

# Child Welfare Policy Manual

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## Questions & Answers

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### 6.13 CCWIS options

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#### 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