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GAVIN NEWSOM  
GOVERNOR

July 7, 2025

SENT VIA EMAIL

Antonio Reyes  
Financial Analyst  
Fresno County Department of Social Services  
205 West Pontiac Way  
Clovis, CA 93612

SUBJECT: DENIAL OF ADVANCE PLANNING DOCUMENT BINTI – RESOURCE  
FAMILY APPROVAL SOFTWARE; PROJECT NUMBER  
#10-25-547-00-00.

Dear Antonio Reyes:

This letter is in response to Fresno County's Advance Planning Document (APD) #10-25-547-00-00 initially received on May 16, 2025, which requests funding approval for multiple modules of Binti – Licensing, Placements, Family Finding and Engagement, Clear (search) and Artificial Intelligence (AI).

We regret to inform you that Fresno County's Advance Planning Document #10-25-547-00-00 dated May 16, 2025, which requests approval for Binti – Licensing, Placements, Family Finding and Engagement, Clear, and AI modules is denied, due to the county's status as a pilot county for both the Child Welfare Services-California Automated Response and Engagement System (CWS-CARES) Resource Family Approval (RFA) module and CWS-CARES Version 1 (V1). Fresno County shall not proceed with the acquisition or implementation of the requested software, regardless of funding source. Federal financial participation and the associated State of California (State) general funds are denied.

**Background and Findings**

Fresno County submitted APD #10-25-547-00-00 dated May 16, 2025, requesting the following software:

- Licensing Module
- AI Module
- Placements Module
- Family Finding and Engagement – 8 Clear Seats included

The county's initial submission did not include proposed contract term dates and included a quote set to expire within a week of submission. The State requested the additional necessary information and an updated quote from the county on May 19, 2025, and reminded the county on May 20, 2025, of the State's 30 business day review period for APDs. The State received the requested information and revised APD documentation from the county on May 22, 2025, via email. The State's review began on May 23, 2025.

### **Relevant Regulations**

The [California Welfare and Institutions Code \(W&IC\) 16501.9 \(a\)\(1\)\(D\)](#) requires CWS-CARES to improve accuracy, availability, completeness, and timeliness of all data, documentation, and information needed by child welfare services staff, while reducing duplicative or manual data entry to the extent possible.

Additionally, [45 CFR Section 1355.52\(a\)](#) requires that the statewide child welfare information system must support the efficient, economical, and effective administration of the title IV-B and IV-E plans by:

1. Improving program management by maintaining all program data required by federal, state or tribal law or policy,
2. Preventing duplicative application system development or software maintenance, and
3. Ensuring costs are reasonable, appropriate, and beneficial.

[Section 1355.52\(b\)](#) goes on to require that the system must maintain data:

1. Required for ongoing federal child welfare reports,
2. Required for title IV-E eligibility determinations, authorizations of services, and expenditures under IV-B and IV-E,
3. Supporting federal child welfare laws, regulations, and policies,
4. Pertaining to case management, which supports federal audits, reviews, and other monitoring activities,
5. Supporting state child welfare laws, regulations, policies, practices, reporting requirements, audits, program evaluations, and reviews.

The data collected in the statewide child welfare information system must generate or contribute to federal and state reports. Counties are required to fully utilize the functionality provided by the replacement statewide child welfare information system when it has been implemented statewide [W&IC 16501.5\(d\)](#). The State's statewide child welfare information system will be the CWS-CARES, once implemented, and must adhere to the regulations discussed above, including the requirements for the data to be complete, accurate, and timely ([45 CFR Section 1355.52\(d\)\(1\)\(i\)](#)). Maintaining data meeting the criteria above in a system external to the CWS-CARES places the State's compliance at risk.

The risks and consequences maintaining duplicative Child Welfare Services external systems includes, but is not limited to, the potential for retroactive federal sanctions and/or disallowance of all federal CCWIS funding for the State ([All County Letter \(ACL\) 18-47, Child Welfare Services External Systems](#)).

### **Binti Licensing Module**

The State must deny the county's proposal to purchase and implement Binti RFA software because it is duplicative of the CWS-CARES RFA module that Fresno County is currently using at the State's cost. Fresno County is a pilot county for the CWS-CARES RFA module and as such, has received Core Constituent Participation allocation funds to support the implementation of this module in the county. Since the State is providing the county with software free of charge that accomplishes the same business process, approval of the county's purchase and use of the Binti RFA functionality would not meet the requirements of the federal regulations discussed above.

Additionally, the county has just been accepted to be a pilot county for CWS-CARES V1. As a pilot county, all data conversion must be completed by August 2026. To ensure case records are complete, the CWS-CARES project is working with all counties to convert data from each of their *singular* RFA systems. By standing up a second system to collect RFA data, this would create new data conversion work that the State did not anticipate and cannot accommodate at this stage in development work. Fresno County's RFA data housed in the CWS-CARES RFA module will be available in CWS-CARES V1.

### **Binti Placements, Family Finding, Clear, and AI Modules**

Fresno County's request to purchase and implement all other Binti modules as proposed is also denied, due to a failure to meet the federal regulations discussed above.

The Placements and Family Finding functionality will be available in the CWS-CARES V1, which will go-live October 2026, as outlined in the [Child Welfare Digital Services Planning Roadmap](#) and the V1 Scope Summary shared with counties via email correspondence in February 2025.

Since these functions are duplicative of CWS-CARES V1, they would be subject to decommissioning ([ACL 18-47](#)). This means that the county would implement these systems for only up to one year before being required to decommission them, which is not an economical use of resources. Additionally, there are concerns regarding the county's capacity for change management for multiple systems within a year, from CWS-CARES RFA to Binti Licensing to CWS-CARES V1.

Although the AI and Clear functionality will not be available in CWS-CARES V1, those enhancements cannot function without the denied Licensing and Family Finding modules. If the county is interested in pursuing alternative options that would fulfill the

business needs associated with the AI and Clear functionality, the county must submit a new APD for that option.

### **Conclusion**

In summary, the county's request to purchase and implement the Binti modules as proposed in this APD is denied due to the Fresno's status as a pilot county for both CWS-CARES RFA and V1, combined with the imminence of the CWS-CARES V1 go-live date. If the county fails to comply with this letter, pursuant to [2 CFR Section 200.339](#), the State may take the following actions:

1. Temporarily withhold payments until the recipient or subrecipient takes corrective action.
2. Disallow costs for all or part of the activity associated with the noncompliance of the recipient or subrecipient.
3. Suspend or terminate the Federal award in part or in its entirety.
4. Initiate suspension or debarment proceedings as authorized in [2 CFR Part 180](#) and the Federal agency's regulations, or for pass-through entities, recommend suspension or debarment proceedings be initiated by the Federal agency.
5. Withhold further Federal funds (new awards or continuation funding) for the project or program.
6. Pursue other legally available remedies.

If you have questions related to this notice, please contact the CWSB Fiscal Monitoring Unit at [CWSB-Fiscal@osi.ca.gov](mailto:CWSB-Fiscal@osi.ca.gov). If you have questions related to external system data conversion or decommissioning, please contact the CWSB ESCU at [CWDS-ExternalStakeholder@osi.ca.gov](mailto:CWDS-ExternalStakeholder@osi.ca.gov).

Sincerely,

JESSICA ROUGEUX, Chief *p.p. Rachel Trusty (Acting Branch Chief)*  
Child Welfare System Branch  
Children and Family Services Division

cc: Sanja Bugay, Director, Fresno County Department of Social Services