

Child Welfare Policy Manual

Questions & Answers

6.6B Child welfare contributing agencies

1. Question: Does paragraph 1355.52(e)(1)(ii) require a CCWIS to have real-time access to child welfare contributing agency (CWCA) databases?

Answer: No. Title IV-E agencies are not required to view CWCA databases in real-time.

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(e)(1)(ii); 81 FR 35450 at 35463 (issued June 2, 2016); 80 FR 48200 at 48212 (issued August 11, 2016)

2. Question: Paragraph 1355.52(e)(1)(ii) requires CCWIS to have a data exchange with "Systems operated by child welfare contributing agencies that are collecting or using data described in paragraph (b) of this section, if applicable." What is the meaning of the phrase "if applicable"?

Answer: For paragraph 1355.52(e)(1)(ii), "if applicable" means that CCWIS must have a data exchange with a child welfare contributing agency (CWCA) if that CWCA uses a system other than CCWIS for child abuse and neglect investigations, placements, or child welfare case management. It is not applicable if a CWCA is entering data directly into a title IV-E agency's CCWIS.

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(e); 81 FR 35450 at 35463 (issued June 2, 2016); 80 FR 48200 at 48212 (issued August 11, 2016)

3. Question: Is the title IV-E agency responsible for assuring the quality of data submitted by child welfare contributing agencies (CWCAs) to CCWIS, per paragraph 1355.52(e)(1)(ii)?

Answer: Yes. The title IV-E agency is responsible for assuring data quality in compliance with the requirements described in paragraph 1355.52(d).

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(d); 45 CFR 1355.52(e)(1)(ii); 81 FR 35450 at 35456 - 35461 and 35463 (issued June 2, 2016); 80 FR 48200 at 48208 - 48212 (issued August 11, 2016)

4. Question: If a county has a contract with a child welfare contributing agency (CWCA), may the required bi-directional data exchange with CCWIS "go through" a county system?

Answer: Yes, with ACF approval.

This question and answer is repeated in the external child welfare systems section.

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 1355.52(e)(1)(ii), (iv); 81 FR 35450 at 35463 - 35464 (issued June 2, 2016); 80 FR 48200 at 48212 (issued August 11, 2015); CWPM 6.1 #3 and 6.6D #1 and #2.

5. Question: How frequently must data be electronically exchanged between CCWIS and CWCA systems?

Answer: The title IV-E agency has discretion to determine the frequency of data exchanges that support the requirement to provide data in a timely manner, pursuant to paragraph 1355.52(d)(1)(i).

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 1355.52(d)(1)(i), (e)(1)(ii); 81 FR 35450 at 35456 - 35457 and 35463 - 35464 (issued June 2, 2016); 80 FR 48200 at 48208 - 48209 and 48212 (issued August 11, 2015).

6. Question: If a child welfare contributing agency (CWCA) has an information system that duplicates a CCWIS automated function, may the title IV-E agency use a CCWIS cost allocation methodology approved by the Department to claim federal financial participation (FFP) for the CCWIS automated function duplicated by the CWCA system?

(Deleted 11/30/2022)

7. Question: If a child welfare contributing agency's (CWCA) information system that receives no federal, state, or tribal funds, duplicates a CCWIS automated function, may the title IV-E agency use a CCWIS cost allocation methodology approved by the Department to claim federal financial participation (FFP) for the CCWIS automated function?

(Deleted 11/30/2022)