reimbursement on services not allowed under traditional IV-E so it is imperative for Colorado to implement FFPSA as quickly as possible to earn the lost dollars from the Waiver.*

#### **The department was asked to address the following questions during its presentation to the Joint Technology Committee (JTC) on September 10, 2019.**

1. This budget request states that the department received \$2.4 million in FY 2019-20 and that approximately \$400,000 was redirected towards operating costs associated with Trails modernization efforts. What is the status of the other \$2 million of funding received to date, and can these funds be redirected toward the purposes outlined in the request?

2. Please provide additional information related to the conditional funding the department received from the Administration of Children and Families mentioned on page 2 of the request document.

3. During the Governor's Office's presentation on the Colorado Digital Services (CDS), it was mentioned that CDS would be assisting with the Trails Modernization project. Please provide additional information related to how CDS may be involved with this project.

4. Please explain what steps have been taken to mitigate "scope creep" on the project moving forward.

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5. Is the department planning on requiring performance testing before the changes being described are implemented?

**The department was asked to submit written responses to JTC staff to the following questions on September 9, 2019.**

1. What is the timeline for the department to receive FFPSA funding? Are there deadlines to apply for the funding? Also, please provide a summary of federal funding requirements.
2. Does the department have an OIT agile project manager engaged in this project?
3. Please describe how the department will work with the counties to decommission or interface with their existing "auxiliary systems and time-consuming work-arounds" mentioned on page 4 of the request document.
4. Is the CGI contract fixed-term? Is this contract a time and materials contract?
5. Given that OIT is contracting with CGI to fill staffing gaps, will OIT have enough technical staff to support the system once it is implemented? Does the department plan to continue to contract with CGI under a support contract after implementation?