Introduction
On May 26, 2016, the Department of Health and Human Services (HHS) Administration for Children and Families (ACF) issued the Final Rule for a next generation of state child welfare systems called Comprehensive Child Welfare Information Systems (CCWIS). The CCWIS Final Rule was published in the Federal Register on June 2, 2016 (81 FR 35449) and will go into effect on August 1, 2016, at which time it will replace the existing regulations, governing what are known as Statewide and Tribal Automated Child Welfare Information Systems (S/TACWIS).

The scope of changes from the existing SACWIS scheme to the CCWIS Final Rule are dramatic and sweeping. KPMG LLP (KPMG) believes it would be prudent for states to begin immediately—if they have not already started—to assess impacts on their child welfare systems development plans. Given the breadth of change that the CCWIS Final Rule brings, state child welfare agencies should be cognizant of the new regulations and factor them into planning and procurement vision and time lines—regardless of the status of their system modernization, replacement, or operations enhancement planning.

While posing the challenges that accompany any major change in regulatory requirements, the opportunities that the new CCWIS Final Rule option offers states, in addition to the existing SACWIS scheme, are significant. The CCWIS Final Rule offers states the latitude to receive federal support for systems aligned with contemporary child welfare practice in ways that are more difficult to achieve under the prior S/TACWIS regulations. The new CCWIS framework is intended to “assist title IV-E [child welfare] agencies in developing information management systems that leverage new innovations and technology in order to better serve children and families. More specifically, this Final Rule supports the use of cost-effective, innovative technologies to automate the collection of high-quality case management data and to promote its analysis, distribution, and use by workers, supervisors, administrators, researchers, and policy makers.”

On August 11, 2015, ACF had issued a Notice of Proposed Rulemaking (NPRM) for CCWIS (80 FR 48199). The NPRM went through a notice and comment period in which ACF received 40 substantive and unduplicated submissions containing approximately 309 comments and questions on the proposal. Commenters included representatives from 20 state child welfare agencies and 9 national child welfare organizations, other organizations, associations, and advocacy groups.

Although the Final Rule makes a number of relatively minor revisions to the NPRM, the fundamental structure of the proposed rule remains intact. This issue brief updates KPMG’s original publication (Federal Regulatory Proposals Could Spur Next Generation of Child Welfare Information Systems – August 2015) to incorporate the final provisions and support state and local child welfare agencies as they navigate the implications of the CCWIS Final Rule.

Leveraging KPMG’s deep knowledge and experience in working with clients in the health and human services sector (and the child welfare sector specifically) to achieve greater program efficiency and effectiveness, the following presents an overview of the CCWIS Final Rule and discusses potential opportunities and next steps.
Significant differences between S/TACWIS and the CCWIS Final Rule

ACF’s issuance of the CCWIS Final Rule for the next generation of state child welfare systems represents a substantial shift in approach by the federal child welfare program, and one that will have enormous potential impact on state system operations and modernization activities. The existing regulations, governing what are known as SACWIS’s, have been in place since 1993, and have been modified only once: in 2012, to add provisions for tribal systems to those for states.

The issuance of the CCWIS Final Rule is significant in a number of ways:

— Federal child welfare systems oversight is moving away from the “single comprehensive system” approach in place for over two decades to an approach more closely aligned with other HHS programs (particularly those governed by the Centers for Medicare & Medicaid Services or CMS). This new approach emphasizes modularity, reusability, shareability, and interoperable technology.

— The CCWIS framework significantly reduces the prior 90 system requirements characterizing SACWIS (of which there were 51 mandated functional requirements) to an alternative approach that offers states greater flexibility to determine the appropriate size, scope, and functionality of their information systems. The CCWIS Final Rule highlights 14 requirements and encourages system planning and implementation to be based on each state’s unique child welfare business needs and practice.

— At the heart of the CCWIS Final Rule is a greater emphasis on data exchanges between child welfare and a larger number of other programs and entities. This emphasis aligns child welfare programs more closely with the integrated services delivery approach that many other HHS programs have already begun to implement.

— The CCWIS framework, unlike the existing SACWIS framework, will now allow state systems (at state option) to obtain data from external sources and systems (including providers or “child welfare contributing agencies”) and to provide data to external agencies and other government programs.

“Child welfare contributing agency” is defined in the CCWIS Final Rule as “A public or private entity that, by contract or agreement with the title IV-E agency, provides child abuse and neglect investigations, placements, or child welfare case management (or any combination of these) to children and families.” It is further clarified that this definition does not include county public children services agencies within a County Administered/State Supervised child welfare program, although these are subject to data exchange requirements where appropriate.

The CCWIS Final Rule promotes more efficient system development that follows current industry design standards in a number of important ways, including the following:

Data maintenance vs. data capture: The prior S/TACWIS regulations were more rigid in enforcing a single statewide child welfare information system—a “one-size-fits-all” approach in which data were required to be captured and maintained throughout the “life cycle” of child welfare cases. The CCWIS Final Rule, however, provides far greater flexibility to state agencies to develop systems that meet their child welfare practices and business needs by moving from a “data capture” to a “data maintenance” philosophy. This allows a CCWIS, unlike a SACWIS, to obtain required data from external information systems so long as a copy of that data is stored and maintained in the CCWIS.

Modularity: States now have the option to modularize their CCWIS applications and establish data exchanges through which pertinent child welfare information can be captured in other systems, and via exchanges, stored in a CCWIS. Significantly, this paves the way for states to conduct smaller, incremental implementations on a modular basis following an agile approach—the intent being to help curb costs and enable more manageable, smaller projects. These changes present increased flexibility to child welfare agencies (at both the state and county level) to determine the size, scope, and functionality of their information systems based on the variations and nuances in child welfare practice across, and within, states.
Increase in required data exchanges: The CCWIS Final Rule requires new bidirectional data exchanges and the use of electronic data exchange standards. Six existing bidirectional exchanges remain in place, and five new bidirectional data exchanges have been added to the Final Rule for CCWIS.

Existing SACWIS-mandated exchanges:
- Title IV-E/IV-B Financial system
- Title IV-E Eligibility system
- Child Abuse and Neglect system, when practicable
- Temporary Assistance for Needy Families (TANF) (Title IV-A), when practicable
- Medicaid Eligibility (Title XIX), when practicable
- Child Support (Title IV-D), when practicable

New CCWIS-mandated exchanges:
- Education agencies, when practicable
- Child welfare court system, when practicable
- Other ancillary child welfare systems used by IV-E agency staff
- Systems supporting child welfare contributing agencies
- Medicaid claims, when practicable

The phrase “Systems supporting child welfare contributing agencies” would include instances in which a county agency within a county-administered/state-supervised child welfare program is operating its own system.

The CCWIS Final Rule requires an electronic data exchange standard that promotes improved efficiency and common understanding and that applies to exchanges:
- with child welfare contributing agencies and their supporting systems
- with systems external to CCWIS that are used to collect IV-E data.

The data exchange standard:
- Does not apply to existing exchanges
- May “translate” data between the sending/receiving system.

In addition, the CCWIS Final Rule allows multiple data exchanges, instead of permitting only a single exchange, with each of the systems specified [refer to 1355.52(e)(1)]. The Final Rule also provides increased flexibility in that the data exchange standard does not apply to internal data exchanges between CCWIS automated functions [refer to 1355.52(f)(2)].
In 1355.54, it is indicated that an agency may make a business case to ACF to add additional data exchanges or automated functions to a CCWIS if:

— The CCWIS meets all of the requirements in 1355.52
— The optional exchange or function is necessary to achieve title IV-E or IV-B program goals.

All requirements applicable to mandated data exchanges would also apply to additional exchanges.

**Reusability, shareability, and interoperability** are a significant component of the CCWIS Final Rule with the intent of driving down costs associated with the current single, comprehensive system approach to implementations. The CCWIS Final Rule underscores a more holistic approach to child welfare intervention and service provision with the new requirements for data exchanges, for example, new data exchanges between child welfare agencies and education departments to provide broader views of children served. In addition, the Final Rule provides the flexibility to “right-size” child welfare systems for states and tribes, and to better leverage existing systems or components of them.

**Reduced number of federal requirements:**

S/TACWIS is comprised of 90 Federal Requirements, of which 56 are mandated (including 51 Functional Requirements). CCWIS is comprised of 10 categories of CCWIS System Requirements and mandates 14 requirements, including 11 data exchanges, federal and agency reporting, and IV-E eligibility determinations. Of note, there is just one CCWIS functional requirement (unchanged from the current SACWIS requirement): “CCWIS must support a standard title IV-E eligibility determination process and must be a single process and not duplicated by other systems” (refer to 1355.52 [g]).

**Quality of data:** At the core of the CCWIS Final Rule is a focus on quality of data, and more specifically, establishing data quality requirements, including the maintenance of a data quality plan and performance of biennial data quality reviews.

ACF clarifications pertaining to the focus on data quality are as follows:

— If two or more data quality standards apply to the same data, ACF will expect the system to measure the more rigorous standard [refer to 1355.52(d)(1)(i)].
— Current and historical CCWIS data must be requested when receiving data from the CWCA.

— A biennial title IV-E agency data quality review is required, with flexibility for title IV-E agencies to maintain current processes for such reviews if they meet CCWIS standards [refer to 1355.52(d)(3)].

The data quality reviews ensure that:

— Data has been collected.
— Data meets quality standards.
— Data quality is regularly monitored through automated functions.
— Data exchanges are operational and meet confidentiality requirements and other applicable standards.

**Cap on system cost:** The CCWIS Final Rule assumes the cost of a new CCWIS application will be less than traditional SACWIS applications based on a variety of factors, including the reduction in functional requirements; the encouragement of smaller, incremental, modular approaches; and the utilization of reusable products or components thereof. The Final Rule attempts to cap the cost of next-generation child welfare systems by promoting the flexibility, reusability, sharing of, and interoperability of systems and/or components, or modules, of systems.

These differences between the prior S/TACWIS regulations and the CCWIS Final Rule offer states the opportunity to reassess their child welfare operations and business needs. The emphasis would no longer be on meeting the multiplicity of federal requirements but instead on promoting the implementation of child welfare systems that meet the business needs and practices of each state, as well as shifting towards an integrated and holistic service delivery approach. One of the challenges states faced in implementing traditional S/TACWIS applications was an up-front emphasis on system requirements. The CCWIS Final Rule encourages, and affords state agencies the opportunity, to reassess their child welfare operations, practice, and business needs first, with system requirements being produced as an output of this analysis and assessment. The opportunity is ripe for states to (1) transform their child welfare practice and (2) implement supporting systems in a more expedient and cost-effective manner.
Overview of CCWIS Final Rule system and design requirements

How CCWIS advances child welfare. The CCWIS Final Rule:

- Accommodates changes in child welfare practice that have taken place in recent years
- Leverages advances in information technology that have occurred and accelerated since 1993
- Focuses on quality of data, and assurance that data meets quality standards, rather than on specific system functionality
- Provides states with the latitude to “right-size” their child welfare systems
- Allows states to leverage existing systems to the extent they wish to do so
- Is intended to reduce costs for system development and maintenance
- Encourages interoperability through both ongoing and newly mandated data exchanges
- Supports interoperability by requiring standard data exchange protocols
- Maximizes flexibility by offering states a wider range of system options

Under the Final Rule, the goals of the new CCWIS requirements include, but are not limited to, improving program management and administration; appropriately applying technology; avoiding duplicate development and maintenance; and ensuring that costs are reasonable, appropriate, and beneficial. To achieve these goals, a number of system and design requirements now exist. The Final Rule provides that a CCWIS must:

- Maintain the IV-B/IV-E data to support federal and state audits, reports, reviews, regulations and policies, and monitoring including, but not limited to, the Adoption and Foster Care Analysis and Reporting System (AFCARS), National Child Abuse and Neglect Data System (NCANDS), National Youth in Transition Database (NYTD), and Child and Family Services Review (CFSR) reporting

- Comply with best practices to improve data quality, such as edit checks, data quality alerts, and prompts for child welfare contributing agencies to provide data and quality reports

- Maintain bidirectional data exchanges with the IV-B/IV-E eligibility determinations, service authorizations and expenditures), child abuse and neglect system TANF program, Medicaid eligibility system, and Child Support program
Add bidirectional data exchanges with child welfare contributing agencies, other systems the IV-E agency uses to collect CCWIS data, the Medicaid claims processing system, child welfare courts, and the education system, to the extent practicable.

Maintain data to support the Indian Child Welfare Act (ICWA).

Implement and utilize a data exchange standard that best meets a state’s needs, including National Information Exchange Model (NIEM) or another federal or state-developed or designated standard.

Follow design requirements that include modularity, plain language documentation, reliable automated functionality, shareability, and reusability.

Automated functions may be exempted from design requirements if:
- The automated function is part of a transitioning S/TACWIS or non-S/TACWIS.
- ACF approves an agency proposal for an even more efficient, economical, and effective design.

Federal Financial Participation matching funds, eligibility for cost allocation for CCWIS and non-CCWIS and Advance Planning Documents

Submission of CCWIS plans

Federal matching funds will continue to be available for both CCWIS and non-CCWIS (including SACWIS) at the rate of 50 percent (refer to Section 1356.60 – Fiscal Requirements [Title IV-E]). The Rule also clarifies that Federal Financial Participation (FFP) is available for both development and operational costs. KPMG’s interpretation of the cost allocation methodology from the NPRM (given this was neither expounded upon in the Final Rule nor further clarified in detail) is as follows:

- For states in CCWIS development, cost may be allocated to Title IV-E, if they benefit:
  - Title-IV-E-funded participants in Title IV-E programs and activities
  - State-or tribal-funded participants of programs and activities described in Title IV-E
  - Title IV-B programs
  - Programs related to both Title IV-E and child welfare (it is important to note that ACF only classifies Juvenile Justice and Adult Protective Services as child-welfare-related programs).

Note: During the developmental stage, CCWIS states can allocate Title IV-B costs to Title IV-E, while during the operational stage, states must allocate costs between Title IV-E and non-IV-E programs:
- For CCWIS operational states, only the items reflected in the first two bullets above may be allocated to Title IV-E, provided those programs or activities are benefitted.
For non-CCWIS states, only the first bullet above under CCWIS development applies. The major difference between CCWIS and non-CCWIS cost allocation is that non-CCWIS states must take into account the eligibility ratio (proportion of out-of-home-care children who are Title IV-E eligible), while CCWIS states can allocate 100 percent of allowable costs to Title IV-E.

For non-CCWIS states, ACF indicates in the Final Rule: “There is no penalty for using a S/TACWIS beyond the 24-month transition period. However, we would like to clarify that S/TACWIS systems that do not transition to CCWIS do not maintain S/TACWIS level cost allocation after the 24-month transition period. After the transition period, the rule classifies these systems as non-CCWIS, and they may qualify for non-CCWIS cost allocation.”

Regardless of how a state wishes to proceed (CCWIS or non-CCWIS), ACF must be notified appropriately within the 24-month transition period regarding the decision by an Advance Planning Document (APD) or notice of intent.

We encourage states to maintain open communication with ACF around FFP matching funds, eligibility for cost allocation, and administrative and Title IV-E penetration rate eligibility if further clarification and/or guidance is needed to support decision making.

Paragraph (i)(1) of 1355.52 of the Final Rule specifies, “before claiming funding in accordance with a CCWIS cost allocation, a Title IV-E agency must submit an APD or, if below the APD submission thresholds defined at 45 CFR 95.611, a notice of intent,” including:

- A brief description of the CCWIS project
- An automated function list of modules included in the CCWIS, indicating whether each automated function meets (or will meet when implemented) the CCWIS requirements (1355.52 a-h)
- A notation that each automated function is not duplicated and is consistently used by all
- A notation that each automated function complies with CCWIS design requirements (1355.53).
Annual and operational APDs must include an updated automated function list that, for each automated function:

- Indicates it is not duplicated within the CCWIS or systems supporting CWCA and is consistently used by all child welfare users
- Describes changes to the function’s scope or compliance with the CCWIS design requirements of 1355.53.

The annual and operational APDs must also include the agency’s CCWIS data quality plan. The data quality plan must:

- Describe the approach to promote data quality, meeting the data quality requirements
- Provide the status of compliance with the data quality requirements

Transitioning to a CCWIS

What decisions, actions, and steps do states need to take during the upcoming 24-month transitional period? This section discusses these questions and the possible approaches to answering them.

CCWIS decisions, actions, and next steps

The Final Rule states, “The Title IV-E agency does not need to finish the transition within the 24 months to be a CCWIS. A new CCWIS may be built at any time.”

States would be able to transition to a CCWIS whether they (1) have a completed SACWIS application, (2) have an in-development SACWIS application, or (3) are currently considered to have a non-SACWIS application.

Nevertheless, the state is required to submit an APD or notice of intent within 24 months of the effective date of the regulations (August 1, 2018) to receive CCWIS funding after the 24-month period. To avoid possible recoupment, SACWIS projects not transitioning to CCWIS would be required to notify ACF with an APD or notice of intent within 24 months as well. These non-CCWIS states will be expected to use their SACWIS through its life expectancy.

Opportunities and actions state and local child welfare agencies may wish to consider in determining how to proceed

For states with an implemented SACWIS, the CCWIS Final Rule presents both opportunities and challenges. These states may want to consider:

- Assessing their systems to determine which modules present challenges and pain points (For these particularly challenging areas or modules, states would have the option to utilize a more efficient system, a module from another system, or a commercial off-the-shelf (COTS) product, which could potentially capture the necessary data in a more efficient and streamlined manner for users. Data captured could then be exchanged with the new CCWIS or SACWIS.)
- Pursuing the option of having their local county agencies or contracted child welfare agencies complement their SACWIS by implementing data exchanges from their own systems
- Taking advantage of transitioning to CCWIS and securing funds for additional data exchanges with other state programs, including education departments, court systems, and other child-welfare-related entities.

A challenge for states that have implemented a SACWIS could arise if county child welfare agencies advocate to revert to using their own preexisting or new systems and exchange data from those systems to SACWIS or CCWIS. States would need to make determinations on how to plan for and address these requests and potentially track and oversee resulting projects.
States in the process of implementation or that are modernizing their systems ("in-flight") may choose to reassess their direction and plans for implementation/modernization and make adjustments as applicable to take advantage of the available options and enhanced flexibility that the CCWIS Final Rule provides:

— These states may have intended to enhance and modernize components of their existing SACWIS as part of their modernization strategy and road map. Under CCWIS, they now have the flexibility to implement stand-alone modules from other systems (if this is deemed more advantageous than enhancement of current preexisting SACWIS modules) and implement these modules with a data exchange to their existing SACWIS or CCWIS.

— In-flight states could enhance planning for systems transformations or updates by creating specific requirements for interoperability and data interfaces. States that are beginning system development would now have the opportunity to build in the time, resources, and requirements to create effective interfaces and information data exchanges.

States that have faced challenges in implementing a SACWIS or have opted to remain non-SACWIS-compliant are likely to find the new federal approach more amenable:

— The CCWIS Final Rule could enhance their ability to secure federal matching funds for the desired system functionality based on future APD approval for CCWIS-compliant systems that would not have met S/TACWIS requirements.

— For states where counties are using various case management systems, a central statewide “hub” could be considered to interface and exchange data with the county systems for reporting purposes.

For states that are in the early planning stages of a SACWIS replacement or modernization, the opportunity to reassess their initial plans and adjust as needed based on the new opportunities afforded by the CCWIS Final Rule is available.
For states in all categories, there could be significant new opportunities created by the new regulatory framework:

— Data exchange with child welfare contributing agencies could allow for a different approach where governmental agencies have outsourced case management services through contracting with private providers. These state agencies may opt for a “federated” model, in which local agencies and private providers administering case management services interface with the state’s CCWIS and exchange data from their own systems, instead of directly entering data into a statewide system.

— The Final Rule opens up the opportunity for states to enhance or add program modules and to do so through newer COTS products (subject to the preexisting APD waiver process). For example, should a state wish to implement a new structured decision-making assessment protocol, case plan, or financial system, it could do so using different technologies, including the COTS software and “exchange” data with CCWIS. This could offer a more cost-effective development and implementation process for a state than modification to its existing SACWIS components.

— The requirement that states provide their agency-owned software to ACF should allow CCWIS funding to be maximized across states, since sharing existing software with another state will reduce the cost in implementing that same feature in another agency.

— The CCWIS approach supports state and local jurisdictions to drive human services reform and to transform child welfare practice by encouraging data sharing (through data exchanges) across health and human services verticals that were traditionally siloed programs. In addition, the Final Rule encourages the integration of services by leveraging new technologies and delivery approaches to improve operations and better meet the needs of clients and community partners. As an example, state Department of Education information systems, which are relatively new in most states, would be encouraged to exchange data with child welfare agencies. This would overcome the traditional challenge of capturing up-to-date information on a child’s educational achievement and development plans in SACWIS applications. It could assist states in complying with new requirements under the federal Uninterrupted Scholars Act.

However a state chooses to proceed, it will be of paramount importance to maintain open and consistent dialogue with ACF as the state conducts its analysis and explores the multitude of options now available.

Potential next-step considerations for state and local child welfare agencies

Now would certainly be an excellent opportunity for states to revisit core elements of their business operations. State and local child welfare agencies may want to consider the following steps:

Assessment of the overall governance model of their child welfare program and its interactions across the health and human services domain

The Final Rule provides an opportune time to reassess, streamline, and enhance a child welfare program. Questions a state may wish to address include:

— What are our core child welfare services?
— Who are our clients?
— Which agencies/community partners do we interact with to serve and protect our state’s families and children?
— Are services being delivered in the most effective and efficient manner?
— Where can improvements be made?
— What business and practice changes are required to improve service delivery?
— What are our business requirements?

Once business requirements are established, system requirements that focus on addressing business needs, promoting sound practice, and enhancing outcomes for children and families can be more easily derived. In addition, the likelihood of a successful system implementation will be enhanced with “program driving technology.”
Assessment of existing SACWIS applications and available market products

A state could bring together representatives from child welfare agencies to assess and discuss the greatest challenges and pain points within their existing SACWIS application and/or in the existing practice. KPMG recommends including both IT and program personnel from state and local agencies, geographical representation from urban and rural communities, and community partner participation, if relevant.

Discussion points could include:

- What are the main areas to address?
- How can these challenges be overcome?
- Which available market products offer the best solutions?
- What alternative options that were previously not available can be considered?

The mandate of the assessment could be twofold: (1) compiling a list of challenges, available options to solve problems, and prioritization of these challenges and options and (2) recommendation of the strategy, course, and time line to pursue to determine a road map to meet the state’s vision.

Formation or expansion of a multidisciplinary statewide team on potential data exchanges and related confidentiality issues

A state could invite agency representatives and community partners who have a role in child protection.

Examples of agency representatives may include education, health, mental health, juvenile justice, law enforcement, court systems, private providers, foster parents, and child welfare practitioners. The focus would be on how agencies can work collectively to provide a more holistic picture of children at risk, or in need, in an efficient and streamlined manner that enables all partners to deliver enhanced services.

Role of mobility in next-generation CCWIS

The Final Rule provides another opportunity, given the increased flexibility it creates, to determine a state’s overall IT and child welfare strategy pertaining to mobility. With rapid advances in technology in this realm, out-of-the-box thinking about how mobility can support increased efficiency and effectiveness of workers, managers, and administrators is needed. Can components or modules of the system be completely mobilized? Are there groups of workers who could be completely mobile and not need a physical office and standard desktop to capture and maintain data? Mobility for child welfare should be encouraged to be a core part of all planning, requirements, and design based on user needs and how mobile applications can best support the child protection field.
About KPMG
KPMG leverages a global network of highly experienced health and human services professionals from across a wide range of functional and technical service areas to deliver tailored and practical solutions to our firm’s clients. Our teams have strong skills and deep knowledge in business transformation, harnessing data analytics, and implementing solutions to improve program outcomes. KPMG’s tools include the KPMG Enterprise Reference Architecture for Health and Human Services, KPMG Resource Integration Suite, and KPMG Analytics Driving Insights. They can be used to support states during any stage of child welfare modernization efforts, including strategy, planning, design, implementation, maintenance/operations, and governance.

For more insights, visit us at www.kpmg.com/us/hhs-insights.

Contact us

Paul Hencoski
U.S. Lead Principal – Health and Human Services
T: 212-872-3131
E: phencoski@kpmg.com

David Hansell
Managing Director and lead, Center of Excellence for Health and Human Services
T: 212-954-2867
E: dahansell@kpmg.com

Bryan Tatterson
Lead Director – Child Welfare, Health and Human Services
M: 407-733-3425
E: btatterson@kpmg.com

Susan Drummond
Manager – Child Welfare, Health and Human Services
M: 740-253-0523
E: sdrummond@kpmg.com

kpmg.com/socialmedia

Some or all of the services described herein may not be permissible for KPMG audit clients and their affiliates.

The information contained herein is of a general nature and is not intended to address the circumstances of any particular individual or entity. Although we endeavor to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act upon such information without appropriate professional advice after a thorough examination of the particular situation.

© 2016 KPMG LLP, a Delaware limited liability partnership and the U.S. member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative (“KPMG International”), a Swiss entity. All rights reserved. Printed in the U.S.A. The KPMG name and logo are registered trademarks or trademarks of KPMG International NDPPS 587207.