

Case Data Removal

		DOCUMENT APPROVAL HISTORY	
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1 **OVERVIEW**

California county welfare departments are generally governed by the Code of Federal Regulations (CFR) and State of California Welfare and Institutions (W&I) Code. In addition, the Department of Health Care Services and California Department of Social Services publish All County Welfare Directors Letters (ACWDLs), All County Letters (ACLs), and the CDSS Manual of Policies and Procedures (MPP) to give counties added guidance to meet regulations. The CalSAWS Data Retention Policy pertains to the data related to the eligibility programs administered by the Counties and stored within the CalSAWS systems. This data retention policy was approved by Project Steering Committee members during the September 19, 2019 PSC meeting. This approval can be found in the following Approved Meeting Minutes.

The Case Data Removal feature for CalSAWS will first be implemented for the C-IV System. This will be done using the Agile methodology. This design document will be updated as features are deployed to Production at the conclusion of each of our planned three-week Sprints.

1.1 Current Design

• Case and Person level data is currently retained indefinitely within both the LRS/CalSAWS System and the C-IV System.

1.2 Requests

The following are the case record retention guidelines as approved by the Consortium:

- Identify and remove all Cases which have been closed for 6 years or more.
- There are multiple exceptions to the 6-year rule:
 - o Retain cases that currently have open recovery accounts
 - Retain cases associated with a Special Investigation, Criminal, or Civil Litigation record for three years after the final claim is submitted for federal reimbursement.
 - Retain all cases that include one of the following programs, regardless of status:
 - Adoptions Assistance
 - Foster Care
 - Kin-GAP
 - Retain all cases currently under Federal, State, or County Audit until the audit(s) have been resolved.
 - o Retain all cases that included an Intentional Program Violation
- Warrant Register data will be retained indefinitely (as will all Scheduled Reports).
- Each removed case will remain in the System as a Shell Case. See Section 2.1.1 for details on what data will be retained in Shell Cases.
- Shell Case details will be added to this document during a future Sprint. These will include:
 - Lists of all database tables that will have records retained.

- Page mockups of what a Shell Case will look like in the front-end application
- Case removal is permanent. Once a case has been removed, there will be no mechanism for retrieval of data removed from the System. I.e., Case Data Removal is NOT an Archive capability.
- Migration DDID 2261 ("The CONTRACTOR shall configure the imaging solution to permanently delete documents based on the approved CalSAWS Software document retention policies for all 58 Counties.") is in scope for this effort.

1.3 Overview of Recommendations

The following is a high-level overview of the features that will be implemented as part of the Case Data Removal functionality:

- Create a new page in the system for users to view the current dispensation of a
 Case with regards to whether it is eligible for Removal. This determination would
 likely be implemented as a batch job (frequency TBD)
- Create a report to show summary and detail information regarding Cases identified for Removal.
- Create a capability for users to override the Removal decision made by the user. This would also require the user to document a Reason for their override.
- Create a report for supervisors to see lists of Cases that have had their Purge decision overridden.
- Develop a series of batch processes responsible for removing branches of the CASE and PERS tables. PERS records would only be removed when the PERS was only associated to Removable Cases. The current target date for running the Data Removal batch jobs is April 16, 2021.
- Remove Case and Person documents stored in the Document Storage system (Alfresco for C-IV, AWS S3 for CalSAWS) for each Removed Case/Person
- Remove Images from the imaging system for each removed case. The one
 exception is we will retain any Image with a Document Type = Time Limits.

1.4 Assumptions

- The ICT tables are not in scope for this effort as they do not have CASE as a
 parent table. I.e., Any removal of ICT data would be separate from the Case
 Data Removal.
- The Removal feature for CalSAWS will first be implemented for the C-IV System. This will be done using the Agile methodology. This design document will be updated as features are deployed to Production at the conclusion of each of our planned three-week Sprints.
- Once the entire Removal feature has been implemented for the C-IV System, we will have a Planning Sprint to determine the necessary modifications to port this functionality to the CalSAWS System

- CalWIN data retention is being implemented by DXC as part of Conversion and will be applied during each CalWIN Wave. The two teams are periodically checking in with each other to make sure both teams are on the same page with regards to overall approach.
- The contents of the CASE_PURGE and RPT_CASE_PURGE tables will be converted from C-IV to CalSAWS as part of the overall Migration conversion effort.

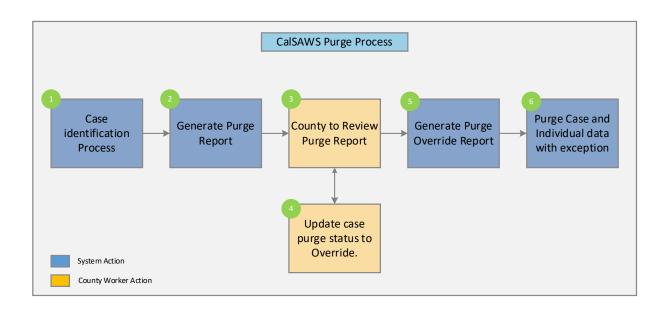
2 PROPOSED SOLUTION

2.1 Case Data Removal Process Overview

The removal process will remove dormant data that falls outside of the retention guidelines approved by the Consortium, leaving behind a shell case for those that have been removed. Initially, this process will be built for the C-IV System, given the direct impacts to C-IV conversion cutover activities and the length of time that C-IV has existed (since 2004 for the original four C-IV counties). Future sprints will then transform what was built for C-IV to work in the CalSAWS system, where it will run on some (undetermined) regular schedule as part of the ongoing operations of that System.

2.1.1 Case Data Removal

The following diagram defines the high-level 6-step process to remove a Case in the System:



Step 1: Identify a list of removable cases based on the approved retention rules. The details of the case selection criteria are defined in Epic 1 of this document.

- **Step** 2: Generate a report containing list of removable cases selected in step 1 for the counties to review.
- **Step** 3: Counties to review the list and perform step 4 (as needed).
- **Step** 4: If the case needs to be excluded from the remove process, users with appropriate security rights will be able to override this decision
- **Step** 5: Generate a report containing a list of overridden cases. This list will be excluded from the Case Data Removal process.
- **Step** 6: Execute Case Data Remove processes to delete data from database tables following the approved retention rules.

C-IV Application Case Data Removal Status:

- Identified: The Case has been identified as one that will have data removed from the System per Data Retention Policies
- In Process: The removal of data for this case has begun
- **Override**: Someone has decided to override the System's automated decision to removal this Case's data. The reason for this override will also be captured
- Complete: Data has been removed. This is now a Shell Case

Shell Case

While most of the case and individual data will be removed from the database tables, certain information related to the case and the individuals will be retained in the system. This information is called a shell case and will include the following:

- 1) Serial Number and Case Name will remain unchanged
- 2) The "All People Associated With the Case" section of the Case Summary page will be retained.
- 3) Case Confidentiality
- 4) Companion Case relationship
- 5) Time Limit data for all people associated to the case. This will include the follow forms:

Form Number	Form Name	
CF 377.11A	CalFresh Time Limit Notice for Expiration of Three Consecutive Months for ABAWDs	
CF 377.11B	CalFresh Countable Month Letter	
CF 377.11C	CalFresh Time Limit for ABAWDs	
CF 377.11D	CalFresh Discretionary Exemption for Able-Bodied Adults Without Dependents (ABAWD)	
CF 377.11E	CalFresh Able-Bodied Adult Without Dependents (ABAWD) Time Limit Exemption Screening Form	
CW 61	Medical Report	

CW 215	Notification of Intercounty Transfer
CW 2184	CalWORKs 48 Month Time Limit
CW 2186A	CalWORKs Time Limit Exemption Request
CW 2186B	CalWORKs Time Limit Exemption Determination
CW 2187	Your CalWORKS 48 Month Time Limit
CW 2188	Verification of Aid for the TANF Program
CW 2189	Notice of Your CalWORKs Time Limit at 42nd Month On Aid
CW 2190A	CalWORKs 48-Month Time Limit Extender Request Form
CW 2190B	CalWORKs 48-Month Time Limit Extender Determination Denial Form
CW 2191	Time on Aid Verification for CalWORKs 48-Month / TANF 60-Month Time Limits
CW 2192	Tracking Non-California TANF Assistance for the Time Limits
CW 2208	Your Welfare-To-Work 24-Month Time Clock
M40-107D	Time on Aid To Former CalWORKs Recipient
NA 840	Sanction / Removal from Aid of Participant Notice
NA 845	Removal of Second Parent Notice
NA 1276	Welfare-to-Work 24-Month Time Clock Limit Notice
PLAN 106 CIV	Family Plan
PLAN 112 CIV	Care of a Household Member Verification
TEMP CW 2186A	CalWORKs Time Limit Exemption Request
WTW 38	Welfare-To-Work 24-Month Time Clock Notice
WTW 43	Notice Of Your Welfare-To-Work (WTW) 24-Month Time Clock Ending Soon
WTW 44	Welfare To Work (WTW) 24-Month Time Clock Extension Request Form
WTW 45	Welfare To Work (WTW) 24-Month Time Clock Extension Determination
WTW 46	End Of Welfare-To-Work 24-Month Time Clock Review Appointment Letter

- 6) Journal Entries (stored as a PDF attached to the case)7) Issuance History (stored as a PDF attached to the case)

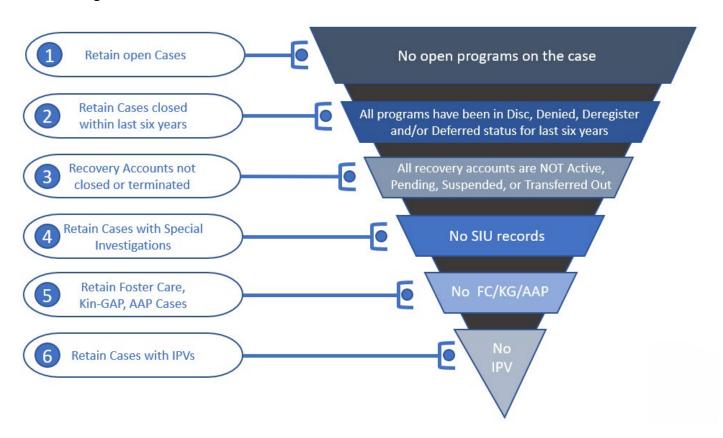
8) CH_TRANSACT_INFO, ICT_CIV_CASE, ICT_CIV_PERS table data will be retained. For CH_TRANSACT_INFO, we are currently exploring adding "ON DELETE SET NULL" to the PGM_ID foreign key.

More details about what is retained in Shell Cases will be added to this document during a future Sprint.

2.2 Case Data Removal Identification

2.2.1 Overview

A batch job will identify cases eligible for removal based on the approved record retention guidelines:



2.2.2 Rules:

Case must meet **all** of the following criteria in order to be considered removable:

- The Case must have no open programs
- All programs on the Case must be closed for more than six years. A program is defined as Closed if it is in one of the following statuses:
 - Discontinued (DS)
 - Denied (DE)
 - Deferred (DF)

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- Deregistered (DG)
- If the Case has any recovery accounts, they must all be Closed. Open recovery accounts are defined as any that are currently in one of the following statuses:
 - Active (AC)
 - Transferred Out (TO)
 - o Pending (PE)
 - Suspended (SU)
- The Case cannot have any Special Investigation records (regardless of the status of those investigations).
- The Case cannot contain any of the following programs, regardless of status:
 - Foster Care (FC)
 - o Kin-GAP (KG)
 - Adoption Assistance (AA)
- The Case cannot have an open Federal or State audit. Federal/State audits are conducted within the first two years of Case closure and it may take up to a year to complete the investigation. Therefore, selecting cases that are closed for more than six years covers this rule without any additional automation.

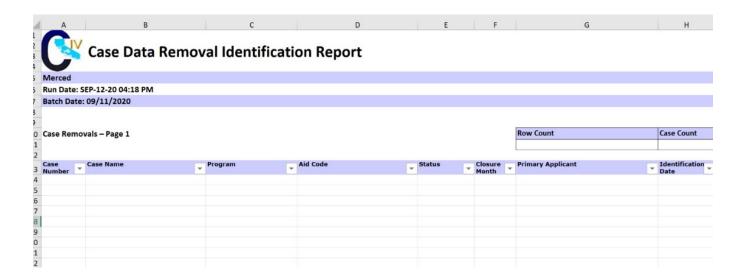
Please Note there are multiple types of audits that can be conducted on a case; and not every audit is necessarily captured in Cal SAWS. This could end up being a potential Override reason when that functionality is designed.

- The Case cannot have any Intentional Program Violations. The following types of IPV sanctions are considered:
 - o Child Support IPV (06)
 - o Cal Fresh IPV (24)

2.2.3 Case Data Removal Identification Report

The purpose of this report is to provide counties a list of which cases have been identified by the System as those that will have data removed during the next deletion batch ruin. The Report will be split into multiple sheets for counties with over 1M rows. Some highlights of items included in this report:

- Identification Date is the date the Case was selected for removal having met all the requirements outlined above.
- Closure Month represents the month the case program was closed (i.e., Denied, Discontinued, Deregistered, or Deferred).
- When possible, the Aid Code for the program in question will be displayed on the Report. This column is populated using the same method as the Aid Code that is displayed on the Case Summary page. For example, Medi-Cal aid codes exist at the person level and are not displayed on the Case Summary page. The same is true this report: All MC programs listed on the report will have the Aid Code blank.
- Navigation to the Report: Homepage > Reports > Scheduled > Case Activity > Title 'Case Data Removal Identification Report'



2.2.4 Batch Jobs

A new process (PB00P800) will be created to identify cases that can be removed. This module will search the C-IV database to identify data removal cases and insert into the purge table with an initial status of 'Identified'.

- A new database table called CASE_PURGE will store the case ID and purge status, along with other information required for auditing and reporting.
- A new batch process (PB00P800) will execute the core SQL to identify cases and insert them into the purge table.
- After PB00P800, the Report Load Job PB00R800 is run to load the RPT CASE PURGE Table to facilitate Report Creation for each County.
 - The Identification Report as shown above is created by PBxxR801 Jobs for each of the 39 C-IV Counties. Batch job Schedule

Specifics related to run frequency and schedule date/time will be determined during a later phase of the project. The present run frequency for PB00R800 and PBxxR801 is monthly on 11th of each month. Initially, PB00P800 ran on September 11, 2020 and all future runs will be determined at a later date (no earlier than the first run of the Deletion batch, which is currently targeted for April 16, 2021)

2.2.5 Restart Logic

To be built in Sprint 5.

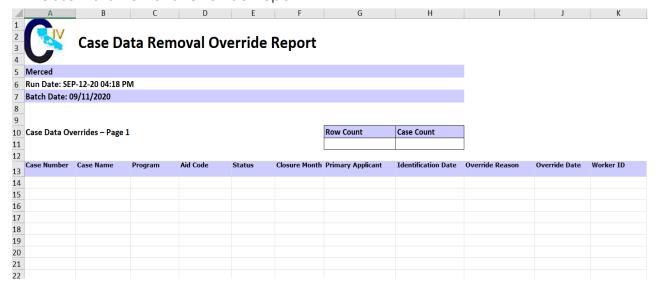
2.3 Case Data Removal Override

2.3.1 Case Data Removal Override Report

The purpose of this report is to provide counties a list of which cases have been overrode by users. The report will also display the Override Reason of why these cases should not have any case data removed on them. This report will contain each column contained in the Identification reports with three additional columns. The following bullets detail each of the additional columns on the Override report:

- Override Reason represents the reason for the Override, based on the agreed upon set of reasons across each County. These reasons are all situations that cannot be automatically identified by the System.
 - o The current Override reasons:
 - Board of Supervisors Decision
 - Hearing/Court Order
 - Pending Litigation
 - Under QA/QC Review
- Override Date represents the date the County Staff member switched the Data Removal Status from Identified to Override on the Case Data Removal detail page.
- Worker ID represents the ID of the County Staff member that switched the status from Identified to Override on the Case Data Removal detail page.

Navigation to the Report: Homepage > Reports > Scheduled > Case Activity > Title 'Case Data Removal Override Report'



2.3.2 Batch Jobs

The batch job (PB00P800) identifies cases that can be removed. This module will search the C-IV database to identify data removal cases and insert into the purge table with an initial status of 'Identified'

- The CASE_PURGE table will store the case ID and purge status, along with other information required for auditing and reporting.
- The batch job (PB00P800) will execute the core SQL to identify cases and insert them into the CASE PURGE table.
- After PB00P800, the Report Load Job PB00R800 is run to load the RPT_CASE_PURGE Table to facilitate Report Creation for each County.
- The Override Report as shown above is generated by the PBxxR802 Jobs for each of the 39 C-IV Counties. It will load the RPT_CASE_PURGE table cases that have a status of Override and populate the Override report in the application.

2.3.3 Batch job Schedule

Specifics related to run frequency and schedule date/time will be determined during a later phase of the project. The present run frequency for PB00R800, PBxxR801, and PBxxR802 is monthly on 11th of each month. Initially, PB00P800 ran on September 11, 2020 and all future runs will be determined at a later date (no earlier than the first run of the Deletion batch, which is currently targeted for April 16, 2021).

2.3.4 Restart Logic

To be built in Sprint 5.

2.4 Case Data Removal Online Page changes

2.4.1 Case Summary Page updates

For cases that have been identified for Case Data Removal only, the Case Summary page will now show Case Data Removal Status changes as we progress from Identified to Complete in the deletion process.

C-IV Application Case Data Removal Status:

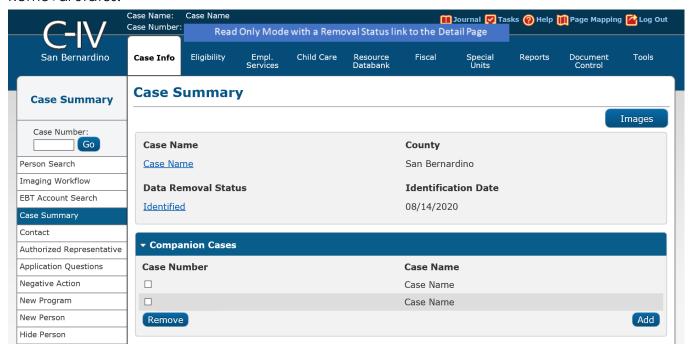
- Identified: The Case has been identified as one that will have data removed from the System per Data Retention Policies
- In Process: The removal of data for this case has begun. This status will only be set once the Case Data Removal process has started on the case through the deletion batch process. Once this Status has been set, the user cannot Override it
- **Override**: Someone has decided to override the System's automated decision to remove this Case's data. The reason for this override will also be captured.

- Please reference section 2.3.1 for the listing of current Override Reason Codes.
- **Complete**: Data has been removed. This is now a Shell Case. This status will only be set once the Case Data Removal process has completed on the case through the deletion batch process. Once this Status has been set, the user cannot Override it.

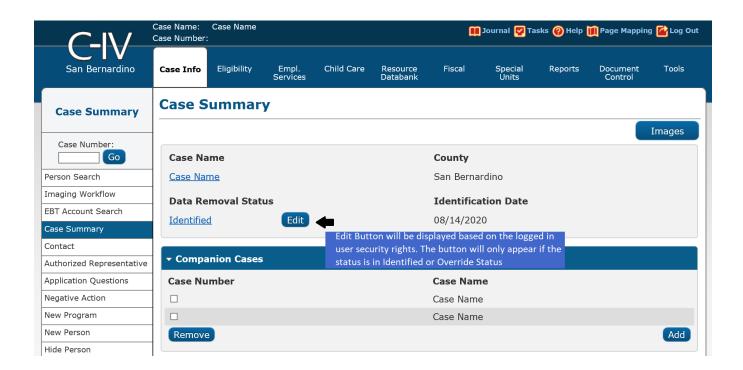
2.4.2 Case Data Removal Status on Case Summary Page

The C-IV Case Summary page will now show a Case Data Removal Status, which will be a hyperlink to display the current status in the Case Data Removal process. This link will also take you to the Case Data Removal Detail page when clicked.

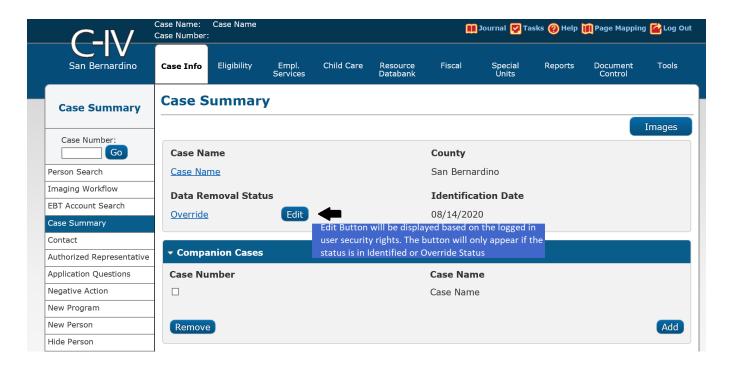
The following image represents the Identified Data Removal Status on the Case Summary page for a County Staff member that does not have rights to edit the Data Removal Status.



The following image represents the Identified Data Removal Status on the Case Summary page for a County Staff member that has rights to edit the Data Removal Status. The Case must also have a removal status of 'Identified' or 'Override' for this Edit button to appear.



The following image represents the Override Data Removal Status on the Case Summary page for a County Staff member that has rights to edit the Data Removal Status. The Case must also have a removal status of 'Identified' or 'Override' for this Edit button to appear.



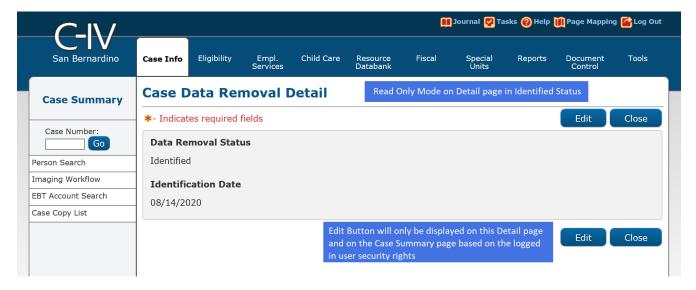
2.4.3 Case Data Removal Detail page

The Case Data Removal Detail page is where County Staff members with the appropriate rights can update the Status from 'Identified' to 'Override', or back to 'Identified' from 'Override'. If the Status on this detail page is changed from the original Status of 'Identified' (as determined by the Data Removal Identification batch job) to the 'Override' status, the case will be excluded from having any case data removed. If the status is left in 'Identified' status, the case will have case data removed once the Deletion Batch is executed [Note that the run date of the first execution of the Deletion Batch is currently TBD, no earlier than January 2021].

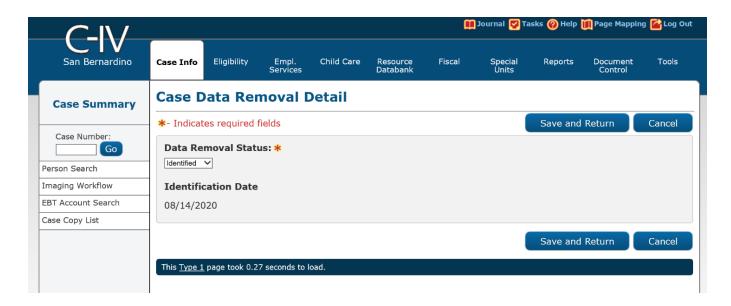
Security Group for Edit functionality:

The Case Data Removal Detail page Edit functionality is accessible for users who are joined to the new 'Case Data Removal Edit' security group. This also applies to the Edit button on Case Summary, next to the status, for those cases having a Case Data Removal status of 'Identified' or 'Override'. The 'Case Data Removal Edit' group, which contains the 'CaseDataRemovalEdit' right, is not assigned to any security role. The local Security Administrators will need to add the approved users to this new security group.

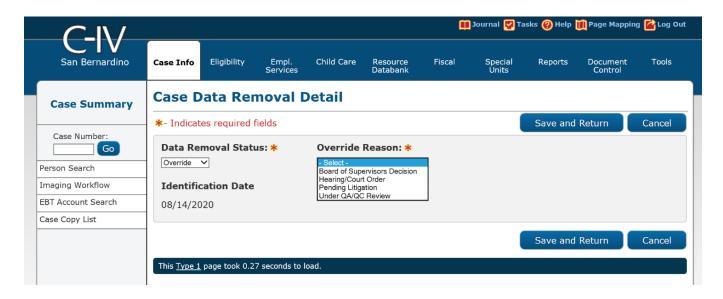
The following image represents the Case Data Removal Detail page in Read Only mode when left in 'Identified' status.



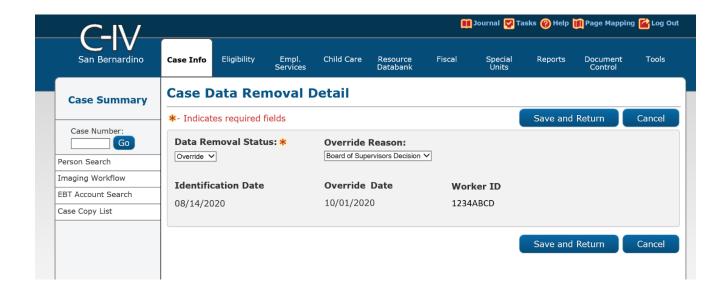
The following image represents the Case Data Removal Detail page in Edit Mode when left in 'Identified' status.



The following image represents the Case Data Removal Detail page in Edit Mode when changing from 'Identified' status to 'Override' status. This status change allows the 'Override Reason' field to display (see Section 2.3.1 for a list of Override Reasons).

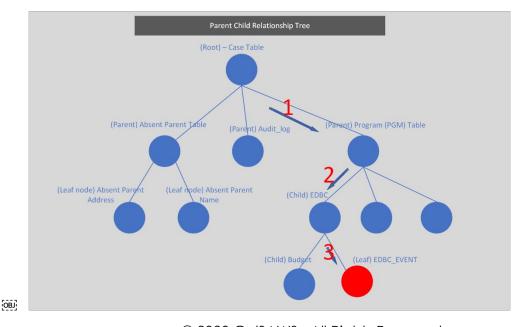


The following image represents the Case Data Removal Detail page in Edit Mode when the status has already been updated to 'Override'. The County Staff member will be able to see the Override Date the Override was made in addition to the Worker ID that made the change.



2.5 Data Deletion Process

The Case data deletion process includes a series of batch jobs that will process each of the cases that are Identified for data deletion. A series of batch processes and procedures are executed to delete the Case and Person related data from the database tables. The list of database tables that are identified for deletion is loaded into the configuration tables (described in detail in technical design document) with parent and child relationships and appropriate keys to identify unique data. The process reads the configuration tables and will traverse through the relationship to find the leaf node (lowest child). Once the leaf node is identified, it starts deleting the data and moves up the hierarchy until the data from parent table is deleted. An example of the parent and child relationship (tree structure) and traversing logic is defined in the following diagram.



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The above diagram represents the parent and child relationship of database tables in a tree structure. This structure is used to traverse through the branches to find the children (leaf node) to start deleting the data. The highlighted steps in red describe how the deletion leaf node logic identifies the child tables at a high level.

- 1) When a Case is selected from the CASE_PURGE table, Program IDs associated to the Case are selected from the PGM table
- 2) Based on the Program ID, appropriate records from the EDBC table are selected
- 3) As we traverse through the EDBC tables, the EDBC_EVENT table is a leaf node, and hence the data from EDBC EVENT table can be deleted
- 4) After deleting the data, the logic flow is moved up to find the next child and the leaf node

2.5.1 Data Deletion Batch Job - PB00PXXX

A new process (PB00PXXX) will be created to delete the case data from the database tables. This module will perform the following steps to remove the data:

- Pick up a Case from the CASE_PURGE table and re-verify the Case to confirm it is still valid for removal. The re-verification is completed by executing all the validations steps identified in process PB00P800, section 2.2.2 Rules of this document.
- Once the Case is verified to still meet all the deletion criteria, the Case Data Removal Status is updated to 'In Process' and the PDF creation module is called to create PDF files for Journal Entries and Issuance history data.
- Upon successful creation of PDFs, the data deletion module is called to delete the data from identified tables.
- Upon successful deletion of Case data, the process updates the Case Data Removal Status to 'Complete' and will begin processing the next Case for deletion.

2.5.1.1 PDF Creation Function - PB00PXXX

This process will be developed in Sprint 5 to create PDF files for Case Journal entries and Issuance history.

2.5.1.2 Data Deletion - PB00PXXX

Data Deletion is an Oracle procedure that physically deletes the data from the database tables for a given Case. The procedure uses configuration tables, defined in the below section, to traverse through the tree to find the leaf node, build the delete SQL statement based on the table key to uniquely identify the data, and execute the SQL statement to physically delete the data. Once the data is deleted from the table, it moves up in the hierarchy to find the next leaf and repeat the process.

2.5.1.3 Configuration table

The data deletion logic will be driven by two configuration tables. The first configuration table lists the immediate child of the root and the second table contains children of the parent and their level, as noted in section 2.5. The details of these configuration tables are defined in a technical configuration document.

2.5.1.4 Exception Logging:

A standard batch framework is used to log all exceptions encountered in the data deletion process.

2.5.1.5 Deletion Logging Mode:

The batch deletion process will have an option to turn the deletion logging on or off by passing a parameter in the main batch job. When the logging mode is on, the data deletion module will start logging every action performed in the function, including table name where data is being deleted with the Case ID, Person ID and other key columns to identify a unique record in the table.

2.6 What's Next

The following is a list of pending scope that will be developed in the upcoming sprints. These sprints will focus on implementing the change for C-IV counties. Changes required to accommodate LRS will be implemented in future releases.

Sprint #	Sprint Scope	Start Date	End Date
	Creation of PDFs for Journal, Issuances. Updates to	10/26/2020	11/13/2020
Sprint 5	Detail page to access PDFs		
	Restart capabilities, Id of PGM_DETL data removal	11/16/2020	12/4/2020
Sprint 6	dependencies, Batch window criteria		
	Delete from ABSENT_PARENT, JOURNAL_ENTRY and	12/7/2020	1/8/2021
Sprint 7	their child tables		
	Delete from GENERATE_DOC and dependencies,	1/11/2021	1/29/2021
Sprint 8	Delete Alfresco Document files		
	Delete from PGM_DETL and CASE tables with their	2/1/2021	2/19/2021
Sprint 9	dependencies		
	Delete from CASE_PERS and Delete images	2/22/2021	3/12/2021
Sprint 10	associated with data removal cases		
	Automation of DB Optimization Process (Index rebuild,	3/15/2021	4/2/2021
Sprint 11	compute status, etc.)		

3 REQUIREMENTS

3.1 Project Requirements

DDID	Description	Notes
CIV-105446	Monthly Batch job - case data removal – Discontinued / Inactive cases.	The scope of this DDID is covered in SCR-107763.
CA-208415	Monthly Batch job - case data removal - Discontinued / Inactive cases.	

4 MIGRATION IMPACTS

It was determined to start with building a C-IV Case Data Removal process first, due to the large amount of data that would get removed from that database. Deletion of a large amount of data will help with the conversion cutover window when C-IV migrates to CalSAWS. The current timeline of the planned Sprints has been confirmed to dovetail nicely with the Conversion timeline.

5 SUPPORTING DOCUMENTS

Number	Functional Area	Description	Attachment
107763	SCR	Create Case Data Removal Functionality	
107825	SCR	Implement Case Data Removal Sprint 1 Features	
107834	SCR	Implement Case Data Removal Sprint 2 Features	
107924	SCR	Implement Case Data Removal Sprint 3 Features	
107957	SCR	Implement Case Data Removal Sprint 4 Features	

220458	SCR (CalSAWs)	Create CASE_PURGE table and Codes Table references to align with C-IV	
108104	SCR	Implement Case Data Removal Sprint 5 Features	
108106	SCR	Implement Case Data Removal Sprint 6 Features	
108107	SCR	Implement Case Data Removal Sprint 7 Features	