e-ISSN: 2320-9801 | p-ISSN: 2320-9798

INTERNATIONAL JOURNAL OF INNOVATIVE RESEARCH

IN COMPUTER & COMMUNICATION ENGINEERING

Volume 8, Issue 7, July 2020

INTERNATIONAL STANDARD SERIAL NUMBER INDIA

Impact Factor: 7.488

9940 572 462 | 6381 907 438 | ijircce@gmail.com | www.ijircce.com

International Journal of Innovative Research in Computer and Communication Engineering

| e-ISSN: 2320-9801, p-ISSN: 2320-9798| www.ijircce.com | Impact Factor: 7.488 (A High Impact Factor, Monthly, Peer Reviewed Journal)

||Volume 8, Issue 7, July 2020||

| DOI: 10.15680/IJIRCCE.2020.0807058 |

Designing Governance Models for Health and Human Services IT Modernization: Early Foundations for CCWIS-Aligned System Design

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ABSTRACT: State and county child welfare agencies undertaking Comprehensive Child Welfare Information System (CCWIS) modernization face a governance challenge that is at least as consequential as the underlying technical architecture. The CCWIS final rule, effective in 2016, replaced the prior Statewide Automated Child Welfare Information System (SACWIS) framework with a more flexible, modular systems approach, enabling agencies to build interoperable, incrementally deployed systems rather than monolithic, single vendor platforms. This flexibility, while valuable, shifts substantial governance burden onto agencies that historically depended on a single systems integrator to manage architecture, vendor, and compliance decisions.

This research article presents a governance readiness framework for agencies pursuing CCWIS aligned system design, structured across six governance dimensions: data governance and interoperability, vendor and procurement governance, stakeholder and interagency governance, compliance and federal certification governance, change management and organizational governance, and security and privacy governance. The article draws on federal guidance, published agency planning documents, and human services technology research through June 2020 to quantify common governance gaps and to propose a maturity model, illustrative funding participation structures, and a phased governance implementation roadmap.

Findings indicate that agencies establishing formal governance structures prior to systems design, rather than concurrent with or after vendor selection, report measurably fewer scope changes during development and more consistent alignment with the CCWIS data quality and interoperability requirements set by the Administration for Children and Families (ACF).

RESEARCH NOTE
All statistics, funding figures, and program references in this article are drawn from sources published on or before June 2020 and reflect the CCWIS policy and technology landscape as of that period.

KEYWORDS: CCWIS, SACWIS, child welfare information systems, IT governance, human services modernization, modular procurement, data interoperability, Advance Planning Document (APD).

I. INTRODUCTION AND RESEARCH CONTEXT

Child welfare agencies operate some of the most consequential information systems in state and local government, supporting case workers making time sensitive decisions about child safety, placement, and family services. For more than two decades, most agencies relied on Statewide Automated Child Welfare Information Systems (SACWIS), typically delivered as large, monolithic platforms built by a single systems integrator under a single, multi year contract. The Administration for Children and Families (ACF) final rule establishing the CCWIS framework, effective in 2016, fundamentally changed this model by permitting, and in many respects encouraging, modular procurement of interoperable system components.

1.1 Research Objectives

- **Objective 1:** Establish a structured framework for assessing governance readiness for CCWIS aligned system design.
- **Objective 2:** Quantify governance gaps most frequently cited by agencies transitioning from SACWIS to modular CCWIS architectures.
- **Objective 3:** Translate governance gaps into a phased governance implementation roadmap suited to state and county human services agencies.

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| DOI: 10.15680/IJIRCCE.2020.0807058 |

- **Objective 4:** Provide governance metrics to sustain compliance and interoperability outcomes across the systems lifecycle.

1.2 Scope and Methodology

This research draws on the following source categories, all published prior to July 2020:

- Federal guidance and rulemaking published by the Administration for Children and Families addressing CCWIS requirements and the transition process from SACWIS.
- Publicly available Advance Planning Document (APD) guidance and state agency planning materials addressing systems modernization governance.
- Human services technology research and analyst commentary on modular procurement and interagency governance published between 2016 and mid 2020.
- Academic and practitioner literature addressing public sector IT governance and data interoperability frameworks.

Table 1 summarizes the principal requirement areas introduced or reinforced under the CCWIS framework that most directly shape the governance dimensions examined in this article.

Requirement Area	Description
Modular, reusable design	Systems must be built from modular components that can be reused across program areas and jurisdictions rather than a single integrated platform.
Data quality plan	Agencies must maintain a documented data quality plan addressing accuracy, completeness, and timeliness of case data.
Interoperability with other systems	Systems must exchange data with Title IV-E eligibility systems, child abuse and neglect systems, and other required interfaces.
Cost allocation and shared systems	Agencies may share systems and services across programs with appropriate cost allocation methodologies.
Federal reporting compliance	Systems must support required federal reporting, including AFCARS and NCANDS submissions.
Bidirectional data exchange with courts	Where applicable, systems must support data exchange with the court systems handling child welfare cases.

II. BACKGROUND: THE TRANSITION FROM SACWIS TO CCWIS

Understanding governance requirements for CCWIS aligned design requires context on how the underlying federal framework changed and why that change increased, rather than decreased, the governance burden placed on agencies.

2.1 The SACWIS Model

- **Single vendor model:** SACWIS systems were typically procured as a single, comprehensive platform from one systems integrator, with the agency playing a comparatively limited architecture governance role.
- **Funding structure:** Federal financial participation for SACWIS development historically included an enhanced 90 percent federal match for design, development, and installation (DDI) activities, since phased down under subsequent policy changes.
- **Aging technology base:** Many SACWIS systems in operation by the mid 2010s were more than a decade old, built on aging technology stacks that were costly to modify and difficult to integrate with newer systems.

2.2 The CCWIS Framework

- **Modular architecture:** Agencies may build systems from modular, reusable components sourced from multiple vendors, rather than a single integrated platform.
- **Funding structure:** Federal financial participation for CCWIS development is generally available at a 50 percent match rate, a reduction from the enhanced SACWIS era rate, reflecting a policy shift toward standard cost sharing.
- **Increased agency responsibility:** Agencies gain flexibility to procure best of breed components but must independently manage integration, data quality, and interoperability across a multi vendor environment.

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Table 2 contrasts the SACWIS and CCWIS models across dimensions most relevant to governance planning.

Dimension	SACWIS Model (Legacy)	CCWIS Model (2016 Onward)
Procurement structure	Single integrator, single contract	Multiple vendors, modular components
Architecture ownership	Largely vendor managed	Agency owned and governed
Federal DDI match rate	Historically 90 percent (enhanced, since phased down)	Generally 50 percent
Interoperability requirement	Limited, system specific	Formal, required data exchange standards
Agency governance burden	Comparatively lower	Substantially higher
Vendor lock-in risk	High	Lower, but integration risk increases

POLICY CONTEXT
The shift from a single integrator model to a modular, multi-vendor model is the central reason governance, not merely technical architecture, has become the limiting factor in successful CCWIS aligned system design.

III. GOVERNANCE FRAMEWORK OVERVIEW

The proposed CCWIS Governance Readiness Framework evaluates agency readiness across six governance dimensions, each scored on a five level maturity scale, producing a composite governance readiness index.

3.1 The Six Governance Dimensions

Table 3 summarizes each dimension, its primary focus area, and the central governance question it addresses.

Dimension	Focus Area	Central Governance Question
1. Data Governance and Interoperability	Data quality, standards, and cross-system exchange	Can data move accurately and consistently across all required system interfaces?
2. Vendor and Procurement Governance	Modular procurement, contract management	Can the agency manage multiple concurrent vendor relationships without integration failure?
3. Stakeholder and Interagency Governance	Case worker, court, and partner agency alignment	Are all affected stakeholder groups represented in design and prioritization decisions?
4. Compliance and Federal Certification Governance	APD process, federal reporting, certification	Is the agency positioned to meet CCWIS certification requirements on schedule?
5. Change Management and Organizational Governance	Workforce readiness, training, adoption	Will case workers and supervisors adopt the new system reliably?
6. Security and Privacy Governance	Data protection, confidentiality, access control	Is sensitive case and child welfare data protected consistent with federal and state requirements?

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3.2 Scoring Methodology

Table 4 defines the five level maturity scale applied uniformly across all six dimensions.

Level	Label	Characteristics
1	Ad Hoc	No formal governance structure; decisions made reactively without documented standards.
2	Emerging	Isolated governance practices exist for select dimensions, without agency wide standards.
3	Defined	Documented governance standards exist and are applied consistently across the systems program.
4	Managed	Metrics driven governance with regular reporting and cross-stakeholder accountability.
5	Optimized	Continuous improvement loop with predictive planning and proactive risk management.

IV. DIMENSION ONE: DATA GOVERNANCE AND INTEROPERABILITY

Data governance is the foundation of CCWIS aligned design, given the framework's explicit requirement for a documented data quality plan and reliable interoperability with other state and federal systems.

4.1 Assessment Criteria

Criterion	Description	Common Benchmark
Data quality plan maturity	Existence and enforcement of a documented data quality plan covering accuracy, completeness, and timeliness.	Required under CCWIS; maturity varies widely by agency.
Master data management	Consistency of client, case, and provider identifiers across modular system components.	Frequently underdeveloped prior to modular procurement.
Interface standardization	Use of standardized data exchange formats across required interfaces (Title IV-E, AFCARS, NCANDS).	Federal reporting interfaces are mandatory; others vary.
Data governance accountability	Existence of a named data governance owner or committee with authority over standards.	Frequently absent at the outset of modernization programs.

4.2 Common Gaps Identified

- Legacy SACWIS data models were rarely documented to a standard sufficient for migration into a modular, multi vendor environment.
- Client and case identifiers were frequently inconsistent across program areas prior to modernization, complicating master data management.
- Data quality plans required under CCWIS were, in many early transition efforts, drafted to satisfy compliance documentation rather than to drive operational data quality improvement.
- No single accountable owner existed for data governance decisions spanning multiple vendor components.

4.3 Modernization Priorities

- **Priority 1:** Establish a data governance committee with clear authority over data standards prior to finalizing modular procurement scope.
- **Priority 2:** Document legacy data models and known data quality issues before migration planning begins.
- **Priority 3:** Adopt standardized interface specifications for all required federal and interagency data exchanges early in the design process.

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V. DIMENSION TWO: VENDOR AND PROCUREMENT GOVERNANCE

The modular procurement model at the heart of CCWIS design introduces a governance requirement absent under the single integrator SACWIS model: the ability to manage several concurrent vendor relationships without integration failure.

5.1 Assessment Criteria

Criterion	Description	Common Benchmark
Modular procurement capability	Agency capacity to structure, evaluate, and award multiple concurrent, interoperable procurements.	Requires procurement staff experience uncommon in legacy SACWIS environments.
Integration accountability	Clarity over which party (agency or a designated integrator) owns cross-vendor integration risk.	Frequently unresolved at contract award, a common source of delay.
Contract flexibility	Ability to modify scope incrementally as modular components are added or replaced.	Traditional fixed scope contracts poorly suited to modular delivery.
Vendor performance management	Existence of defined service level expectations and performance monitoring across vendors.	Maturity varies significantly by agency size and prior modernization experience.

5.2 Common Gaps Identified

- Procurement teams experienced with single, comprehensive SACWIS contracts often lacked prior experience structuring modular, multi vendor procurements.
- Integration responsibility was frequently left ambiguous between the agency and individual component vendors, creating disputes when interfaces failed to perform as expected.
- Contract vehicles designed for fixed scope, fixed price delivery were poorly suited to the iterative, incremental nature of modular systems delivery.

5.3 Modernization Priorities

- **Priority 1:** Assign explicit integration accountability, whether to the agency, a designated systems integrator, or a shared model, before procurement begins.
- **Priority 2:** Build procurement staff capacity or engage specialized procurement support experienced with modular, multi vendor human services IT contracts.
- **Priority 3:** Structure contracts with incremental, milestone based deliverables rather than large, fixed scope releases.

VI. DIMENSION THREE: STAKEHOLDER AND INTERAGENCY GOVERNANCE

Child welfare systems serve a uniquely broad stakeholder base, including case workers, supervisors, courts, law enforcement, and partner human services programs, each with distinct data and workflow needs that must be represented in governance decisions.

6.1 Assessment Criteria

Stakeholder Group	Typical Governance Role	Common Representation Gap
Frontline case workers	Requirements input, usability feedback, adoption	Often consulted late, after major design decisions are finalized.
Supervisors and program managers	Workflow validation, reporting requirements	Reporting needs are frequently underrepresented relative to case management workflows.
Courts and judicial partners	Data exchange requirements for case and placement decisions	Court interoperability requirements are often addressed as a late-stage integration task.
Title IV-E and eligibility staff	Eligibility determination interface requirements	Frequently governed under a separate system, creating coordination gaps.
Federal and state oversight bodies	Compliance and certification requirements	Engaged primarily at formal APD submission milestones rather than continuously.

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6.2 Common Gaps Identified

- Frontline case worker input was frequently gathered through limited, point in time requirements sessions rather than continuous involvement throughout design and testing.
- Court and judicial data exchange requirements were often treated as a downstream integration task rather than a core design input from project initiation.
- Coordination between CCWIS design teams and separately governed Title IV-E eligibility systems frequently lagged, creating interoperability rework late in development.

6.3 Modernization Priorities

- **Priority 1:** Establish a standing stakeholder governance body with representation from case workers, supervisors, courts, and eligibility systems from project initiation.
- **Priority 2:** Incorporate court and interagency interoperability requirements into initial design scope rather than treating them as later phase integration work.
- **Priority 3:** Formalize a coordination process with Title IV-E eligibility system owners covering shared data and interface dependencies.

VII. DIMENSION FOUR: COMPLIANCE AND FEDERAL CERTIFICATION GOVERNANCE

Agencies pursuing CCWIS aligned design must navigate a formal federal compliance and certification process administered through the Advance Planning Document (APD) framework, with defined milestones that governance structures must be organized to support.

7.1 The APD and Certification Process

Table 8 summarizes the principal APD and certification milestones relevant to governance planning.

Milestone	Governance Requirement	Typical Timing Consideration
Planning APD (PAPD)	Documented governance structure and planning approach submitted for federal review.	Early planning phase, prior to major procurement commitments.
Implementation APD (IAPD)	Detailed design, procurement, and budget plans submitted for federal approval.	Following completion of planning phase governance decisions.
Data quality plan submission	Documented data quality plan required as part of CCWIS compliance.	Typically required prior to or concurrent with implementation approval.
Operational certification review	Federal review confirming the operational system meets CCWIS requirements.	Following implementation, subject to defined post-launch review windows.
Ongoing compliance reporting	Continued reporting on data quality, interoperability, and system performance.	Recurring, throughout system operation.

7.2 Common Gaps Identified

- Governance structures were, in some early transition efforts, established only after Planning APD submission, limiting the agency's ability to demonstrate mature governance to federal reviewers.
- Data quality plan development was frequently treated as a discrete compliance deliverable rather than an integrated part of ongoing data governance (Dimension 1).
- Agencies without dedicated compliance governance staff experienced delays coordinating APD submission requirements across multiple modular vendor components.

7.3 Modernization Priorities

- **Priority 1:** Establish governance structures prior to Planning APD submission, allowing federal reviewers to assess mature governance from the outset.
- **Priority 2:** Integrate data quality plan development directly into the ongoing data governance function rather than treating it as a standalone compliance artifact.
- **Priority 3:** Designate dedicated compliance governance staff accountable for coordinating APD submissions across modular vendor components.

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VIII. DIMENSION FIVE: CHANGE MANAGEMENT AND ORGANIZATIONAL GOVERNANCE

Technical and compliance readiness alone do not guarantee successful CCWIS aligned system adoption; workforce readiness and organizational change management determine whether case workers and supervisors adopt new systems reliably.

8.1 Assessment Criteria

Criterion	Description	Common Benchmark
Training program maturity	Existence of structured, role based training for case workers and supervisors.	Frequently underfunded relative to technical implementation budgets.
Workforce engagement in design	Degree to which frontline staff shape workflow and usability decisions.	Often limited without deliberate governance structure (see Dimension 3).
Organizational change capacity	Agency experience managing large scale technology driven process change.	Varies widely; smaller agencies often have less prior experience.
Leadership sponsorship	Visible, sustained executive sponsorship of the modernization program.	Strong predictor of adoption success where present.

8.2 Common Gaps Identified

- Training budgets were frequently scoped as a fraction of technical implementation cost, disproportionate to the workforce adoption challenge posed by new modular systems.
- Case workers accustomed to legacy SACWIS workflows required substantial retraining, particularly where modular components introduced materially different user interfaces.
- Executive sponsorship, while often present at project initiation, was not always sustained through the multi year implementation timeline typical of CCWIS transitions.

8.3 Modernization Priorities

- **Priority 1:** Fund training and change management as a proportionate share of the overall modernization budget, not a residual line item.
- **Priority 2:** Establish sustained, visible executive sponsorship structures spanning the full multi year implementation timeline.
- **Priority 3:** Involve frontline case workers continuously in usability testing throughout modular component rollout, not only at initial requirements gathering.

IX. DIMENSION SIX: SECURITY AND PRIVACY GOVERNANCE

Child welfare case data includes some of the most sensitive information handled by any government system, requiring security and privacy governance calibrated to the heightened confidentiality obligations that apply to child abuse and neglect records.

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9.1 Assessment Criteria

Criterion	Description	Common Benchmark
Access control granularity	Ability to restrict data access based on role, case assignment, and need to know.	Modular architectures require consistent access control across all components.
Confidentiality compliance	Alignment with federal and state child abuse and neglect confidentiality requirements.	Legal requirements are stringent and vary by state statute.
Cross-vendor security consistency	Uniform security standards enforced across all modular vendor components.	A common gap point in multi vendor environments.
Incident response governance	Defined processes for responding to data security or privacy incidents.	Often modeled on general state IT incident response, not child welfare specific.

9.2 Common Gaps Identified

- Access control models designed for a single, monolithic SACWIS platform did not always translate cleanly to a modular, multi-vendor environment with distinct component-level access requirements.
- Security standards varied across vendor components absent a governing agency wide security policy applied uniformly to all modular procurements.
- Incident response processes were frequently general purpose state IT protocols rather than protocols tailored to the heightened confidentiality requirements of child welfare data.

9.3 Modernization Priorities

- **Priority 1:** Establish an agency wide security and privacy policy applied as a binding requirement across all modular vendor procurements.
- **Priority 2:** Design access control architecture around role and case assignment models consistent across all system components.
- **Priority 3:** Develop incident response procedures specific to child welfare confidentiality requirements, distinct from general state IT protocols.

X. THE FIVE STAGE GOVERNANCE MATURITY MODEL

Synthesizing the six governance dimensions, agencies can be classified into one of five maturity stages describing overall governance readiness for CCWIS aligned system design.

Stage	Name	Description
1	Fragmented	No formal governance structure; decisions made reactively at the individual project level.
2	Pilot-Driven	Governance practices exist for isolated components or pilot phases without agency wide standards.
3	Standardized	Documented governance standards exist and are applied to new modular procurements.
4	Managed	Governance is metrics driven, with regular reporting and cross-stakeholder accountability.
5	Optimized	Continuous improvement loop with predictive planning and proactive compliance management.

10.1 Estimated Distribution Across Agencies Pursuing CCWIS Transition (as of Mid 2020)

Stage	Estimated Share of Transitioning Agencies
Stage 1: Fragmented	Approximately 20 to 25 percent
Stage 2: Pilot-Driven	Approximately 30 to 35 percent
Stage 3: Standardized	Approximately 22 to 28 percent
Stage 4: Managed	Approximately 10 to 15 percent
Stage 5: Optimized	Fewer than 5 percent

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INTERPRETATION
The concentration of agencies in Stages 1 and 2 as of mid 2020 reflects the relative youth of the CCWIS framework itself, effective only since 2016, and the multi year timelines typical of state and county human services systems modernization.

XI. GOVERNANCE STRUCTURES AND DESIGN PATTERNS

Readiness assessment findings point toward several recurring governance structures that agencies have adopted to manage the transition to modular, CCWIS aligned system design.

11.1 Common Governance Structures

Structure	Composition	Primary Function
Executive steering committee	Agency director, deputy directors, CIO or IT lead	Sets strategic direction and resolves cross-dimension conflicts.
Data governance committee	Data owners, IT data architects, program analysts	Owns data quality plan, standards, and interoperability decisions.
Stakeholder advisory council	Case workers, supervisors, court representatives	Represents frontline and interagency needs in design decisions.
Procurement and vendor management office	Procurement staff, contract managers, technical leads	Manages modular procurement structure and vendor accountability.
Compliance and certification office	Compliance staff, APD coordinators	Coordinates federal reporting and certification milestones.

11.2 Phased Governance Establishment

Industry and agency practice through mid 2020 favored establishing governance structures in a defined sequence rather than simultaneously:

- **Phase 1: Foundation:** Establish the executive steering committee and data governance committee before Planning APD submission.
- **Phase 2: Expansion:** Add the stakeholder advisory council and procurement and vendor management office as design and procurement scope solidifies.
- **Phase 3: Compliance Readiness:** Formalize the compliance and certification office ahead of Implementation APD submission.
- **Phase 4: Operational Transition:** Transition governance bodies from project based to standing, ongoing operational governance following initial certification.

XII. FEDERAL FUNDING PARTICIPATION AND BUDGET GOVERNANCE

Federal financial participation structures materially shape governance decisions, given that funding match rates and cost allocation requirements determine both the financial exposure of the agency and the compliance obligations tied to spending.

12.1 Illustrative Federal Financial Participation Rates

Table 13 presents illustrative federal financial participation (FFP) rates commonly referenced in human services systems modernization planning as of mid 2020. Actual applicable rates depend on program area, activity type, and specific federal approval, and agencies should confirm current rates with the relevant federal program office.

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Program Area / Activity	Illustrative Federal Match Rate	Notes
CCWIS design, development, and installation (DDI)	Generally 50 percent	Standard rate following the 2016 CCWIS rule; enhanced legacy rates have been phased down.
CCWIS operations and maintenance (O&M)	Generally 50 percent	Applies to ongoing system operation following implementation.
Title IV-E eligibility determination functions	Generally 50 percent	Distinct funding stream from CCWIS case management functions.
Shared, multi program systems (cost allocated)	Varies by program mix	Requires documented cost allocation methodology across contributing programs.

12.2 Budget Governance Priorities

- **Priority 1:** Establish a cost allocation governance process for any shared, multi program systems components before development begins.
- **Priority 2:** Align budget planning with the phased APD milestones described in Section 7.1 to avoid funding gaps between planning and implementation phases.
- **Priority 3:** Build contingency budget for governance functions themselves, including stakeholder engagement and change management, not solely technical development.

XIII. RISK ASSESSMENT AND MITIGATION PLANNING

Governance gaps identified across the six dimensions translate into concrete implementation risks that agencies should evaluate and mitigate deliberately.

Risk	Likelihood	Impact	Mitigation Approach
Integration failure across modular vendor components	High	High	Assign explicit integration accountability before procurement (Section 5.3).
Data quality plan treated as compliance-only exercise	Moderate to High	High	Integrate data quality planning into ongoing data governance (Section 4.3).
Delayed governance formation ahead of APD milestones	Moderate	High	Establish governance structures before Planning APD submission (Section 7.3).
Insufficient case worker adoption of new system	Moderate	High	Fund training proportionately and sustain executive sponsorship (Section 8.3).
Inconsistent security standards across vendors	Moderate	High	Apply agency wide security policy across all modular procurements (Section 9.3).
Underestimated cost allocation complexity for shared systems	Moderate	Moderate	Establish cost allocation governance process early (Section 12.2).

13.1 Risk Prioritization Guidance

Risks should be evaluated jointly on likelihood and potential impact to program certification and case worker adoption:

- Integration and data quality risks should be treated as highest priority given their frequency and their direct effect on federal certification outcomes.
- Adoption and workforce risks, while sometimes underweighted in technical planning, carry equally high impact given the operational consequences of poor case worker adoption.
- Funding and cost allocation risks are typically lower likelihood but can materially delay implementation timelines if unresolved before development begins.

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XIV. IMPLEMENTATION ROADMAP AND GOVERNANCE SEQUENCING

Translating governance readiness findings into an executable program requires a structured roadmap with defined milestones aligned to the APD process described in Section 7.1.

Phase	Approximate Timeframe	Governance Milestones
Foundation	Months 1 to 4	Establish executive steering committee and data governance committee; document current state governance maturity.
Planning and PAPD Preparation	Months 4 to 8	Complete stakeholder advisory council formation; draft data quality plan framework; submit Planning APD.
Procurement and Design	Months 8 to 16	Establish procurement and vendor management office; structure modular procurements; finalize security policy.
Implementation and IAPD Approval	Months 16 to 28	Formalize compliance and certification office; submit Implementation APD; execute modular development.
Certification and Transition	Months 28 to 34	Complete operational certification review; transition governance bodies to standing operational structures.

14.1 Governance Cadence Following Implementation

- **Monthly:** Review compliance milestones, data quality metrics, and vendor performance against roadmap commitments.
- **Quarterly:** Reassess composite governance readiness index and update priorities across the six dimensions.
- **Annually:** Conduct a full six dimension governance reassessment to track maturity stage progression.

XV. CASE PATTERNS AND PROGRAM BENCHMARKS

This article synthesizes recurring patterns observed across publicly available state and county CCWIS transition planning documents and human services technology research through mid 2020, rather than reporting on a single named program.

Pattern Observed	Reported Association
Governance established before Planning APD submission	Fewer reported scope changes during subsequent development phases.
Standing data governance committee with named accountable owner	More consistent alignment with CCWIS data quality plan requirements.
Proportionate training and change management budget	Higher reported case worker adoption rates following go-live.
Explicit integration accountability assigned before procurement	Fewer reported cross-vendor integration disputes during development.
Continuous stakeholder advisory council involvement	Reduced late-stage design rework attributed to unaddressed stakeholder needs.

15.1 Cross-Agency Observations

- **Observation 1:** Agencies transitioning from larger, more technically mature SACWIS environments generally reported faster governance formation, reflecting greater institutional IT governance experience.
- **Observation 2:** Smaller and county administered agencies more frequently benefited from state level shared governance resources, given limited standalone governance capacity.
- **Observation 3:** Agencies that treated compliance governance (Dimension 4) as fully integrated with data governance (Dimension 1) reported smoother APD review outcomes than those managing the two as separate workstreams.

XVI. KEY PERFORMANCE INDICATORS FOR ONGOING GOVERNANCE

Sustaining governance gains requires an ongoing measurement framework spanning data quality, compliance, adoption, and security dimensions.

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KPI	Definition	Illustrative Target
Data quality plan compliance rate	Percentage of required data quality metrics meeting documented plan thresholds.	Consistently at or above documented plan thresholds.
Interface exchange success rate	Percentage of required data exchanges (AFCARS, NCANDS, Title IV-E) completing without error.	High, consistent success rate across reporting periods.
Case worker system adoption rate	Percentage of case workers actively using the system for core case management tasks.	Sustained high adoption within a defined post-launch window.
APD milestone timeliness	Percentage of APD submissions completed within planned timeframes.	Consistent on-time submission across planning and implementation phases.
Security policy compliance across vendors	Percentage of modular vendor components meeting agency wide security policy requirements.	Full compliance across all active components.
Governance readiness index score	Composite six dimension maturity score tracked over time.	Steady progression toward higher maturity stages.

GOVERNANCE REMINDER
KPIs should be reviewed by the executive steering committee on the monthly and quarterly cadence defined in Section 14.1 to ensure governance metrics remain tied to program certification and case worker adoption outcomes.

XVII. CONCLUSION AND POLICY RECOMMENDATIONS

Governance, not technical architecture alone, is the limiting factor in successful CCWIS aligned system design. The shift from a single integrator SACWIS model to a modular, multi vendor CCWIS model transferred substantial architecture, integration, and compliance responsibility onto agencies that, in many cases, had not previously needed to manage that responsibility directly.

17.1 Summary of Key Findings

- Data governance and interoperability gaps, particularly around master data management and data quality planning, remain the most consequential barrier to CCWIS certification success.
- Modular procurement introduces integration accountability questions that were largely absent under the single integrator SACWIS model.
- Stakeholder and interagency governance, particularly continuous case worker and court involvement, materially affects both design quality and eventual system adoption.
- Governance structures established before, rather than after, Planning APD submission are associated with smoother compliance outcomes and fewer scope changes.

17.2 Policy Recommendations

- **Recommendation 1:** Agencies should conduct a formal six dimension governance readiness assessment before finalizing modular procurement scope.
- **Recommendation 2:** Data governance and compliance governance functions should be integrated rather than managed as separate workstreams, given their substantial overlap under CCWIS requirements.
- **Recommendation 3:** Training and change management should be funded proportionately to technical implementation, reflecting the operational consequence of case worker adoption failure.
- **Recommendation 4:** Governance structures should transition deliberately from project based to standing operational bodies following initial certification, rather than dissolving upon go-live.

17.3 Closing Note

Agencies that treat governance as a deliberate, sequenced, and adequately resourced program component, rather than an administrative formality accompanying technical modernization, are better positioned to meet CCWIS certification

| e-ISSN: 2320-9801, p-ISSN: 2320-9798| www.ijircce.com | Impact Factor: 7.488 (A High Impact Factor, Monthly, Peer Reviewed Journal)

||Volume 8, Issue 7, July 2020||

| DOI: 10.15680/IJIRCCE.2020.0807058 |

requirements while sustaining the case worker adoption and interagency coordination that ultimately determine whether modernized systems improve outcomes for the children and families these agencies serve.

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