

# Child Welfare Policy Manual

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## Questions & Answers

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### 6.5A Standards and confidentiality

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#### **1. Question: Are missing or unknown data elements permitted by the CCWIS data quality requirements and standards of paragraph 1355.52(d)(1)(i)?**

**Answer:** It depends. CCWIS data quality requirements and standards are defined in federal, state and tribal program regulations, laws, and policies related to specific data elements and their use. Paragraph 1355.52(d)(1)(i) mandates data quality standards for completeness, timeliness, and accuracy of CCWIS data, but does not specify the data quality standard applicable to specific data elements.

Some data quality standards, such as the ones applicable to AFCARS data, define specific values for AFCARS data elements that may require only known values for certain data or set limits for missing data. But a different data quality program or reporting standard may specify conditions where data is not required or permit "unknown" as a data value.

In cases where two or more data quality standards apply to the same data element, the most rigorous standard applies, per paragraph 1355.52(d)(1)(i).

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(d)(1)(i); 81 FR 35450 at 35457 (issued June 2, 2016); 80 FR 48200 at 48208 - 48209 (issued August 11, 2016)

#### **2. Question: May a title IV-E agency automatically prefill CCWIS data fields with known information?**

**Answer:** It depends. The automatic calculation of data based on information previously known to the system, such as the name of a worker's supervisor or a zip code for an entered address, is allowable. Use of system-calculated data, such as system generated time stamps to capture the time of record entry or to accurately calculate current age from birth date data known to the system, is allowable.

However, the automated generation of default data, such as classifying all citizenship values as U.S. citizenship, is prohibited because users may not uniformly verify or correct inaccuracies in the default value pursuant to 1355.52(d)(1)(v).

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

- **Legal and Related References:** 45 CFR 1355.52(d)(1)(v); 81 FR 35450 at 35457 (issued June 2, 2016); 80 FR 48200 at 48209 (issued August 11, 2016)