

Child Welfare Policy Manual

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Questions & Answers

6. CCWIS

6.1 CCWIS Definitions

1. Question: 1355.52(b)(1)(iv) requires the title IV-E agency's CCWIS to maintain "Case management data to support federal audits, reviews, and other monitoring activities." What does "case management" mean?

Answer: ACF has not specifically defined the term "case management" because states and tribes define case management differently due to varying laws, policies, and practices.

ACF does, however, provide examples of case management activities. The CCWIS Notice of Proposed Rulemaking identifies activities considered "case management" to include the collection and updating of information such as child and family histories, assessments, contact notes, calendars, services recommended and delivered, eligibility for programs and services, and client outcomes.

- **Source/Date:** (9/14/16)

- **Legal and Related References:** Section 474 of title IV-E of the Social Security Act; Section 106 CAPTA; 45 CFR 1355.52(b)(1)(iv); 80 FR 48200 at 48213 (August 11, 2015); 58 FR 67939 at 67946 (December 22, 1993); ACYF-CB-PI-13-06.

2. Question: Is a foster family agency that provides for the daily care and supervision of foster children considered a child welfare contributing agency (CWCA)?

Answer: It depends. If a foster family agency has a contract or agreement with the title IV-E agency and provides child abuse and neglect investigations, placements, or child welfare case management services, this is a CWCA.

- **Source/Date:** (9/14/16)
- **Legal and Related References:** 45 CFR 1355.51(a); 81 FR 35450 at 35453 (June 2, 2016)

3. Question: Are county public entities, in county-administered states (such as County Children and Youth agencies), that provide child abuse and neglect investigations, placements, or child welfare case management services defined as child welfare contributing agencies (CWCAs)?

Answer: No. Counties are political subdivisions of the state, and the single state title IV-E agency designated in the state's title IV-B and title IV-E plan supervises the administration of county- administered title IV-B and IV-E programs. Therefore, counties in county-administered states are not considered CWCAs. Section 471(a)(2) of the Act and 45 CFR 205.100 provide the authority and parameters by which a single state title IV-E agency may delegate the administration of the title IV-E program to the state's political subdivisions and local agencies or offices.

- **Source/Date:** (9/14/16)
- **Legal and Related References:** Section 471(a)(2) of the Act; 45 CFR 205.100 and 1355.51(a); 81 FR 35450 at 35453 (June 2, 2016)

4. Question: Both a S/TACWIS and non-S/TACWIS project is defined in section 1355.51 as being "an 'active' automated data processing system or project." What does "active" mean in this context?

Answer: "Active" means a system that the state or tribe is using as of the effective date of these regulations (August 1, 2016), or the state or tribe is designing, developing or implementing the system as of the effective date of the regulations.

- **Source/Date:** (9/14/16)
- **Legal and Related References:** 45 CFR 1355.51; 80 FR 48200 at 48205 (August 11, 2015)

5. Question: Is a public or private entity that provides child abuse and neglect investigations, placement, or child welfare case management (or any combination of these) to children and families through contract or agreement with a county child welfare agency, considered a "child welfare contributing agency" (CWCA) as defined in section 1355.51?

Answer: Yes. CWCAs include public or private entities providing child abuse and neglect investigations, placement, or child welfare case management (or any combination of these) that have contracts or agreements with county child welfare agencies that are administering the IV-E program.

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 1355.51; 81 FR 35450 at 35453 (issued June 2, 2016); 80 FR 48200 at 48205 (issued August 11, 2015)

6. Question: What is a non-CCWIS project?

Answer: A non-CCWIS project means a project to develop a child welfare information system that does not meet the requirements of sections 45 CFR 1355.52 and 1355.53.

- **Source/Date:** 09/19/2019
- **Legal and Related References:** 45 CFR 1355.57(f); 1356.60(e); 81 FR 35450 at 35473 - 35476 (issued June 2, 2016); 80 FR 48200 at 48206 - 48218 (issued August 11, 2016)

7. Question: Is a Federal tribe, Tribal organization or Tribal consortium (Tribes) a Child Welfare Contributing Agency (CWCA)?

Answer: No. Although a tribe may have a contract or agreement with the title IV-E agency to provide child abuse and neglect investigations, placement, or child welfare case management (or any combination of these) to children and families, they are sovereign nations and therefore are not CWCAs as defined at 45 CFR 1355.51.

- **Source/Date:** (4/17/20)
- **Legal and Related References:** 45 CFR 1355.51

6.2 Efficient, economical, and effective

1. Question: Are title IV-E agencies required to include all CCWIS automated functions on a single technology platform?

Answer: No. Title IV-E agencies may design CCWIS to include automated functions that are not on a single technology platform, such as commercial off-the-shelf (COTS) products or data warehouses residing in the cloud. A title IV-E agency may submit an Advance Planning Document (APD) that describes all the automated functions that are distributed across

different technology platforms and describes why the approach leads to a more efficient, economical, and effective administration of the title IV-B and IV-E programs. Agencies may wish to consider single sign on access, timely data access, security consistency and coordinated management control as factors to address when implementing automated functions that are distributed across different platforms.

The title IV-E agency may be eligible for federal financial participation (FFP) under a CCWIS cost allocation plan for all approved automated functions. To receive FFP for COTS products described in paragraph 45 CFR 95.617(c), the agency must request a waiver pursuant to 45 CFR 95.627 (see CWPM 6.12A #8).

- **Source/Date:** 01/19/2022
- **Legal and Related References:** 45 CFR 1355.52(a); 45 CFR 95.627; 81 FR 35450 at 35453 – 35454 (issued June 2, 2016); 80 FR 48200 at 48206 (issued August 11, 2015); CWPM 6.12A #8

6.3 CCWIS data

1. Question: What does it mean in paragraph 1355.52(b) that CCWIS must "maintain" data?

Answer: The CCWIS must "maintain" data by storing and sharing data with other appropriate child welfare automated data processing systems. The CCWIS must also "maintain" data by consistently applying data quality processes and procedures to the data no matter where the data may have been initially collected.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(b); 81 FR 35450 at 35454 (issued June 2, 2016); 80 FR 48200 at 48207 (issued August 11, 2016)

2. Question: Does the requirement of paragraph 1355.52(b) to maintain all CCWIS data in the CCWIS allow child welfare contributing agency (CWCA) systems to collect CCWIS data?

Answer: Yes. CWCA systems may collect CCWIS data if the data is electronically exchanged with CCWIS, per paragraph 1355.52(e)(1)(ii).

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(b); 45 CFR 1355.52(e)(1)(ii); 81 FR 35450 at 35454 and 35463 (issued June 2, 2016); 80 FR 48200 at 48203, 48207 and 48212 (issued August 11, 2016)

3. Question: Is the use of a centralized data warehouse (in addition to a CCWIS production database) permitted as part of the overall CCWIS design?

Answer: Yes. The title IV-E agency may maintain CCWIS data in a CCWIS production database (which is a database processing CCWIS transactions) and a data warehouse (which is a database used for reporting and data analysis) provided all CCWIS automated functions seamlessly access data from both the database and data warehouse. For example, when generating a report or completing a task that requires data from both the database and data warehouse, CCWIS must be able to immediately access needed data.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(b); 81 FR 35450 at 35454 (issued June 2, 2016)

4. Question: How long must a title IV-E agency maintain CCWIS data?

Answer: The regulations for CCWIS require that CCWIS data "be maintained in accordance with confidentiality requirements in section 471(a)(8) of the Act, and 45 CFR 205.50, and 42 U.S.C. 5106a(b)(2)(B)(viii) through (x) of the Child Abuse Prevention and Treatment Act, if applicable, and other applicable federal and state or tribal laws" (paragraph 1355.52(d)(1)(iii)).

- **Source/Date:** 09/19/2019
- **Legal and Related References:** 45 CFR 1355.52(d)(1)(iii); 45 CFR 1355.30(i); 45 CFR 75.361

5. Question: How should the title IV-E agency collect CCWIS data that must be maintained in a CCWIS but is not required to be provided through the bi-directional data exchanges?

Answer: The title IV-E agency should collect such data in a CCWIS using methods that support the efficient, economical, and effective administration of the program, pursuant to paragraph 1355.52(a).

Different data collection methods should be considered. For example, the agency may:

- design a CCWIS automated function to support data capture in a CCWIS;
 - establish an optional data exchange to capture data in a CCWIS;
 - build a portal or mobile application so that data may be entered into a CCWIS;
 - receive information from a data warehouse shared with other programs and/or agencies not requiring a CCWIS bi-directional data exchange; or
 - assign workers to enter in hard-copy reports from other agencies not requiring a CCWIS bi-directional data exchange.
- **Source/Date:** 4/3/2020

- **Legal and Related References:** 45 CFR 1355.52(a); 45 CFR 1355.52(b); 45 CFR 1355.52(e); 81 FR 35450 at 35453 - 35456 and 35461 - 35466 (issued June 2, 2016); 80 FR 48200 at 48206 - 48208 and 48211 - 48215 (issued August 11, 2015)

6. Question: What data must the title IV-E agency collect and maintain in its CCWIS from a tribe with a title IV-E agreement under section 472(a)(2)(B)(ii) of the Act with the title IV-E agency?

Answer: Title IV-E agencies must maintain in the CCWIS data collected by the tribe with a title IV-E agreement under section 472(a)(2)(B)(ii) of the Act that is described at 45 CFR 1355.52(b).

- **Source/Date:** (4/17/20)
- **Legal and Related References:** 45 CFR 1355.52(b)

7. Question: How may CCWIS data (such as prevention program data) collected by systems external to CCWIS be provided to CCWIS?

Answer: It depends on who is collecting the CCWIS data:

- Title IV-E agency staff collecting CCWIS data through an external system must use a bi-directional data exchange (See 45 CFR 1355.52(e)(1)(iv); CWPM 6.6 #3 and CWPM 6.6D#1).
- Child Welfare Contributing Agencies (CWCAs) may either enter CCWIS data directly into CCWIS or enter CCWIS data into a CWCA system that provides the data to CCWIS through a bi-directional data exchange.
- A community provider that is not a CWCA may provide CCWIS data to a CCWIS using an optional data exchange, a portal, a data warehouse or by other methods described in CWPM 6.3 #5.

- **Source/Date:** 07/18/2022
- **Legal and Related References:** 45 CFR 1355.52(e)(1)(ii) and(iv)

6.3A Federal data

1. Question: What federal data are required to be maintained in CCWIS per paragraph 1355.52(b)?

Answer: The federal data required to be maintained in CCWIS are described in federal child welfare laws and policies. Because the required federal data may change as laws and policies change, paragraph 1355.52(b) lists categories of data from these laws and policies rather than specify a comprehensive set of federal data. ACF will use the federal laws,

regulations, and policies effective at the time of a CCWIS review to determine compliance with paragraph 1355.52(b). Below are examples of required federal data, based on laws and policies in effect at the time the CCWIS final rule was published.

Examples of federal data required to be maintained in CCWIS for ongoing federal child welfare reports include:

- All AFCARS data;
- For state title IV-E agencies, NYTD case management data must be maintained in CCWIS, although NYTD outcomes information collected from periodic surveys may be maintained in external systems;
- Financial information for the CB-496, such as training costs, demonstration project costs, and administrative costs may be maintained in a separate financial system that exchanges data with CCWIS per paragraph 1355.52 (e)(1)(i). Other data, such as the average monthly number of children receiving title IV-E Foster Care maintenance assistance payments, may be derived from CCWIS case management and placement records.
- Examples of federal data required for title IV-E eligibility determinations, authorizations of services, and expenditures under titles IV-B and IV-E include:
 - Data necessary for title IV-E eligibility determinations includes data such as the factors used to demonstrate the child would qualify for AFDC under the 1996 plan, placement licensing and background check information, and court findings.
 - Data required for authorizations of services and other expenditures under titles IV-B and IV-E includes data such as documentation of services authorized, records that the services were delivered, payments processed, and payment status, including whether the payment will be allocated to one or more federal, state, or tribal programs for reimbursement, and the payment amount allocated.
 - Financial information may be maintained in a financial system exchanging data with CCWIS.

Examples of federal data documenting interactions with and on behalf of clients that the title IV-E agency determines is needed to support federal child welfare laws, regulations, and policies include:

- case management information,
- recommended services,
- placement data, and

- licensing information on foster care providers.

Examples of federal case management data collected in the course of casework with clients that may be needed for a Child and Family Services Review (CFSR) includes:

- abuse and neglect reports,
- case plans, and
- placement histories.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** Section 474(a)(3)(C)(i) of the Social Security Act; 45 CFR 1355.52(b); 81 FR 35450 at 35454 - 35455 (issued June 2, 2016); 80 FR 48200 at 48206 - 48207 (issued August 11, 2016); ACYF-CB-PI-10-04 (issued April 2, 2010)

2. Question: Is a title IV-E agency required to maintain foster parent training data in the CCWIS pursuant to paragraph 1355.52(b)(1)?

Answer: Yes, if the IV-E agency claims IV-B or IV-E funding for that training. A title IV-E agency's CCWIS must maintain, "data required for expenditures under IV-B and IV-E" (1355.52(b)(1)(ii)). Since title IV-E agencies typically claim federal financial participation (FFP) for foster parent training (as reported on the CFS-101, Part II), CCWIS must maintain the data necessary to support the claim (80 FR 48200 at 48207).

- **Source/Date:** 09/19/2019
- **Legal and Related References:** 45 CFR 1355.52(b)(1)(ii); 45 CFR 1356.60(b)(1)(ii); 81 FR 35450 at 35454 - 35455 (issued June 2, 2016); 80 FR 48200 at 48206 - 48207 (issued August 11, 2016)

3. Question: Is the title IV-E agency required to maintain information in CCWIS confirming that a service provider processed a payment for a child (such as information that the provider cashed a check)?

Answer: No. The CCWIS must maintain data required for authorizations of services and other expenditures that may be claimed for reimbursement under titles IV-B and IV-E. However, the automated functions that use this information, such as those that support financial claims processing and payments, are not required to be a part of the CCWIS (45 CFR 1355.52(b)(1)(ii); 80 FR 48200 at 48207).

- **Source/Date:** 12/14/2021
- **Legal and Related References:** 45 CFR 1355.52(b)(1)(ii); 45 CFR 1356.71(b)(2); 81 FR 35450 at 35455 (issued June 2, 2016); 80 FR 48200 at 48207 (issued August 11, 2015)

4. Question: Must a title IV-E agency include data to support title IV-E foster care and prevention candidacy determinations for children on whose behalf the agency claims title IV-E administrative costs in the agency's CCWIS system?

Answer: Yes, if an agency is electing to operate a CCWIS, a title IV-E agency must collect and maintain in CCWIS information required for title IV-E eligibility determinations (45 CFR 1355.52(b)(1)(ii)). This includes candidate eligibility determinations under the title IV-E foster care program and the title IV-E prevention services program, if the agency operates such program. In addition, a title IV-E agency's CCWIS must maintain data needed for on-going federal child welfare reports (45 CFR 1355.52(b)(1)(i) and (c)(1)). One such report is the Title IV-E Programs (Foster Care, Adoption Assistance, Guardianship Assistance, Prevention Services and Kinship Navigator Programs) Quarterly Financial Report, in which a title IV-E agency must report data on candidates for title IV-E foster care and prevention services for which the agency claims title IV-E administrative costs.

- **Source/Date:** 07/18/2022
- **Legal and Related References:** 45 CFR 1355.52(b)(1) and (c)(1)

5. Question: If the title IV-E agency has an approved title IV-E prevention plan, is the prevention program data required pursuant to sections 471(e)(4)(E) and 471(e)(5)(B)(x) of the Act considered "CCWIS data" that the agency must maintain in the CCWIS?

Answer: Yes. A title IV-E agency that elects to develop and operate a CCWIS and a title IV-E prevention program must maintain required title IV-E prevention program data in the CCWIS. Federal regulations require that an agency's CCWIS maintain title IV-E and IV-B data needed for on-going federal child welfare reports, data required for eligibility determinations, authorizations of services and expenditures, and case management data to support federal audits, reviews, and other monitoring activities (45 CFR 1355.52(b)(1); CWPM 6.3A#1). Therefore, a CCWIS must maintain title IV-E prevention program data for these purposes.

- **Source/Date:** 07/18/2022
- **Legal and Related References:** Social Security Act – sections 471(e)(4)(E) and 471(e)(5)(B)(x); 45 CFR 1355.52(b)(1); CCWIS Technical Bulletin (TB) #7 Appendix J, and Title IV-E Prevention Program Data TB #2

6.3B State data

1. Question: Is substance abuse treatment and parenting class information considered data that the title IV-E agency's CCWIS is required to maintain "to support state or tribal child welfare laws, regulations, policies, practices, reporting requirements, audits, program evaluations, and reviews" in accordance with paragraph 1355.52(b)(2)?

Answer: It depends. Title IV-E agencies must maintain substance abuse treatment and parenting class data in its CCWIS if the IV-E agency has determined that such data supports a data need based on the agency's specific circumstances, populations, title IV-B and IV-E plans, and business practices.

We do not require title IV-E agencies to maintain this specific data to allow agencies flexibility to implement a CCWIS tailored to their needs.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(b); 81 FR 35450 at 35455 (issued June 2, 2016); 80 FR 48200 at 48207 (issued August 11, 2016)

2. Question: How will ACF determine title IV-E agency compliance with the requirement that CCWIS maintain data "to support state or tribal child welfare laws, regulations, policies, practices, reporting requirements, audits, program evaluations, and reviews" per paragraph 1355.52(b)(2)?

Answer: ACF will determine compliance with this requirement by reviewing state and tribal laws, regulations, policies, practices, reporting requirements and audit, program evaluation, and CCWIS review requirements in consultation with title IV-E agency representatives. For example, to determine if CCWIS maintains the data necessary to support state or tribal practices, we will consider the information needs of child welfare contributing agencies (CWCAs). If we document a pattern of CWCAs re-entering information clients provided to other CWCAs, that may suggest that the data should be in CCWIS and shared with CWCAs to prevent the duplicate entry of needed data. In such circumstances, we will consult with the title IV-E agency before determining if the data should be classified as CCWIS data and exchanged with the title IV-E agency's CCWIS.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(b)(2); 81 FR 35450 at 35455 (issued June 2, 2016); 80 FR 48200 at 48207 (issued August 11, 2016)

6.3C ICWA

1. Question: Are state title IV-E agencies required to build electronic data exchanges with federally recognized Indian tribes, tribal organizations, and tribal consortia to comply with the Indian Child Welfare Act (ICWA) requirements of paragraph 1355.52(b)(3)?

Answer: No. The regulations do not require a data exchange between CCWIS and federally recognized Indian tribes, tribal organizations, and tribal consortia. However, section 1355.54 permits this optional data exchange. Optional data exchanges proposed by a title IV-E agency and approved by ACF may qualify for CCWIS cost allocation as described at section 1355.57.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(b)(3); 45 CFR 1355.54; 45 CFR 1355.57; 81 FR 35450 at 35455, 35471 and 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48207 - 48208, 48218 - 48219, and 48220 - 58222 (issued August 11, 2016)

6.3D NCANDS

6.4 Reporting

1. Question: May a title IV-E agency use a centralized data warehouse and a CCWIS production database to generate a report or complete a task using data?

Answer: Yes. However when generating a report that requires data from both the database and data warehouse, CCWIS must be able to immediately access needed data.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(c); 81 FR 35450 at 35456 (issued June 2, 2016) 80 FR 48200 at 48208 (issued August 11, 2016)

2. Question: Can an agency use non-CCWIS data sources to produce reports under paragraph 1355.52(c)?

Answer: CCWIS must provide CCWIS data as needed for reports per paragraph 1355.52(c) (1), however, CCWIS is not required to produce every agency report. If CCWIS maintains a subset of a required report's data, CCWIS is not required to generate the complete report, but must provide the data maintained in the CCWIS for incorporation into the report.

Agencies may decide how to provide the data. For example:

- CCWIS may transmit available National Youth in Transition Database (NYTD) data to a system that collects NYTD survey data and generates the federal report.
- CCWIS may support financial audits by providing data on authorized placements and services that may be merged with non-CCWIS data to create audit trails.
- CCWIS may provide a hardcopy summary of demographic and placement statistics that staff add to a narrative report demonstrating progress on Child and Family Service Review (CFSR) goals.
- Data analysts may use a spreadsheet of CCWIS data to develop reports on trends in child welfare.

If, however, CCWIS maintains all the data required for a report, the report must be generated entirely from that data. For example, even if child welfare contributing agencies (CWCAs) collect Adoption and Foster Care Analysis and Reporting System (AFCARS) data, the

AFCARS report must be generated from the data provided by CWCAs and maintained in CCWIS.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(c); 81 FR 35450 at 35456 (issued June 2, 2016); 80 FR 48200 at (issued August 11, 2016)

6.4A Federal reports

6.4B State and tribal reports

6.5 Data quality

1. Question: What are the data security, archiving, and purging requirements for CCWIS?

Answer: These requirements are addressed in paragraphs 1355.30(i) and (k) and 1355.52(j) as follows:

Paragraph 1355.30(i) applies the requirements at 45 CFR 75.361 to programs funded under titles IV-B and IV-E of the Social Security Act.

Paragraph 1355.30(k) applies 45 CFR 95.621(f) to CCWIS projects meeting the thresholds at 45 CFR 95.611.

Paragraph 1355.52(j) applies 45 CFR 95.621(f) to CCWIS projects below the thresholds at 45 CFR 95.611.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 92.42; 45 CFR 95.611; 45 CFR 95.621(f); 45 CFR 1355.30(i); 45 CFR 1355.30(k); 81 FR 35450 at 35457 (issued June 2, 2016)

2. Question: Do the CCWIS data quality requirements described in 45 CFR 1355.52(d) apply to the optional data exchanges and automated functions described at 45 CFR 1355.54?

Answer: Yes. Regardless of how data is collected, all CCWIS data must meet the CCWIS data quality requirements described at 45 CFR 1355.52(d).

This question and answer is repeated in the CCWIS options section.

- **Source/Date:** 06/15/2022
- **Legal and Related References:** 45 CFR 1355.54; 45 CFR 1355.52(d)

6.5A Standards and confidentiality

1. Question: Are missing or unknown data elements permitted by the CCWIS data quality requirements and standards of paragraph 1355.52(d)(1)(i)?

Answer: It depends. CCWIS data quality requirements and standards are defined in federal, state and tribal program regulations, laws, and policies related to specific data elements and their use. Paragraph 1355.52(d)(1)(i) mandates data quality standards for completeness, timeliness, and accuracy of CCWIS data, but does not specify the data quality standard applicable to specific data elements.

Some data quality standards, such as the ones applicable to AFCARS data, define specific values for AFCARS data elements that may require only known values for certain data or set limits for missing data. But a different data quality program or reporting standard may specify conditions where data is not required or permit "unknown" as a data value.

In cases where two or more data quality standards apply to the same data element, the most rigorous standard applies, per paragraph 1355.52(d)(1)(i).

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(d)(1)(i); 81 FR 35450 at 35457 (issued June 2, 2016); 80 FR 48200 at 48208 - 48209 (issued August 11, 2016)

2. Question: May a title IV-E agency automatically prefill CCWIS data fields with known information?

Answer: It depends. The automatic calculation of data based on information previously known to the system, such as the name of a worker's supervisor or a zip code for an entered address, is allowable. Use of system-calculated data, such as system generated time stamps to capture the time of record entry or to accurately calculate current age from birth date data known to the system, is allowable.

However, the automated generation of default data, such as classifying all citizenship values as U.S. citizenship, is prohibited because users may not uniformly verify or correct inaccuracies in the default value pursuant to 1355.52(d)(1)(v).

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(d)(1)(v); 81 FR 35450 at 35457 (issued June 2, 2016); 80 FR 48200 at 48209 (issued August 11, 2016)

6.5B Automated support for data quality

1. Question: Under paragraph 1355.52(d)(2)(iii), what data may CCWIS request through the required exchange with child welfare contributing agency systems?

Answer: Per paragraph 1355.52(d)(2)(iii), the electronic requests are for current and historical CCWIS data. The electronic requests may include data meeting any of the requirements of paragraph 1355.52(b), which describes the CCWIS data requirements.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(b); 45 CFR 1355.52(d)(2)(iii); 81 FR 35450 at 35454 - 35456 and 35458 (issued June 2, 2016); 80 FR 48200 at 48206 - 48208 and 48210 (issued August 11, 2016)

2. Question: How is duplicate data entry defined?

Answer: Duplicate data entry is the manual reentry of data already captured by either the CCWIS or another system required to provide data to CCWIS.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(d)(2)(iv); 81 FR 35450 at 35458 (issued June 2, 2016)

6.5C Data quality reviews

1. Question: Are there other CCWIS data quality reviews in addition to the biennial data quality reviews?

Answer: No. Paragraph 1355.52(d)(3) describes the biennial data quality review, which is the only required CCWIS data quality review.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(d)(3); 81 FR 35450 at 35458 (issued June 2, 2016)

2. Question: Are the data quality reviews described at paragraph 1355.52(d)(3) conducted by ACF central or regional office staff, the title IV-E agency, or another party?

Answer: The title IV-E agency conducts the data quality review. However, paragraph 1355.52(d)(3) does not prohibit the agency from seeking assistance, such as from another agency or a vendor of data quality services, with the data quality review.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(d)(3); 81 FR 35450 at 35458 (issued June 2, 2016); 80 FR 48200 at 48210 (issued August 11, 2016)

3. Question: What activities and processes must be part of the biennial data quality review described in paragraph 1355.52(d)(3)?

Answer: The activities and processes for the data quality review established by the title IV-E agency and approved by ACF must meet the requirements of paragraph 1355.52(d)(3). Title IV-E agencies have flexibility to select a review process most suitable for their circumstances. Examples of activities in biennial review processes include: reviewing a sample of case records, interviewing select state/tribal and child welfare contributing agency staff, evaluating automated edit checks, and a reviewing of data quality reports. Some data quality activities, such as automated processes, may be continuous while other activities may occur one time during the biennial review period.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(d)(3); 81 FR 35450 at 45458 (issued June 2, 2016); 80 FR 48200 at 48210 (issued August 11, 2016)

4. Question: Is CCWIS cost allocation available for staff time spent planning and conducting the data quality review?

Answer: It depends. Planning and conducting the data quality review is an approved activity as defined at section 1355.51 and qualifies for CCWIS cost allocation as described in section 1355.57(c). Data correction and related program activities do not qualify for CCWIS funding.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.51; 45 CFR 1355.52(d); 45 CFR 1355.57(c); 81 FR 35450 at 35459 (issued June 2, 2016); 80 FR 48200 at 48204, 48210, and 48221 (issued August 11, 2016)

5. Question: Are title IV-E agencies required to include child welfare contributing agencies (CWCAs) that have contracts or agreements with county child welfare agencies in the biennial data quality reviews required by paragraph 1355.52(d)(3)?

Answer: Yes. The title IV-E agency must include all CWCAs in the biennial data quality reviews, pursuant to paragraph 1355.52(d)(3)(i).

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 1355.52(d)(3); 81 FR 35450 at 35458 - 35460 (issued June 2, 2016); 80 FR 48200 at 48210 (issued August 11, 2015)

6.5D Data quality findings

1. Question: What actions must the title IV-E agency take to address findings from the data quality reviews described in paragraph 1355.52(d)(3)?

Answer: Title IV-E agencies must correct the factors contributing to poor quality data, such as data collection procedures and training, CCWIS programing errors, or problems with bi-directional data exchanges, per paragraph 1355.52(d)(4). Agencies must propose how they

will address review findings and demonstrate improvement in data quality in their data quality plans, per paragraph 1355.52(d)(5).

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(d)(3) - (5); 81 FR 35450 at 35458 - 35461 (issued June 2, 2016); 80 FR 48200 at 48210 - 48211 (issued August 11, 2016)

2. Question: Does the requirement to address CCWIS data quality review findings in paragraph 1355.52(d)(4) require title IV-E agencies to correct previously collected data?

Answer: No. The regulation permits, but does not require, agencies to correct previously collected data.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(d)(4); 81 FR 35450 at 35460 (issued June 2, 2016); 80 FR 48200 at (issued August 11, 2016)

3. Question: Are there deadlines for the title IV-E agency to correct findings from a data quality review?

Answer: No. The title IV-E agency will propose timeframes to correct findings for ACF approval as part of the data quality plan per paragraph 1355.52(d)(5) or an Advance Planning Document (APD) per 45 CFR 95, Subpart F.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45CFR 95, Subpart F; 45 CFR 1355.52(d)(3) - (5); 81 FR 35450 at 35458 - 35461 (issued June 2, 2016); 80 FR 48200 at 48210 - 48211 (issued August 11, 2016)

6.5E Data quality plans

1. Question: Are title IV-E agencies that do not implement a CCWIS required to develop a CCWIS data quality plan?

Answer: No.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(d)(5); 81 FR 35450 at 35461 (issued June 2, 2016)

2. Question: When must the title IV-E agency submit the first CCWIS data quality plan?

Answer: Title IV-E agencies must include the CCWIS data quality plan as part of the first Annual or Operational Advance Planning Documents (APDs) submitted to ACF after the agency formally notifies ACF that it will implement a CCWIS.

- **Source/Date:** 10/25/2017
- **Legal and Related References:** 45 CFR 95.610; 45 CFR 1355.52(d)(5); 45 CFR 1355.52(i)(1); 81 FR 35450 at 35460 - 35461 and 35467 - 35468 (issued June 2, 2016); 80 FR 48200 at 48211 and 48216 - 48217 (issued August 11, 2015)

3. Question: Is a title IV-E agency required to include child welfare contributing agencies (CWCAs) in its data quality plan?

Answer: Yes. The data quality plan must describe how the title IV-E agency ensures the quality of data collected by CWCAs pursuant to 1355.52(d)(5)(i) and 1355.52(d)(3)(i).

- **Source/Date:** 02/12/2018
- **Legal and Related References:** 45 CFR 1355.52(d)(3)(i); 45 CFR 1355.52(d)(5)(i); 81 FR 35450 at 35458 - 35461 (issued June 2, 2016); 80 FR 48200 at 48210 - 48211 (issued August 11, 2015)

6.6 Data exchanges

1. Question: Are title IV-E agencies only able to claim federal financial participation (FFP) for the bi-directional data exchanges described in paragraph 1355.52(e)?

Answer: No. In addition to the eleven mandatory bi-directional data exchanges required under 1355.52(e), a title IV-E agency may request approval to claim FFP for additional optional data exchanges, including uni-directional data exchanges, per section 1355.54.

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(e); 45 CFR 1355.54; 81 FR 35450 at 35461 and 35471 (issued June 2, 2016); 80 FR 48200 at 48211 and 48218 - 48219 (issued August 11, 2016)

2. Question: Are title IV-E agencies required to track the source of data provided by bi-directional data exchanges per paragraph 1355.52(e)?

Answer: No. The CCWIS regulations do not require title IV-E agencies to track the source of data provided by data exchanges.

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(e); 81 FR 35450 at 35461 (issued June 2, 2016)

3. Question: Can a title IV-E agency's CCWIS that obtains data from a data warehouse instead of exchanging data through a bi-directional data exchange, satisfy a data exchange requirement of paragraph 1355.52(e)?

Answer: Yes, data obtained from a data warehouse may satisfy the data exchange requirement per paragraph 1355.52(e) if the data available in the data warehouse is complete, timely, accurate, and consistent.

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(e); 81 FR 35450 at 35462 (issued June 2, 2016); 80 FR 48200 at 48214 (issued August 11, 2016)

4. Question: Is title IV-E funding available to support the costs other programs incur in developing and operating the data exchanges described under 45 CFR 1355.52(e)(2)?

Answer: No. Title IV-E funding is not available for the data exchange costs of programs that are not title IV-E related, such as those described in 45 CFR 1355.52(e)(2)(ii) through (vi).

- **Source/Date:** 11/07/16
- **Legal and Related References:** Section 474(a)(3)(C) and (D) of the Social Security Act; 45 CFR 1355.52(e)(2); 45 CFR 1355.57(e); 81 FR 35450 at 35464 - 35466 and 35475 (June 2, 2016); 80 FR 48200 at 48212 - 48215 and 48222 (issued August 11, 2016); Action Transmittal ACF-OSS-05 (issued August 21, 1998)

5. Question: Paragraph 1355.52(e)(2) requires bi-direction data exchanges "to the extent practicable." What are the reasons that a title IV-E agency may cite to demonstrate that a bi-directional data exchange is not practicable?

Answer: Title IV-E agencies may present a business case in an Advance Planning Document (APD) describing the circumstances rendering a data exchange impracticable. These circumstances include, but are not limited to: (1) the other system is not capable of conducting an exchange; or (2) the exchange is not feasible due to cost constraints. Title IV-E agencies may cite any circumstances they deem relevant for ACF's consideration.

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(e)(2); 81 FR 35450 at 35464 (issued June 2, 2016); 80 FR 48200 at 48212 - 48213 (issued August 11, 2016)

6. Question: If a title IV-E agency is only able to establish a partial data exchange, is the agency in compliance with the requirements of paragraph 1355.52(e)(2)? For example, if some child welfare courts are able to establish a bi-directional data exchange with CCWIS but other courts are unable to participate, does this meet the requirement to have a bi-directional data exchange with courts per paragraph 1355.52(e)(2)(v)?

Answer: It depends. Title IV-E agencies may present a business case in an Advance Planning Document (APD) describing the circumstances rendering a data exchange impracticable. For example, if some courts participated in the data exchange while others did not, ACF would consider a business case explaining that the partial exchange met the requirements under 1355.52(e)(2)(v).

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(e)(2); 81 FR 35450 at 35464 (issued June 2, 2016); 80 FR 48200 at 48212 - 48213 (issued August 11, 2016)

7. Question: Are title IV-E agencies transitioning from a S/TACWIS or non-S/TACWIS system to CCWIS, required to implement data exchanges consistent with CCWIS design requirements of paragraph 1355.53(a)?

Answer: It depends. If the data exchange was developed prior to, or during the CCWIS transition period, it may be exempted from one or more of the CCWIS design requirements if the CCWIS project meets the requirements of paragraphs 1355.56(b) or (f)(1). If the data exchange was developed after the CCWIS transition period, then it must meet the CCWIS design requirements in order to qualify for CCWIS developmental cost allocation unless ACF approves, on a case-by-case basis, an alternative design proposed by a title IV-E agency that is determined by ACF to be more efficient, economical, and effective, pursuant to 1355.53(b)(2).

This question and answer is repeated in the Automated Functions Requirements section.

- **Source/Date:** 01/11/2017
- **Legal and Related References:** 45 CFR 1355.53(b); 45 CFR 1355.57(a); 81 FR 35450 at 35470 and 35473 - 35474 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 and 48220 - 48221 (issued August 11, 2015)

6.6A Financial systems

6.6B Child welfare contributing agencies

1. Question: Does paragraph 1355.52(e)(1)(ii) require a CCWIS to have real-time access to child welfare contributing agency (CWCA) databases?

Answer: No. Title IV-E agencies are not required to view CWCA databases in real-time.

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(e)(1)(ii); 81 FR 35450 at 35463 (issued June 2, 2016); 80 FR 48200 at 48212 (issued August 11, 2016)

2. Question: Paragraph 1355.52(e)(1)(ii) requires CCWIS to have a data exchange with "Systems operated by child welfare contributing agencies that are collecting or using data described in paragraph (b) of this section, if applicable." What is the meaning of the phrase "if applicable"?

Answer: For paragraph 1355.52(e)(1)(ii), "if applicable" means that CCWIS must have a data exchange with a child welfare contributing agency (CWCA) if that CWCA uses a system other than CCWIS for child abuse and neglect investigations, placements, or child welfare case management. It is not applicable if a CWCA is entering data directly into a title IV-E agency's CCWIS.

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(e); 81 FR 35450 at 35463 (issued June 2, 2016); 80 FR 48200 at 48212 (issued August 11, 2016)

3. Question: Is the title IV-E agency responsible for assuring the quality of data submitted by child welfare contributing agencies (CWCAs) to CCWIS, per paragraph 1355.52(e)(1)(ii)?

Answer: Yes. The title IV-E agency is responsible for assuring data quality in compliance with the requirements described in paragraph 1355.52(d).

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(d); 45 CFR 1355.52(e)(1)(ii); 81 FR 35450 at 35456 - 35461 and 35463 (issued June 2, 2016); 80 FR 48200 at 48208 - 48212 (issued August 11, 2016)

4. Question: If a county has a contract with a child welfare contributing agency (CWCA), may the required bi-directional data exchange with CCWIS "go through" a county system?

Answer: Yes, with ACF approval.

This question and answer is repeated in the external child welfare systems section.

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 1355.52(e)(1)(ii), (iv); 81 FR 35450 at 35463 - 35464 (issued June 2, 2016); 80 FR 48200 at 48212 (issued August 11, 2015); CWPM 6.1 #3 and 6.6D #1 and #2.

5. Question: How frequently must data be electronically exchanged between CCWIS and CWCA systems?

Answer: The title IV-E agency has discretion to determine the frequency of data exchanges that support the requirement to provide data in a timely manner, pursuant to paragraph 1355.52(d)(1)(i).

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 1355.52(d)(1)(i), (e)(1)(ii); 81 FR 35450 at 35456 - 35457 and 35463 - 35464 (issued June 2, 2016); 80 FR 48200 at 48208 - 48209 and 48212 (issued August 11, 2015).

6. Question: If a child welfare contributing agency (CWCA) has an information system that duplicates a CCWIS automated function, may the title IV-E agency use a CCWIS cost allocation methodology approved by the Department to claim federal financial participation (FFP) for the CCWIS automated function duplicated by the CWCA system?

(Deleted 11/30/2022)

7. Question: If a child welfare contributing agency's (CWCA) information system that receives no federal, state, or tribal funds, duplicates a CCWIS automated function, may the title IV-E agency use a CCWIS cost allocation methodology approved by the Department to claim federal financial participation (FFP) for the CCWIS automated function?

(Deleted 11/30/2022)

6.6C Title IV-E determinations

1. Question: In order to qualify for CCWIS cost allocation, paragraph 1355.57(e)(1)(iii) requires that activities and automated functions must benefit federal, state or tribal funded participants in programs and allowable activities described in title IV-E of the Act to the title IV-E program. What programs and activities qualify for CCWIS cost allocation under paragraph 1355.57(e)(1)(iii)?

Answer: A title IV-E agency may cost allocate CCWIS activities and automated functions that benefit participants in programs such as foster care, adoption assistance or guardianship programs, pursuant to 1355.57(e)(1)(iii). Activities and automated functions supporting other health and human service programs, such as Temporary Assistance to Needy Families (TANF), Child Care, Child Support, Supplemental Nutrition Assistance Program (SNAP), Medicaid and related state or tribal health and human service programs do not qualify for CCWIS cost allocation pursuant to 1355.57(e)(1)(iii). If a title IV-E agency would like to include some other program not listed here, then the title IV-E agency may

present a business case for allocating the cost of activities and automated functions benefiting such program in accordance with 1355.57(e)(1). ACF will review and determine the appropriate cost allocation in accordance with 45 CFR 95 Subpart F.

- **Source/Date:** 11/10/16
- **Legal and Related References:** 45 CFR 1355.57(e)(1)(iii); 81 FR 35450 at 35475 (issued June 2, 2016); 80 FR 48220 at 48222 (issued August 11, 2015)

6.6D External child welfare systems

1. Question: Paragraph 1355.52(e)(1)(iv) requires CCWIS to have a data exchange with "Each system external to CCWIS used by title IV-E agency staff to collect CCWIS data, if applicable." What is the meaning of the phrase "if applicable"?

Answer: For paragraph 1355.52(e)(1)(iv), "if applicable" means that CCWIS must have a data exchange with any external system used by agency staff to collect CCWIS data, however, it is not applicable if there are no such external systems.

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(e); 81 FR 35450 at 35463 (issued June 2, 2016); 80 FR 48200 at 48212 (issued August 11, 2016)

2. Question: Are child welfare information systems used by counties in county administered states required to have a bi-directional exchange with the state CCWIS under 1355.52(e)(1)(iv)?

Answer: Yes. Counties are political subdivisions of the state, and the single state title IV-E agency designated in the state's title IV-B and title IV-E plan supervises the administration of county administered title IV-B and IV-E programs. Section 471(a)(2) of the Social Security Act and 45 CFR 205.100 provide the authority and parameters by which a single state title IV-E agency may delegate the administration of the title IV-E program to the state's political subdivisions and local agencies or offices. Therefore, a county system external to CCWIS and used by title IV-E agency staff to collect CCWIS data must, per paragraph 1355.52(e)(1)(iv), have a bi-directional data exchange with CCWIS.

- **Source/Date:** 11/07/16
- **Legal and Related References:** Section 471(a)(2) of the Social Security Act; 45 CFR 205.100; 45 CFR 1355.52(e)(1)(iv); 81 FR 35450 at 35453 and 35463 - 35464 (June 2, 2016); 80 FR 48200 at 48212 (issued August 11, 2016)

3. Question: If a title IV-E agency operating a CCWIS wants to exchange data with the National Electronic Interstate Compact Enterprise (NEICE) Case Management System (CMS) is a bidirectional data exchange required, per paragraph 1355.52(e)(1)(iv)?

Answer: Yes. A bi-directional data exchange is required because the NEICE CMS is considered an external system to CCWIS, per paragraph 1355.52(e)(1)(iv).

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(e)(1)(iv); 81 FR 35450 at 35463 - 35464 (June 2, 2016); 80 FR 48200 at 48212 (issued August 11, 2016)

4. Question: Would a web-portal external to CCWIS that is used to enter information that is then sent to the National Electronic Interstate Compact Enterprise (NEICE) Clearinghouse comply with the CCWIS bi-directional data exchange requirements?

Answer: No. CCWIS bi-direction data exchanges must be capable of both sending data to, and receiving data from the other system. A web-portal used by child welfare workers only to access the NEICE Clearinghouse does not meet the automation requirements for CCWIS data exchanges.

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(e)(1)(iv); 81 FR 35450 at 35463 - 35464 (June 2, 2016); 80 FR 48200 at 48211 - 48212 (issued August 11, 2016); Action Transmittal ACF-OSS-05 (issued August 21, 1998)

5. Question: If a county has a contract with a child welfare contributing agency (CWCA), may the required bi-directional data exchange with CCWIS "go through" a county system?

Answer: Yes, with ACF approval. This question and answer is repeated in the child welfare contributing agencies section.

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 1355.52(e)(1)(ii), (iv); 81 FR 35450 at 35463 - 35464 (issued June 2, 2016); 80 FR 48200 at 48212 (issued August 11, 2015); CWPM 6.1 #3 and 6.6D #1 and #2.

6. Question: How frequently must data be electronically exchanged between CCWIS and county child welfare information systems?

Answer: The title IV-E agency has discretion to determine the frequency of data exchanges that support the requirement to provide data in a timely manner, pursuant to paragraph 1355.52(d)(1)(i).

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 1355.52(d)(1)(i), (e)(1)(iv); 81 FR 35450 at 35456 - 35457 and 35463 - 35464 (issued June 2, 2016); 80 FR 48200 at 48208 - 48209 and 48212 (issued August 11, 2015).

7. Question: If a title IV-E agency modifies the National Electronic Interstate Compact Enterprise (NEICE) Case Management System (CMS) so it is integrated as an automated function in the CCWIS, is the modified and integrated NEICE CMS considered an external system requiring a bi-directional data exchange with CCWIS as described in paragraph 1355.52(e)(1)(iv)?

Answer: No. An automated function integrated into CCWIS is not considered an external system as described in paragraph 1355.52(e)(1)(iv).

- **Source/Date:** 02/12/2018
- **Legal and Related References:** 45 CFR 1355.52(e)(1)(iv); 81 FR 35450 at 35463 – 35464 (June 2, 2016); 80 FR 48200 at 48211 – 48212 (issued August 11, 2016); Action Transmittal ACF-OSS-05 (issued August 21, 1998)

8. Question: If a title IV-E agency's CCWIS portal permits users to enter data into CCWIS, access CCWIS data reports, or both, is the portal considered an external child welfare system as described at paragraph 1355.52(e)(1)(iv)?

Answer: No. A portal that permits users to enter data into CCWIS, access CCWIS data reports, or both is a CCWIS automated function.

- **Source/Date:** 09/19/2019
- **Legal and Related References:** 45 CFR 1355.51(a); 45 CFR 1355.52(e)(1)(iv); 81 FR 35450 at 35463 - 35454 (issued June 2, 2016); 80 FR 48200 at 48204 - 48205 and 48212 (issued August 11, 2015)

9. Question: Must a title IV-E agency's CCWIS portal meet the CCWIS design requirements described at paragraph 1355.53(a)?

Answer: Yes. An agency's CCWIS portal is an automated function and must meet the CCWIS design requirements described at paragraph 1355.53(a) unless exempted by paragraph 1355.53(b).

- **Source/Date:** 09/19/2019
- **Legal and Related References:** 45 CFR 1355.51(a); 45 CFR 1355.53; 81 FR 35450 at 35468 - 35471 (issued June 2, 2016); 80 FR 48200 at 48204 - 48205 and 48217 - 48218 (issued August 11, 2015)

10. Question: If a title IV-E agency's CCWIS portal duplicates another CCWIS automated function, can the title IV-E agency receive the CCWIS cost allocation for either its portal or the other automated function?

Answer: No. CCWIS cost allocation is only available for automated functions that are not duplicated, pursuant to paragraphs 1355.57(a)(2)(ii) and (b)(2)(ii).

- **Source/Date:** 09/19/2019
- **Legal and Related References:** 45 CFR 1355.57(a)(2)(ii) and (b)(2)(ii); 81 FR 35450 at 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48220 - 48221 (issued August 11, 2015)

11. Question: May title IV-E agencies without a CCWIS receive software and associated documentation from the federal repository described at paragraph 1355.52(h)?

Answer: Yes. With ACF approval, title IV-E agencies without a CCWIS may receive software and associated documentation from the federal repository described at paragraph 1355.52(h).

- **Source/Date:** 09/19/2019
- **Legal and Related References:** 45 CFR 1355.52(h); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

12. Question: May a title IV-E agency using a CCWIS develop a stand-alone data system to collect CCWIS data (such as to collect required data for a title IV-E prevention program)?

Answer: Yes. A title IV-E agency may design CCWIS to include a system external to the CCWIS that is used by title IV-E agency staff to collect CCWIS data (See CWPM 6.2 Q/A #1).

However, a CCWIS must be able to immediately access CCWIS data from an external system that is used by title IV-E agency staff through a bi-directional data exchange. See 45 CFR 1355.52(e)(1)(iv); CWPM 6.6 Q/A #3 and CWPM 6.6D#1 for additional information.

The bi-directional data exchange between CCWIS and the external system used by title IV-E agency staff must meet the data exchange standard requirements of 45 CFR 1355.52(f)(2).

- **Source/Date:** 07/18/2022
- **Legal and Related References:** 45 CFR 1355.52(e)(1)(iv); 45 CFR 1355.52(f)(2); 81 FR 35450 at 35454, 35456, and 35462 (issued June 2, 2016); 80 FR 48200 at 48215 (issued August 11, 2015)

6.6E Child abuse and neglect systems

1. Question: If automated functions that support the reporting and investigation of child abuse and neglect reside exclusively in a CCWIS, how must the title IV-E agency cost allocate development costs for those automated functions?

Answer: Pursuant to 1355.57(a) - (e), the title IV-E agency may allocate development costs using a CCWIS cost allocation methodology unless the automated functions in the CCWIS are:

- Duplicated in other systems supporting the state or tribe's title IV-E or title IV-B programs, pursuant to 1355.57(a)(2)(ii) and (b)(2)(ii);
- Not used consistently by all child welfare users responsible for the area supported by the automatic function, pursuant to 1355.57(a)(2)(ii) and (b)(2)(ii);
- Unique child welfare related program functions (such as juvenile justice and adult protective services) not used by the title IV-E program, pursuant to 1355.57(e) and (f) and 45 CFR 95.631; and
- Common or unique functions benefiting other health and human service programs (such as child support, child care, Supplementary Nutritional Assistance Program, Temporary Assistance to Needy Families, Medicaid, courts and/or education programs), pursuant to 1355.57(e) and (f) and 45 CFR 95.631.

This question and answer is repeated in the Cost Allocation section.

- **Source/Date:** 10/26/2017
- **Legal and Related References:** 45 CFR 95.631; 45 CFR 1355.52(e)(2)(i); 45 CFR 1355.57; 81 FR 35450 at 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48213 and 48220 - 48222 (issued August 11, 2015)

2. Question: If automated functions that support the reporting and investigation of child abuse and neglect reside in an external system and are not duplicated in CCWIS, how must the agency cost allocate development costs for those automated functions?

Answer: Pursuant to 1355.57(e), the title IV-E agency must allocate development costs using a non-CCWIS cost allocation methodology if the automated functions reside in an external system.

This question and answer is repeated in the Cost Allocation section.

- **Source/Date:** 10/26/2017
- **Legal and Related References:** 45 CFR 95.631; 45 CFR 1355.52(e)(2)(i); 45 CFR 1355.57; 81 FR 35450 at 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48213 and 48220 - 48222 (issued August 11, 2015)

3. Question: If automated functions that support the reporting and investigation of child abuse and neglect reside in both a CCWIS and an external system, how must the agency cost allocate development costs for those automated functions?

Answer: Pursuant to 1355.57(e), the title IV-E agency must allocate development costs using a non-CCWIS cost allocation methodology if the automated functions reside in both a CCWIS and an external system. The duplicated development costs are allocated to the benefiting program or programs. All programs pay their share of an automated function under a non-CCWIS cost allocation methodology.

This question and answer is repeated in the Cost Allocation section.

- **Source/Date:** 10/26/2017
- **Legal and Related References:** 45 CFR 95.631; 45 CFR 1355.52(e)(2)(i); 45 CFR 1355.57; 81 FR 35450 at 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48213 and 48220 - 48222 (issued August 11, 2015)

6.6F Title IV-A systems

6.6G Title XIX eligibility systems

6.6H Title XIX claims processing

1. Question: What data are title IV-E agencies required to maintain in CCWIS from the data exchange with the Medicaid Management Information System (MMIS), per paragraph 1355.52(e)(2)(iii)(B)?

Answer: Paragraph 1355.52(e)(2)(iii)(B) requires title IV-E agencies to maintain in CCWIS the available medical record information received from the MMIS, which would include the Medicaid claims history or, for those enrolled in managed care, provider encounter data.

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(e)(2)(iii)(B); 81 FR 35450 at 35465 (issued June 2, 2016); 80 FR 48200 at 48213 - 48214 (issued August 11, 2016)

2. Question: Does paragraph 1355.52(e)(2)(iii)(B) require a title IV-E agency to maintain a foster child's entire medical record in CCWIS?

Answer: No.

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(e)(2)(iii)(B); 81 FR 35450 at 35465 (issued June 2, 2016); 80 FR 48200 at 48213 - 48214 (issued August 11, 2016)

3. Question: If the title IV-E agency already has a process in place to enter current health information on children in foster care into CCWIS, is the title IV-E agency still required to implement a data exchange between CCWIS and the Medicaid Management Information system?

Answer: Yes, to the extent practicable. The bi-directional data exchange is required to provide CCWIS with all relevant data to serve clients and improve outcomes, including information on prior medical services, such as immunization histories, therapies, and prescriptions. Although the title IV-E agency may already have access to some of this information, implementing a bi-direction data exchange also improves efficiency by reducing duplicate data entry and provides the state title XIX program with data collected by the title IV-E agency that it may use in serving foster children.

- **Source/Date:** 2/12/2018
- **Legal and Related References:** 45 CFR 1355.52(e)(2)(iii)(B); 81 FR 35450 at 35461 and 35464 - 35465 (June 2, 2016); 80 FR 48200 at 48211 - 48214 (issued August 11, 2016)

6.6I Title IV-D systems

6.6J Court systems

6.6K Education systems

6.7 Data exchange standard

1. Question: Is the title IV-E agency that is implementing a CCWIS project required to comply with the data exchange standard requirements of paragraph 1355.52(f) for data exchanges implemented before the rule's effective date of August 1, 2016?

Answer: Yes. Upon implementation of a CCWIS, the title IV-E agency must use a single data exchange standard with child welfare contributing agencies (CWCAs) and external systems as described in paragraph 1355.52(f), including exchanges that were implemented before the rule's effective date.

- **Source/Date:** 11/08/16
- **Legal and Related References:** 45 CFR 1355.52(f); 81 FR 35450 at 35466 (issued June 2, 2016); 80 FR 48200 at 48215 - 48216 (issued August 11, 2016)

2. Question: Is a title IV-E agency required to specify the technology used to transfer data in the data exchange standard?

Answer: No. Paragraph 1355.52(f) requires the title IV-E agency to describe in the data exchange standard applicable data, definitions, formats, and other specifications. Although the data exchange standard may include specifications for the technology used to transfer data, it is not required.

- **Source/Date:** 11/08/16

- **Legal and Related References:** 45 CFR 1355.52(f); 81 FR 35450 at 35466 (issued June 2, 2016); 80 FR 48200 at 48215 (issued August 11, 2016)

3. Question: Is a title IV-E agency required to specify a single communication protocol for the data exchange in the data exchange standard required by paragraph 1355.52(f)?

Answer: No. Paragraph 1355.52(f) requires the title IV-E agency to describe in the data exchange standard applicable data, definitions, formats, and other specifications. The title IV-E agency is not required to specify a single communication protocol.

- **Source/Date:** 11/08/16
- **Legal and Related References:** 45 CFR 1355.52(f); 81 FR 35450 at 35466 (issued June 2, 2016); 80 FR 48200 at 48215 (issued August 11, 2016)

4. Question: Who selects the data exchange standard required by paragraph 1355.52(f)? Is it a federal agency such as ACF, or does the state or tribe select the data exchange standard?

Answer: The state or tribe implementing the CCWIS selects the data exchange standard for its CCWIS project.

- **Source/Date:** 11/08/16
- **Legal and Related References:** 45 CFR 1355.52(f); 81 FR 35450 at 35466 (issued June 2, 2016); 80 FR 48200 at 48215 (issued August 11, 2016)

5. Question: Can the title IV-E agency's data exchange standard change over time?

Answer: Yes, the data exchange standard can change over time. For example, standards often add nuanced and precise conditions to accommodate new and varied circumstances or expand to standardize new areas to address changing policies or practices. The title IV-E agency may change standards consistent with Advance Planning Document (APD) rules at 45 CFR 95.610(c)(2).

- **Source/Date:** 11/08/16
- **Legal and Related References:** 45 CFR 1355.52(f); 81 FR 35450 at 35466 - 35467 (issued June 2, 2016); 80 FR 48200 at 48215 - 48216 (issued August 11, 2016)

6. Question: May child welfare contributing agencies (CWCAs) that have data exchange standards different from the title IV-E agency data exchange standard use their own standard when exchanging data with CCWIS?

Answer: No. Paragraph 1355.52(f) specifies a single data exchange standard for data exchanges with CWCAs and systems external to CCWIS used by title IV-E agency staff to collect CCWIS data.

- **Source/Date:** 11/08/16
- **Legal and Related References:** 45 CFR 1355.52(f); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48215 - 48216 (issued August 11, 2016)

7. Question: Is a title IV-E agency required to ensure that a CWCA system exchanging data with a county agency's external child welfare information system uses the single data exchange standard pursuant to 1355.52(f)?

Answer: Yes. The title IV-E agency must ensure that CWCA systems comply with the data exchange standard required pursuant to 1355.52(f)(2), and support the efficient, economical, and effective administration of the title IV-B and IV-E plans, pursuant to 1355.52(a).

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 1355.52(a) and (f); 81 FR 35450 at 35453 - 35454 and 35466 - 35467 (issued June 2, 2016); 80 FR 48200 at 48206 and 48215 - 48216 (issued August 11, 2015)

8. Question: May a title IV-E agency switch from one data exchange standard to a different data exchange standard?

Answer: Yes, provided all bi-directional data exchanges described in paragraph 1355.52(f) use the same data exchange standard.

- **Source/Date:** 2/12/2018
- **Legal and Related References:** 45 CFR 1355.52(f); 81 FR 35450 at 35466 - 35467 (June 2, 2016); 80 FR 48200 at 48215 - 48216 (issued August 11, 2016)

9. Question: Does the CCWIS single data exchange standard described in 45 CFR 1355.52(f) apply to optional data exchanges?

Answer: No. The regulations for CCWIS do not require that optional data exchanges meet the single data exchange standard described at 45 CFR 1355.52(f).

This question and answer is repeated in the CCWIS options section.

- **Source/Date:** 06/15/2022
- **Legal and Related References:** 45 CFR 1355.54; 45 CFR 1355.52(f); 45 CFR 1355.55; 80 FR 48200 at 48219 (issued August 11, 2015)

6.8 Title IV-E determinations

1. Question: Is a CCWIS required to contain the automated functions that determine title IV-E eligibility?

Answer: No. The automated functions that determine title IV-E eligibility may be:

- Wholly provided by the CCWIS;
- Wholly provided by another system such as a larger system that determines eligibility for multiple programs; or
- Provided by different systems that have different steps of the title IV-E eligibility determination process. For example, the automated support for determining if a child meets the AFDC requirements may be located in the system supporting the title IV-A program while the remaining automated support is in the CCWIS.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(g); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

2. Question: May a title IV-E agency use two or more automated functions to support one part of title IV-E eligibility determinations, such as using one system to determine Aid to Families with Dependent Children (AFDC) eligibility for some children and another system to determine AFDC eligibility for the remaining children?

Answer: A state title IV-E agency operating a CCWIS is prohibited from using two or more automated functions to support one part of title IV-E eligibility determinations, per 1355.52(g)(1). A state title IV-E agency must use the same automated function or the same group of automated functions for all title IV-E eligibility determinations.

However, if it is not practicable to use a single automated function, or the same group of automated functions per 1355.52(g)(2), a tribal IV-E agency may use multiple automated functions or manual processes to support one part of the title IV-E eligibility determinations. For example, tribes are required by section 479B(c)(C)(ii)(II) of the Social Security Act to use the AFDC plan that was in effect on July 16, 1996 of the state in which the child resides at the time of removal from the home to determine if the child meets the AFDC eligibility requirement. This means that tribal title IV-E agencies may need to use the AFDC plan from different states for different children, depending on the child's location at the time of removal. Therefore, it may not be cost effective for tribal title IV-E agencies to build an automated function to accommodate AFDC eligibility requirements of all states from which tribal children may be removed.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(g); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

3. Question: Must CCWIS be the "system of record" for title IV-E eligibility determinations, since paragraph 1355.52(g) permits other information systems to support eligibility determinations?

Answer: Yes. CCWIS must maintain the calculated outcome of the title IV-E eligibility determination process including the data contributing to the determination of title IV-E eligibility per paragraph 1355.52(b)(1)(ii).

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(g); 45 CFR 1355.52(b)(1)(ii); 81 FR 35450 at 35455 and 35467 (issued June 2, 2016); 80 FR 48200 at 48207 and 48216 (issued August 11, 2015)

4. Question: How must title IV-E eligibility data collected by other information system be transmitted to CCWIS?

Answer: Title IV-E eligibility data collected by other information systems must be provided to CCWIS via a bi-directional electronic data exchange, per paragraph 1355.52(e)(1)(iii).

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(e)(1)(iii); 80 FR 48200 at 48212 (issued August 11, 2015)

6.8A State title IV-E determinations

6.8B Tribal title IV-E determinations

6.9 Software provision

1. Question: Does paragraph 1355.52(h), which requires title IV-E agencies to provide a copy of the agency-owned software that is designed, developed, or installed with federal financial participation (FFP) and associated documentation to the designated federal repository, apply only to software developed once an agency implements a new CCWIS or transitions another system to CCWIS?

Answer: No. The title IV-E agency may be required to provide ACF software from legacy systems developed with FFP per 45 CFR 95.617(b).

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(h); 45 CFR 95.617(b); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

2. Question: In county administered states, may counties directly access software and associated documentation from the federal repository described in paragraph 1355.52(h) or must the state title IV-E agency make such a request?

Answer: County administered agencies may ask that the state title IV-E agency request software and associated documentation from the federal repository. Title IV-E agencies must receive federal approval to provide the materials to the county administered agency.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(h); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

3. Question: Must title IV-E agencies submit commercial off-the-shelf (COTS) products or third party utilities to the federal repository described in paragraph 1355.52(h)?

Answer: No. Agencies are not required to submit these products because ACF is not granted a license to COTS products or third party utilities that are not owned by the title IV-E agency per 45 CFR 95.617.

However, COTS software enhanced or modified with federal financial participation is owned by the title IV-E agency. This includes extensions to connect the COTS product to, or use it with other modules of the CCWIS. ACF has regulatory authority to add these products to the federal registry.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(h); 45 CFR 95.617; 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

4. Question: Must title IV-E agencies provide automated functions that support multiple programs within an agency to ACF for inclusion in the federal repository described in paragraph 1355.52(h)?

Answer: It depends. If an automated function is designed, developed, or installed with any federal financial participation (FFP), ACF has the regulatory authority to add it to the federal repository per paragraph 1355.52(h).

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(h); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

5. Question: If a title IV-E agency provided agency-owned software and documentation to the federal repository described at 1355.52(h), is the agency required to provide updates made to the software or documentation to the federal repository?

Answer: Yes, if ACF requests the updated software or documentation, pursuant to 1355.52(h).

- **Source/Date:** 10/25/2017

- **Legal and Related References:** 45 CFR 1355.52(h); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

6. Question: If a title IV-E agency receives a copy of software from the federal repository and enhances it, is the agency required to provide the enhanced software to the federal repository?

Answer: Yes, if ACF requests the enhanced software, pursuant to 1355.52(h).

- **Source/Date:** 10/25/2017
- **Legal and Related References:** 45 CFR 1355.52(h); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

7. Question: If ACF requests that a title IV-E agency provide the federal repository with an automated function requiring a specific configuration to run (such as a specific database product or interfaces to proprietary products), is the agency required to provide the configuration requirements to the federal repository?

Answer: Yes. The title IV-E agency is required to provide a copy of the agency-owned software and associated documentation pursuant to 1355.52(h).

- **Source/Date:** 10/25/2017
- **Legal and Related References:** 45 CFR 1355.52(h); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

8. Question: Is a title IV-E agency required to provide proprietary products to the federal repository when it provides the agency-owned software?

Answer: No. Title IV-E agencies are not required to submit proprietary products when submitting agency-owned software to the federal repository pursuant to 45 CFR 95.617(c).

- **Source/Date:** 10/25/2017
- **Legal and Related References:** 45 CFR 1355.52(h); 45 CFR 95.617; 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015); CWPM 6.9 #3

9. Question: May ACF add vendor owned software products to the federal repository described in paragraph 1355.52(h)?

Answer: No. ACF will only add software and associated documentation that is owned by a title IV-E agency and designed, developed, or installed with federal financial participation to the federal repository, pursuant to paragraph 1355.52(h).

- **Source/Date:** 2/12/2018

- **Legal and Related References:** 45 CFR 1355.52(h); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

10. Question: Must title IV-E agencies provide open source software to the federal repository upon ACF's request, pursuant to paragraph 1355.52(h)?

Answer: Yes. Upon ACF request, title IV-E agencies must provide open source software that was designed, developed, or installed with federal financial participation to the federal repository.

- **Source/Date:** 2/12/2018
- **Legal and Related References:** 45 CFR 1355.52(h); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

11. Question: May title IV-E agencies without a CCWIS receive software and associated documentation from the federal repository described at paragraph 1355.52(h)?

Answer: Yes. With ACF approval, title IV-E agencies without a CCWIS may receive software and associated documentation from the federal repository described at paragraph 1355.52(h).

- **Source/Date:** 09/19/2019
- **Legal and Related References:** 45 CFR 1355.52(h); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

6.10 Submission

6.10A Initial submission

1. Question: If the agency elects not to transition a S/TACWIS project to a CCWIS, is the title IV-E agency required to submit the documents listed in paragraph 1355.52(i) (1) to ACF when submitting an Advance Planning Document (APD) or Notice of Intent during the transition period?

Answer: No. A record from the title IV-E agency signed by the governor, tribal leader, or designated state or tribal official notifying ACF that the title IV-E agency elects not to transition a S/TACWIS project to a CCWIS project is sufficient. However, the IV-E agency must continue to submit applicable APDs for the non-CCWIS project.

- **Source/Date:** 10/27/2016

- **Legal and Related References:** 45 CFR 95 Subpart F; 45 CFR 1355.51; 45 CFR 1355.52(i)(1); 45 CFR 1355.56(d)(1) 81 FR 35450 at 35467 - 35468 and 35473 (issued June 2, 2016); 80 FR 48200 at 48205, 48216 - 48217, and 48220 (issued August 11, 2015)

2. Question: What is the "start date" of a CCWIS project?

Answer: The start date of a CCWIS project is the date ACF indicates in its response letter to an approvable submission from the title IV-E agency.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 95 Subpart F; 45 CFR 1355.51; 45 CFR 1355.52(i)(1); 81 FR 35450 at 35467 - 35468 (issued June 2, 2016); 80 FR 48220 at 48205 and 48216 - 48217 (issued August 11, 2015)

3. Question: What documents must a title IV-E agency submit when notifying ACF that the agency intends to build a CCWIS?

Answer: The submission must meet the requirements of 1355.52(i)(1), which means that the title IV-E agency must submit an Advance Planning Document (APD) or, if below the APD submission thresholds defined at 45 CFR 95.611, a Notice of Intent. The APD or Notice of Intent must include:

- A description of how the CCWIS will meet the requirements in 1355.52 (a) through (h) and, if applicable 1355.54;
- A list of all automated functions included in the CCWIS; and
- A notation of whether each automated function included in the CCWIS meets, or when implemented will meet, the following requirements:
 - The automated function supports at least one requirement of 1355.52 or, if applicable, 1355.54;
 - The automated function is not duplicated within the CCWIS or systems supporting child welfare contributing agencies and is consistently used by all child welfare users responsible for the area supported by the automated function; and
 - The automated function complies with the CCWIS design requirements at 1355.53(a), unless exempted in accordance with 1355.53(b).
- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 95 Subpart F; 45 CFR 1355.51; 45 CFR 1355.52(i)(1); 81 FR 35450 at 35467 - 35468 (issued June 2, 2016); 80 FR 48220 at 48205 and 48216 - 48217 (issued August 11, 2015)

4. Question: Does paragraph 1355.52(i)(1)(iii)(B) require a title IV-E agency that elects to allow Child Welfare Contributing Agencies to use their systems to note if a CCWIS automated function is duplicated in a system used by a contract service provider?

Answer: Yes, if the contract service provider meets the definition of a child welfare contributing agency, any automated functions in the provider's system that duplicate automated functions in CCWIS must be included in the automated function list described in paragraph 1355.52(i)(1)(ii). Per section 1355.51, a child welfare contributing agency is a public or private entity that, by contract or agreement with the title IV-E agency, provides child abuse and neglect investigations, placement, or child welfare case management (or any combination of these) to children and families.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.51; 45 CFR 1355.52(i)(1); 81 FR 35450 at 35453 and 35468 (issued June 2, 2016); 80 FR 48220 at 48205 and 48216 - 48217 (issued August 11, 2015)

5. Question: When notifying ACF that a title IV-E agency intends to transition an existing S/TACWIS or non-S/TACWIS to CCWIS, does paragraph 1355.52(i)(1)(ii) require the agency to list existing automated functions of the transitioning system that will be used in the CCWIS?

Answer: Yes. The list includes existing automated functions of the transitioning system that will be used in the CCWIS as well as newly developed automated functions that will be part of the CCWIS. Providing this list in addition to the more detailed information required in paragraph 1355.52(i)(1)(iii) at the start of a CCWIS project will help both ACF and the title IV-E agency to more reliably estimate project costs.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(i)(1); 80 FR 48220 at 4648216 - 48217 (issued August 11, 2015)

6. Question: When a title IV-E agency submits an Advance Planning Document (APD) notifying ACF of the agency's plan to implement a CCWIS, is the agency required to include the description of how the planned system will meet the CCWIS requirements and the automated function list as separate documents?

Answer: No. While the title IV-E agency is required to include the system description and automated function list as specified in 1355.52(i)(1)(i) - (iii) when submitting an APD notifying ACF of the agency's plan to implement a CCWIS, the information may be integrated into the APD project documentation described at 45 CFR 95.610.

- **Source/Date:** 2/12/2018
- **Legal and Related References:** 45 CFR 95.610; 45 CFR 1355.52(i)(1); 81 FR 35450 at 35467 - 35468 (issued June 2, 2016); 80 FR 48200 at 48216 - 48217 (issued August 11, 2015)

7. Question: Must title IV-E agencies report electronic data exchanges on the automated functions list pursuant to paragraph 1355.52(i)(1)(ii)?

Answer: Yes. An electronic data exchange is "a computerized process or collection of related processes to achieve a purpose or goal" and therefore is an automated function as defined at paragraph 1355.51(a).

- **Source/Date:** 09/19/2019
- **Legal and Related References:** 45 CFR 1355.51(a); 45 CFR 1355.52(i)(1)(ii); 80 FR 48200 at 48204 - 48205 and 48216 (issued August 11, 2015)

8. Question: If the title IV-E agency's CCWIS is part of an enterprise system in which at least one automated function is shared between at least two programs, what automated functions must the title IV-E agency report on the list of automated functions required under 1355.52(i)(1)(ii)? For example, the agency's intake function is part of an enterprise system between child welfare and Medicaid.

Answer: The title IV-E agency must report only automated functions that support the child welfare program on the list of automated functions. This includes: 1) automated functions that only support child welfare; and 2) automated functions that support child welfare and another program. Previous policy required that a title IV-E agency developing or operating a CCWIS as part of an enterprise system report all automated functions of the entire system. We revised this policy to reduce requirements and provide more flexibility in meeting the CCWIS design requirements.

This question and answer is repeated in the On-going Submission section.

- **Source/Date:** 09/19/2019; updated 07/11/2023
- **Legal and Related References:** 45 CFR 95.605; 45 CFR 95.610; 45 CFR 1355.52(i)(1)(ii) and 1355.53(a); 80 FR 48200 at 48216 - 48218 (issued August 11, 2015)

9. Question: How must a title IV-E agency determine if an automated function "is consistently used by all child welfare users responsible for the area supported by the automated function" pursuant to paragraphs 1355.52(i)(1)(iii)(B), 1355.57(a)(2)(ii), and 1355.57(b)(2)(ii)?

Answer: "Consistently used" means that public and private child welfare workers use an automated function as required by the title IV-E agency. Examples of an automated function not being consistently used are:

✎ workers interpreting data fields differently than instructed and entering incorrect data because the CCWIS data fields are not clearly labeled; and

✎ workers skipping required steps and screens because they are not consistently trained on the CCWIS case management tool.

The phrase "by all child welfare workers responsible for the area supported by the automated function" means that all workers responsible for a task use the automated function(s) designed for the task in the manner required by the title IV-E agency. Examples of all workers responsible for a task not using the required automated function are:

✂ some workers using different automated assessment tools when the title IV-E agency requires that all workers conducting assessments use a specified automated assessment tool; and

✂ some workers not entering home visit notes into CCWIS within the timeframe required by the title IV-E agency.

This question and answer is repeated in the Cost Allocation for Transitioning Systems and Cost Allocation for New CCWIS sections.

- **Source/Date:** 09/19/2019
- **Legal and Related References:** 45 CFR 1355.52(i)(1)(iii)(B); 45 CFR 1355.57(a)(2)(ii) and (b)(2)(ii); 81 FR 35450 at 35468 and 35474 - 35475 (issued June 2, 2016); 80 FR 48200 at 48217 and 48221 (issued August 11, 2015)

10. Question: How does a title IV-E agency determine if a CCWIS automated function is "duplicated within the CCWIS or systems supporting child welfare contributing agencies" pursuant to paragraphs 1355.52(i)(1)(iii)(B), 1355.57(a)(2)(ii), and 1355.57(b)(2)(ii)?

(Deleted 02/03/2022)

11. Question: If the title IV-E agency's CCWIS is part of an enterprise system running on a shared platform used by other programs such as child support and Medicaid, what automated functions must the title IV-E agency report on the list of automated functions?

Answer: On the list of automated functions, the title IV-E agency must report:

- The shared platform;
- automated functions that support the child welfare program but are not on the shared platform; and
- automated functions running on the shared platform, such as a document management function, that support the administration of title IV-B and IV-E plans, per 1355.52(i)(1)(ii).

We revised this policy to reduce requirements and provide more flexibility in meeting the CCWIS design requirements.

This question and answer is repeated in the On-going Submission section.

- **Source/Date:** 5/15/20; updated 07/11/2023
- **Legal and Related References:** 45 CFR 95.610; 45 CFR 1355.52(i)(1)(ii); 81 FR 45450 at 35467 – 35468 (issued June 2, 2016); 80 FR 48200 at 48216 – 48217 (issued August 11, 2015)

12. Question: If a title IV-E agency plans to replace an existing automated function does the agency report both the planned and the existing automated function on the automated function checklist per 1355.52(i)(1)(ii)?

Answer: It depends.

If the title IV-E agency reports planned development work on the automated function in an APD, and the schedule indicates that work on that function will start or continue during the current annual APD reporting cycle, the agency will report both the planned and the existing functions on the automated function checklist. For example, if an agency plans to replace an existing automated function to eliminate duplication during the current annual APD reporting cycle, then the agency indicates on the automated function checklist:

1. the planned function that will eliminate duplication and notes it is unduplicated per 1355.52(i)(1)(iii)(B); and
2. the existing function and notes it is duplicated per 1355.52(i)(1)(iii)(B).

However, if ACF does not approve the plan, the agency may be required to revise the automated function checklist.

In this example, if the title IV-E agency does not commit to start or continue to work on the planned automated function within the current annual APD reporting cycle, then the agency reports only the existing automated function on the checklist and notes it is duplicated per 1355.52(i)(1)(iii)(B).

This question and answer is repeated in the On-going submission section.

- **Source/Date:** 09/04/20
- **Legal and Related References:** 45 CFR 95.610(c); 45 CFR 1355.52(i); 81 FR 35450 at 35467 – 35468 (issued June 2, 2016); 80 FR 48200 at 48216 – 48217 (issued August 11, 2016)

13. Question: Regulations at 45 CFR 1355.52(i)(1)(iii)(B), 1355.57(a)(2)(ii), and 1355.57(b)(2)(ii) prohibit a title IV-E agency from claiming Comprehensive Child Welfare Information System (CCWIS) cost allocation for an automated function that is duplicated. When is an automated function considered duplicated within the CCWIS?

Answer: A CCWIS automated function is duplicated within the CCWIS if more than one automated function within the CCWIS itself supports the same child welfare business practice. If automated functions supporting child welfare business processes in the CCWIS are duplicated in a child welfare contributing agency (CWCA), we no longer consider that to conflict with the regulatory requirement for non-duplication. This is because, our initial interpretation is unduly narrow and may be a disincentive for title IV-E agencies to continue to innovate and update the CCWIS and contract with CWCAs for services as needed. Duplication exists only if an automated function for the same child welfare business practice within the CCWIS itself is duplicated, and not across the CCWIS and CWCAs. For example, it is no longer considered a duplicated function if the CCWIS supports foster care placement activities and a CWCA system duplicates that support. Therefore, CCWIS automated functions that are duplicated by automated functions in a CWCA may qualify for CCWIS cost allocation.

This question and answer is repeated in the Cost Allocation for Transitioning Systems and Cost Allocation for New CCWIS sections.

- **Source/Date:** 02/03/2022
- **Legal and Related References:** 45 CFR 1355.52(a)(3); 45 CFR 1355.52(i)(1)(iii)(B); 45 CFR 1355.57(a)(2)(ii) and (b)(2)(ii)

6.10B On-going submission

1. Question: Must title IV-E agencies report electronic data exchanges on the automated functions list pursuant to paragraph 1355.52(i)(1)(ii)?

Answer: Yes. An electronic data exchange is "a computerized process or collection or related processes to achieve a purpose or goal" and therefore is an automated function as defined at paragraph 1355.51(a).

This question and answer is repeated in the Initial Submission section.

- **Source/Date:** 09/19/2019
- **Legal and Related References:** 45 CFR 1355.51(a); 45 CFR 1355.52(i)(1)(ii); 80 FR 48200 at 48204 - 48205 and 48216 (issued August 11, 2015)

2. Question: If the title IV-E agency's CCWIS is part of an enterprise system in which at least one automated function is shared between at least two programs, what automated functions must the title IV-E agency report on the list of automated functions required under 1355.52(i)(1)(ii)? For example, the agency's intake function is part of an enterprise system between child welfare and Medicaid.

Answer: The title IV-E agency must report only automated functions that support the child welfare program on the list of automated functions. This includes: 1) automated functions that only support child welfare; and 2) automated functions that support child welfare and another program. Previous policy required that a title IV-E agency developing or operating a CCWIS as part of an enterprise system report all automated functions of the entire system. We revised this policy to reduce requirements and provide more flexibility in meeting the CCWIS design requirements.

This question and answer is repeated in the Initial Submission section.

- **Source/Date:** 09/19/2019; updated 07/11/2023
- **Legal and Related References:** 45 CFR 95. 605; 45 CFR 95.610; 45 CFR 1355.52(i)(1)(ii) and 1355.53(a); 80 FR 48200 at 48216 - 48218 (issued August 11, 2015)

3. Question: If the title IV-E agency's CCWIS is part of an enterprise system running on a shared platform used by other programs such as child support and Medicaid, what automated functions must the title IV-E agency report on the list of automated functions?

Answer: On the list of automated functions, the title IV-E agency must report:

- The shared platform;
- automated functions that support the child welfare program but are not on the shared platform; and
- automated functions running on the shared platform, such as a document management function, that support the administration of title IV-B and IV-E plans, per 1355.52(i)(1)(ii).

We revised this policy to reduce requirements and provide more flexibility in meeting the CCWIS design requirements.

This question and answer is repeated in the Initial Submission section.

- **Source/Date:** 5/15/20; updated 07/11/2023
- **Legal and Related References:** 45 CFR 95.610; 45 CFR 1355.52(i)(1)(ii); 81 FR 45450 at 35467 – 35468 (issued June 2, 2016); 80 FR 48200 at 48216 – 48217 (issued August 11, 2015)

4. Question: If a title IV-E agency plans to replace an existing automated function does the agency report both the planned and the existing automated function on the automated function checklist per 1355.52(i)(1)(ii)?

Answer: It depends.

If the title IV-E agency reports planned development work on the automated function in an APD, and the schedule indicates that work on that function will start or continue during the current annual APD reporting cycle, the agency will report both the planned and the existing functions on the automated function checklist. For example, if an agency plans to replace an existing automated function to eliminate duplication during the current annual APD reporting cycle, then the agency indicates on the automated function checklist:

3. the planned function that will eliminate duplication and notes it is unduplicated per 1355.52(i)(1)(iii)(B); and

4. the existing function and notes it is duplicated per 1355.52(i)(1)(iii)(B).

However, if ACF does not approve the plan, the agency may be required to revise the automated function checklist.

In this example, if the title IV-E agency does not commit to start or continue to work on the planned automated function within the current annual APD reporting cycle, then the agency reports only the existing automated function on the checklist and notes it is duplicated per 1355.52(i)(1)(iii)(B).

This question and answer is repeated in the Initial submission section.

- **Source/Date:** 09/04/20
- **Legal and Related References:** 45 CFR 95.610(c); 45 CFR 1355.52(i); 81 FR 35450 at 35467 – 35468 (issued June 2, 2016); 80 FR 48200 at 48216 – 48217 (issued August 11, 2016)

6.11 Other APD requirements

1. Question: Which Advance Planning Document (APD) regulations apply to CCWIS projects below the APD thresholds described at 45 CFR 95.611?

Answer: A title IV-E agency claiming title IV-E federal financial participation (FFP) for CCWIS projects below the APD submission thresholds at 45 CFR 95.611 is subject to certain portions of the APD rules that are necessary for effective project management per paragraph 1355.52(j), including:

- 95.613 - Procurement standards;
- 95.615 - Access to systems and records;
- 95.617 - Software and ownership rights;
- 95.619 - Use of Automated Data Processing (ADP) systems;
- 95.621 - Automated Data Processing (ADP) Reviews;

- 95.626 - Independent Verification and Validation;
 - 95.627 - Waivers;
 - 95.631 - Cost identification for purpose of FFP claims;
 - 95.633 - Nondiscrimination requirements;
 - 95.635 - Disallowance of FFP for automated systems that fail to comply substantially with requirements; and
 - 95.641 - Applicability of rules for charging equipment in Subpart G.
- **Source/Date:** 11/09/16
 - **Legal and Related References:** 45 CFR 95, Subpart F; 45 CFR 1355.52(j); 80 FR 48200 at 48217 (issued August 11, 2016)

2. Question: Which Advance Planning Document (APD) regulations apply to CCWIS projects at or above the APD thresholds described at 45 CFR 95.611?

Answer: CCWIS projects claiming title IV-E federal financial participation (FFP) with costs above the thresholds in 45 CFR 95.611 (currently \$5 million total project cost) continue to be subject to all of the provisions of 45 CFR part 95, subpart F, including submission of APDs. For these over threshold projects, application of the APD rules does not change.

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 95, Subpart F; 45 CFR 1355.30(k); 45 CFR 1355.52(j); 80 FR 48200 at 48217 (issued August 11, 2016)

6.12 Design requirements

1. Question: Are title IV-E agencies that transition S/TACWIS and non-S/TACWIS systems to CCWIS required to rebuild existing system components to comply with the CCWIS design requirements?

Answer: No. Paragraph 1355.53(b)(1) exempts CCWIS automated functions from one or more of the CCWIS design requirements in paragraph 1355.53(a) if the CCWIS project meets the submission requirements of paragraph 1355.56(b) or paragraph 1355.56(f)(1). This will reduce the costs of transitioning these systems to CCWIS.

- **Source/Date:** 01/11/2017
- **Legal and Related References:** 45 CFR 1355.53; 81 FR 35450 at 35468 - 35469 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 (issued August 11, 2015)

2. Question: Must the title IV-E agency follow the CCWIS design requirements described in 1355.53(a) for development work done after July 31, 2018 on automated functions of a system transitioning to a CCWIS?

Answer: Yes, unless exempted by paragraph 1355.53(b)(2).

This question and answer is repeated in the Cost Allocation for Transitioning Systems section.

- **Source/Date:** 4/2/2020
- **Legal and Related References:** 45 CFR 1355.53; 45 CFR 1355.57(a); 81 FR 35450 at 35468 - 35471 and 35474 - 35475 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 and 48221 (issued August 11, 2015)

3. Question: Must the title IV-E agency comply with the CCWIS design requirements described in paragraph 1355.53(a) for maintenance done after July 31, 2018 on automated functions of a system transitioning to a CCWIS?

Answer: It depends.

If an automated function's development is exempt from the CCWIS design requirements pursuant to paragraph 1355.53(b), the title IV-E agency's maintenance work on the automated function is not required to comply with the CCWIS design requirements.

If an automated function's development complies with the CCWIS design requirements, the title IV-E agency's maintenance work on the automated function must comply with the design requirements unless exempted by paragraph 1355.53(b)(2).

This question and answer is repeated in the Cost Allocation for Transitioning Systems section.

- **Source/Date:** 4/2/2020
- **Legal and Related References:** 45 CFR 1355.53; 45 CFR 1355.57(a); 81 FR 35450 at 35468 - 35471 and 35474 - 35475 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 and 48221 (issued August 11, 2015)

6.12A Automated function requirements

1. Question: If the title IV-E agency uses commercial-off-the-shelf (COTS) software or a Software-as-a-Service (SaaS) system owned or maintained by a vendor, must it meet the CCWIS design requirements of paragraph 1355.53(a)?

Answer: No. Paragraph 1355.53(a) does not apply to proprietary COTS or SaaS systems owned or maintained by vendors. Federal financial participation is not available to develop proprietary COTS products or SaaS systems pursuant to 45 CFR 95.617(c), therefore, they

are not required to be developed in accordance with the design requirements at 1355.53(a).

- **Source/Date:** 01/11/2017
- **Legal and Related References:** 45 CFR 1355.53; 81 FR 35450 at 35470 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 (issued August 11, 2015)

2. Question: May a title IV-E agency propose an alternative design for their CCWIS that does not meet one or more of the CCWIS design requirements of paragraph 1355.53(a)?

Answer: Yes. A title IV-E agency may propose an alternative CCWIS design for ACF review pursuant to paragraph 1355.53(b)(2). If ACF determines that the alternative design is more efficient, economical, and effective than what is found in paragraph 1355.53(a), then the CCWIS automated function may be exempted from one or more of the CCWIS design requirements of paragraph 1355.53(a).

- **Source/Date:** 01/11/2017
- **Legal and Related References:** 45 CFR 1355.53; 81 FR 35450 at 35470 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 (issued August 11, 2015)

3. Question: Are title IV-E agencies transitioning from a S/TACWIS or non-S/TACWIS system to CCWIS, required to implement data exchanges consistent with CCWIS design requirements of paragraph 1355.53(a)?

Answer: It depends. If the data exchange was developed prior to, or during the CCWIS transition period, it may be exempted from one or more of the CCWIS design requirements if the CCWIS project meets the requirements of paragraphs 1355.56(b) or (f)(1). If the data exchange was developed after the CCWIS transition period, then it must meet the CCWIS design requirements in order to qualify for CCWIS developmental cost allocation unless ACF approves, on a case-by-case basis, an alternative design proposed by a title IV-E agency that is determined by ACF to be more efficient, economical, and effective, pursuant to 1355.53(b)(2).

This question and answer is repeated in the Data Exchanges section.

- **Source/Date:** 01/11/2017
- **Legal and Related References:** 45 CFR 1355.53(b); 45 CFR 1355.57(a); 81 FR 35450 at 35470 and 35473 - 35474 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 and 48220 - 48221 (issued August 11, 2015)

4. Question: We understand that a title IV-E agency that is transitioning from a S/TACWIS to CCWIS receives S/TACWIS development funding for automated functions developed during the transition period per paragraph 1355.56(a), regardless of whether the automated function meets the CCWIS design requirements of paragraph

1355.53(a). However, if the title IV-E agency has not completed developing the automated function by the end of the transition period, may the title IV-E agency continue to receive CCWIS development funding for completing work on the automated function after the transition period?

Answer: It depends. All development of automated functions done after the transition period on a S/TACWIS transitioning to CCWIS must meet the CCWIS design requirements of paragraph 1355.53(a) unless, pursuant to paragraph 1355.53(b)(2), ACF determines that the alternative design proposed by the agency is more efficient, economical, and effective than the CCWIS design requirements. If ACF makes such a determination, the automated functions may qualify for CCWIS development cost allocation.

- **Source/Date:** 01/11/2017
- **Legal and Related References:** 45 CFR 1355.53; 45 CFR 1355.57(a) and (e); 81 FR 35450 at 35470 and 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 and 48220 - 48222 (issued August 11, 2015)

5. Question: Must a title IV-E agency design CCWIS automated functions to reside on specific hardware, such as individual user workstations?

Answer: No. The CCWIS design requirements at 1355.53(a) do not specify how automated functions must be configured.

- **Source/Date:** 10/25/2017
- **Legal and Related References:** 45 CFR 1355.53(a); 81 FR 35450 at 35468 - 35470 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 (issued August 11, 2015)

6. Question: If the title IV-E agency uses an automated function that allow users to access CCWIS from other devices, such as mobile phones, would those functions qualify for CCWIS development cost allocation?

Answer: Yes, provided the automated function is documented in the automated function list pursuant to 1355.52(i)(1)(ii) - (iii), and:

1. is included in the CCWIS;
2. supports at least one requirement of section 1355.52 or, if applicable section 1355.54;
3. is not duplicated within the CCWIS or systems supporting child welfare contributing agencies and is consistently used by all child welfare users responsible for the area supported by the automated function; and
4. complies with the CCWIS design requirements of paragraph 1355.53(a), unless exempted in accordance with paragraph 1355.53(b).

- **Source/Date:** 2/12/2018
- **Legal and Related References:** 45 CFR 95.610; 45 CFR 1355.52(i)(1); 45 CFR 1355.53; 81 FR 35450 at 35467 - 35471 (issued June 2, 2016); 80 FR 48200 at 48216 - 48218 (issued August 11, 2015)

7. Question: If ACF approves a title IV-E agency's plan to transition an existing system to CCWIS prior to July 31 2018, must all development work done after ACF's approval comply with the CCWIS design requirements of 1355.53(a)?

Answer: No. A title IV-E agency's compliance with CCWIS design requirements is based on the transition period end date of July 31, 2018, not the date of ACF's approval of the plan to transition an existing system to CCWIS.

Development work completed on a transitioning system on or before July 31, 2018 is exempt from the CCWIS design requirements of paragraph 1355.53(a).

Development work performed on a transitioning system after July 31, 2018 must meet the CCWIS design requirements unless exempted by 1355.53(b)(2), pursuant to paragraph 1355.57(a).

This question and answer is repeated in the transition period section.

- **Source/Date:** 2/12/2018
- **Legal and Related References:** 45 CFR 1355.52(i)(1); 45 CFR 1355.53; 45 CFR 1355.57(a); 81 FR 35450 at 35467 - 35471 and 35473 - 35474 (issued June 2, 2016); 80 FR 48200 at 48216 - 48218 and 48220 - 48221 (issued August 11, 2015)

8. Question: Must a title IV-E agency apply for a waiver to receive federal financial participation (FFP) if it wants to use commercial-off-the-shelf (COTS) software products described in paragraph 45 CFR 95.617(c)?

Answer: Yes. In order to receive FFP for COTS products described in paragraph 45 CFR 95.617(c), the agency must request a waiver pursuant to 45 CFR 95.627.

- **Source/Date:** 2/12/2018
- **Legal and Related References:** 45 CFR 1355.30(k); 45 CFR 1355.52(j); 45 CFR 95.617(c); 45 CFR 95.627; 80 FR 48200 at 48217 (issued August 11, 2015)

6.12A.1 Modularity

6.12A.2 Plain language

6.12A.3 Development standard

1. Question: Is a title IV-E agency required to use one development standard for all automated functions per paragraph 1355.53(a)(3) (which could limit the agency's flexibility in implementing CCWIS) or is it permissible for the title IV-E agency to use different development standards for different automated functions?

Answer: The title IV-E agency is required per paragraph 1355.53(a)(3) to use a single development standard. However, title IV-E agencies may select a development standard that accommodates variations in their development approach. For example, the development standard may apply certain requirements for one set of conditions and other requirements for other conditions.

- **Source/Date:** 01/11/2017
- **Legal and Related References:** 45 CFR 1355.53; 81 FR 35450 at 35470 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 (issued August 11, 2015)

6.12A.4 Reuse

1. Question: Paragraph 1355.53(a)(4) requires that automated functions are "capable of being shared"? What are the processes by which title IV-E agencies share components?

Answer: There are two general processes by which title IV-E agencies may share components.

First, ACF may request software and associated documents for the federal repository per requirements at paragraph 1355.52(h). ACF may then share these products with title IV-E agencies at the agency's request.

Second, title IV-E agencies may directly share products with other agencies.

- **Source/Date:** 01/11/2017
- **Legal and Related References:** 45 CFR 1355.53; 81 FR 35450 at 35470 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 (issued August 11, 2015)

2. Question: Paragraph 1355.53(a)(4) requires that automated functions be capable of reuse. Does this mean title IV-E agencies are required to make automated functions "plug and play"?

Answer: No, paragraph 1355.53(a)(4) does not require title IV-E agencies to make automated functions adaptable to different hardware configurations without manual configuration (plug and play).

- **Source/Date:** 01/11/2017
- **Legal and Related References:** 45 CFR 1355.53; 81 FR 35450 at 35470 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 (issued August 11, 2015)

3. Question: If ACF places a CCWIS automated function in the federal repository described in paragraph 1355.52(h) and it is not selected by another agency for re-use, does that mean the automated function did not comply with the reuse requirement of paragraph 1355.53(a)(4)?

Answer: No. Paragraph 1355.53(a)(4) requires that automated functions be "capable of being shared, leveraged, and reused." The regulation does not require modules be reused when it is not appropriate, such as when a module does not support an agency's business processes.

- **Source/Date:** 01/11/2017
- **Legal and Related References:** 45 CFR 1355.53; 81 FR 35450 at 35470 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 (issued August 11, 2015)

6.12B Design waivers

6.13 CCWIS options

1. Question: Are all CCWIS data exchanges required to be bi-directional?

Answer: No. Paragraph 1355.52(e) requires eleven mandatory bi-directional data exchanges. However, optional data exchanges approved by ACF pursuant to section 1355.54 may be uni-directional data exchanges. Exchanges benefiting the title IV-B or IV-E programs may be eligible for CCWIS funding, but exchanges not benefiting the title IV-B or IV-E programs must be cost allocated to the benefiting program or programs.

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 1355.54; 81 FR 35450 at 35471 (issued June 2, 2016); 80 FR 48200 at 48218 - 48219 (issued August 11, 2015)

2. Question: May title IV-E agencies establish data exchanges with private entities that are not defined as child welfare contributing agencies (CWCAs), such as providers of substance abuse, mental health and other treatment services pursuant to section 1355.54?

Answer: Yes, with ACF approval.

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 1355.54; 81 FR 35450 at 35453 and 35471 (issued June 2, 2016); 80 FR 48200 at 48218 - 48219 (issued August 11, 2015)

3. Question: May title IV-E agencies build data exchanges with other Federal entities such as the Social Security Administration or with state or tribal agencies, such as departments of labor and employment pursuant to section 1355.54?

Answer: Yes, with ACF approval.

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 1355.54; 81 FR 35450 at 35471 (issued June 2, 2016); 80 FR 48200 at 48218 - 48219 (issued August 11, 2015)

4. Question: Are state title IV-E agencies required to build electronic data exchanges with federally recognized Indian tribes to comply with the requirements of paragraph 1355.52(b)(3) regarding the Indian Child Welfare Act (ICWA)?

Answer: No. State title IV-E agencies are not required to build a data exchange between CCWIS and federally recognized Indian tribes. However, a state title IV-E agency may propose such a data exchange for ACF approval pursuant to section 1355.54.

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 1355.52(b)(3); 45 CFR 1355.54; 45 CFR 1355.57; 81 FR 35450 at 35455, 35471 and 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48207 - 48208, 48218 - 48219, and 48220 - 48222 (issued August 11, 2015)

5. Question: How must the title IV-E agency cost allocate development, operational and equipment costs for portions of a CCWIS that benefit the juvenile justice program?

Answer: Pursuant to 1355.57 (e) and (f) and as described at 80 FR 48200 at 48220, development costs that benefit both the title IV-E program and the juvenile justice program may be allocated to the title IV-E program.

Pursuant to 1355.57 (e) and (f) and 45 CFR 95.631(a), development costs must be allocated to the juvenile justice program for:

- Enhancements made to automated functions benefitting a juvenile justice program, but not the title IV-E program.
- Automated functions only benefitting the juvenile justice program.

Pursuant to 45 CFR 95.631(b), operational costs may be allocated to the title IV-E program in proportion to the use of the CCWIS by the title IV-E program versus use by the juvenile justice program. Operational costs must be allocated to the juvenile justice program in proportion to the use of the system to support the non-title IV-E juvenile justice program.

Equipment costs are allocated to the title IV-E program in proportion to its use by workers of the title IV-E program versus the juvenile justice program.

- **Source/Date:** 10/26/2017

- **Legal and Related References:** 45 CFR 1355.54; 45 CFR 1355.57; 45 CFR 95.631 81 FR 35450 at 35471 and 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48218 - 48222 (issued August 11, 2015)

6. Question: If a title IV-E agency elects to support the Interstate Compact on the Placement of Children (ICPC) with a bi-directional data exchange between CCWIS and the National Electronic Interstate Compact Enterprise (NEICE) Clearinghouse, must this data exchange comply with the single data exchange standard requirements of 1355.52(f)?

Answer: No. Only CCWIS bi-directional data exchanges with child welfare contributing agencies (CWCAs) and/or external systems used by IV-E agency staff to collect CCWIS data are required to comply with the single data exchange standard requirements of 1355.52(f). The NEICE Clearinghouse is not a CWCA, as defined at paragraph 1355.51, because the Clearinghouse does not provide the services of "child abuse and neglect investigations, placement, or child welfare case management (or any combination of these) to children and families." The Clearinghouse is not an external system as described in the regulation at 1355.52(e)(1)(iv) because it lacks features that enable workers to directly enter CCWIS data.

- **Source/Date:** 2/12/2018
- **Legal and Related References:** 45 CFR 1355.51; 45 CFR 1355.52(e)(1)(iv); 45 CFR 1355.52(f); 81 FR 35450 at 35453, 35461 - 35464, and 35466 - 35467 (issued June 2, 2016); 80 FR 48200 at 48205, 48211 - 48212, and 48215 - 48216 (issued August 11, 2015)

7. Question: Must an optional data exchange encompass all similar entities located within the state or tribal jurisdiction? For example, if a state title IV-E agency builds an optional data exchange between CCWIS and a hospital, is the agency required to extend the data exchange to all hospitals in the state?

Answer: No. The regulations for CCWIS do not require that an optional data exchange is state or tribal wide.

However, if a title IV-E agency implements an optional data exchange it must be described in the agency's approved Advance Planning Document (APD). Therefore, if ACF approves a title IV-E agency's APD to implement a data exchange between CCWIS and a hospital, then the agency must build it. However, the agency is not required to extend the optional data exchange to hospitals that were not included in the plan submitted in the APD.

- **Source/Date:** 06/15/2022
- **Legal and Related References:** 45 CFR 1355.54; 45 CFR 1355.55; 80 FR 48200 at 48219 (issued August 11, 2015)

8. Question: Does the CCWIS single data exchange standard described in 45 CFR 1355.52(f) apply to optional data exchanges?

Answer: No. The regulations for CCWIS do not require that optional data exchanges meet the single data exchange standard described at 45 CFR 1355.52(f).

This question and answer is repeated in the Data exchange standard section.

- **Source/Date:** 06/15/2022
- **Legal and Related References:** 45 CFR 1355.52(f); 45 CFR 1355.54; 45 CFR 1355.55; 80 FR 48200 at 48219 (issued August 11, 2015)

9. Question: Do the CCWIS data quality requirements described in 45 CFR 1355.52(d) apply to the optional data exchanges and automated functions described at 45 CFR 1355.54?

Answer: Yes. Regardless of how data is collected, all CCWIS data must meet the CCWIS data quality requirements described at 45 CFR 1355.52(d).

This question and answer is repeated in the Data quality section.

- **Source/Date:** 06/15/2022
- **Legal and Related References:** 45 CFR 1355.52(d); 45 CFR 1355.54

6.14 CCWIS reviews

1. Question: Will ACF review CCWIS projects over Advance Planning Document (APD) thresholds and CCWIS projects under these thresholds in accordance with the same review and assessment process described in section 1355.55?

Answer: Yes. ACF will review, assess and inspect the planning, design, development, installation, operation and maintenance of each CCWIS project on a continuing basis to determine the extent to which the project meets CCWIS requirements, regardless of whether the project was over or under the \$5 million APD threshold.

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 95.611, 45 CFR 1355.55; 81 FR 35450 at 35471 (issued June 2, 2016); 80 FR 48200 at 48219 (issued August 11, 2015)

2. Question: What data quality metrics will ACF use during the CCWIS reviews described at paragraph 1355.55?

Answer: ACF will use the standards in federal laws, regulations, and policies for evaluating data quality for federally required data described in section 1355.52(b)(1). We will apply the standards established by the state or tribe when evaluating the quality of required data

described in section 1355.52 (b)(2). If two or more standards apply to the same data, ACF will apply the more rigorous standard, per 1355.52(d)(1)(i) in reviewing data quality. For example, if one standard required updating certain CCWIS data in seven days and a second standard set a two-day limit, we will hold the title IV-E agency to the two-day limit.

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 1355.52(b)(1) - (2); 1355.52(d)(1); 45 CFR 1355.55; 81 FR 35450 at 35454 - 35455, 35457 and 35471 (issued June 2, 2016); 80 FR 48200 at 48207 - 48209 and 48219 (issued August 11, 2015)

3. Question: Will ACF conduct CCWIS reviews as described in section 1355.55 solely based on the title IV-E agency's CCWIS data quality plan submitted per paragraph 1355.52(d)(5)?

Answer: No. During a CCWIS review described by section 1355.55, ACF will review the extent to which the CCWIS project meets requirements in sections 1355.52, 1355.53, 1355.56, and, if applicable, 1355.54 which will include, but is not limited to a review of the title IV-E agency's data quality plan.

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 1355.52(d)(5); 45 CFR 1355.55; 81 FR 35450 at 35460 - 35461 and 35471 (issued June 2, 2016); 80 FR 48200 at 48211 and 48219 (issued August 11, 2015)

4. Question: Are title IV-E agencies required to conduct an independent verification and validation (IV&V) review for CCWIS design, implementation, and data quality reviews as part of the CCWIS review process?

Answer: No. Section 1355.55 does not specifically require title IV-E agencies to conduct an IV&V review as part of the CCWIS review process. However, ACF may require a title IV-E agency to complete an IV&V per Advance Planning Document (APD) regulations at 45 CFR 95.626.

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 95.626; 45 CFR 1355.55; 81 FR 35450 at 35471 - 35472 (issued June 2, 2016); 80 FR 48200 at 48219 (issued August 11, 2015)

6.15 Transition Period

1. Question: What requirements must a title IV-E agency with a S/TACWIS meet if the agency does not build a CCWIS?

Answer: A title IV-E agency with a S/TACWIS project that elects not to transition to a CCWIS must:

1. notify ACF by July 31, 2018 in an Advance Planning Document (APD) or Notice of Intent that it will not transition the S/TACWIS project to CCWIS; and
2. continue to use the S/TACWIS through its life expectancy in accordance with 45 CFR 95.619.

The title IV-E agency must also continue to meet the APD requirements at 45 CFR 95, Subpart F per 1355.30(k).

- **Source/Date:** (9/14/16)
- **Legal and Related References:** 45 CFR 95, Subpart F; 45 CFR 1355.30(k); 45 CFR 1355.56(d); 81 FR 35450 at 35473 (June 2, 2016); 80 FR 48200 at 48220 (August 11, 2015)

2. Question: What are the consequences if a title IV-E agency with a S/TACWIS fails to notify ACF by July 31, 2018 that the agency will not transition to CCWIS?

Answer: The title IV-E agency may be subject to recoupment of all title IV-E funds for the project per 45 1355.56(e)

- **Source/Date:** (9/14/16)
- **Legal and Related References:** 45 CFR 1355.56(e); 45 CFR 1358; 45 CFR 95.635(b); 81 FR 35450 at 35473 (June 2, 2016); 80 FR 48200 at 48220 and 48222 (August 11, 2015)

3. Question: Are CCWIS projects subject to all Advance Planning Document (APD) regulations at 45 CFR 95 Subpart F?

Answer: It depends on whether the CCWIS project is at, above, or below the APD thresholds.

CCWIS projects at or above the APD thresholds at 45 CFR 95.611 are subject to all the APD regulations at 45 CFR 95 Subpart F.

CCWIS projects below the APD thresholds at 45 CFR 95.611 are subject to only the APD regulations at 45 CFR 95.613 through 95.621 and 95.626 through 95.641.

- **Source/Date:** (9/14/16)
- **Legal and Related References:** 45 CFR 1355.30(k); 45 CFR 1355.52(j); 80 FR 48200 at 48217 (August 11, 2015)

4. Question: Is there specific language that a title IV-E agency must use to notify ACF that the agency does not intend to transition a S/TACWIS to CCWIS?

Answer: No. 1355.56(d) requires the agency to notify ACF in an APD or Notice of Intent submitted during the transition period that the agency does not elect to transition a S/TACWIS project to CCWIS. The required notification must convey the message that the IV-E agency does not elect to transition the S/TACWIS project to CCWIS.

- **Source/Date:** (9/14/16)
- **Legal and Related References:** 45 CFR 1355.56(d)(1); 81 FR 35450 at 35473 (issued June 2, 2016)

5. Question: What requirements must a title IV-E agency with a non-S/TACWIS meet if the agency does not build a CCWIS?

Answer: The title IV-E agency must continue to meet the APD requirements at 45 CFR 95, Subpart F.

- **Source/Date:** (9/14/16)
- **Legal and Related References:** Section 474(a)(C) of title IV-E of the Social Security Act

6. Question: Are there financial consequences for using a former S/TACWIS as a non-CCWIS beyond the 24 month transition period ending on July 31, 2018?

Answer: It depends. There are no consequences in the CCWIS regulations for using a former S/TACWIS as a non-CCWIS provided the title IV-E agency:

notifies ACF by July 31, 2018 in an APD or Notice of Intent, that it will not transition the S/TACWIS project to CCWIS; and

- continues to use the S/TACWIS through its life expectancy in accordance with 45 CFR 95.619.

The title IV-E agency must also continue to meet the APD requirements at 45 CFR 95, Subpart F per 1355.30(k).

However, if the title IV-E agency does not meet these requirements, the agency may be subject to funding recoupment.

- **Source/Date:** (9/14/16)
- **Legal and Related References:** 45 CFR 95, Subpart F; 45 CFR 1355.30(k); 45 CFR 1355.56(d) and (e); 45 CFR 1358; 81 FR 35450 at 35473 (June 2, 2016); 80 FR 48200 at 48220 and 48222 (August 11, 2015)

7. Question: If a S/TACWIS does not transition to CCWIS and meets the notification and continued-use requirements of 1355.56(d), what cost allocation does the S/TACWIS qualify for both during and after the transition period?

Answer: Through July 31, 2018, the S/TACWIS may continue to claim title IV-E funding according to the cost allocation methodology approved by ACF for the development or the operational cost allocation plan approved by the Department or both.

After July 31, 2018, ACF will classify the system as a non-CCWIS. The non-CCWIS may qualify for non-CCWIS cost allocation.

- **Source/Date:** (9/14/16)
- **Legal and Related References:** 45 CFR 1355.56(a); 45 CFR 1355.57(f); 45 CFR 1356.60(d); 81 FR 35450 at 35472 - 35473 and 35475 (June 2, 2016); 80 FR 48200 at 48219 - 48220 and 48222 (August 11, 2016)

8. Question: If a title IV-E agency decides to build a new CCWIS, transition a S/TACWIS to CCWIS, or transition a non-S/TACWIS to CCWIS, what CCWIS requirements must the agency meet before claiming funding in accordance with a CCWIS cost allocation?

Answer: A title IV-E agency must notify ACF of the decision before claiming funding in accordance with a CCWIS cost allocation. The agency must meet the requirements of 1355.52(i)(1) when formally conveying the decision to ACF. Paragraph 1355.52(i)(1) requires that the agency provide the following documents:

- an Advance Planning Document (APD) (if the CCWIS project is over the APD thresholds defined at 45 CFR 95.611) or a Notice of Intent (if the CCWIS project is under APD thresholds);
- a description of how the planned CCWIS will meet the CCWIS project requirements found in 1355.52(a) - (h), and if applicable, any optional exchanges or functions included in the CCWIS as allowed under 1355.54; and
- a list of all automated functions planned for the CCWIS including, for each automated function:
 - if the automated function supports a requirement of section 1355.52 (CCWIS Project Requirements) or section 1355.54 (CCWIS Options);
 - if the automated function is not duplicated within the CCWIS or systems supporting child welfare contributing agencies and is consistently used by all child welfare users responsible for the area supported by the automated function; and,
 - if the automated function complies with paragraph 1355.53(a) (CCWIS Design Requirements), unless exempted from the design requirements by one of the conditions described in paragraph 1355.53(b).

The title IV-E agency must provide the above documents to ACF by July 31, 2018 (the end of the transition period) if transitioning a S/TACWIS to CCWIS or transitioning a non-S/TACWIS to CCWIS.

- **Source/Date:** (9/15/16)
- **Legal and Related References:** 45 CFR 1355.52(i)(1); 45 CFR 1355.56(b); 45 CFR 1355.56(f)(1); 80 FR 48216 - 48217 and 48219 - 48220 (August 11, 2016)

9. Question: Do the CCWIS design requirements listed in 1355.53(a) apply to a S/TACWIS or non-S/TACWIS project transitioning to CCWIS?

Answer: It depends. For S/TACWIS or non-S/TACWIS projects, the CCWIS design requirements do not apply to automated functions developed on or before July 31, 2018 (the end of the transition period).

The CCWIS design requirements apply to automated functions developed after July 31, 2018 unless ACF approves technical advances in design proposed by the title IV-E agency that ACF determines to be more efficient, economical and effective than the CCWIS design requirements listed in paragraph 1355.53(a).

- **Source/Date:** (9/15/16)
- **Legal and Related References:** 45 CFR 1355.53; 45 CFR 1355.57(a); 80 FR 48200 at 48217 - 48218 and 48221; 81 FR 35450 at 35468 - 35471 and 35474 - 35475

10. Question: Must a S/TACWIS or non-S/TACWIS transitioning to CCWIS meet all CCWIS project requirements described at 1355.52?

Answer: Yes.

- **Source/Date:** (9/15/16)
- **Legal and Related References:** 45 CFR 1355.52

11. Question: Do the CCWIS design requirements listed in 1355.53(a) apply to a new CCWIS?

Answer: It depends. The CCWIS design requirements apply to all automated functions of a new CCWIS unless ACF approves technical advances in design proposed by the title IV-E agency that ACF determines to be more efficient, economical and effective than the CCWIS design requirements listed in paragraph 1355.53(a).

- **Source/Date:** (9/15/16)
- **Legal and Related References:** 45 CFR 1355.53; 45 CFR 1355.57(b); 80 FR 48200 at 48217 - 48218 and 48221; 81 FR 35450 at 35468 - 35471 and 35474 - 35475

12. Question: Must CCWIS projects be operational by the end of the transition period on July 31, 2018?

Answer: No. CCWIS projects are not required to be operational by the end of the transition period on July 31, 2018.

July 31, 2018 is the deadline by which a title IV-E agency with a S/TACWIS or non-S/TACWIS must notify ACF of the decision to either transition or not transition the system to a CCWIS.

- **Source/Date:** (9/15/16)
- **Legal and Related References:** 45 CFR 1355.56(b), (d), and (f)(1); 80 FR 48200 at 48204 and 48219 - 48220; 81 FR 35472 - 35473

13. Question: If a title IV-E agency transitions a S/TACWIS or non-S/TACWIS to CCWIS, can it replace this CCWIS with a new CCWIS at a later date?

Answer: Yes. A title IV-E agency may initiate a new CCWIS project at any time.

- **Source/Date:** (9/15/16)
- **Legal and Related References:** 45 CFR 1355.56(c) and (f)(2); 80 FR 48200 at 48204 and 48219

14. Question: If a title IV-E agency does not have the resources to begin a new CCWIS project during the transition period, may the agency begin a new CCWIS project after the transition period?

Answer: Yes. A title IV-E agency may begin a new CCWIS project after the transition period. The CCWIS regulations do not establish deadlines for starting a new CCWIS project.

- **Source/Date:** (9/15/16)
- **Legal and Related References:** 45 CFR 1355.56(c) and (f)(2); 80 FR 48200 at 48204 and 48219

15. Question: May a title IV-E agency make changes to the list of automated functions submitted per 1355.52(i)(1)?

Answer: Yes. The title IV-E agency must submit an updated list of CCWIS automated functions in their Annual Advance Planning Document (APD) or Operational APD, as appropriate, that identifies any revisions to the CCWIS automated functions.

- **Source/Date:** (9/15/16)
- **Legal and Related References:** 45 CFR 1355.52(i)(2); 80 FR 48200 at 48217

16. Question: During the 24 month transition period (August 1, 2016 - July 31, 2018), must a title IV-E agency get ACF approval before implementing enhancements to its S/TACWIS project?

Answer: It depends. Depending on the scope of the change and the status of the Implementation Advance Planning Document (APD), the agency would either seek approval or report changes in an As Needed, Annual or Operational APD in accordance with 45 CFR 95, Subpart F.

- **Source/Date:** (9/15/16)
- **Legal and Related References:** 45 CFR 95, Subpart F

17. Question: Must title IV-E agencies with a S/TACWIS that is not compliant with all S/TACWIS requirements continue to work toward S/TACWIS compliance?

Answer: No. As of August 1, 2016, the CCWIS regulations are effective and replace S/TACWIS regulations. Therefore, the S/TACWIS regulations are no longer applicable.

- **Source/Date:** (9/15/16)
- **Legal and Related References:** 81 CFR 35450 at 35450 and 35473

18. Question: What federal financial participation (FFP) rate are S/TACWIS projects eligible for during the August 1, 2016 - July 31, 2018 transition period?

Answer: S/TACWIS projects are eligible for 50% FFP for the share of project costs allocable to title IV-E during the August 1, 2016 - July 31, 2018 transition period.

This question and answer is repeated in the Cost Allocation for Transitioning Systems section.

- **Source/Date:** 11/09/16
- **Legal and Related References:** Section 474(a)(3)(C) and (D) of the Social Security Act; 45 CFR 1355.56(a); 80 FR 48200 at 48291 (issued August, 11, 2015); 81 FR 35450 at 35472 (issued June 2, 2016)

19. Question: What cost allocation methodologies are S/TACWIS projects eligible for during the August 1, 2016 - July 31, 2018 transition period for development and operational costs?

Answer: During the August 1, 2016 - July 31, 2018 transition period, title IV-E agencies with a S/TACWIS project may claim title IV-E funding according to the cost allocation methodology approved by ACF for development or the operational cost allocation plan approved by the Department, or both, per paragraph 1355.56(a).

Activities and costs must be eligible for title IV-E funding and be described in an applicable APD, per 46 CFR 95.610.

This question and answer is repeated in the Cost Allocation for Transitioning Systems section.

- **Source/Date:** 11/09/16
- **Legal and Related References:** Section 474(c) of the Social Security Act; 45 CFR 1355.56(a); 45 CFR 95.610; 81 FR 35472 (issued June 2, 2016); 80 FR 48219 (issued August 11, 2015)

20. Question: May a title IV-E agency use their existing S/TACWIS cost allocation methodology for continued S/TACWIS work after the 24-month transition period?

Answer: No. The existing S/TACWIS cost allocation methodology is only available for S/TACWIS projects and related project costs during the 24-month transition period from August 1, 2016 - July 31, 2018, per paragraph 1355.56(a).

After the transition period ends on July 31, 2018, S/TACWIS projects that have transitioned to CCWIS may receive CCWIS cost allocation per 1355.57(a). S/TACWIS projects that have been classified as non-CCWIS may receive non-CCWIS cost allocation per 1355.57(f).

This question and answer is repeated in the Cost Allocation for Transitioning Systems section.

- **Source/Date:** 11/09/16
- **Legal and Related References:** 45 CFR 1355.56(a); 45 CFR 1357(a), (c), (e), and (f); 81 FR 35472, 35474 - 35475 (issued June 2, 2016); 80 FR 48219, 48221 - 48222 (issued August 11, 2015)

21. Question: What requirements must a title IV-E agency's S/TACWIS or non-S/TACWIS system transitioning to a CCWIS meet to qualify for CCWIS cost allocation?

Answer: The title IV-E agency must ensure that the transitioning system, when completed, 1) meets the CCWIS project requirements at section 1355.52; and, 2) all automated functions developed after July 31, 2018 must meet the CCWIS design requirements of section 1355.53. The title IV-E agency must also have an approved operational cost allocation plan for their CCWIS, effective October 1, 2019, pursuant to 45 CFR 95.631(b).

If the system meets the above requirements, ACF separately evaluates each automated function. An automated function may qualify for CCWIS cost allocation if it meets three conditions pursuant to section 1355.57(a)(2). Those conditions are: 1) the automated function supports programs authorized under titles IV-B or IV-E, and at least one requirement of section 1355.52 or, if applicable section 1355.54; 2) the automated function is not

duplicated within the CCWIS or systems supporting child welfare contributing agencies and 3) the automated function is consistently used by all child welfare users responsible for the area supported by the automated function.

This question and answer is repeated in the Cost Allocation for Transitioning Systems section.

- **Source/Date:** 11/09/16; (4/2/2020)
- **Legal and Related References:** 45 CFR 95.631(b); 45 CFR 1355.52(i)(1); 45 CFR 1355.57(a); 81 FR 35450 at 35467 - 35468 and 35474 - 35475 (issued June 2, 2016) 80 FR 48200 at 48216 - 48217 and 48200 - 48221 (issued August 11, 2015)

22. Question: We understand that an automated function that is part of a S/TACWIS transitioning to CCWIS may receive S/TACWIS cost allocation for development during the transition period, even if the automated function does not meet the CCWIS design requirements of 1355.53(a), pursuant to paragraph 1355.56(a). However, if the development on this automated function continues after the transition period, may the title IV-E agency claim CCWIS developmental cost allocation for this automated function?

Answer: No. For transitioning projects, all CCWIS development that occurs after the transition period must meet the CCWIS design requirements described under paragraph 1355.53(a) unless ACF approves, on a case-by-case basis, an alternative design proposed by a title IV-E agency that is determined by ACF to be more efficient, economical, and effective than what is found in paragraph 1355.53(a), pursuant to paragraph 1355.53(b)(2).

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 1355.53, 1355.56(a) and 1355.57(a)(1); 81 FR 35450 at 35468 - 35472 and 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48217 - 48222 (issued August 11, 2015)

23. Question: May a title IV-E agency transitioning a S/TACWIS to a CCWIS claim CCWIS operational funding after July 31, 2018 for the maintenance of an automated function developed by July 31, 2018 that does not meet the CCWIS design requirements of paragraph 1355.53(a)?

Answer: Yes, a title IV-E agency may claim CCWIS operational funding for this automated function provided the title IV-E agency has an approved cost allocation plan, pursuant to 45 CFR 95.631(b), and the automated function meets three conditions, pursuant to 1355.57(a) (2). Those conditions are: 1) the automated function supports programs authorized under titles IV-B or IV-E, and at least one requirement of section 1355.52 or, if applicable section 1355.54; 2) the automated function is not duplicated within the CCWIS or systems supporting child welfare contributing agencies and 3) the automated function is consistently used by all child welfare users responsible for the area supported by the automated function.

This question and answer is repeated in the cost allocation for transitioning systems section.

- **Source/Date:** 4/24/2017; (4/2/2020)
- **Legal and Related References:** 45 CFR 95.631(b), 1355.53(a) and 1355.57(a); 81 FR 35450 at 35468 - 35470 and 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48217 - 48217 and 48220 - 48221 (issued August 11, 2015)

24. Question: If ACF approves a title IV-E agency's plan to transition an existing system to CCWIS prior to July 31, 2018, must all development work done after ACF's approval comply with the CCWIS design requirements of 1355.53(a)?

Answer: No. A title IV-E agency's compliance with CCWIS design requirements is based on the transition period end date of July 31, 2018, not the date of ACF's approval of the plan to transition an existing system to CCWIS.

Development work completed on a transitioning system on or before July 31, 2018 is exempt from the CCWIS design requirements of paragraph 1355.53(a).

Development work performed on a transitioning system after July 31, 2018 must meet the CCWIS design requirements unless exempted by 1355.52(b)(2), pursuant to paragraph 1355.57(a).

This question and answer is repeated in the automated function requirements section.nts section.

- **Source/Date:** 02/12/2018
- **Legal and Related References:** 45 CFR 1355.52(i)(1); 45 CFR 1355.53; 45 CFR 1355.57(a); 81 FR 35450 at 35467 – 35471 and 35473 – 35474 (issued June 2, 2016); 80 FR 48200 at 48216 – 48218 and 48220 – 48221 (issued August 11, 2015)

6.16 Cost allocation

1. Question: Is the federal financial participation (FFP) rate for CCWIS mandated by statute?

Answer: Yes. Section 474(a)(3)(C) and (D) of the Social Security Act mandates the 50% FFP rate.

- **Source/Date:** 11/09/16
- **Legal and Related References:** Section 474(a)(3)(C) and (D) of the Social Security Act.

2. Question: Is FFP available for both CCWIS development and operational costs?

Answer: Yes. FFP is available for CCWIS development and operational costs.

- **Source/Date:** 11/09/16
- **Legal and Related References:** Section 474(a)(3)(C) and (D) of title IV-E of the Social Security Act; 45 CFR 1355.57(e); 81 FR 35450 at 35475 (issued June 2, 2016); 80 FR 48220 at 48222 (issued August 11, 2015)

3. Question: Is CCWIS cost allocation available for the costs for commercial off-the-shelf (COTS) products?

Answer: It depends.

Federal financial participation is not available to develop COTS products. Software developed using a CCWIS cost allocation must be owned by the state or tribe. The federal government must be granted a royalty-free, nonexclusive, and irrevocable license to reproduce, publish, or otherwise use and authorize others to use for federal government purposes, the software, modifications, and other documents produced.

However, CCWIS cost allocation may be available for COTS licensing fees for the use of COTS products. CCWIS cost allocation may also be available to configure and install COTS products.

- **Source/Date:** 11/09/16
- **Legal and Related References:** 45 CFR 1355.57(e)(1); 45 CFR 95.617; 81 FR 35450 at 35475 (issued June 2, 2016); 80 FR 48220 at 48222 (issued August 11, 2015); ACF-OA-PI-31-01 (issued June 11, 2013)

4. Question: Are county, external IV-E agency, or private agency systems that collect CCWIS data eligible for CCWIS cost allocation?

Answer: No. These systems are not eligible for funding under the CCWIS cost allocation methodology.

- **Source/Date:** 11/09/16
- **Legal and Related References:** 45 CFR 1355.57(f); 45 CFR 1356.60(d); 81 FR 35450 at 35475 (issued June 2, 2016); 80 FR 48200 at 48222 (issued August 11, 2015)

5. Question: If automated functions that support the reporting and investigation of child abuse and neglect reside exclusively in a CCWIS, how must the title IV-E agency cost allocate development costs for those automated functions?

Answer: Pursuant to 1355.57(a) - (e), the title IV-E agency may allocate development costs using a CCWIS cost allocation methodology unless the automated functions in the CCWIS are:

- Duplicated in other systems supporting the state or tribe's title IV-E or title IV-B programs, pursuant to 1355.57(a)(2)(ii) and (b)(2)(ii);

- Not used consistently by all child welfare users responsible for the area supported by the automatic function, pursuant to 1355.57(a)(2)(ii) and (b)(2)(ii);
- Unique child welfare related program functions (such as juvenile justice and adult protective services) not used by the title IV-E program, pursuant to 1355.57(e) and (f) and 45 CFR 95.631; and
- Common or unique functions benefiting other health and human service programs (such as child support, child care, Supplementary Nutritional Assistance Program, Temporary Assistance to Needy Families, Medicaid, courts and/or education programs), pursuant to 1355.57(e) and (f) and 45 CFR 95.631.

This question and answer is repeated in the Child Abuse and Neglect Systems section.

- **Source/Date:** 10/26/2017
- **Legal and Related References:** 45 CFR 95.631; 45 CFR 1355.52(e)(2)(i); 45 CFR 1355.57; 81 FR 35450 at 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48213 and 48220 - 48222 (issued August 11, 2015)

6. Question: If automated functions that support the reporting and investigation of child abuse and neglect reside in an external system and are not duplicated in CCWIS, how must the agency cost allocate development costs for those automated functions?

Answer: Pursuant to 1355.57(e), the title IV-E agency must allocate development costs using a non-CCWIS cost allocation methodology if the automated functions reside in an external system.

This question and answer is repeated in the Child Abuse and Neglect Systems section.

- **Source/Date:** 10/26/2017
- **Legal and Related References:** 45 CFR 95.631; 45 CFR 1355.52(e)(2)(i); 45 CFR 1355.57; 81 FR 35450 at 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48213 and 48220 - 48222 (issued August 11, 2015)

7. Question: If automated functions that support the reporting and investigation of child abuse and neglect reside in both a CCWIS and an external system, how must the agency cost allocate development costs for those automated functions?

Answer: Pursuant to 1355.57(e), the title IV-E agency must allocate development costs using a non-CCWIS cost allocation methodology if the automated functions reside in both a CCWIS and an external system. The duplicated development costs are allocated to the benefiting program or programs. All programs pay their share of an automated function under a non-CCWIS cost allocation methodology.

This question and answer is repeated in the Child Abuse and Neglect Systems section.

- **Source/Date:** 10/26/2017
- **Legal and Related References:** 45 CFR 95.631; 45 CFR 1355.52(e)(2)(i); 45 CFR 1355.57; 81 FR 35450 at 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48213 and 48220 - 48222 (issued August 11, 2015)

8. Question: If a child welfare contributing agency (CWCA) has an information system that duplicates a CCWIS automated function, may the title IV-E agency use a CCWIS cost allocation methodology approved by the Department to claim federal financial participation (FFP) for the CCWIS automated function duplicated by the CWCA system?

(Deleted 11/30/2022)

9. Question: If a child welfare contributing agency's (CWCA) information system that receives no federal, state, or tribal funds, duplicates a CCWIS automated function, may the title IV-E agency use a CCWIS cost allocation methodology approved by the Department to claim federal financial participation (FFP) for the CCWIS automated function?

(Deleted 11/30/2022)

10. Question: Is a title IV-E agency required to submit an operational cost allocation plan or plan amendment prior to claiming federal financial participation (FFP) for a CCWIS?

Answer: A title IV-E agency must allocate project costs in accordance with applicable HHS regulations and other guidance pursuant to 1355.57(d). A state title IV-E agency must claim FFP for costs associated with a program only in accordance with its approved Public Assistance Cost Allocation Plan (PACAP). However, if a state title IV-E agency has submitted a PACAP or an amendment, it may, at its option claim FFP based on the proposed PACAP or amendment, unless otherwise advised by the Department of Health and Human Services (DHHS) Cost Allocation Services (CAS), pursuant to 45 CFR 95.517(a) and 95.631(b).

Tribal title IV-E agencies follow ACF's guidance, ACYF-CB-PI 10-13, for claiming FFP for a CCWIS. The Office of Grants Management (OGM) permits tribes, upon notification from OGM, to claim FFP based on a proposed Title IV-E Cost Allocation Methodology (CAM) or amendment.

- **Source/Date:** 4/3/2020
- **Legal and Related References:** 45 CFR 95.517(a); 45 CFR 95.631(b); 45 CFR 1355.57(d); 80 FR 48200 at 48221 - 48222 (issued August 11, 2015); ACYF-CB-PI-10-13 (issued November 23, 2010)

11. Question: Is a title IV-E agency required to submit a development cost allocation plan or plan amendment prior to claiming federal financial participation (FFP) for a CCWIS?

Answer: A title IV-E agency must allocate project costs in accordance with applicable HHS regulations and other guidance pursuant to 1355.57(d). A state title IV-E agency must claim FFP for costs associated with a program only in accordance with its approved Cost Allocation Methodology (CAM). However, if a state title IV-E agency has submitted a CAM or an amendment, it may, at its option claim FFP based on the proposed CAM or amendment, unless otherwise advised by the Department of Health and Human Services (DHHS), pursuant to 45 CFR 95.517(a) and 95.631(a).

Tribal title IV-E agencies follow ACF's guidance, ACYF-CB-PI 10-13, for claiming FFP for a CCWIS. The Office of Grants Management (OGM) permits tribes, upon notification from OGM, to claim FFP based on a proposed Development CAM or plan amendment.

- **Source/Date:** 4/3/2020
- **Legal and Related References:** 45 CFR 95.517(a); 45 CFR 95.631(a); 45 CFR 1355.57(d); 80 FR 48200 at 48221 - 48222 (issued August 11, 2015); ACYF-CB-PI-10-13 (issued November 23, 2010)

12. Question: What training activities can the title IV-E agency claim as allowable CCWIS project activities that may qualify for title IV-E federal financial participation (FFP) pursuant to section 1355.57?

Answer: Certain training activities may be allowable CCWIS project activities provided the title IV-E agency describes the activities and costs in the applicable Advance Planning Document (APD) and ACF approves the activities and costs, pursuant to 45 CFR 95.610(b) (8).

In general, training activities directly related to the CCWIS design, development, installation, and operation are allowable CCWIS project activities, such as training for CCWIS project staff, technical training for system operators, and training the staff that will train workers and management staff. Examples of costs associated with such activities include costs for:

- salaries, fringe benefits, and travel of program and system project staffs directly involved in the development of training plans and materials;
- training of trainers;
- system resources needed to support the training effort; and
- salaries, fringe benefits and travel of trainers to conduct user training.

The costs for users to take CCWIS trainings (including time spent preparing for, traveling to, or participating in training) are not allowable CCWIS project activities; these costs may qualify for 75% FFP pursuant to paragraph 1356.60(b).

- **Source/Date:** 4/3/2020
- **Legal and Related References:** 45 CFR 95.610(b)(8); 45 CFR 1356.60(b); ACF-OISM-001 (issued: February 24, 1995); ACF-OSS-05 (reissued August 21, 1998)

13. Question: Can the title IV-E agency allocate allowable CCWIS project training costs as development costs?

Answer: It depends.

Title IV-E agencies may allocate costs to develop trainings (such as developing training materials, classroom presentations, and online trainings) according to the approved development cost allocation methodology per Action Transmittals (AT) ACF-OISM-001 and ACF-OOS-05.

Title IV-E agencies may allocate costs to deliver trainings (such as the costs of trainers to travel to classroom sites and the costs to deliver the training) during the CCWIS project's implementation phase according to the approved development cost allocation methodology per ACF-OISM-001 and ACF-OOS-05.

Title IV-E agencies may allocate the costs to deliver trainings during the CCWIS project's operational phase according to the approved operational cost allocation methodology per ACF-OISM-001 and ACF-OOS-05.

- **Source/Date:** 4/3/2020
- **Legal and Related References:** 45 CFR 95.631; ACF-OISM-001 (issued February 24, 1995); ACF-OSS-05 (issued: February 24, 1995 revised: August 21, 1998)

14. Question: May a title IV-E agency receive federal financial participation (FFP) according to the approved CCWIS cost allocation plan for a system other than a CCWIS (such as a data warehouse that contains CCWIS data)?

(Deleted 03/23/2021)

6.16A Cost allocation for transitioning systems

1. Question: What federal financial participation (FFP) rate are S/TACWIS projects eligible for during the August 1, 2016 - July 31, 2018 transition period?

Answer: S/TACWIS projects are eligible for 50% FFP for the share of project costs allocable to title IV-E during the August 1, 2016 - July 31, 2018 transition period.

This question and answer is repeated in the Transition Period section.

- **Source/Date:** 11/10/16

- **Legal and Related References:** Section 474(a)(3)(C) and (D) of the Social Security Act; 45 CFR 1355.56(a); 80 FR 48200 at 48291 (issued August, 11, 2015); 81 FR 35450 at 35472 (issued June 2, 2016)

2. Question: What cost allocation methodologies are S/TACWIS projects eligible for during the August 1, 2016 - July 31, 2018 transition period for development and operational costs?

Answer: During the August 1, 2016 - July 31, 2018 transition period, title IV-E agencies with a S/TACWIS project may claim title IV-E funding according to the cost allocation methodology approved by ACF for development or the operational cost allocation plan approved by the Department, or both, per paragraph 1355.56(a).

Activities and costs must be eligible for title IV-E funding and be described in an applicable APD, per 46 CFR 95.610.

This question and answer is repeated in the Transition Period section.

- **Source/Date:** 11/10/16
- **Legal and Related References:** Section 474(c) of the Social Security Act; 45 CFR 1355.56(a); 45 CFR 95.610; 81 FR 35472 (issued June 2, 2016); 80 FR 48219 (issued August 11, 2015)

3. Question: May a title IV-E agency use their existing S/TACWIS cost allocation methodology for continued S/TACWIS work after the 24-month transition period?

Answer: No. The existing S/TACWIS cost allocation methodology is only available for S/TACWIS projects and related project costs during the 24-month transition period from August 1, 2016 - July 31, 2018, per paragraph 1355.56(a).

After the transition period ends on July 31, 2018, S/TACWIS projects that have transitioned to CCWIS may receive CCWIS cost allocation per 1355.57(a). S/TACWIS projects that have been classified as non-CCWIS may receive non-CCWIS cost allocation per 1355.57(f).

This question and answer is repeated in the Transition Period section.

- **Source/Date:** 11/10/16
- **Legal and Related References:** 45 CFR 1355.56(a); 45 CFR 1357(a), (c), (e), and (f); 81 FR 35472, 35474 - 35475 (issued June 2, 2016); 80 FR 48219, 48221 - 48222 (issued August 11, 2015)

4. Question: What requirements must a title IV-E agency's S/TACWIS or non-S/TACWIS system transitioning to a CCWIS meet to qualify for CCWIS cost allocation?

Answer: The title IV-E agency must ensure that the transitioning system, when completed, must 1) meet the CCWIS project requirements at section 1355.52; and, 2) all automated functions developed after July 31, 2018 must meet the CCWIS design requirements of section 1355.53. The title IV-E agency must also have an approved operational cost allocation plan for their CCWIS, effective October 1, 2019, pursuant to 45 CFR 95.631(b).

If the system meets the above requirements, ACF separately evaluates each automated function. An automated function may qualify for CCWIS cost allocation if it meets three conditions pursuant to section 1355.57(a)(2). Those conditions are: 1) the automated function supports programs authorized under titles IV-B or IV-E, and at least one requirement of section 1355.52 or, if applicable section 1355.54; 2) the automated function is not duplicated within the CCWIS or systems supporting child welfare contributing agencies and 3) the automated function is consistently used by all child welfare users responsible for the area supported by the automated function.

This question and answer is repeated in the Transition Period section.

- **Source/Date:** 11/10/16; (4/2/2020)
- **Legal and Related References:** 45 CFR 95.631(b); 45 CFR 1355.52(i)(1); 45 CFR 1355.57(a); 81 FR 35450 at 35467 - 35468 and 35474 - 35475 (issued June 2, 2016) 80 FR 48200 at 48216 - 48217 and 48200 - 48221 (issued August 11, 2015)

5. Question: May a title IV-E agency transitioning a S/TACWIS to a CCWIS claim CCWIS operational funding after July 31, 2018 for the maintenance of an automated function developed by July 31, 2018 that does not meet the CCWIS design requirements of paragraph 1355.53(a)?

Answer: Yes, a title IV-E agency may claim CCWIS operational funding for this automated function provided the title IV-E agency has an approved cost allocation plan, pursuant to 45 CFR 95.631(b), and the automated function meets three conditions, pursuant to 1355.57(a)(2). Those conditions are: 1) the automated function supports programs authorized under titles IV-B or IV-E, and at least one requirement of section 1355.52 or, if applicable section 1355.54; 2) the automated function is not duplicated within the CCWIS or systems supporting child welfare contributing agencies and 3) the automated function is consistently used by all child welfare users responsible for the area supported by the automated function.

This question and answer is repeated in the transition period section.

- **Source/Date:** 4/24/2017; (4/2/2020)
- **Legal and Related References:** 45 CFR 95.631(b), 1355.53(a) and 1355.57(a); 81 FR 35450 at 35468 - 35470 and 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48217 - 48217 and 48220 - 48221 (issued August 11, 2015)

6. Question: How must a title IV-E agency determine if an automated function "is consistently used by all child welfare users responsible for the area supported by the automated function" pursuant to paragraphs 1355.52(i)(1)(iii)(B), 1355.57(a)(2)(ii), and 1355.57(b)(2)(ii)?

Answer: "Consistently used" means that public and private child welfare workers use an automated function as required by the title IV-E agency. Examples of an automated function not being consistently used are:

- ✂ workers interpreting data fields differently than instructed and entering incorrect data because the CCWIS data fields are not clearly labeled; and
- ✂ workers skipping required steps and screens because they are not consistently trained on the CCWIS case management tool.

The phrase "by all child welfare workers responsible for the area supported by the automated function" means that all workers responsible for a task use the automated function(s) designed for the task in the manner required by the title IV-E agency. Examples of all workers responsible for a task not using the required automated function are:

- ✂ some workers using different automated assessment tools when the title IV-E agency requires that all workers conducting assessments use a specified automated assessment tool; and
- ✂ some workers not entering home visit notes into CCWIS within the timeframe required by the title IV-E agency.

This question and answer is repeated in the Initial Submission and Cost Allocation for New CCWIS sections.

- **Source/Date:** 09/19/2019
- **Legal and Related References:** 45 CFR 1355.52(i)(1)(iii)(B); 45 CFR 1355.57(a)(2)(ii) and (b)(2)(ii); 81 FR 35450 at 35468 and 35474 - 35475 (issued June 2, 2016); 80 FR 48200 at 48217 and 48221 (issued August 11, 2015)

7. Question: How does a title IV-E agency determine if a CCWIS automated function is "duplicated within the CCWIS or systems supporting child welfare contributing agencies" pursuant to paragraphs 1355.52(i)(1)(iii)(B), 1355.57(a)(2)(ii), and 1355.57(b)(2)(ii)?

(Deleted 02/03/2022)

8. Question: Must the title IV-E agency follow the CCWIS design requirements described in 1355.53(a) for development work done after July 31, 2018 on automated functions of a system transitioning to CCWIS?

Answer: Yes, unless exempted by paragraph 1355.53(b)(2).

This question and answer is repeated in the Design Requirements section.

- **Source/Date:** 4/2/2020
- **Legal and Related References:** 45 CFR 1355.53; 45 CFR 1355.57(a); 81 FR 35450 at 35468 - 35471 and 35474 - 35475 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 and 48221 (issued August 11, 2015)

9. Question: Must the title IV-E agency comply with the CCWIS design requirements described in paragraph 1355.53(a) for maintenance done after July 31, 2018 on automated functions of a system transitioning to a CCWIS?

Answer: It depends.

If an automated function's development is exempt from the CCWIS design requirements pursuant to paragraph 1355.53(b), maintenance work on the automated function is not required to comply with the CCWIS design requirements.

If an automated function's development complies with the CCWIS design requirements, maintenance work on the automated function must comply with the design requirements unless exempted by paragraph 1355.53(b)(2).

This question and answer is repeated in the Design Requirements section.

- **Source/Date:** 4/2/2020
- **Legal and Related References:** 45 CFR 1355.53; 45 CFR 1355.57(a); 81 FR 35450 at 35468 - 35471 and 35474 - 35475 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 and 48221 (issued August 11, 2015)

10. Question: Regulations at 45 CFR 1355.52(i)(1)(iii)(B), 1355.57(a)(2)(ii), and 1355.57(b)(2)(ii) prohibit a title IV-E agency from claiming Comprehensive Child Welfare Information System (CCWIS) cost allocation for an automated function that is duplicated. When is an automated function considered duplicated within the CCWIS?

Answer: A CCWIS automated function is duplicated within the CCWIS if more than one automated function within the CCWIS itself supports the same child welfare business practice. If automated functions supporting child welfare business processes in the CCWIS are duplicated in a child welfare contributing agency (CWCA), we no longer consider that to conflict with the regulatory requirement for non-duplication. This is because, our initial interpretation is unduly narrow and may be a disincentive for title IV-E agencies to continue

to innovate and update the CCWIS and contract with CWCAs for services as needed. Duplication exists only if an automated function for the same child welfare business practice within the CCWIS itself is duplicated, and not across the CCWIS and CWCAs. For example, it is no longer considered a duplicated function if the CCWIS supports foster care placement activities and a CWCA system duplicates that support. Therefore, CCWIS automated functions that are duplicated by automated functions in a CWCA may qualify for CCWIS cost allocation.

This question and answer is repeated in the Initial Submission and Cost Allocation for New CCWIS sections.

- **Source/Date:** 02/03/2022
- **Legal and Related References:** 45 CFR 1355.52(a)(3); 45 CFR 1355.52(i)(1)(iii)(B); 45 CFR 1355.57(a)(2)(ii) and (b)(2)(ii)

6.16B Cost allocation for new CCWIS

1. Question: What requirements must a new system meet to be classified as a new CCWIS and qualify for CCWIS cost allocation?

Answer: A new system may be classified as a CCWIS if 1) the system as a whole meets, or when completed will meet, the CCWIS project requirements at section 1355.52; and, 2) all of the system's automated functions meet the CCWIS design requirements of section 1355.53.

If the system as a whole meets the above two requirements, ACF separately evaluates each automated function. An automated function may qualify for CCWIS cost allocation if it meets three conditions. Those conditions are: 1) the automated function supports programs authorized under titles IV-B or IV-E, and at least one requirement of section 1355.52 or, if applicable section 1355.54; 2) the automated function is not duplicated within the CCWIS or systems supporting child welfare contributing agencies and 3) the automated function is consistently used by all child welfare users responsible for the area supported by the automated function.

- **Source/Date:** 11/09/16
- **Legal and Related References:** 45 CFR 1355.51; 45 CFR 1355.57(b); 81 FR 35450 at 35474 - 35475 (issued June 2, 2016); 80 FR 48200 at 48205 and 48220 - 48221 (issued August 11, 2015)

2. Question: How must a title IV-E agency determine if an automated function "is consistently used by all child welfare users responsible for the area supported by the automated function" pursuant to paragraphs 1355.52(i)(1)(iii)(B), 1355.57(a)(2)(ii), and 1355.57(b)(2)(ii)?

Answer: "Consistently used" means that public and private child welfare workers use an automated function as required by the title IV-E agency. Examples of an automated function not being consistently used are:

✎ workers interpreting data fields differently than instructed and entering incorrect data because the CCWIS data fields are not clearly labeled; and

✎ workers skipping required steps and screens because they are not consistently trained on the CCWIS case management tool.

The phrase "by all child welfare workers responsible for the area supported by the automated function" means that all workers responsible for a task use the automated function(s) designed for the task in the manner required by the title IV-E agency. Examples of all workers responsible for a task not using the required automated function are:

✎ some workers using different automated assessment tools when the title IV-E agency requires that all workers conducting assessments use a specified automated assessment tool; and

✎ some workers not entering home visit notes into CCWIS within the timeframe required by the title IV-E agency.

This question and answer is repeated in the Initial Submission and Cost Allocation for Transitioning Systems sections.

- **Source/Date:** 09/19/2019
- **Legal and Related References:** 45 CFR 1355.52(i)(1)(iii)(B); 45 CFR 1355.57(a)(2)(ii) and (b)(2)(ii); 81 FR 35450 at 35468 and 35474 - 35475 (issued June 2, 2016); 80 FR 48200 at 48217 and 48221 (issued August 11, 2015)

3. Question: How does a title IV-E agency determine if a CCWIS automated function is "duplicated within the CCWIS or systems supporting child welfare contributing agencies" pursuant to paragraphs 1355.52(i)(1)(iii)(B), 1355.57(a)(2)(ii), and 1355.57(b)(2)(ii)?

(Deleted 02/03/2022)

4. Question: Regulations at 45 CFR 1355.52(i)(1)(iii)(B), 1355.57(a)(2)(ii), and 1355.57(b)(2)(ii) prohibit a title IV-E agency from claiming Comprehensive Child Welfare Information System (CCWIS) cost allocation for an automated function that is duplicated. When is an automated function considered duplicated within the CCWIS?

Answer: A CCWIS automated function is duplicated within the CCWIS if more than one automated function within the CCWIS itself supports the same child welfare business practice. If automated functions supporting child welfare business processes in the CCWIS are duplicated in a child welfare contributing agency (CWCA), we no longer consider that to conflict with the regulatory requirement for non-duplication. This is because, our initial interpretation is unduly narrow and may be a disincentive for title IV-E agencies to continue to innovate and update the CCWIS and contract with CWCAs for services as needed. Duplication exists only if an automated function for the same child welfare business practice within the CCWIS itself is duplicated, and not across the CCWIS and CWCAs. For example, it is no longer considered a duplicated function if the CCWIS supports foster care placement activities and a CWCA system duplicates that support. Therefore, CCWIS automated functions that are duplicated by automated functions in a CWCA may qualify for CCWIS cost allocation.

This question and answer is repeated in the Initial Submission and Cost Allocation for Transitioning Systems sections.

- **Source/Date:** 02/03/2022
- **Legal and Related References:** 45 CFR 1355.52(a)(3); 45 CFR 1355.52(i)(1)(iii)(B); 45 CFR 1355.57(a)(2)(ii) and (b)(2)(ii)

6.16C CCWIS cost allocation

1. Question: In order to qualify for CCWIS cost allocation, paragraph 1355.57(e)(1)(iii) requires that activities and automated functions must benefit federal, state or tribal funded participants in programs and allowable activities described in title IV-E of the Act to the title IV-E program. What programs and activities qualify for CCWIS cost allocation under paragraph 1355.57(e)(1)(iii)?

Answer: A title IV-E agency may cost allocate CCWIS activities and automated functions that benefit participants in programs such as foster care, adoption assistance or guardianship programs, pursuant to 1355.57(e)(1)(iii). Activities and automated functions supporting other health and human service programs, such as Temporary Assistance to Needy Families (TANF), Child Care, Child Support, Supplemental Nutrition Assistance Program (SNAP), Medicaid and related state or tribal health and human service programs do not qualify for CCWIS cost allocation pursuant to 1355.57(e)(1)(iii). If a title IV-E agency would like to include some other program not listed here, then the title IV-E agency may present a business case for allocating the cost of activities and automated functions benefiting such program in accordance with 1355.57(e)(1). ACF will review and determine the appropriate cost allocation in accordance with 45 CFR 95 Subpart F.

- **Source/Date:** 11/11/16

- **Legal and Related References:** 45 CFR 1355.57(e)(1)(iii); 81 FR 35450 at 35475 (issued June 2, 2016); 80 FR 48220 at 48222 (issued August 11, 2015)

6.16C.1 Development

1. Question: If a title IV-E agency has completed development activities on a CCWIS automated function, are the automated function's installation costs classified as development costs?

Answer: Yes, automated function installation costs are classified as development costs. Federal regulations define installation as the integrated testing of programs and subsystems, system conversion, and turnover to operation status, per 45 CFR 95.605. Software testing is included in the definition of development (45 CFR 95.605).

- **Source/Date:** 09/04/20
- **Legal and Related References:** 45 CFR 95.605

6.16C.2 Operations

1. Question: May title IV-E agencies allocate CCWIS operational costs benefiting title IV-B to title IV-E?

Answer: No. CCWIS operational costs benefiting title IV-B may not be allocated to title IV-E.

- **Source/Date:** 11/09/16
- **Legal and Related References:** 80 FR 48200 at 48220 (issued August 11, 2015); Action Transmittal ACF-OSS-05, Section III (issued February 24, 1995)

2. Question: Are software maintenance activities eligible for development costs?

Answer: No. Software maintenance activities normally include corrective, adaptive, and perfective changes (45 CFR 95.605).

- **Source/Date:** 09/04/20
- **Legal and Related References:** 45 CFR 95.605

6.17 Failure to comply

1. Question: What corrective measures will ACF require a title IV-E agency to implement to end a suspension and reinstate funding per paragraph 1355.58(c)?

(Deleted 09/22/2017)

6.17A Suspension

6.17B Ending suspension

1. Question: What corrective measures will ACF require a title IV-E agency to implement to end a suspension and reinstate funding per paragraph 1355.58(c)?

Answer: ACF determines the appropriate corrective measures for a title IV-E agency on a case-by-case basis depending on the reasons for the suspension and other relevant factors. In some cases, ACF may require a title IV-E agency to implement a corrective action plan per paragraph 1355.58(c)(2).

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 1355.58; 81 FR 35450 at 35475-35476 (issued June 2, 2016); 80 FR 48200 at 48222 (issued August 11, 2015)

6.17C Recoupment
