## **Child Welfare Policy Manual**

## **Questions & Answers**

## 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).

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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