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July 14, 2026

The Honorable Robert Rivas
Speaker,
California State Assembly
P.O. Box 942849
Sacramento, CA 94249-0029

The Honorable Monique Limón
President Pro Tempore
California State Senate
1021 O Street, Suite 8518
Sacramento, CA 95814

The Honorable Jesse Gabriel, Chair
Assembly Committee on Budget
1021 O Street, Suite 8230
Sacramento, CA 95814

The Honorable John Laird, Chair
Senate Committee on Budget & Fiscal Review
1021 O Street, Suite 8720
Sacramento, CA 95814

The Honorable Alex Lee
Chair, Assembly Human Services Committee
1020 N Street, Room 124
Sacramento, CA 95814

The Honorable Josh Becker
Chair, Senate Human Services Committee
1021 O Street, Ste. 6520
Sacramento, CA 95814

The Honorable Dr. Corey A. Jackson
Chair, Assembly Budget Subcommittee No. 2
1021 O Street, Suite 6120
Sacramento, CA 95814

The Honorable Caroline Menjivar
Chair, Senate Budget Subcommittee No. 3
1021 O Street, Suite 6630
Sacramento, CA 95814

RE: REQUEST TO PROTECT CHILD SAFETY BY DELAYING CWS-CARES SYSTEM LAUNCH & ENHANCING ACCOUNTABILITY MEASURES

Dear Pro Tem Limón and Speaker Rivas, and Chairs Laird, Gabriel, Becker, Lee, Menjivar, and Jackson:

On behalf of the County Welfare Directors Association of California (CWDA), we write to express our urgent concerns regarding the readiness of the Child Welfare Services-California Automated Response and Engagement System (CWS-CARES). Moving forward with the planned October 26, 2026, launch date is no longer a viable option compatible with child safety. The CWS-CARES system is underperforming and incomplete, with project milestones and deliverables significantly behind schedule with less than four months out from the system's planned launch. The Project's poor health assessment is corroborated by the State's own independent oversight consultants in their monthly reports to the Administration for Children and Families (ACF), as well as the Project's statutorily mandated monthly reports to the Legislature and Legislative Analyst's Office (LAO).ⁱ

Releasing an incomplete system to frontline county social workers jeopardizes the integrity of California's child welfare practice and infrastructure, and poses a high risk of probable system failures and data gaps that may result in uninvestigated reports of abuse or neglect, severe trauma related to unnecessary removals, placement disruptions, serious injury, or a child fatality. Therefore, we respectfully request urgent legislative intervention to delay the CWS-CARES planned Go-live date of October 26, 2026, by at least six months and no more than eight months, and to codify enhanced Project accountability measures that must be achieved prior to launch. CWDA estimates a six-month to eight-month extension would require approximately \$100 million to \$180.7 million State General Fund, depending on level of federal funds drawdown and additional assumptions as further detailed on pages 6-7. As detailed below, given the stakes of proceeding with the implementation as presently planned, this is a necessary investment to prevent critical failures and potentially devastating outcomes for California's most vulnerable children and families.

Should the planned Go-live date go unchanged, the implementation of an unfinished and untested system will trigger immediate, cascading impacts across multiple domains of practice:

- Direct Risks to Child Safety: Current design flaws, which are not scheduled to be fixed by launch, include:
 - In CWS/CMS, contact notes are consolidated in a single location, providing one place to review the latest information about the child or youth, family, and caregivers. In CARES, contact notes are documented in multiple places throughout the system, making it difficult for a worker to be confident they have all relevant information when reviewing information in the child's CARES files to determine services and plans of care, which could introduce risks to child safety. For example, if a safety issue regarding a relative's behavior with the child is raised during a Child and Family Team (CFT) meeting and a plan is made to observe contact with that relative, the documentation is only present in that section of the system. If that social worker, or later a different social worker, does not see that contact note, they will not know to more carefully screen the interaction and pursue remedial activities to support the child's safety.
 - When searching for a potential placement, the system only returns a single placement option at a time, making it extremely time consuming to find a placement for children and youth, particularly those with high needs. For foster youth who are commercially-sexually exploited or have severe behavioral health needs, for example, having complete information on appropriate placement settings that can meet the foster youth's needs is critical to ensuring timely and safe access to services.
 - Additionally, the system currently cannot clearly document language translation needs, risking miscommunications during child abuse investigations involving vulnerable children or caregivers that could lead to decisions being made about child safety without all of the necessary information. For example, If the child is bilingual, but more comfortable speaking Spanish, and the social worker does not know this and speaks only in English, the child may not convey clearly that their bruises were the result of abuse instead of having fallen off their bunk

bed. The worker may consider the injuries to be accidental and the child could continue to get hurt in the future because the origin of the injuries was not understood.

- **Compounded Workforce Burnout:** California is facing a severe social worker retention crisis. Forcing staff to navigate a flawed and incomplete system while managing manual workarounds and incomplete/flawed data conversions will drastically increase the administrative burden, accelerating worker burnout, exacerbating critical staffing shortages, and increasing risks to child safety.
- **Legal and Financial Liability:** Requiring counties to work in a system incapable of reliably tracking court mandates, statutory timelines, and fully supporting confidentiality protections raises significant liability concerns for counties. Delivery of an incomplete CWS-CARES system that poses risks of child safety passes the liability onto counties for future litigation and significant new costs. For example, the fiscal impacts of just one lawsuit can fall in the tens of millions of dollars, with some recent child welfare-related litigation costs and damages awards against counties and social workers exceeding \$30 million each.

Time Constraints Shortchange Safe, Complete, and True Production Simulation, Forcing High-Risk Manual Workarounds

We respect that our State partners at the California Department of Social Services (CDSS) and Office of Technology and Solutions Integration (OTSI) remain steadfast in their commitment to delivering a system that is on time, on budget, and eligible for full Federal Financial Participation (FFP), actively partnering with CWDA and counties to triage and prioritize fixes to known and emerging defects, application usability issues, and poor data integrity. Together, we are continuing to exhaust all available remediation and harm reduction efforts. However, based on the industry standard, active county end user feedback, and experience from other comparable IT system conversions, the nature and magnitude of setbacks this Project has encountered over the last two months would typically materialize 12 to 18 months prior to launch, providing adequate time for quality remediation, data conversion, full functionality testing, and county readiness. Recent Project deficiencies include significant development backlogs, unsecure confidentiality controls, critical design gaps, unresolved defects, and incomplete and unvalidated data conversion related to the transition of 30 billion case records spanning three decades. In order to meet the October launch date, the Project is relegated to shortchanging a safe, complete, and true simulation of production inclusive of substantially complete and accurate data, making it impossible for counties to prepare their staff and business processes so that social workers, probation officers as well as tribal entities with Title IV-E agreements can find and record critical child safety data in the system.

Frontline staff and management rely on a statewide case management system to track abuse investigations, evaluate immediate child safety risks, coordinate foster care placements and services, report to the courts, and issue timely caregiver and supportive service payments. Such end-to-end baseline system functionality and several essential features will not be fully supported by Go-live and are not scheduled for completion until January 2027 and into the spring of next year. Even if some of the core baseline functionality is available by October 2026, data conversion and other key testing and quality control measures have not been completed, resulting in

counties developing plans consistent with their existing disaster planning protocols which include resorting to basic “pen and paper” tracking of mandated reports, investigation findings and monthly contacts with foster children and families, to name a few key functions. **Unlike information recorded in the statewide case management system, manual workarounds like pen and paper and spreadsheets are not visible to other staff or counties responsible for subsequent child safety decisions, significantly increasing the risk that critical decisions will be made without access to all relevant information.**

Our risk assessment regarding the Project’s poor health is corroborated by the State’s own independent oversight consultants in their monthly reports to the Administration for Children and Families (ACF), as well as the Project’s statutorily mandated monthly reports to the Legislature and Legislative Analyst’s Office (LAO).ⁱⁱ These reports consistently reflect the Project in a ‘Red’ status, signaling that work is significantly behind schedule and unlikely to be safely completed by the target implementation date. The complexity and delay-prone nature of transitional systems like CWS-CMS has been observed in other states with similar systems and documented nationally as a barrier to CCWIS compliance by the ACF in a recently issued June 2026 brief,ⁱⁱⁱ noting that “Legacy systems with complex or convoluted architecture and poor documentation require more effort to transition and maintain during the transition period. The scope and scale of data migration from legacy systems to new CCWIS systems also affects the complexity of a project.”

Even if needed functionality is delivered before Go-live, time is running out for adequate testing and county readiness activities needed to support implementation. For example, the CWS-CARES system must comply with federal requirements for a single integrated eligibility determination which requires interfacing with CalSAWS. This interface continues to be developed and has not yet been adequately tested. If there are defects or flaws in this interface, this can result in missed or late payments to foster caregivers, including kinship caregivers, which could result in placement disruption and further trauma to foster children and potential disruptions for non-minor dependents (NMDs) aged 18-21 in supervised independent living settings.

Requested Statute for CARES Stabilization Period, County Readiness and Accountability

To protect the lives of the children and families we serve, we respectfully request the Legislature’s support to enact trailer bill language (TBL) delaying the CWS-CARES launch by six to eight months, no later than June 30, 2027, after objective statutory readiness milestones and criteria have been achieved. We propose establishing the following readiness criteria and timelines to support a successful launch:

- **Completion of Baseline Functionality and Efficiency Improvements to Hotline Functionality:** Require the programming and deployment of all baseline requirements outlined in Special Project Report 6 (SPR6), including the resolution of the approximately three hundred outstanding essential stories,^{iv} as well as all outstanding critical, high, and medium defects. Furthermore, require development of the necessary enhancements to the Hotline functionality that maintain timely response times and do not increase caller wait time nor delay investigations. We propose a strict system delivery schedule for completion of outstanding items as detailed in our proposed TBL; all to be completed and deployed to production simulation no later than December 14, 2026.

- Full Data Conversion with Certification: Complete and accurate conversion of all historical case records from CWS/CMS and full conversion of all planned supporting systems' data into CARES. The project must provide counties with a minimum of six continuous weeks, beginning no later than January 31, 2027, to review and validate the results of the full data conversion in production simulation. For example, confirming that critical history of prior allegations of abuse or neglect is not lost or corrupted. Furthermore, the CARES project must supply certification from the Project's existing IV&V vendor to the Legislature and to counties that the conversion meets the Comprehensive Child Welfare Information Systems (CCWIS) Data Quality Plan (DQP) under 45 CFR 1355.52(d). This step is critical to successfully transitioning approximately 30 billion records that have accumulated over the 30-years in the CWS/CMS system as well as incorporating multiple external system data into CWS-CARES.
- Support for the Full Five-Month County Readiness Window in Production Simulation with All Essential Stories and Converted Data: The provision of a minimum of five consecutive months for county business process redesign and staff training prior to launch. At least three months of this window must occur only after all essential stories have been deployed to production simulation along with a full and validated data conversion in production simulation. We also propose strict timelines for the training vendor to update training and implementation materials; the establishment of a plan for user support no later than September 30, 2026; the provision of a plan for data access during the conversion cutover window and the issuance of instructions for entering this data into CARES by December 14, 2026; and the issuance of state policy guidance regarding any workarounds or other data entry requirements no later than February 1, 2027, so counties have the necessary information to incorporate these materials into their training, organizational changes management (OCM), and operational readiness plans. This will prevent the immense financial waste and irresponsible use of staff time resulting from training and re-training staff in a constantly shifting and unstable environment. We also propose expanding the content of the monthly legislative briefings to include implementation metrics such as system performance, workforce readiness, manual workaround burden, continuity of operations and child safety risks.
- Guarantee the Operational Safety Net: Extend read-only access to the legacy CWS/CMS system for at least one-year post launch, providing a necessary historical reference for county staff. Also, to the extent permitted by federal CCWIS regulation, allow counties to maintain read-only access to external system data that has not been converted to CARES, and which must be maintained to meet data retention policies or until such time the data can be converted into future versions of CARES.
- Lessons Learned for CARES Version Two: To ensure the safety and wellbeing of California's children and continue to improve the efficiency and effectiveness of CARES for end users, we request that the legislature to direct CDSS and OTSI to work with CWDA, and CPOC to provide a plan no later than May 1, 2027, to gather and incorporate end user input into the initial design and ongoing development of CARES V2, and to establish annual reports to the LAO no later than January 15, 2028.
- Exemption from Contracting Requirements: Recognizing the need for urgency to maintain access to

CWS/CMS while finalizing the CARES build, conversion, and readiness activities, we have proposed a broad exemption to contracting requirements to allow CDSS and OTSI to negotiate the requisite changes to contracts, or enter new contracts, to accomplish these timelines.

- Accompanying Budget Bill Language - Allow Access to Existing County Support Funding Allocation for FY 2026-27 regardless of CARES Version Development: With our requested delay of the CARES launch, we ask the legislature direct CDSS and OTSI to make the request to the Department of Finance and California Department of Technology to redirect funds from the \$10 million set aside to support counties for CARES Version Two (V2) as it is unlikely there will be significant county activities for V2 in FY 2026-27, and allow it to be used for Version One (V1) activities.

Budget Impacts of Proposed Delay to Protect Child Safety

The shift from October, 2026, to an April through mid-June, 2027 Go Live date will result in additional costs. According to CWDA's projections, **a 6-month delay is estimated to cost \$100 million to \$133.0 million General Fund, while an 8-month delay is projected to cost \$133.3 million to \$180.7 million General Fund.** To continue county access to CWS/CMS, support continued development of the CWS-CARES in a manner that incorporates all essential stories and completes remaining development, testing, quality control, and data conversion activities and resolves all critical, high and medium defects necessary prior to Go Live, CWDA estimates a breakdown of delay costs as follows:

- \$36.3 to \$65.9 million State General Fund (SGF) for CWS/CMS and related access, and
- \$63.6 to \$114.8 million SGF for CWS-CARES Version 1 (V1) carrying costs.
- Total costs combined are estimated to be in the range of \$100 to \$180.7 million SGF, depending whether the project is delayed through April or June 2027 and depending on the level of eligible federal funds drawdown.
- Accompanying budget bill language is proposed to authorize the Department of Finance to accordingly increase the CWS-CARES budget authority, and to effectuate the aforementioned transfer for county readiness funds from V2 to V1.

CWDA notes the following with respect to our cost assumptions:

- CWDA believes the CWS/CMS carrying costs will be eligible for approximately 26.5 percent FFP, rather than the current 50 percent federal financial participation (FFP) rate, pursuant to federal guidance that allows FFP for non-CCWIS compliant systems. This is counter to information provided by CDSS in December 2025 that no FFP can be provided. However, CWDA's higher range estimate does account for the possibility of 100% State General Fund in the event of federal denial of necessary cost allocation plan amendments.
- Even in the event that CWS-CARES V1 launches in October 2026, there will be necessary carrying costs post Go-live due to the significant amount of continued and needed development that currently is

planned for the incomplete system. The FFP for this work is unknown and therefore, we estimate a range to account for 50% FFP through June 2027, and also a higher General Fund cost scenario of 50% FFP through December 2026 with the aforementioned non-CCWIS rate of 26% from January through June 2027.

- We estimate the above cost projections are a maximum-exposure estimate across both categories for prospective FFP. Moreover, as noted, given there are subsequent releases planned for originally established V1 functionality through at least the first quarter of 2027, we estimate the State would have otherwise incurred some portion the V1 carrying costs even without a formal extension. CWDA requests the Administration's technical assistance to estimate that portion of costs, which may result in a reduced net General Fund impact.

CWDA recognizes the financial risks to California, as conveyed by CDSS, OTSI, and other Administration representatives, of delaying Go-live. We also believe that California is equally at risk of such action if the system is unable to perform the functionality agreed to with the federal administration due to system failures, defects or flaws resulting from rushed development, and incomplete testing and deployment of the system, with the added risks posed to our state's most vulnerable children and families, and additional costs borne by counties related to likely damages and litigation that a system failure may trigger. To mitigate such risks, we believe this is a necessary investment to bring a promising new CWS-CARES system, with new and improved functionality, across the final finish line.

Conclusion

We join our State partners in remaining unequivocal in our shared commitment to transition CWS-CMS, our nearly 30-year-old legacy IT child welfare case management system, to one that better supports the safety and wellbeing of children and families in the Child Welfare System, brings California into federal CCWIS compliance, and facilitates the completion of key legislative priorities like implementation of the Tiered Rates Structure (TRS), unlocking federal prevention services dollars, and continuing our progress in reducing disproportionate child welfare involvement of racial and ethnic minorities through the power of automated systems. All of these shared aims, however, are in imminent jeopardy should the Project's Go-live date remain unchanged, and an irreversible incident befalls a child or family.

We recognize that delaying this system's launch carries a fiscal cost to the State. However, at less than four months from launch, too much work remains outstanding to be successfully completed on time and in keeping with child safety. The current strategy of simultaneously completing baseline development, resolving defects, converting and validating data, conducting user testing, redesigning business processes and training approximately 25,000 county and tribal staff simultaneously to meet an inflexible October deadline is unsound and unsafe. Launching an incomplete system does not erase the remaining work or cost. It transfers that work into a live child welfare environment where system defects, incomplete data, and manual workarounds will directly affect frontline decision-making.

The more fiscally responsible approach is a controlled, milestone-based stabilization period in which the State completes and validates the system, counties conduct meaningful readiness activities against a stable environment, and implementation proceeds only after objective criteria are met. This approach protects both the State's financial investment and the children and families whose safety depends upon the system functioning as intended. Our proposed TBL criteria prevent these avoidable system costs and represent the most fiscally responsible path forward.

Most importantly, the human cost of a premature launch is simply too high. Launching an unfinished system directly endangers California's most vulnerable children, places an unbearable administrative burden on our workforce and passes destabilizing liability and risk onto counties. We look forward to partnering with the Legislature and the Administration to ensure CWS-CARES fulfills its core purpose: providing our county social workers with a safe, reliable, and functional tool to protect California's most vulnerable children.

Sincerely,



Carlos Marquez III
Executive Director
County Welfare Directors Association of California

cc:

Honorable Members, Assembly Human Services Committee
Honorable Members, Senate Human Services Committee
Members and Staff of the Senate Budget Subcommittee No. 3
Members and Staff of the Assembly Budget Subcommittee No. 2
Chris Woods, Office of the Senate President Pro Tempore
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Naima Ford-Antal, Senate Human Services Committee
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ⁱ The independent project oversight rating and dashboard is available online at:
<https://www.projecttracking.technology.ca.gov/Home/Details?id=2d0ec0f6-ac47-495a-980a-65d353a17210>.

The monthly reports to the Legislature and Legislative Analyst's Office (LAO) are available online at:
https://cwds.ca.gov/monthly_reports.

ⁱⁱ The independent project oversight rating and dashboard is available online at:
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ⁱⁱⁱ Child Welfare Technology System Implementation Shows Minimal Progress: After 10 years and \$2 Billion, Modern Information Systems Are Still Out of Reach, USDHHS (June 1, 2026),
<https://aspe.hhs.gov/reports/ccwis-implementation-shows-minimal-progress>

^{iv} The CARES Project defines essential stories as those where a user is unable to execute a necessary business process and there is no possible workaround. The "three hundred outstanding essential stories" comprise approximately 260 essential stories from the baseline requirements as well as 38 essential stories derived from county feedback during End-User Scenario Testing 3 (EUST3).

^v Supporting systems data to be converted includes CARES Live for CANS Data, Structured Decision Making (SDM), and Resource Family Approval (RFA) data from Binti, Greenfield, San Luis Obispo County and Contra Costa County. Other supporting system that will interface with CARES include the California Department of Education (CDE), Regional Center Details from Department of Developmental Services (DDS), Licensing

Information System & Facility Automation System (LIS/FAS), County Expense Claim Reporting Information System (CECRIS), Foster Care Eligibility Determination (FCED) with CalSAWS, Case Management Assessment (CMA), Person-Centered Intelligence Solution (P-CIS), and Juvenile Network (JNET).