

Child Welfare Policy Manual

Questions & Answers

6.8 Title IV-E determinations

1. Question: Is a CCWIS required to contain the automated functions that determine title IV-E eligibility?

Answer: No. The automated functions that determine title IV-E eligibility may be:

- Wholly provided by the CCWIS;
- Wholly provided by another system such as a larger system that determines eligibility for multiple programs; or
- Provided by different systems that have different steps of the title IV-E eligibility determination process. For example, the automated support for determining if a child meets the AFDC requirements may be located in the system supporting the title IV-A program while the remaining automated support is in the CCWIS.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(g); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

2. Question: May a title IV-E agency use two or more automated functions to support one part of title IV-E eligibility determinations, such as using one system to determine Aid to Families with Dependent Children (AFDC) eligibility for some children and another system to determine AFDC eligibility for the remaining children?

Answer: A state title IV-E agency operating a CCWIS is prohibited from using two or more automated functions to support one part of title IV-E eligibility determinations, per 1355.52(g)(1). A state title IV-E agency must use the same automated function or the same group of automated functions for all title IV-E eligibility determinations.

However, if it is not practicable to use a single automated function, or the same group of automated functions per 1355.52(g)(2), a tribal IV-E agency may use multiple automated functions or manual processes to support one part of the title IV-E eligibility determinations. For example, tribes are required by section 479B(c)(C)(ii)(II) of the Social Security Act to use the AFDC plan that was in effect on July 16, 1996 of the state in which the child resides at the time of removal from the home to determine if the child meets the AFDC eligibility requirement. This means that tribal title IV-E agencies may need to use the AFDC plan from

different states for different children, depending on the child's location at the time of removal. Therefore, it may not be cost effective for tribal title IV-E agencies to build an automated function to accommodate AFDC eligibility requirements of all states from which tribal children may be removed.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(g); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

3. Question: Must CCWIS be the "system of record" for title IV-E eligibility determinations, since paragraph 1355.52(g) permits other information systems to support eligibility determinations?

Answer: Yes. CCWIS must maintain the calculated outcome of the title IV-E eligibility determination process including the data contributing to the determination of title IV-E eligibility per paragraph 1355.52(b)(1)(ii).

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(g); 45 CFR 1355.52(b)(1)(ii); 81 FR 35450 at 35455 and 35467 (issued June 2, 2016); 80 FR 48200 at 48207 and 48216 (issued August 11, 2015)

4. Question: How must title IV-E eligibility data collected by other information system be transmitted to CCWIS?

Answer: Title IV-E eligibility data collected by other information systems must be provided to CCWIS via a bi-directional electronic data exchange, per paragraph 1355.52(e)(1)(iii).

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(e)(1)(iii); 80 FR 48200 at 48212 (issued August 11, 2015)