

Child Welfare Policy Manual

Questions & Answers

6.3B State data

1. Question: Is substance abuse treatment and parenting class information considered data that the title IV-E agency's CCWIS is required to maintain "to support state or tribal child welfare laws, regulations, policies, practices, reporting requirements, audits, program evaluations, and reviews" in accordance with paragraph 1355.52(b)(2)?

Answer: It depends. Title IV-E agencies must maintain substance abuse treatment and parenting class data in its CCWIS if the IV-E agency has determined that such data supports a data need based on the agency's specific circumstances, populations, title IV-B and IV-E plans, and business practices.

We do not require title IV-E agencies to maintain this specific data to allow agencies flexibility to implement a CCWIS tailored to their needs.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(b); 81 FR 35450 at 35455 (issued June 2, 2016); 80 FR 48200 at 48207 (issued August 11, 2016)

2. Question: How will ACF determine title IV-E agency compliance with the requirement that CCWIS maintain data "to support state or tribal child welfare laws, regulations, policies, practices, reporting requirements, audits, program evaluations, and reviews" per paragraph 1355.52(b)(2)?

Answer: ACF will determine compliance with this requirement by reviewing state and tribal laws, regulations, policies, practices, reporting requirements and audit, program evaluation, and CCWIS review requirements in consultation with title IV-E agency representatives. For example, to determine if CCWIS maintains the data necessary to support state or tribal practices, we will consider the information needs of child welfare contributing agencies (CWCAs). If we document a pattern of CWCAs re-entering information clients provided to other CWCAs, that may suggest that the data should be in CCWIS and shared with CWCAs to prevent the duplicate entry of needed data. In such circumstances, we will consult with the title IV-E agency before determining if the data should be classified as CCWIS data and exchanged with the title IV-E agency's CCWIS.

- **Source/Date:** 10/27/2016

- **Legal and Related References:** 45 CFR 1355.52(b)(2); 81 FR 35450 at 35455 (issued June 2, 2016); 80 FR 48200 at 48207 (issued August 11, 2016)