

Child Welfare Policy Manual

Questions & Answers

6.7 Data exchange standard

1. Question: Is the title IV-E agency that is implementing a CCWIS project required to comply with the data exchange standard requirements of paragraph 1355.52(f) for data exchanges implemented before the rule's effective date of August 1, 2016?

Answer: Yes. Upon implementation of a CCWIS, the title IV-E agency must use a single data exchange standard with child welfare contributing agencies (CWCAs) and external systems as described in paragraph 1355.52(f), including exchanges that were implemented before the rule's effective date.

- **Source/Date:** 11/08/16
- **Legal and Related References:** 45 CFR 1355.52(f); 81 FR 35450 at 35466 (issued June 2, 2016); 80 FR 48200 at 48215 - 48216 (issued August 11, 2016)

2. Question: Is a title IV-E agency required to specify the technology used to transfer data in the data exchange standard?

Answer: No. Paragraph 1355.52(f) requires the title IV-E agency to describe in the data exchange standard applicable data, definitions, formats, and other specifications. Although the data exchange standard may include specifications for the technology used to transfer data, it is not required.

- **Source/Date:** 11/08/16
- **Legal and Related References:** 45 CFR 1355.52(f); 81 FR 35450 at 35466 (issued June 2, 2016); 80 FR 48200 at 48215 (issued August 11, 2016)

3. Question: Is a title IV-E agency required to specify a single communication protocol for the data exchange in the data exchange standard required by paragraph 1355.52(f)?

Answer: No. Paragraph 1355.52(f) requires the title IV-E agency to describe in the data exchange standard applicable data, definitions, formats, and other specifications. The title IV-E agency is not required to specify a single communication protocol.

- **Source/Date:** 11/08/16
- **Legal and Related References:** 45 CFR 1355.52(f); 81 FR 35450 at 35466 (issued June 2, 2016); 80 FR 48200 at 48215 (issued August 11, 2016)

4. Question: Who selects the data exchange standard required by paragraph 1355.52(f)? Is it a federal agency such as ACF, or does the state or tribe select the data exchange standard?

Answer: The state or tribe implementing the CCWIS selects the data exchange standard for its CCWIS project.

- **Source/Date:** 11/08/16
- **Legal and Related References:** 45 CFR 1355.52(f); 81 FR 35450 at 35466 (issued June 2, 2016); 80 FR 48200 at 48215 (issued August 11, 2016)

5. Question: Can the title IV-E agency's data exchange standard change over time?

Answer: Yes, the data exchange standard can change over time. For example, standards often add nuanced and precise conditions to accommodate new and varied circumstances or expand to standardize new areas to address changing policies or practices. The title IV-E agency may change standards consistent with Advance Planning Document (APD) rules at 45 CFR 95.610(c)(2).

- **Source/Date:** 11/08/16
- **Legal and Related References:** 45 CFR 1355.52(f); 81 FR 35450 at 35466 - 35467 (issued June 2, 2016); 80 FR 48200 at 48215 - 48216 (issued August 11, 2016)

6. Question: May child welfare contributing agencies (CWCAs) that have data exchange standards different from the title IV-E agency data exchange standard use their own standard when exchanging data with CCWIS?

Answer: No. Paragraph 1355.52(f) specifies a single data exchange standard for data exchanges with CWCAs and systems external to CCWIS used by title IV-E agency staff to collect CCWIS data.

- **Source/Date:** 11/08/16
- **Legal and Related References:** 45 CFR 1355.52(f); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48215 - 48216 (issued August 11, 2016)

7. Question: Is a title IV-E agency required to ensure that a CWCA system exchanging data with a county agency's external child welfare information system uses the single data exchange standard pursuant to 1355.52(f)?

Answer: Yes. The title IV-E agency must ensure that CWCA systems comply with the data exchange standard required pursuant to 1355.52(f)(2), and support the efficient, economical, and effective administration of the title IV-B and IV-E plans, pursuant to 1355.52(a).

- **Source/Date:** 4/24/2017

- **Legal and Related References:** 45 CFR 1355.52(a) and (f); 81 FR 35450 at 35453 - 35454 and 35466 - 35467 (issued June 2, 2016); 80 FR 48200 at 48206 and 48215 - 48216 (issued August 11, 2015)

8. Question: May a title IV-E agency switch from one data exchange standard to a different data exchange standard?

Answer: Yes, provided all bi-directional data exchanges described in paragraph 1355.52(f) use the same data exchange standard.

- **Source/Date:** 2/12/2018
- **Legal and Related References:** 45 CFR 1355.52(f); 81 FR 35450 at 35466 - 35467 (June 2, 2016); 80 FR 48200 at 48215 - 48216 (issued August 11, 2016)

9. Question: Does the CCWIS single data exchange standard described in 45 CFR 1355.52(f) apply to optional data exchanges?

Answer: No. The regulations for CCWIS do not require that optional data exchanges meet the single data exchange standard described at 45 CFR 1355.52(f).

This question and answer is repeated in the CCWIS options section.

- **Source/Date:** 06/15/2022
- **Legal and Related References:** 45 CFR 1355.54; 45 CFR 1355.52(f); 45 CFR 1355.55; 80 FR 48200 at 48219 (issued August 11, 2015)