Child Welfare Policy Manual

Section 6.10A: Initial submission

6.10A. Initial submission

Question 2. What is the "start date" of a CCWIS project?

Answer

The start date of a CCWIS project is the date ACF indicates in its response letter to an approvable submission from the title IV-E agency.

Source/Date

10/27/2016

Legal and Related References

45 CFR 95 Subpart F; 45 CFR 1355.51; 45 CFR 1355.52(i)(1); 81 FR 35450 at 35467 - 35468 (issued June 2, 2016); 80 FR 48220 at 48205 and 48216 - 48217 (issued August 11, 2015)

Question 3. What documents must a title IV-E agency submit when notifying ACF that the agency intends to build a CCWIS?

Answer

The submission must meet the requirements of 1355.52(i)(1), which means that the title IV-E agency must submit an Advance Planning Document (APD) or, if below the APD submission thresholds defined at 45 CFR 95.611, a Notice of Intent. The APD or Notice of Intent must include:

- A description of how the CCWIS will meet the requirements in1355.52 (a) through (h) and, if applicable 1355.54;
- A list of all automated functions included in the CCWIS; and

- A notation of whether each automated function included in the CCWIS meets, or when implemented will meet, the following requirements:
    - The automated function supports at least one requirement of 1355.52 or, if applicable,1355.54;
    - The automated function is not duplicated within the CCWIS or systems supporting child welfare contributing agencies and is consistently used by all child welfare users responsible for the area supported by the automated function; and
    - The automated function complies with the CCWIS design requirements at 1355.53(a), unless exempted in accordance with 1355.53(b).

Source/Date

10/27/2016

Legal and Related References

45 CFR 95 Subpart F; 45 CFR 1355.51; 45 CFR 1355.52(i)(1); 81 FR 35450 at 35467 - 35468 (issued June 2, 2016); 80 FR 48220 at 48205 and 48216 - 48217 (issued August 11, 2015)

Question 6. When a title IV-E agency submits an Advance Planning Document (APD) notifying ACF of the agency's plan to implement a CCWIS, is the agency required to include the description of how the planned system will meet the CCWIS requirements and the automated function list as separate documents?

Answer

No. While the title IV-E agency is required to include the system description and automated function list as specified in 1355.52(i)(1)(i) - (iii) when submitting an APD notifying ACF of the agency's plan to implement a CCWIS, the information may be integrated into the APD project documentation described at 45 CFR 95.610.

Source/Date

2/12/2018

Legal and Related References

45 CFR 95.610; 45 CFR 1355.52(i)(1); 81 FR 35450 at 35467 - 35468 (issued June 2, 2016); 80 FR 48200 at 48216 - 48217 (issued August 11, 2015)

Question 7. Must title IV-E agencies report electronic data exchanges on the automated functions list pursuant to paragraph 1355.52(i)(1)(ii)?

Answer

Yes. An electronic data exchange is "a computerized process or collection of related processes to achieve a purpose or goal" and therefore is an automated function as defined at paragraph 1355.51(a).

Source/Date

9/19/2019

Legal and Related References

45 CFR 1355.51(a); 45 CFR 1355.52(i)(1)(ii); 80 FR 48200 at 48204 - 48205 and 48216 (issued August 11, 2015)

Question 8. If the title IV-E agency's CCWIS is part of an enterprise system in which at least one automated function is shared between at least two programs, what automated functions must the title IV-E agency report on the list of automated functions required under 1355.52(i)(1)(ii)? For example, the agency's intake function is part of an enterprise system between child welfare and Medicaid.

Answer

The title IV-E agency must report only automated functions that support the child welfare program on the list of automated functions. This includes: 1) automated functions that only support child welfare; and 2)

automated functions that support child welfare and another program. Previous policy required that a title IV-E agency developing or operating a CCWIS as part of an enterprise system report all automated functions of the entire system. We revised this policy to reduce requirements and provide more flexibility in meeting the CCWIS design requirements. This question and answer is repeated in the On-going Submission section.

Source/Date

09/19/2019; updated 07/11/2023

Legal and Related References

45 CFR 95. 605; 45 CFR 95.610; 45 CFR 1355.52(i)(1)(ii) and 1355.53(a); 80 FR 48200 at 48216 - 48218 (issued August 11, 2015)

Question 9. How must a title IV-E agency determine if an automated function "is consistently used by all child welfare users responsible for the area supported by the automated function" pursuant to paragraphs 1355.52(i)(1)(iii)(B), 1355.57(a)(2)(ii), and 1355.57(b)(2)(ii)?

Answer

"Consistently used" means that public and private child welfare workers use an automated function as required by the title IV-E agency. Examples of an automated function not being consistently used are:

- workers interpreting data fields differently than instructed and entering incorrect data because the CCWIS data fields are not clearly labeled; and

- workers skipping required steps and screens because they are not consistently trained on the CCWIS case management tool.

The phrase "by all child welfare workers responsible for the area supported by the automated function" means that all workers responsible for a task use the automated function(s) designed for the task in the manner required by the title IV-E agency. Examples of all

workers responsible for a task not using the required automated function are:

- some workers using different automated assessment tools when the title IV-E agency requires that all workers conducting assessments use a specified automated assessment tool; and

- some workers not entering home visit notes into CCWIS within the timeframe required by the title IV-E agency.

This question and answer is repeated in the Cost Allocation for Transitioning Systems and Cost Allocation for New CCWIS sections.

Source/Date

9/19/2019

Legal and Related References

45 CFR 1355.52(i)(1)(iii)(B); 45 CFR 1355.57(a)(2)(ii) and (b)(2)(ii); 81 FR 35450 at 35468 and 35474 - 35475 (issued June 2, 2016); 80 FR 48200 at 48217 and 48221 (issued August 11, 2015)

Question 11. If the title IV-E agency's CCWIS is part of an enterprise system running on a shared platform used by other programs such as child'support and Medicaid, what automated functions must the title IV-E agency report on the list of automated functions?

Answer

On the list of automated functions, the title IV-E agency must report:

- The shared platform;
- automated functions that support the child welfare program but are not on the shared platform; and
- automated functions running on the shared platform, such as a document management function, that support the administration of title IV-B and IV-E plans, per 1355.52(i)(1)(ii).

We revised this policy to reduce requirements and provide more flexibility in meeting the CCWIS design requirements. This question and answer is repeated in the On-going Submission section.

Source/Date

5/15/20; updated 07/11/2023

Legal and Related References

45 CFR 95.610; 45 CFR 1355.52(i)(1)(ii); 81 FR 45450 at 35467 – 35468 (issued June 2, 2016); 80 FR 48200 at 48216 – 48217 (issued August 11, 2015)

Question 12. If a title IV-E agency plans to replace an existing automated function does the agency report both the planned and the existing automated function on the automated function checklist per 1355.52(i)(1)(ii)?

Answer

It depends.

If the title IV-E agency reports planned development work on the automated function in an APD, and the schedule indicates that work on that function will start or continue during the current annual APD reporting cycle, the agency will report both the planned and the existing functions on the automated function checklist. For example, if an agency plans to replace an existing automated function to eliminate duplication during the current annual APD reporting cycle, then the agency indicates on the automated function checklist:
1. the planned function that will eliminate duplication and notes it is unduplicated per 1355.52(i)(1)(iii)(B); and
2. the existing function and notes it is duplicated per 1355.52(i)(1)(iii)(B).

However, if ACF does not approve the plan, the agency may be required to revise the automated function checklist.

In this example, if the title IV-E agency does not commit to start or continue to work on the planned automated function within the current annual APD reporting cycle, then the agency reports only the existing automated function on the checklist and notes it is duplicated per 1355.52(i)(1)(iii)(B).

This question and answer is repeated in the On-going submission section.

Source/Date

9/4/2020

Legal and Related References

45 CFR 95.610(c); 45 CFR 1355.52(i); 81 FR 35450 at 35467 – 35468 (issued June 2, 2016); 80 FR 48200 at 48216 – 48217 (issued August 11, 2016)

Question 13. Regulations at 45 CFR 1355.52(i)(1)(iii)(B), 1355.57(a)(2)(ii), and 1355.57(b)(2)(ii) prohibit a title IV-E agency from claiming Comprehensive Child Welfare Information System (CCWIS) cost allocation for an automated function that is duplicated. When is an automated function considered duplicated within the CCWIS?

Answer

A CCWIS automated function is duplicated within the CCWIS if more than one automated function within the CCWIS itself supports the same child welfare business practice. If automated functions supporting child welfare business processes in the CCWIS are duplicated in a child welfare contributing agency (CWCA), we no longer consider that to conflict with the regulatory requirement for non-duplication. This is because, our initial interpretation is unduly narrow and may be a disincentive for title IV-E agencies to continue to innovate and update the CCWIS and contract with CWCAs for services as needed. Duplication exists only if an automated function for the same child welfare business practice within the CCWIS itself is duplicated, and not

across the CCWIS and CWCAs. For example, it is no longer considered a duplicated function if the CCWIS supports foster care placement activities and a CWCA system duplicates that support. Therefore, CCWIS automated functions that are duplicated by automated functions in a CWCA may qualify for CCWIS cost allocation.

This question and answer is repeated in the Cost Allocation for Transitioning Systems and Cost Allocation for New CCWIS sections.

Source/Date

2/3/2022

Legal and Related References

45 CFR 1355.52(a)(3); 45 CFR 1355.52(i)(1)(iii)(B); 45 CFR 1355.57(a)(2)(ii) and (b)(2)(ii)
