

# Child Welfare Policy Manual

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## Questions & Answers

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### 6.6 Data exchanges

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**1. Question: Are title IV-E agencies only able to claim federal financial participation (FFP) for the bi-directional data exchanges described in paragraph 1355.52(e)?**

**Answer:** No. In addition to the eleven mandatory bi-directional data exchanges required under 1355.52(e), a title IV-E agency may request approval to claim FFP for additional optional data exchanges, including uni-directional data exchanges, per section 1355.54.

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(e); 45 CFR 1355.54; 81 FR 35450 at 35461 and 35471 (issued June 2, 2016); 80 FR 48200 at 48211 and 48218 - 48219 (issued August 11, 2016)

**2. Question: Are title IV-E agencies required to track the source of data provided by bi-directional data exchanges per paragraph 1355.52(e)?**

**Answer:** No. The CCWIS regulations do not require title IV-E agencies to track the source of data provided by data exchanges.

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(e); 81 FR 35450 at 35461 (issued June 2, 2016)

**3. Question: Can a title IV-E agency's CCWIS that obtains data from a data warehouse instead of exchanging data through a bi-directional data exchange, satisfy a data exchange requirement of paragraph 1355.52(e)?**

**Answer:** Yes, data obtained from a data warehouse may satisfy the data exchange requirement per paragraph 1355.52(e) if the data available in the data warehouse is complete, timely, accurate, and consistent.

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(e); 81 FR 35450 at 35462 (issued June 2, 2016); 80 FR 48200 at 48214 (issued August 11, 2016)

**4. Question: Is title IV-E funding available to support the costs other programs incur in developing and operating the data exchanges described under 45 CFR 1355.52(e)(2)?**

**Answer:** No. Title IV-E funding is not available for the data exchange costs of programs that are not title IV-E related, such as those described in 45 CFR 1355.52(e)(2)(ii) through (vi).

- **Source/Date:** 11/07/16
- **Legal and Related References:** Section 474(a)(3)(C) and (D) of the Social Security Act; 45 CFR 1355.52(e)(2); 45 CFR 1355.57(e); 81 FR 35450 at 35464 - 35466 and 35475 (June 2, 2016); 80 FR 48200 at 48212 - 48215 and 48222 (issued August 11, 2016); Action Transmittal ACF-OSS-05 (issued August 21, 1998)

**5. Question: Paragraph 1355.52(e)(2) requires bi-direction data exchanges "to the extent practicable." What are the reasons that a title IV-E agency may cite to demonstrate that a bi-directional data exchange is not practicable?**

**Answer:** Title IV-E agencies may present a business case in an Advance Planning Document (APD) describing the circumstances rendering a data exchange impracticable. These circumstances include, but are not limited to: (1) the other system is not capable of conducting an exchange; or (2) the exchange is not feasible due to cost constraints. Title IV-E agencies may cite any circumstances they deem relevant for ACF's consideration.

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(e)(2); 81 FR 35450 at 35464 (issued June 2, 2016); 80 FR 48200 at 48212 - 48213 (issued August 11, 2016)

**6. Question: If a title IV-E agency is only able to establish a partial data exchange, is the agency in compliance with the requirements of paragraph 1355.52(e)(2)? For example, if some child welfare courts are able to establish a bi-directional data exchange with CCWIS but other courts are unable to participate, does this meet the requirement to have a bi-directional data exchange with courts per paragraph 1355.52(e)(2)(v)?**

**Answer:** It depends. Title IV-E agencies may present a business case in an Advance Planning Document (APD) describing the circumstances rendering a data exchange impracticable. For example, if some courts participated in the data exchange while others did not, ACF would consider a business case explaining that the partial exchange met the requirements under 1355.52(e)(2)(v).

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(e)(2); 81 FR 35450 at 35464 (issued June 2, 2016); 80 FR 48200 at 48212 - 48213 (issued August 11, 2016)

**7. Question: Are title IV-E agencies transitioning from a S/TACWIS or non-S/TACWIS system to CCWIS, required to implement data exchanges consistent with CCWIS design requirements of paragraph 1355.53(a)?**

**Answer:** It depends. If the data exchange was developed prior to, or during the CCWIS transition period, it may be exempted from one or more of the CCWIS design requirements if the CCWIS project meets the requirements of paragraphs 1355.56(b) or (f)(1). If the data exchange was developed after the CCWIS transition period, then it must meet the CCWIS design requirements in order to qualify for CCWIS developmental cost allocation unless ACF approves, on a case-by-case basis, an alternative design proposed by a title IV-E agency that is determined by ACF to be more efficient, economical, and effective, pursuant to 1355.53(b)(2).

This question and answer is repeated in the Automated Functions Requirements section.

- **Source/Date:** 01/11/2017
- **Legal and Related References:** 45 CFR 1355.53(b); 45 CFR 1355.57(a); 81 FR 35450 at 35470 and 35473 - 35474 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 and 48220 - 48221 (issued August 11, 2015)