



Child Welfare Technology System Implementation Shows Minimal Progress: After 10 years and \$2 Billion, Modern Information Systems Are Still Out of Reach

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KEY POINTS

- Comprehensive Child Welfare Information System (CCWIS) is the federal framework intended to modernize child welfare systems, but implementation across jurisdictions has been slow and uneven.
- Less than a third of CCWIS projects are operational, with 15 states not yet declaring any new CCWIS projects.
- CCWIS projects have run for six years on average, with wide variation across states. Most projects are still not fully operational after eight years of implementation.
- Total federal and state spending on CCWIS has reached over \$2.2 billion since 2016. This excludes projects that have not yet submitted claims to ACF. Total allocated funding – the amount that projects are approved to spend – was over \$5.8 billion.
- Transitional projects – legacy systems maintained while CCWIS projects are being completed – represent 85 percent of total claims, at \$1.9 billion. New CCWIS builds totaled \$313 million in claims.
- The median claim amount for CCWIS projects is \$11.2 million, relative to \$27.4 million for transitional systems.
- Factors that affect CCIWS project progress include the complexity of technological requirements, organizational readiness for modernization, reliance on transitional systems, and federal processes and requirements. State constraints such as procurement processes, staff capacity, and legal issues, also affect progress.
- There are opportunities to reshape the federal role to better support implementation, including repositioning ACF as an active partner, redefining metrics of success, and modernizing federal guidance.

BACKGROUND

Systems serving families involved in child welfare rely heavily on administrative data to target interventions, provide case management, ensure accountability, and measure performance. Since 2016, the Comprehensive Child Welfare Information System (CCWIS) has been the federal regulatory framework governing how states design, develop, and operate these systems.ⁱ CCWIS shifts away from large, monolithic builds toward modular, interoperable development that better supports caseworkers and families.

When fully implemented, CCWIS has significant potential: streamlining documentation for frontline workers, improving coordination across agencies, strengthening federal accountability, and transforming data from a compliance requirement into a strategic asset. In many states, however, these benefits remain unrealized. Data are fragmented, difficult to access in real time, and underutilized in decision-making. Critical information is not consistently elevated to inform case practice or system-level improvements.

What is CCWIS?

CCWIS is funded under Title IV-E of the Social Security Act (42 U.S.C. § 674(a)(3)(C) and (D)). It replaced the earlier Statewide Automated Child Welfare Information System model. The prior model required a single statewide system. CCWIS allows states to build in modules, reuse components, and implement functionality in phases. States must implement core functions including eligibility determination, case management, provider management, and federal reporting, and must establish data quality plans, data exchange standards, and governance structures. States may transition from SACWIS or continue operating legacy systems, though new development must align with CCWIS standards. At its core, CCWIS is designed to serve as the system of record for the most critical information in child welfare, capturing and organizing data related to child safety, family engagement, service delivery, placement history, and outcomes over time.

Compounding this gap are significant inefficiencies in how resources are spent. Experts in the field note that vendor costs escalate due to limited state oversight and procurement approaches that favor large, bundled acquisitions — often before foundational planning is complete. A substantial share of funding continues to flow toward legacy systems, diverting resources away from modernization.

This brief analyzes state progress in CCWIS implementation and trends in budget for CCWIS projects. It also describes trends for transitional projects, intended to support legacy systems while CCWIS builds are being completed. It also describes barriers states face in fully realizing CCWIS's promise for caseworkers and families, as well as the role the federal government can play in improving CCWIS success.

As described below, transitional projects are funded under CCWIS regulations and often described as part of the total CCWIS spend. States also operate non-CCWIS systems that can receive federal funding. Because this brief only focuses on CCWIS projects (both new builds and transitional projects), for clarity, we only refer to new CCWIS builds as CCWIS projects; transitional projects are not described as CCWIS projects. This analysis does not include funding for non-CCWIS IT projects.

CCWIS IMPLEMENTATION AND FINANCING

State participation in CCWIS follows the Advance Planning Document (APD) process, a series of formal submissions and approvals of different phases of development, per regulation.ⁱⁱ There are three phases to the APD process.

ⁱ 45 C.F.R. Part 1355 (81 Fed. Reg. 35450)

ⁱⁱ CCWIS is primarily regulated by 45 C.F.R. § 95 Subpart F 95.610.

Planning phase. States submit a Planning APD that outlines early activities, examples including:

- Needs assessment, feasibility study, alternatives analysis
- Cost-benefit analysis and project planning
- Functional requirements
- High-level system design and business process reengineering
- APD preparation and procurement planning

Implementation phase. States submit an Implementation APD and begin system design, development, and implementation (DDI) activities. Among other activities, this includes:

- Modular system design and software development
- Configuration, coding, and testing
- Data exchanges and interoperability development
- System installation, conversion, and user training

Fully operational phase. States submit an Operational APD, which confirms a state has completed all CCWIS automated functions, as defined in its approved automated function checklist, and has statewide implementation of the project's scope. Once a state project has been approved to be fully operational, the federal government reimburses activities under **operations and maintenance (O&M)**. Among other activities, O&M includes:

- System operation and hosting
- Ongoing maintenance, patches, and upgrades
- Data quality monitoring and reporting
- APD Updates

In addition to new CCWIS builds, federal funds can reimburse states for the operation of transitional systems.ⁱⁱⁱ These systems serve as a bridge between the legacy systems under prior rules (Statewide Automated Child Welfare Information System, or SACWIS) and new CCWIS systems. Federal funding may support both ongoing operations of transitional systems and the development of new CCWIS functionality concurrently. In practice, this allows federal and state funding to be distributed across parallel systems, with a substantial share of resources often directed toward maintaining legacy environments rather than completing modernization.

CCWIS investments are jointly funded by the federal government and states through Title IV-E federal financial participation, with cost-sharing requirements established in statute and implemented through regulation.^{iv} Federal funding is provided on a reimbursement basis, meaning states must first obligate and expend funds before claiming federal match. As a result, states must have sufficient upfront funding and budget authority to initiate and sustain CCWIS investments. This influences state decision-making on CCWIS projects, particularly in areas where federal allowability is unclear.

Federal reimbursement rates vary based on the type of activity, whether costs are attributable to Title IV-E administration, and whether system functionality meets CCWIS requirements. For DDI activities, federal financial participation is generally available at 50 percent, with states responsible for the remaining share. O&M activities are typically funded at a 50 percent federal match rate.

ⁱⁱⁱ 45 C.F.R. § 1355.57

^{iv} 42 U.S.C. § 674(a)(3); 45 C.F.R. § 1355.57; 45 C.F.R. § 95

For functionality that is not attributable to Title IV-E or does not meet CCWIS requirements, federal funding is limited to allowable costs and allocated based on program benefit. This rate is calculated as 50 percent multiplied by the state’s Title IV-E penetration rate, defined as the percentage of foster care and adoption cases eligible for IV-E funding. This results in a reduced effective federal share for non-IV-E or non-CCWIS-aligned components. The average state IV-E penetration rate is 34 percent, which results in a federal reimbursement rate of 17 percent.

DATA AND METHODS

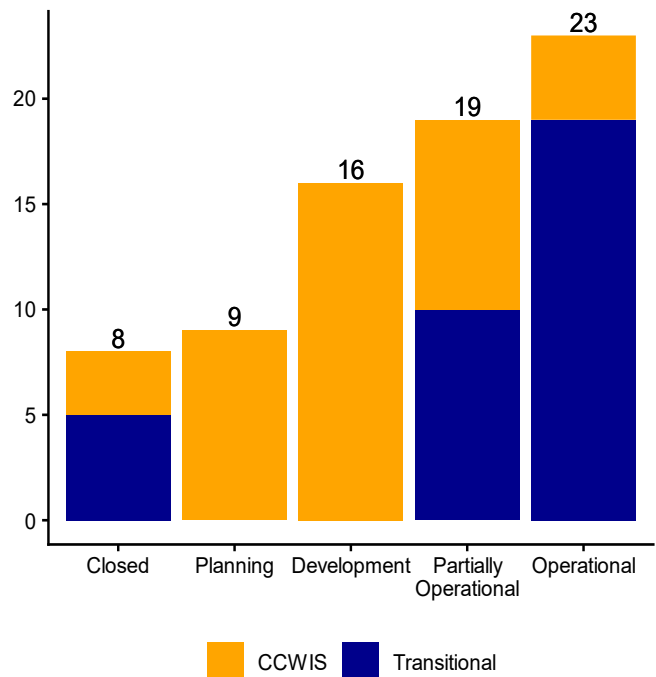
The analysis in this brief relies on data collected about state CCWIS implementation as of February 28, 2026 (with some updates since then), by an independent contractor for the Administration for Children and Families. The data are based on formal submissions for APD approvals, status updates, and claims data (form CB-496). States may not have submitted all relevant claims for federal reimbursement. Additionally, some states may be further along in their implementation activities than reflected here but have not yet submitted or received approval for the corresponding APD. As such, this analysis may not fully reflect states’ current progress or the full amount spent on systems. Findings related to barriers to CCWIS projects are based on existing research studies, the expert experiences of the brief authors, and input from federal experts working with CCWIS projects at the state level, overseeing project implementation at the federal level, and approving state APDs.

LESS THAN A THIRD OF PROJECTS ARE OPERATIONAL, WITH 15 STATES NOT YET DECLARING ANY NEW CCWIS PROJECTS

Since 2016, 49 states and territories have worked on a total of 75 projects. Three states do not have an active project, including Alaska, Massachusetts, and Nebraska. Among the states and territories with projects, 12 only have transitional systems without having started a new CCWIS build. Forty-one projects are for new CCWIS builds, while 34 are maintaining transitional systems.

Figure 1 portrays the status of these projects. Twenty-three projects (30 percent) were fully operational. Eight were closed without becoming operational. Transitional systems are operational or partially operational, and, by definition, are meant to maintain functionality while new builds are developed. Only 10 percent of CCWIS projects for new builds are fully operational.

Figure 1. Project Implementation Status of 75 CCWIS and Transitional Projects



Note: Status as of February 28, 2026. Data include 41 CCWIS and 34 transitional projects. Closed projects were ended early before becoming fully operational.

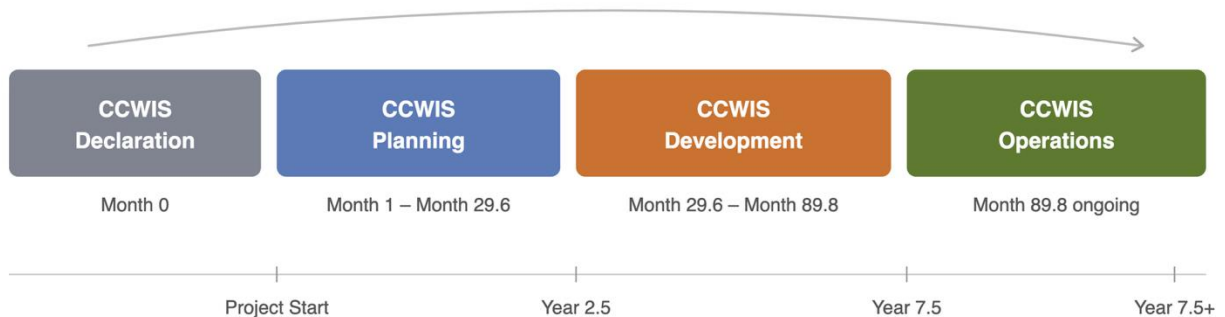
CCWIS PROJECTS HAVE RUN FOR 6 YEARS ON AVERAGE, WITH WIDE VARIATION ACROSS STATES

As of February 2026, the 41 non-transitional CCWIS projects have a median duration of about six years. The duration of projects varies greatly, in large part based on when they started. For instance, Minnesota has a new project that began in September 2025, whereas the longest project is from Virginia, which began in 2016, and is still in its development stage. Seventy-five percent of all projects are still not fully operational after eight years. Several states have recently gone live with their CCWIS systems but are not in O&M due to modifications of certain modules that are still in development. As a result, these systems are not counted as fully operational based on the type of APD submitted to ACF.

Two noteworthy operational CCWIS projects are from Idaho and Arizona. Idaho was the first state to have a fully operational CCWIS; from project declaration to fully operational the state's project took just over three years. The second state to have a fully operational CCWIS project was Arizona, which took just over six years from project declaration to becoming fully operational.

States pursuing CCWIS have experienced wide variation in the duration of planning, development, and implementation activities. Figure 2 outlines the average timeline for CCWIS projects by APD phase. The average time from initial CCWIS declaration to statewide operational status (among operational states) is 61.1 months (five years). The average time since initial CCWIS declaration for states still in active development is 93.8 months (seven years, nine months). Thirty-two states/territories have exceeded five years since declaration without an operational project.

Figure 2. Average CCWIS Timeline



TOTAL CLAIMS FOR CCWIS AND TRANSITIONAL PROJECTS HAS REACHED OVER \$2.2 BILLION SINCE 2016

Since 2016, total federal and state claimed amount on CCWIS and transitional projects has been \$2,284.9 million. The amount allocated for spending – what states are approved to spend – was \$5,863.5 million. This includes planning, implementation, and O&M. Table 1 reports the total budget by CCWIS project type, and Table 2 summarizes the per project budget. Claims on transitional systems outpace spending on new builds. Importantly, 15 states have CCWIS projects that have not made any claims. Projects without any claims tend to have started more recently and have a shorter duration so far; it is unclear from our data the reasons why these projects have no claims.

The total amount to date claimed (for both federal and state spending) on CCWIS projects is \$331.1 million. For transitional projects, total claimed is more than \$1.9 billion. Spending on transitional projects accounts for 85 percent of the total claimed amount to date. The differences between new and transitional projects are largely reflected in the duration of the projects, where transitional projects have generally been in place much longer than new projects.

The amount allocated to projects – which is more reflective of expected cost – is closer between the project types. The overall amount allocated for CCWIS projects is \$2.5 billion, representing 43 percent of total allocations across CCWIS and transitional projects. Transitional projects have \$3.3 billion allocated, 57 percent of the total.

Table 1. Total Claimed and Allocated Funding for CCWIS and Transitional Projects, 2016 through February 2026

Dollar values in millions; Percentages reflect percent of total funding in each column.

	Claimed	Allocated
CCWIS	\$331.1 (14%)	\$2,521.2 (43%)
Transitional	\$1,953.8 (85%)	\$3,342.3 (57%)
All Projects	\$2,284.9	\$5,863.5

Note: Amount claimed reflects claims as of February 28, 2026. The amount spent is likely greater than reported, as states and territories may not have submitted claims for all spending through this date.

At the per project level, the median claim for transitional systems is nearly three times the amount for CCWIS projects. Table 2 shows:

- Claims for CCWIS projects ranged from \$40,000 (Oklahoma) to \$58 million (Connecticut), among projects that have any claims (note: 15 states had no claims for CCWIS projects as of January 2026). The median claimed amount for a CCWIS project was \$11.2 million.
- Claims for transitional systems ranged from \$1.3 million (Montana) to \$539 million (California). The median claimed amount for transitional systems was \$27.4 million.
- Allocations for CCWIS projects ranged from \$2.2 million (Vermont) to \$479 million (California). The median allocation for a CCWIS project was \$40.1 million.
- Allocations for transitional systems ranged from \$4.4 million (Idaho) to \$841.6 million (California). The median allocation for transitional systems was \$43.3 million.

Table 2. Per Project Claimed and Allocated Funding for CCWIS Projects, 2016 through February 2026 (in millions)

	Claimed ⁱ			Allocated ⁱⁱ		
	Minimum	Median	Maximum	Minimum	Median	Maximum
CCWIS	\$0.04	\$11.2	\$58.0	\$2.2	\$40.1	\$479.7
Transitional	\$1.3	\$27.4	\$539.0	\$4.4	\$43.3	\$841.6
All Projects	\$0.04	\$22.4	\$539.0	\$2.2	\$42.9	\$841.6

Note: Amount claimed reflects claims as of February 28, 2026. The amount spent is likely greater than reported, as states and territories may not have submitted claims for all spending through this date.

ⁱ Excludes projects with no claims.

ⁱⁱ Excludes projects with no funding allocated.

Comparing spending on projects is challenging because project durations vary. When calculating average claimed per year of project implementation, transitional projects are 20 times more expensive than new builds. The median amount claimed for transitional projects is \$4.9 million per year and \$250,000 per year for new builds.

Table 3 reports allocated funding by project phase. Across all new CCWIS projects, 81 percent of funding was allocated to implementation, 6.5 percent to planning and 12.5 percent to maintenance and operations. Transitional projects – which are largely already operational when begun – had nearly 90 percent of funding allocated to O&M.

Table 3. Allocated Funding for CCWIS Projects by Phase, 2016 through February 2026
Dollar values in millions; Percentages reflect percent of total funding in each row.

	Planning	Implementation	O&M	Total
CCWIS	\$163.5 (6.5%)	\$2042.4 (81%)	\$315.3 (12.5%)	\$2,521.2
Transitional	\$11.9 (0.4%)	\$330.8 (9.9%)	\$2,999.6 (89.7%)	\$3,342.3
All Projects	\$175.4 (3%)	\$2,373.2 (40.5%)	\$3,314.9 (56.5%)	\$5,863.5

Note: Funding reflects allocated funding, not actual claims. Funding is based on the associated APD. For some projects without a planning APD, any funding for planning activities would be allocated to the implementation APD.

Spending is related to project duration for CCWIS projects, but not so for transitional projects. As expected, the duration of projects for new CCWIS builds is generally related to the amount claimed. On average, for every million dollars spent, projects last nearly an additional month (for projects that have any claims). As a contrast, claimed amounts for transitional projects are not related to the duration of projects. Longer projects do not necessarily cost more; shorter projects do not necessarily cost less. Several other factors likely drive the costs associated with transitional projects.

FACTORS AFFECTING CCWIS PROJECT PROGRESS

Many factors affect the cost and duration of CCWIS projects, as well as their ability to meet the needs of key stakeholders. Below we highlight some key constraints and drivers of success, based on expert perspectives and a review of relevant research.

Complexity of technological requirements.

The scope of projects directly relates to the complexity of a project. Full enterprise systems are likely more costly and take longer than projects that take a modular approach. The complexity of existing legacy systems is also a constraint. Legacy systems with complex or convoluted architecture and poor documentation require more effort to transition and maintain during the transition period.¹ The scope and scale of data migration from legacy systems to new CCWIS systems also affects the complexity of a project. County-administered systems implementing a statewide CCWIS project, for example, may have to deal with different legacy systems from each county.²

Organizational readiness for modernization.

Organizational readiness is a primary driver of CCWIS success. Successful projects rely upon strong institutional foundations. This includes stable leadership at the agency, program, and IT levels. Program and IT leadership need to be aligned on objectives and goals. Governance structures and business processes related to decision-making, monitoring, data management and other areas can help clarify roles and institutionalize processes. Workforce capacity – adequate staffing and appropriate skillsets – and stable funding are necessary to ensure implementation is feasible.^{2,3} And procurement capacity, including managing competitions and overseeing contracts, is essential to control costs, ensure progress is aligned with goals, and enable projects to appropriately adapt to changes. These elements reflect the extent of meaningful planning completed prior to development.

Many states begin development without these foundations in place. As a result, planning often continues into development, leading to evolving requirements, rework, and extended timelines. Common gaps include limited cross-program coordination (i.e., program and IT), absence of an enterprise data strategy, weak business ownership of requirements, and insufficient workforce readiness. States also face challenges securing sustained budget commitments, maintaining executive and legislative support, and aligning with federal expectations from the Administration for Children and Families (ACF).^{1,3}

Stable state funding, in particular, is critical because states must provide half of implementation costs. If states do not allocate consistent funding amounts over the life of a project, progress can stall, contributing to extended timelines and eventual cost overruns. Strong relationships between state agencies and legislatures may be crucial, which may require steady demonstration of progress. This can create a virtuous cycle if a CCWIS build is consistently on target, inspiring confidence in agency leadership. Or it can lead to a vicious cycle of costly, slow progress, leading to skepticism and reluctance to continue to invest.

Reliance on transitional systems.

A substantial portion of CCWIS funding supports legacy transitional systems rather than new system development. Most O&M funding is allocated toward existing transitional systems instead of newly implemented CCWIS functionality. This reflects a misalignment between modernization goals and resource allocation.³

Although CCWIS was intended to accelerate replacement of legacy systems, federal financial participation continues to support their operation without clear, time-bound expectations for transition. States may receive funding for both transitional systems and new CCWIS development simultaneously, splitting resources and increasing costs. Eight-five percent of claims and over half of CCWIS allocation supports legacy systems.

This structure reduces incentives to complete implementation, diverts workforce capacity, and weakens accountability. The regulation permitting states to operate transitional systems (45 C.F.R. § 1355.56) does not enforce firm deadlines. If states are not accountable to timelines committed to in original APDs, projects can undergo prolonged transition periods. Strengthening guidance and tying funding to measurable progress could improve efficiency and accelerate modernization.

Federal processes and requirements.

Several structural factors within the current federal-state framework contribute to delayed and uneven CCWIS implementation. The existing approval processes create incentives for states to initiate development before completing necessary planning and readiness activities, increasing the risk of rework and extended timelines.

States must navigate multiple layers of federal requirements and review, including APD approval processes, CCWIS regulatory expectations, Title IV-E compliance requirements, and related sub-regulatory guidance. While these mechanisms are intended to ensure accountability, interoperability, and program integrity, states may experience them as complex or administratively burdensome.³⁴ When federal compliance requirements evolve, this can slow implementation, limit flexibility, and reinforce risk-averse implementation strategies. Together, these structural dynamics reinforce patterns of delayed execution, fragmented development, and misalignment between CCWIS design principles and real-world delivery.

State procurement, capacity, and legal constraints.

State procurement and internal capacity significantly affect CCWIS cost, duration, and outcomes. Procurement approaches often favor large, multi-year contracts, limiting the modular, iterative development model envisioned under CCWIS. These large, bundled procurements also limit the ability to engage subject matter experts in discrete planning and implementation efforts, reducing the precision and quality of early-stage work. Procurement timelines can last one to two years, which in addition to causing delays, can disrupt other workflows, buy-in from key stakeholders, and create the need to immediately modify a project if other circumstances change.

Contract management capacity also influences vendor performance and cost effectiveness. Weak oversight of contract modifications is a particular risk, as it can allow vendor costs to escalate beyond initial projections without corresponding gains in scope or quality. Strengthening state capacity to manage vendors, segment procurements, and control contractor costs will be critical to improving outcomes and ensuring more effective use of CCWIS investments.

Workforce and leadership stability are critical. Staff turnover disrupts program and IT governance, slows decision-making, and weakens accountability.³ When leadership champions leave, it can be challenging to maintain executive visibility and support, which can help keep projects moving forward.

In several cases, states initiated development while governance structures, business processes, and data strategies were still maturing. When planning continues during development, requirements evolve and modules may require redesign, extending timelines. These challenges are compounded by inconsistent budget commitments and shifting executive or legislative priorities, which can disrupt continuity and limit sustained support for modernization efforts.³

Consent decrees and litigation can also affect data collection, how data can be used, reporting requirements, and system functionality. This can particularly increase complexity when they are finalized after planning has taken place and active CCWIS projects must be redesigned to accommodate changes.⁵

RETHINKING THE FEDERAL ROLE IN SUPPORTING CCWIS IMPLEMENTATION

Federal investment in CCWIS reflects a substantial and ongoing effort to modernize child welfare systems. However, implementation outcomes vary widely across states in terms of pace, scope, cost, and level of readiness at the start of development. This variation demonstrates that funding levels alone do not drive successful implementation. Instead, outcomes are shaped by differences in planning quality, governance maturity, workforce capacity, and alignment between program and IT leadership. States that initiate development without these foundations in place experience longer timelines, greater cost growth, and increased rework. These patterns suggest that current federal funding and approval processes do not consistently ensure that states are prepared to begin system development, contributing to uneven progress across the CCWIS landscape. There are several areas where federal policy and support can better position states for success.

Position ACF as an active partner, rather than solely overseeing compliance.

The patterns of long project timelines, high costs, and extended support for transitional systems, indicate that current federal processes do not consistently ensure that states are ready to begin development of CCWIS projects. While planning phases can be lengthy, there is no standardized expectation for the artifacts or level of maturity required before approval of DDI funding. As a result, time spent in planning does not reliably

translate into readiness, and implementation risk is carried forward into later phases. Strengthening planning resources and positioning ACF as an active partner in shaping planning outputs, rather than primarily overseeing compliance, would better ensure that states enter development with the structures necessary for successful, timely implementation.

Variation in CCWIS implementation outcomes reflects a misalignment between federal funding approvals and demonstrated state readiness. Current processes allow states to enter DDI phases without consistently establishing the planning foundations required for successful delivery, increasing the likelihood of delays, rework, and cost growth. Addressing this misalignment requires partnering with states to reach expectations for planning and readiness prior to funding approval for the implementation phase. This includes establishing standardized readiness criteria, partnering with states in the development of core planning artifacts, and expanding federal engagement during early planning phases. Positioning ACF as an active planning partner, rather than primarily an oversight body, would help ensure that states use planning time effectively and enter development with clearly defined business processes, governance structures, and data strategies.

Redefine metrics of success towards outcomes and impact.

Technology modernization projects are often judged by whether they are delivered on time and within budget, and CCWIS projects have historically been evaluated in similar terms. However, these metrics do not capture the factors that ultimately determine whether a CCWIS delivers value. System effectiveness depends on elements such as strong data governance, usability for caseworkers and administrators, and the ability to support program oversight and accountability.

Shifting away from a primary focus on compliance with system requirements, ACF could place greater emphasis on implementation progress and program outcomes. Linking federal funding to measurable indicators—such as deployment progress, system usability, data quality, and improvements in child welfare practice—would better align incentives with the goals of CCWIS modernization.

Modernize federal guidance to keep pace with technological change.

Current regulatory interpretation has not kept pace with the speed of technological change. Ambiguity in federal guidance, particularly around modularity, functional overlap, and emerging technologies, contributes to risk-averse decision-making and reinforces reliance on slower, monolithic system approaches. While CCWIS policy was designed to enable modular, interoperable systems, states often lack clear direction on how to operationalize this flexibility within procurement and funding frameworks. Clarifying federal expectations in key areas would strengthen oversight by reducing uncertainty and enabling more consistent, forward-looking implementation strategies. This includes reaffirming modularity as a preferred approach to system delivery, modernizing the interpretation of duplicative functionality to account for iterative technology improvement, and providing clear guidance on the adoption of AI, SaaS platforms, and add-on solutions. Without this clarity, oversight mechanisms risk emphasizing compliance with outdated interpretations rather than supporting effective, modern system design.

Modernizing guidance does not necessarily imply statutory or regulatory changes. Existing regulatory authority may permit a more principle-based and forward-looking approach. This is critical to aligning federal oversight with the realities of current technology and accelerating progress toward fully operational, high-performing CCWIS environments.

Some CCWIS projects have been in operational status for over six years. During that period, technology, system architecture, data management practices, cybersecurity expectations, and approaches to system usability have continued to evolve. Federal guidance could better reflect this environment by clarifying how

states may continue to assess, refine, and modernize CCWIS after initially achieving operational status. This may include identifying circumstances under which states can re-enter planning or implementation phases to address changing technology needs, strengthen system performance, or implement innovative solutions. Framing CCWIS modernization as an ongoing lifecycle, rather than a one-time transition, may help states keep their CCWIS technology modern and continue to strengthen the tools that support services for children and families.

CONCLUSION

CCWIS represents a substantial federal and state investment in modernizing child welfare systems, with more than \$2.2 billion spent since the regulation's promulgation in 2016 and over \$3.5 billion in additional funding approved (totaling over \$5.8 billion). Despite this investment, implementation has been slow and uneven, with many states remaining in extended development and continuing to operate legacy systems. These outcomes reflect persistent gaps in planning, governance, and implementation readiness, rather than a lack of available technology.

CCWIS systems are not simply technology investments. They are the primary infrastructure through which child welfare agencies capture, manage, report, and act on critical information about children and families. CCWIS data supports core functions including eligibility determinations, safety assessments, placement decisions, service delivery tracking, caseworker workload management, federal reporting, and payments to providers and caregivers. The quality, accessibility, and timeliness of this data directly influence decision-making at every level, from frontline caseworkers to state leadership and federal oversight.

Gaps in system implementation have consequences beyond project timelines and costs. Delays prolong reliance on legacy systems that often limit data quality, restrict interoperability, and increase administrative burden on caseworkers. This can result in incomplete or delayed information, reduced visibility into outcomes, and diminished ability to identify risks or intervene effectively, affecting key child welfare outcomes such as timeliness of services, safety, placement stability, and permanency. As federal and state agencies increasingly rely on data to drive accountability, performance management, and cross-system coordination, the importance of fully functional, modern CCWIS environments continues to grow. Strengthening implementation is not only a technology priority but a programmatic imperative, as the effectiveness of child welfare agencies is directly tied to the systems that support them.

Current state and federal policies and practices do not consistently ensure that states are prepared to begin development. In some cases, they also incentivize prolonged reliance on legacy systems. As a result, significant resources are directed toward maintaining transitional systems rather than completing modernization, contributing to extended timelines and higher costs. Improving CCWIS progress will require a shift in how CCWIS is supported. Strengthening planning partnerships, clearly defining expectations, and positioning ACF as an active partner to states can help ensure that states enter development with the necessary foundations in place. At the same time, realigning funding incentives to prioritize completion will be critical to accelerating progress. Without these changes, current patterns of delay and inefficiency are likely to persist. Adapting federal processes does not require updating regulations, which is a lengthy process. ACF and states can take steps immediately to align planning, funding, and oversight with the goals of CCWIS modernization. This offers a clear path to improving implementation outcomes and ensuring that these investments more effectively support child welfare practice and outcomes.

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