

Child Welfare Policy Manual

Questions & Answers

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)