

Child Welfare Policy Manual

Questions & Answers

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 CWCA's 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 CWCA's. 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)