

Child Welfare Policy Manual

Questions & Answers

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)