

Child Welfare Policy Manual

Questions & Answers

6.6D External child welfare systems

1. Question: Paragraph 1355.52(e)(1)(iv) requires CCWIS to have a data exchange with "Each system external to CCWIS used by title IV-E agency staff to collect CCWIS data, if applicable." What is the meaning of the phrase "if applicable"?

Answer: For paragraph 1355.52(e)(1)(iv), "if applicable" means that CCWIS must have a data exchange with any external system used by agency staff to collect CCWIS data, however, it is not applicable if there are no such external systems.

- **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)

2. Question: Are child welfare information systems used by counties in county administered states required to have a bi-directional exchange with the state CCWIS under 1355.52(e)(1)(iv)?

Answer: Yes. Counties are political subdivisions of the state, and the single state title IV-E agency designated in the state's title IV-B and title IV-E plan supervises the administration of county administered title IV-B and IV-E programs. Section 471(a)(2) of the Social Security Act and 45 CFR 205.100 provide the authority and parameters by which a single state title IV-E agency may delegate the administration of the title IV-E program to the state's political subdivisions and local agencies or offices. Therefore, a county system external to CCWIS and used by title IV-E agency staff to collect CCWIS data must, per paragraph 1355.52(e)(1)(iv), have a bi-directional data exchange with CCWIS.

- **Source/Date:** 11/07/16
- **Legal and Related References:** Section 471(a)(2) of the Social Security Act; 45 CFR 205.100; 45 CFR 1355.52(e)(1)(iv); 81 FR 35450 at 35453 and 35463 - 35464 (June 2, 2016); 80 FR 48200 at 48212 (issued August 11, 2016)

3. Question: If a title IV-E agency operating a CCWIS wants to exchange data with the National Electronic Interstate Compact Enterprise (NEICE) Case Management System (CMS) is a bidirectional data exchange required, per paragraph 1355.52(e)(1)(iv)?

Answer: Yes. A bi-directional data exchange is required because the NEICE CMS is considered an external system to CCWIS, per paragraph 1355.52(e)(1)(iv).

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(e)(1)(iv); 81 FR 35450 at 35463 - 35464 (June 2, 2016); 80 FR 48200 at 48212 (issued August 11, 2016)

4. Question: Would a web-portal external to CCWIS that is used to enter information that is then sent to the National Electronic Interstate Compact Enterprise (NEICE) Clearinghouse comply with the CCWIS bi-directional data exchange requirements?

Answer: No. CCWIS bi-direction data exchanges must be capable of both sending data to, and receiving data from the other system. A web-portal used by child welfare workers only to access the NEICE Clearinghouse does not meet the automation requirements for CCWIS data exchanges.

- **Source/Date:** 11/07/16
- **Legal and Related References:** 45 CFR 1355.52(e)(1)(iv); 81 FR 35450 at 35463 - 35464 (June 2, 2016); 80 FR 48200 at 48211 - 48212 (issued August 11, 2016); Action Transmittal ACF-OSS-05 (issued August 21, 1998)

5. 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 child welfare contributing agencies 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.

6. Question: How frequently must data be electronically exchanged between CCWIS and county child welfare information 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)(iv); 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).

7. Question: If a title IV-E agency modifies the National Electronic Interstate Compact Enterprise (NEICE) Case Management System (CMS) so it is integrated as an automated function in the CCWIS, is the modified and integrated NEICE CMS

considered an external system requiring a bi-directional data exchange with CCWIS as described in paragraph 1355.52(e)(1)(iv)?

Answer: No. An automated function integrated into CCWIS is not considered an external system as described in paragraph 1355.52(e)(1)(iv).

- **Source/Date:** 02/12/2018
- **Legal and Related References:** 45 CFR 1355.52(e)(1)(iv); 81 FR 35450 at 35463 – 35464 (June 2, 2016); 80 FR 48200 at 48211 – 48212 (issued August 11, 2016); Action Transmittal ACF-OSS-05 (issued August 21, 1998)

8. Question: If a title IV-E agency's CCWIS portal permits users to enter data into CCWIS, access CCWIS data reports, or both, is the portal considered an external child welfare system as described at paragraph 1355.52(e)(1)(iv)?

Answer: No. A portal that permits users to enter data into CCWIS, access CCWIS data reports, or both is a CCWIS automated function.

- **Source/Date:** 09/19/2019
- **Legal and Related References:** 45 CFR 1355.51(a); 45 CFR 1355.52(e)(1)(iv); 81 FR 35450 at 35463 - 35454 (issued June 2, 2016); 80 FR 48200 at 48204 - 48205 and 48212 (issued August 11, 2015)

9. Question: Must a title IV-E agency's CCWIS portal meet the CCWIS design requirements described at paragraph 1355.53(a)?

Answer: Yes. An agency's CCWIS portal is an automated function and must meet the CCWIS design requirements described at paragraph 1355.53(a) unless exempted by paragraph 1355.53(b).

- **Source/Date:** 09/19/2019
- **Legal and Related References:** 45 CFR 1355.51(a); 45 CFR 1355.53; 81 FR 35450 at 35468 - 35471 (issued June 2, 2016); 80 FR 48200 at 48204 - 48205 and 48217 - 48218 (issued August 11, 2015)

10. Question: If a title IV-E agency's CCWIS portal duplicates another CCWIS automated function, can the title IV-E agency receive the CCWIS cost allocation for either its portal or the other automated function?

Answer: No. CCWIS cost allocation is only available for automated functions that are not duplicated, pursuant to paragraphs 1355.57(a)(2)(ii) and (b)(2)(ii).

- **Source/Date:** 09/19/2019

- **Legal and Related References:** 45 CFR 1355.57(a)(2)(ii) and (b)(2)(ii); 81 FR 35450 at 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48220 - 48221 (issued August 11, 2015)

11. Question: May title IV-E agencies without a CCWIS receive software and associated documentation from the federal repository described at paragraph 1355.52(h)?

Answer: Yes. With ACF approval, title IV-E agencies without a CCWIS may receive software and associated documentation from the federal repository described at paragraph 1355.52(h).

- **Source/Date:** 09/19/2019
- **Legal and Related References:** 45 CFR 1355.52(h); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

12. Question: May a title IV-E agency using a CCWIS develop a stand-alone data system to collect CCWIS data (such as to collect required data for a title IV-E prevention program)?

Answer: Yes. A title IV-E agency may design CCWIS to include a system external to the CCWIS that is used by title IV-E agency staff to collect CCWIS data (See CWPM 6.2 Q/A #1).

However, a CCWIS must be able to immediately access CCWIS data from an external system that is used by title IV-E agency staff through a bi-directional data exchange. See 45 CFR 1355.52(e)(1)(iv); CWPM 6.6 Q/A #3 and CWPM 6.6D#1 for additional information.

The bi-directional data exchange between CCWIS and the external system used by title IV-E agency staff must meet the data exchange standard requirements of 45 CFR 1355.52(f)(2).

- **Source/Date:** 07/18/2022
- **Legal and Related References:** 45 CFR 1355.52(e)(1)(iv); 45 CFR 1355.52(f)(2); 81 FR 35450 at 35454, 35456, and 35462 (issued June 2, 2016); 80 FR 48200 at 48215 (issued August 11, 2015)