

Child Welfare Policy Manual

6. CCWIS

6.1 CCWIS Definitions

1 Q: 1355.52(b)(1)(iv) requires the title IV-E agency s CCWIS to maintain Case management data to support federal audits, reviews, and other monitoring activities. What does case management mean?

A: ACF has not specifically defined the term "case management" because states and tribes define case management differently due to varying laws, policies, and practices.

ACF does, however, provide examples of case management activities. The CCWIS Notice of Proposed Rulemaking identifies activities considered "case management" to include the collection and updating of information such as child and family histories, assessments, contact notes, calendars, services recommended and delivered, eligibility for programs and services, and client outcomes.

Source: (9/14/16)(9/14/16)

Reference: Section 474 of title IV-E of the Social Security Act; Section 106 CAPTA; 45 CFR 1355.52(b)(1)(iv); 80 FR 48200 at 48213 (August 11, 2015); 58 FR 67939 at 67946 (December 22, 1993); ACYF-CB-PI-13-06.

2 Q: Is a foster family agency that provides for the daily care and supervision of foster children considered a child welfare contributing agency (CWCA)?

A: It depends. If a foster family agency has a contract or agreement with the title IV-E agency and provides child abuse and neglect investigations, placements, or child welfare case management services, this is a CWCA.

Source: (9/14/16)(9/14/16)

Reference: 45 CFR 1355.51(a); 81 FR 35450 at 35453 (June 2, 2016)

Child Welfare Policy Manual

3 **Q:** Are county public entities, in county-administered states (such as County Children and Youth agencies), that provide child abuse and neglect investigations, placements, or child welfare case management services defined as child welfare contributing agencies (CWCAs)?

A: No. 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. Therefore, counties in county-administered states are not considered CWCAs. Section 471(a)(2) of the 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.

Source: (9/14/16)(9/14/16)

Reference: Section 471(a)(2) of the Act; 45 CFR 205.100 and 1355.51(a); 81 FR 35450 at 35453 (June 2, 2016)

4 **Q:** Both a S/TACWIS and non-S/TACWIS project is defined in section 1355.51 as being "an 'active' automated data processing system or project ." What does "active" mean in this context?

A: "Active" means a system that the state or tribe is using as of the effective date of these regulations (August 1, 2016), or the state or tribe is designing, developing or implementing the system as of the effective date of the regulations.

Source: (9/14/16)(9/14/16)

Reference: 45 CFR 1355.51; 80 FR 48200 at 48205 (August 11, 2015)

6.2 Efficient, economical, and effective

No questions and answers are available at this time.

6.3 CCWIS data

1 **Q:** What does it mean in paragraph 1355.52(b) that CCWIS must "maintain" data?

Child Welfare Policy Manual

- A:** The CCWIS must "maintain" data by storing and sharing data with other appropriate child welfare automated data processing systems. The CCWIS must also "maintain" data by consistently applying data quality processes and procedures to the data no matter where the data may have been initially collected.

Source: 10/27/201610/27/2016

Reference: 45 CFR 1355.52(b); 81 FR 35450 at 35454 (issued June 2, 2016); 80 FR 48200 at 48207 (issued August 11, 2016)

- 2 Q:** Does the requirement of paragraph 1355.52(b) to maintain all CCWIS data in the CCWIS allow child welfare contributing agency (CWCA) systems to collect CCWIS data?

- A:** Yes. CWCA systems may collect CCWIS data if the data is electronically exchanged with CCWIS, per paragraph 1355.52(e)(1)(ii).

Source: 10/27/201610/27/2016

Reference: 45 CFR 1355.52(b); 45 CFR 1355.52(e)(1)(ii); 81 FR 35450 at 35454 and 35463 (issued June 2, 2016); 80 FR 48200 at 48203, 48207 and 48212 (issued August 11, 2016)

- 3 Q:** Is the use of a centralized data warehouse (in addition to a CCWIS production database) permitted as part of the overall CCWIS design?

- A:** Yes. The title IV-E agency may maintain CCWIS data in a CCWIS production database (which is a database processing CCWIS transactions) and a data warehouse (which is a database used for reporting and data analysis) provided all CCWIS automated functions seamlessly access data from both the database and data warehouse. For example, when generating a report or completing a task that requires data from both the database and data warehouse, CCWIS must be able to immediately access needed data.

Source: 10/27/201610/27/2016

Reference: 45 CFR 1355.52(b); 81 FR 35450 at 35454 (issued June 2, 2016)

Child Welfare Policy Manual

6.3A Federal data

1 Q: What federal data are required to be in CCWIS per paragraph 1355.52(b)?

A: The federal data required to be in CCWIS are described in federal child welfare laws and policies. Because the required federal data may change as laws and policies change, paragraph 1355.52(b) lists categories of data from these laws and policies rather than specify a comprehensive set of federal data. ACF will use the federal laws, regulations, and policies effective at the time of a CCWIS review to determine compliance with paragraph 1355.52(b). Below are examples of required federal data, based on laws and policies in effect at the time the CCWIS final rule was published.

Examples of federal data required for ongoing federal child welfare reports include:

<ul style="list-style-type:Disc; margin-left: 2em;">

All AFCARS data;

NYTD outcomes information as described in Program Instruction ACYF-CB-PI-10-04 (issued April 2, 2010), although CCWIS must maintain NYTD case management data;

Financial information for the CB-496, such as training costs, demonstration project costs, and administrative costs may be maintained in a separate financial system that exchanges data with CCWIS per paragraph 1355.52 (e)(1)(i). Other data, such as the average monthly number of children receiving title IV-E Foster Care maintenance assistance payments, may be derived from CCWIS case management and placement records.

Examples of federal data required for title IV-E eligibility determinations, authorizations of services, and expenditures under titles IV-B and IV-E include;

<ul style="list-style-type:Disc; margin-left: 2em;">

Data necessary for title IV-E eligibility determinations includes data such as the factors used to demonstrate the child would qualify for AFDC under the 1996 plan, placement licensing and background check information, and court findings.

Data required for authorizations of services and other expenditures under titles IV-B and IV-E includes data such as documentation of services authorized, records that the services were delivered, payments processed, and payment status, including whether the payment will be allocated to one or more federal, state, or tribal programs for reimbursement, and the payment amount allocated.

Financial information may be maintained in a financial system exchanging data with CCWIS.

Child Welfare Policy Manual

Examples of federal data documenting interactions with and on behalf of clients that the title IV-E agency determines is needed to support federal child welfare laws, regulations, and policies include:

- <ul style="list-style-type: Disc; margin-left: 2em;">
- case management information,
- recommended services,
- placement data, and
- licensing information on foster care providers.

Examples of federal case management data collected in the course of casework with clients that may be needed for a Child and Family Services Review (CFSR) includes:

- <ul style="list-style-type: Disc; margin-left: 2em;">
- abuse and neglect reports,
- case plans, and
- placement histories.

Source: 10/27/201610/27/2016

Reference: Section 474(a)(3)(C)(i) of the Social Security Act; 45 CFR 1355.52(b); 81 FR 35450 at 35454 35455 (issued June 2, 2016); 80 FR 48200 at 48206 48207 (issued August 11, 2016); ACYF-CB-PI-10-04 (issued April 2, 2010)

6.3B State data

1 Q: Is substance abuse treatment and parenting class information considered data that the title IV-E agency's CCWIS is required to maintain to support state or tribal child welfare laws, regulations, policies, practices, reporting requirements, audits, program evaluations, and reviews in accordance with paragraph 1355.52(b)(2)?

A: It depends. Title IV-E agencies must maintain substance abuse treatment and parenting class data in its CCWIS if the IV-E agency has determined that such data supports a data need based on the agency's specific circumstances, populations, title IV-B and IV-E plans, and business practices.

We do not require title IV-E agencies to maintain this specific data to allow agencies flexibility to implement a CCWIS tailored to their needs.

Child Welfare Policy Manual

Source: 10/27/201610/27/2016

Reference: 45 CFR 1355.52(b); 81 FR 35450 at 35455 (issued June 2, 2016); 80 FR 48200 at 48207 (issued August 11, 2016)

2 Q: How will ACF determine title IV-E agency compliance with the requirement that CCWIS maintain data to support state or tribal child welfare laws, regulations, policies, practices, reporting requirements, audits, program evaluations, and reviews per paragraph 1355.52(b)(2)?

A: ACF will determine compliance with this requirement by reviewing state and tribal laws, regulations, policies, practices, reporting requirements and audit, program evaluation, and CCWIS review requirements in consultation with title IV-E agency representatives. For example, to determine if CCWIS maintains the data necessary to support state or tribal practices, we will consider the information needs of child welfare contributing agencies (CWCAs). If we document a pattern of CWCAs re-entering information clients provided to other CWCAs, that may suggest that the data should be in CCWIS and shared with CWCAs to prevent the duplicate entry of needed data. In such circumstances, we will consult with the title IV-E agency before determining if the data should be classified as CCWIS data and exchanged with the title IV-E agency's CCWIS.

Source: 10/27/201610/27/2016

Reference: 45 CFR 1355.52(b)(2); 81 FR 35450 at 35455 (issued June 2, 2016); 80 FR 48200 at 48207 (issued August 11, 2016)

Child Welfare Policy Manual

6.3C ICWA

I Q: Are state title IV-E agencies required to build electronic data exchanges with federally recognized Indian tribes, tribal organizations, and tribal consortia to comply with the Indian Child Welfare Act (ICWA) requirements of paragraph 1355.52(b)(3)?

A: No. The regulations do not require a data exchange between CCWIS and federally recognized Indian tribes, tribal organizations, and tribal consortia. However, section 1355.54 permits this optional data exchange. Optional data exchanges proposed by a title IV-E agency and approved by ACF may qualify for CCWIS cost allocation as described at section 1355.57.

Source: 10/27/2016 10/27/2016

Reference: 45 CFR 1355.52(b)(3); 45 CFR 1355.54; 45 CFR 1355.57; 81 FR 35450 at 35455, 35471 and 35473 35475 (issued June 2, 2016); 80 FR 48200 at 48207 48208, 48218 48219, and 48220 58222 (issued August 11, 2016)

6.3D NCANDS

No questions and answers are available at this time.

6.4 Reporting

I Q: May a title IV-E agency use a centralized data warehouse and a CCWIS production database to generate a report or complete a task using data?

A: Yes. However when generating a report that requires data from both the database and data warehouse, CCWIS must be able to immediately access needed data.

Source: 10/27/2016 10/27/2016

Reference: 45 CFR 1355.52(c); 81 FR 35450 at 35456 (issued June 2, 2016) 80 FR 48200 at 48208 (issued August 11, 2016)

Child Welfare Policy Manual

2 **Q:** Can an agency use non-CCWIS data sources to produce reports under paragraph 1355.52(c)?

A: CCWIS must provide CCWIS data as needed for reports per paragraph 1355.52(c)(1), however, CCWIS is not required to produce every agency report. If CCWIS maintains a subset of a required report's data, CCWIS is not required to generate the complete report, but must provide the data maintained in the CCWIS for incorporation into the report.

Agencies may decide how to provide the data. For example:

<ul style="list-style-type:Disc; margin-left: 2em;">

CCWIS may transmit available National Youth in Transition Database (NYTD) data to a system that collects NYTD survey data and generates the federal report.

CCWIS may support financial audits by providing data on authorized placements and services that may be merged with non-CCWIS data to create audit trails.

CCWIS may provide a hardcopy summary of demographic and placement statistics that staff add to a narrative report demonstrating progress on Child and Family Service Review (CFSR) goals.

Data analysts may use a spreadsheet of CCWIS data to develop reports on trends in child welfare.

If, however, CCWIS maintains all the data required for a report, the report must be generated entirely from that data. For example, even if child welfare contributing agencies (CWCAs) collect Adoption and Foster Care Analysis and Reporting System (AFCARS) data, the AFCARS report must be generated from the data provided by CWCAs and maintained in CCWIS.

Source: 10/27/2016 10/27/2016

Reference: 45 CFR 1355.52(c); 81 FR 35450 at 35456 (issued June 2, 2016); 80 FR 48200 at (issued August 11, 2016)

Child Welfare Policy Manual

6.4A Federal reports

No questions and answers are available at this time.

6.4B State and tribal reports

No questions and answers are available at this time.

6.5 Data quality

1 Q: What are the data security, archiving, and purging requirements for CCWIS?

A: These requirements are addressed in paragraphs 1355.30(i) and (k) and 1355.52(j) as follows:

Paragraph 1355.30(i) applies the requirements at 45 CFR 75.361 to programs funded under titles IV-B and IV-E of the Social Security Act.

Paragraph 1355.30(k) applies 45 CFR 95.621(f) to CCWIS projects meeting the thresholds at 45 CFR 95.611.

Paragraph 1355.52(j) applies 45 CFR 95.621(f) to CCWIS projects below the thresholds at 45 CFR 95.611.

Source: 10/27/201610/27/2016

Reference: 45 CFR 92.42; 45 CFR 95.611; 45 CFR 95.621(f); 45 CFR 1355.30(i); 45 CFR 1355.30(k); 81 FR 35450 at 35457 (issued June 2, 2016)

Child Welfare Policy Manual

6.5A Standards and confidentiality

1 Q: Are missing or unknown data elements permitted by the CCWIS data quality requirements and standards of paragraph 1355.52(d)(1)(i)?

A: It depends. CCWIS data quality requirements and standards are defined in federal, state and tribal program regulations, laws, and policies related to specific data elements and their use. Paragraph 1355.52(d)(1)(i) mandates data quality standards for completeness, timeliness, and accuracy of CCWIS data, but does not specify the data quality standard applicable to specific data elements.

Some data quality standards, such as the ones applicable to AFCARS data, define specific values for AFCARS data elements that may require only known values for certain data or set limits for missing data. But a different data quality program or reporting standard may specify conditions where data is not required or permit "unknown" as a data value.

In cases where two or more data quality standards apply to the same data element, the most rigorous standard applies, per paragraph 1355.52(d)(1)(i).

Source: 10/27/201610/27/2016

Reference: 45 CFR 1355.52(d)(1)(i); 81 FR 35450 at 35457 (issued June 2, 2016); 80 FR 48200 at 48208 48209 (issued August 11, 2016)

Child Welfare Policy Manual

2 Q: May a title IV-E agency automatically prefill CCWIS data fields with known information?

A: It depends. The automatic calculation of data based on information previously known to the system, such as the name of a worker's supervisor or a zip code for an entered address, is allowable. Use of system-calculated data, such as system generated time stamps to capture the time of record entry or to accurately calculate current age from birth date data known to the system, is allowable.

However, the automated generation of default data, such as classifying all citizenship values as U.S. citizenship, is prohibited because users may not uniformly verify or correct inaccuracies in the default value pursuant to 1355.52(d)(1)(v).

Source: 10/27/201610/27/2016

Reference: 45 CFR 1355.52(d)(1)(v); 81 FR 35450 at 35457 (issued June 2, 2016); 80 FR 48200 at 48209 (issued August 11, 2016)

6.5B Automated support for data quality

1 Q: Under paragraph 1355.52(d)(2)(iii), what data may CCWIS request through the required exchange with child welfare contributing agency systems?

A: Per paragraph 1355.52(d)(2)(iii), the electronic requests are for current and historical CCWIS data. The electronic requests may include data meeting any of the requirements of paragraph 1355.52(b), which describes the CCWIS data requirements.

Source: 10/27/201610/27/2016

Reference: 45 CFR 1355.52(b); 45 CFR 1355.52(d)(2)(iii); 81 FR 35450 at 35454 35456 and 35458 (issued June 2, 2016); 80 FR 48200 at 48206 48208 and 48210 (issued August 11, 2016)

Child Welfare Policy Manual

2 Q: How is duplicate data entry defined?

A: Duplicate data entry is the manual reentry of data already captured by either the CCWIS or another system required to provide data to CCWIS.

Source: 10/27/201610/27/2016

Reference: 45 CFR 1355.52(d)(2)(iv); 81 FR 35450 at 35458 (issued June 2, 2016)

6.5C Data quality reviews

1 Q: Are there other CCWIS data quality reviews in addition to the biennial data quality reviews?

A: No. Paragraph 1355.52(d)(3) describes the biennial data quality review, which is the only required CCWIS data quality review.

Source: 10/27/201610/27/2016

Reference: 45 CFR 1355.52(d)(3); 81 FR 35450 at 35458 (issued June 2, 2016)

2 Q: Are the data quality reviews described at paragraph 1355.52(d)(3) conducted by ACF central or regional office staff, the title IV-E agency, or another party?

A: The title IV-E agency conducts the data quality review. However, paragraph 1355.52(d)(3) does not prohibit the agency from seeking assistance, such as from another agency or a vendor of data quality services, with the data quality review.

Source: 10/27/201610/27/2016

Reference: 45 CFR 1355.52(d)(3); 81 FR 35450 at 35458 (issued June 2, 2016); 80 FR 48200 at 48210 (issued August 11, 2016)

Child Welfare Policy Manual

3 **Q:** What activities and processes must be part of the biennial data quality review described in paragraph 1355.52(d)(3)?

A: The activities and processes for the data quality review established by the title IV-E agency and approved by ACF must meet the requirements of paragraph 1355.52(d)(3). Title IV-E agencies have flexibility to select a review process most suitable for their circumstances. Examples of activities in biennial review processes include: reviewing a sample of case records, interviewing select state/tribal and child welfare contributing agency staff, evaluating automated edit checks, and a reviewing of data quality reports. Some data quality activities, such as automated processes, may be continuous while other activities may occur one time during the biennial review period.

Source: 10/27/2016 10/27/2016

Reference: 45 CFR 1355.52(d)(3); 81 FR 35450 at 45458 (issued June 2, 2016); 80 FR 48200 at 48210 (issued August 11, 2016)

4 **Q:** Is CCWIS cost allocation available for staff time spent planning and conducting the data quality review?

A: It depends. Planning and conducting the data quality review is an approved activity as defined at section 1355.51 and qualifies for CCWIS cost allocation as described in section 1355.57(c). Data correction and related program activities do not qualify for CCWIS funding.

Source: 10/27/2016 10/27/2016

Reference: 45 CFR 1355.51; 45 CFR 1355.52(d); 45 CFR 1355.57(c); 81 FR 35450 at 35459 (issued June 2, 2016); 80 FR 48200 at 48204, 48210, and 48221 (issued August 11, 2016)

Child Welfare Policy Manual

6.5D Data quality findings

1 Q: What actions must the title IV-E agency take to address findings from the data quality reviews described in paragraph 1355.52(d)(3)?

A: Title IV-E agencies must correct the factors contributing to poor quality data, such as data collection procedures and training, CCWIS programing errors, or problems with bi-directional data exchanges, per paragraph 1355.52(d)(4). Agencies must propose how they will address review findings and demonstrate improvement in data quality in their data quality plans, per paragraph 1355.52(d)(5).

Source: 10/27/201610/27/2016

Reference: 45 CFR 1355.52(d)(3) (5); 81 FR 35450 at 35458 35461 (issued June 2, 2016); 80 FR 48200 at 48210 48211 (issued August 11, 2016)

2 Q: Does the requirement to address CCWIS data quality review findings in paragraph 1355.52(d)(4) require title IV-E agencies to correct previously collected data?

A: No. The regulation permits, but does not require, agencies to correct previously collected data.

Source: 10/27/201610/27/2016

Reference: 45 CFR 1355.52(d)(4); 81 FR 35450 at 35460 (issued June 2, 2016); 80 FR 48200 at (issued August 11, 2016)

3 Q: Are there deadlines for the title IV-E agency to correct findings from a data quality review?

A: No. The title IV-E agency will propose timeframes to correct findings for ACF approval as part of the data quality plan per paragraph 1355.52(d)(5) or an Advance Planning Document (APD) per 45 CFR 95, Subpart F.

Source: 10/27/201610/27/2016

Child Welfare Policy Manual

Reference: 45CFR 95, Subpart F; 45 CFR 1355.52(d)(3) (5); 81 FR 35450 at 35458 35461 (issued June 2, 2016); 80 FR 48200 at 48210 48211 (issued August 11, 2016)

6.5E Data quality plans

I Q: Are title IV-E agencies that do not implement a CCWIS required to develop a CCWIS data quality plan?

A: No.

Source: 10/27/2016/10/27/2016

Reference: 45 CFR 1355.52(d)(5); 81 FR 35450 at 35461 (issued June 2, 2016)

6.6 Data exchanges

No questions and answers are available at this time.

6.6A Financial systems

No questions and answers are available at this time.

6.6B Child welfare contributing agencies

No questions and answers are available at this time.

6.6C Title IV-E determinations

No questions and answers are available at this time.

6.6D External child welfare systems

No questions and answers are available at this time.

6.6E Child abuse and neglect systems

No questions and answers are available at this time.

Child Welfare Policy Manual

6.6F Title IV-A systems

No questions and answers are available at this time.

6.6G Title XIX eligibility systems

No questions and answers are available at this time.

6.6H Title XIX claims processing

No questions and answers are available at this time.

6.6I Title IV-D systems

No questions and answers are available at this time.

6.6J Court systems

No questions and answers are available at this time.

6.6K Education systems

No questions and answers are available at this time.

6.7 Data exchange standard

No questions and answers are available at this time.

6.8 Title IV-E determinations

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

A: 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

Child Welfare Policy Manual

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: 10/27/2016 10/27/2016

Reference: 45 CFR 1355.52(g); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

2 Q: 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?

A: 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: 10/27/2016 10/27/2016

Reference: 45 CFR 1355.52(g); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

Child Welfare Policy Manual

3 **Q:** 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?

A: 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: 10/27/2016 10/27/2016

Reference: 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 **Q:** How must title IV-E eligibility data collected by other information system be transmitted to CCWIS?

A: 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: 10/27/2016 10/27/2016

Reference: 45 CFR 1355.52(e)(1)(iii); 80 FR 48200 at 48212 (issued August 11, 2015)

6.8A State title IV-E determinations

No questions and answers are available at this time.

6.8B Tribal title IV-E determinations

No questions and answers are available at this time.

6.9 Software provision

1 **Q:** Does paragraph 1355.52(h), which requires title IV-E agencies to provide a copy of the

Child Welfare Policy Manual

agency-owned software that is designed, developed, or installed with federal financial participation (FFP) and associated documentation to the designated federal repository, apply only to software developed once an agency implements a new CCWIS or transitions another system to CCWIS?

- A:** No. The title IV-E agency may be required to provide ACF software from legacy systems developed with FFP per 45 CFR 95.617(b).

Source: 10/27/201610/27/2016

Reference: 45 CFR 1355.52(h); 45 CFR 95.617(b); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

- 2 Q:** In county administered states, may counties directly access software and associated documentation from the federal repository described in paragraph 1355.52(h) or must the state title IV-E agency make such a request?

- A:** County administered agencies may ask that the state title IV-E agency request software and associated documentation from the federal repository. Title IV-E agencies must receive federal approval to provide the materials to the county administered agency.

Source: 10/27/201610/27/2016

Reference: 45 CFR 1355.52(h); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

- 3 Q:** Must title IV-E agencies submit commercial off-the-shelf (COTS) products or third party utilities to the federal repository described in paragraph 1355.52(h)?

- A:** No. Agencies are not required to submit these products because ACF is not granted a license to COTS products or third party utilities that are not owned by the title IV-E agency per 45 CFR 95.617.

However, COTS software enhanced or modified with federal financial participation is owned by the title IV-E agency. This includes extensions to connect the COTS product to, or use it

Child Welfare Policy Manual

with other modules of the CCWIS. ACF has regulatory authority to add these products to the federal registry.

Source: 10/27/201610/27/2016

Reference: 45 CFR 1355.52(h); 45 CFR 95.617; 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

- 4 Q:** Must title IV-E agencies provide automated functions that support multiple programs within an agency to ACF for inclusion in the federal repository described in paragraph 1355.52(h)?
- A:** It depends. If an automated function is designed, developed, or installed with any federal financial participation (FFP), ACF has the regulatory authority to add it to the federal repository per paragraph 1355.52(h).

Source: 10/27/201610/27/2016

Reference: 45 CFR 1355.52(h); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

6.10 Submission

No questions and answers are available at this time.

6.10A Initial submission

- 1 Q:** If the agency elects not to transition a S/TACWIS project to a CCWIS, is the title IV-E agency required to submit the documents listed in paragraph 1355.52(i)(1) to ACF when submitting an Advance Planning Document (APD) or Notice of Intent during the transition period??
- A:** No. A record from the title IV-E agency signed by the governor, tribal leader, or designated state or tribal official notifying ACF that the title IV-E agency elects not to transition a S/TACWIS project to a CCWIS project is sufficient. However, the IV-E agency must continue to submit applicable APDs for the non-CCWIS project.

Child Welfare Policy Manual

Source: 10/27/2016 10/27/2016

Reference: 45 CFR 95 Subpart F; 45 CFR 1355.51; 45 CFR 1355.52(i)(1); 45 CFR 1355.56(d)(1) 81 FR 35450 at 35467 35468 and 35473 (issued June 2, 2016); 80 FR 48200 at 48205, 48216 48217, and 48220 (issued August 11, 2015)

2 **Q:** What is the start date of a CCWIS project?

A: 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: 10/27/2016 10/27/2016

Reference: 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)

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

A: 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:

<ul style="list-style-type:Disc; margin-left: 2em;">

A description of how the CCWIS will meet the requirements in 1355.52 (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:

<ul style="list-style-type:Circle; margin-left: 4em;"> 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).

Child Welfare Policy Manual

Source: 10/27/201610/27/2016

Reference: 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)

4 Q: Does paragraph 1355.52(i)(1)(iii)(B) require a title IV-E agency that elects to allow Child Welfare Contributing Agencies to use their systems to note if a CCWIS automated function is duplicated in a system used by a contract service provider?

A: Yes, if the contract service provider meets the definition of a child welfare contributing agency, any automated functions in the provider's system that duplicate automated functions in CCWIS must be included in the automated function list described in paragraph 1355.52(i)(1)(ii). Per section 1355.51, a child welfare contributing agency is a public or private entity that, by contract or agreement with the title IV-E agency, provides child abuse and neglect investigations, placement, or child welfare case management (or any combination of these) to children and families.

Source: 10/27/201610/27/2016

Reference: 45 CFR 1355.51; 45 CFR 1355.52(i)(1); 81 FR 35450 at 35453 and 35468 (issued June 2, 2016); 80 FR 48220 at 48205 and 48216 48217 (issued August 11, 2015)

5 Q: When notifying ACF that a title IV-E agency intends to transition an existing S/TACWIS or non-S/TACWIS to CCWIS, does paragraph 1355.52(i)(1)(ii) require the agency to list existing automated functions of the transitioning system that will be used in the CCWIS?

A: Yes. The list includes existing automated functions of the transitioning system that will be used in the CCWIS as well as newly developed automated functions that will be part of the CCWIS. Providing this list in addition to the more detailed information required in paragraph 1355.52(i)(1)(iii) at the start of a CCWIS project will help both ACF and the title IV-E agency to more reliably estimate project costs.

Source: 10/27/201610/27/2016

Child Welfare Policy Manual

Reference: 45 CFR 1355.52(i)(1); 80 FR 48220 at 4648216 48217 (issued August 11, 2015)

6.10B On-going submission

No questions and answers are available at this time.

6.11 Other APD requirements

No questions and answers are available at this time.

6.12 Design requirements

No questions and answers are available at this time.

6.12A Automated function requirements

No questions and answers are available at this time.

6.12A.1 Modularity

No questions and answers are available at this time.

6.12A.2 Plain language

No questions and answers are available at this time.

6.12A.3 Development standard

No questions and answers are available at this time.

6.12A.4 Reuse

No questions and answers are available at this time.

6.12B Design waivers

No questions and answers are available at this time.

Child Welfare Policy Manual

6.13 CCWIS options

No questions and answers are available at this time.

6.14 CCWIS reviews

No questions and answers are available at this time.

6.15 Transition Period

1 Q: What requirements must a title IV-E agency with a S/TACWIS meet if the agency does not build a CCWIS?

- A:** A title IV-E agency with a S/TACWIS project that elects not to transition to a CCWIS must:
1. notify ACF by July 31, 2018 in an Advance Planning Document (APD) or Notice of Intent that it will not transition the S/TACWIS project to CCWIS; and
 2. continue to use the S/TACWIS through its life expectancy in accordance with 45 CFR 95.619.

The title IV-E agency must also continue to meet the APD requirements at 45 CFR 95, Subpart F per 1355.30(k).

Source: (9/14/16)(9/14/16)

Reference: 45 CFR 95, Subpart F; 45 CFR 1355.30(k); 45 CFR 1355.56(d); 81 FR 35450 at 35473 (June 2, 2016); 80 FR 48200 at 48220 (August 11, 2015)

Child Welfare Policy Manual

2 **Q:** What are the consequences if a title IV-E agency with a S/TACWIS fails to notify ACF by July 31, 2018 that the agency will not transition to CCWIS?

A: The title IV-E agency may be subject to recoupment of all title IV-E funds for the project per 45 1355.56(e)

Source: (9/14/16)(9/14/16)

Reference: 45 CFR 1355.56(e); 45 CFR 1358; 45 CFR 95.635(b); 81 FR 35450 at 35473 (June 2, 2016); 80 FR 48200 at 48220 and 48222 (August 11, 2015)

3 **Q:** Are CCWIS projects subject to all Advance Planning Document (APD) regulations at 45 CFR 95 Subpart F?

A: It depends on whether the CCWIS project is at, above, or below the APD thresholds. CCWIS projects at or above the APD thresholds at 45 CFR 95.611 are subject to all the APD regulations at 45 CFR 95 Subpart F. CCWIS projects below the APD thresholds at 45 CFR 95.611 are subject to only the APD regulations at 45 CFR 95.613 through 95.621 and 95.626 through 95.641.

Source: (9/14/16)(9/14/16)

Reference: 45 CFR 1355.30(k); 45 CFR 1355.52(j); 80 FR 48200 at 48217 (August 11, 2015)

4 **Q:** Is there specific language that a title IV-E agency must use to notify ACF that the agency does not intend to transition a S/TACWIS to CCWIS?

A: No. 1355.56(d) requires the agency to notify ACF in an APD or Notice of Intent submitted during the transition period that the agency does not elect to transition a S/TACWIS project to CCWIS. The required notification must convey the message that the IV-E agency does not elect to transition the S/TACWIS project to CCWIS.

Child Welfare Policy Manual

Source: (9/14/16)(9/14/16)

Reference: 45 CFR 1355.56(d)(1); 81 FR 35450 at 35473 (issued June 2, 2016)

5 Q: What requirements must a title IV-E agency with a non-S/TACWIS meet if the agency does not build a CCWIS?

A: The title IV-E agency must continue to meet the APD requirements at 45 CFR 95, Subpart F.

Source: (9/14/16)(9/14/16)

Reference: Section 474(a)(C) of title IV-E of the Social Security Act

6 Q: Are there financial consequences for using a former S/TACWIS as a non-CCWIS beyond the 24 month transition period ending on July 31, 2018?

A: It depends. There are no consequences in the CCWIS regulations for using a former S/TACWIS as a non-CCWIS provided the title IV-E agency:

- >notifies ACF by July 31, 2018 in an APD or Notice of Intent, that it will not transition the S/TACWIS project to CCWIS; and

- continues to use the S/TACWIS through its life expectancy in accordance with 45 CFR 95.619.

The title IV-E agency must also continue to meet the APD requirements at 45 CFR 95, Subpart F per 1355.30(k).

Child Welfare Policy Manual

However, if the title IV-E agency does not meet these requirements, the agency may be subject to funding recoupment.

Source: (9/14/16)(9/14/16)

Reference: 45 CFR 95, Subpart F; 45 CFR 1355.30(k); 45 CFR 1355.56(d) and (e); 45 CFR 1358; 81 FR 35450 at 35473 (June 2, 2016); 80 FR 48200 at 48220 and 48222 (August 11, 2015)

Child Welfare Policy Manual

7 **Q:** If a S/TACWIS does not transition to CCWIS and meets the notification and continued-use requirements of 1355.56(d), what cost allocation does the S/TACWIS qualify for both during and after the transition period?

A: Through July 31, 2018, the S/TACWIS may continue to claim title IV-E funding according to the cost allocation methodology approved by ACF for the development or the operational cost allocation plan approved by the Department or both.

After July 31, 2018, ACF will classify the system as a non-CCWIS. The non-CCWIS may qualify for non-CCWIS cost allocation.

Source: (9/14/16)(9/14/16)

Reference: 45 CFR 1355.56(a); 45 CFR 1355.57(f); 45 CFR 1356.60(d); 81 FR 35450 at 35472 35473 and 35475 (June 2, 2016); 80 FR 48200 at 48219 48220 and 48222 (August 11, 2016)

8 **Q:** If a title IV-E agency decides to build a new CCWIS, transition a S/TACWIS to CCWIS, or transition a non-S/TACWIS to CCWIS, what CCWIS requirements must the agency meet before claiming funding in accordance with a CCWIS cost allocation?

A: A title IV-E agency must notify ACF of the decision before claiming funding in accordance with a CCWIS cost allocation. The agency must meet the requirements of 1355.52(i)(1) when formally conveying the decision to ACF. Paragraph 1355.52(i)(1) requires that the agency provide the following documents:

- an Advance Planning Document (APD) (if the CCWIS project is over the APD thresholds defined at 45 CFR 95.611) or a Notice of Intent (if the CCWIS project is under APD thresholds);

- a description of how the planned CCWIS will meet the CCWIS project requirements found in 1355.52(a)??(h), and if applicable, any optional exchanges or functions included in the

Child Welfare Policy Manual

CCWIS as allowed under 1355.54; and

a list of all automated functions planned for the CCWIS including, for each automated function:

- if the automated function supports a requirement of section 1355.52 (CCWIS Project Requirements) or section 1355.54 (CCWIS Options);

- if 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,

- if the automated function complies with paragraph 1355.53(a) (CCWIS Design Requirements), unless exempted from the design requirements by one of the conditions described in paragraph 1355.53(b).

The title IV-E agency must provide the above documents to ACF by July 31, 2018 (the end of the transition period) if transitioning a S/TACWIS to CCWIS or transitioning a non-S/TACWIS to CCWIS.

Source: (9/15/16)(9/15/16)

Child Welfare Policy Manual

Reference: 45 CFR 1355.52(i)(1); 45 CFR 1355.56(b); 45 CFR 1355.56(f)(1); 80 FR 48216 48217 and 48219 48220 (August 11, 2016)

9 Q: Do the CCWIS design requirements listed in 1355.53(a) apply to a S/TACWIS or non-S/TACWIS project transitioning to CCWIS?

A: It depends. For S/TACWIS or non-S/TACWIS projects, the CCWIS design requirements do not apply to automated functions developed on or before July 31, 2018 (the end of the transition period).

The CCWIS design requirements apply to automated functions developed after July 31, 2018 unless ACF approves technical advances in design proposed by the title IV-E agency that ACF determines to be more efficient, economical and effective than the CCWIS design requirements listed in paragraph 1355.53(a).

Source: (9/15/16)(9/15/16)

Reference: 45 CFR 1355.53; 45 CFR 1355.57(a); 80 FR 48200 at 48217 48218 and 48221; 81 FR 35450 at 35468 35471 and 35474 35475

10 Q: Must a S/TACWIS or non-S/TACWIS transitioning to CCWIS meet all CCWIS project requirements described at 1355.52?

A: Yes.

Source: (9/15/16)(9/15/16)

Reference: 45 CFR 1355.52

11 Q: Do the CCWIS design requirements listed in 1355.53(a) apply to a new CCWIS?

A: It depends. The CCWIS design requirements apply to all automated functions of a new CCWIS

Child Welfare Policy Manual

unless ACF approves technical advances in design proposed by the title IV-E agency that ACF determines to be more efficient, economical and effective than the CCWIS design requirements listed in paragraph 1355.53(a).

Source: (9/15/16)(9/15/16)

Reference: 45 CFR 1355.53; 45 CFR 1355.57(b); 80 FR 48200 at 48217 48218 and 48221; 81 FR 35450 at 35468 35471 and 35474 35475

12 Q: Must CCWIS projects be operational by the end of the transition period on July 31, 2018?

A: No. CCWIS projects are not required to be operational by the end of the transition period on July 31, 2018.

July 31, 2018 is the deadline by which a title IV-E agency with a S/TACWIS or non-S/TACWIS must notify ACF of the decision to either transition or not transition the system to a CCWIS.

Source: (9/15/16)(9/15/16)

Reference: 45 CFR 1355.56(b), (d), and (f)(1); 80 FR 48200 at 48204 and 48219 48220; 81 FR 35472 35473

13 Q: If a title IV-E agency transitions a S/TACWIS or non-S/TACWIS to CCWIS, can it replace this CCWIS with a new CCWIS at a later date?

A: Yes. A title IV-E agency may initiate a new CCWIS project at any time.

Source: (9/15/16)(9/15/16)

Reference: 45 CFR 1355.56(c) and (f)(2); 80 FR 48200 at 48204 and 48219

14 Q: If a title IV-E agency does not have the resources to begin a new CCWIS project during the transition period, may the agency begin a new CCWIS project after the transition period?

Child Welfare Policy Manual

- A:** Yes. A title IV-E agency may begin a new CCWIS project after the transition period. The CCWIS regulations do not establish deadlines for starting a new CCWIS project.

Source: (9/15/16)(9/15/16)

Reference: 45 CFR 1355.56(c) and (f)(2); 80 FR 48200 at 48204 and 48219

- 15 Q:** May a title IV-E agency make changes to the list of automated functions submitted per 1355.52(i)(1)?

- A:** Yes. The title IV-E agency must submit an updated list of CCWIS automated functions in their Annual Advance Planning Document (APD) or Operational APD, as appropriate, that identifies any revisions to the CCWIS automated functions.

Source: (9/15/16)(9/15/16)

Reference: 45 CFR 1355.52(i)(2); 80 FR 48200 at 48217

- 16 Q:** During the 24 month transition period (August 1, 2016 July 31, 2018), must a title IV-E agency get ACF approval before implementing enhancements to its S/TACWIS project?

- A:** It depends. Depending on the scope of the change and the status of the Implementation Advance Planning Document (APD), the agency would either seek approval or report changes in an As Needed, Annual or Operational APD in accordance with 45 CFR 95, Subpart F.

Source: (9/15/16)(9/15/16)

Reference: 45 CFR 95, Subpart F

Child Welfare Policy Manual

17 Q: Must title IV-E agencies with a S/TACWIS that is not compliant with all S/TACWIS requirements continue to work toward S/TACWIS compliance?

A: No. As of August 1, 2016, the CCWIS regulations are effective and replace S/TACWIS regulations. Therefore, the S/TACWIS regulations are no longer applicable.

Source: (9/15/16)(9/15/16)

Reference: 81 CFR 35450 at 35450 and 35473

6.16 Cost allocation

No questions and answers are available at this time.

6.16A Cost allocation for transitioning systems

No questions and answers are available at this time.

6.16B Cost allocation for new CCWIS

No questions and answers are available at this time.

6.16C CCWIS cost allocation

No questions and answers are available at this time.

6.16C.1 Development

No questions and answers are available at this time.

6.16C.2 Operations

No questions and answers are available at this time.

Child Welfare Policy Manual

6.17 Failure to comply

No questions and answers are available at this time.

6.17A Suspension

No questions and answers are available at this time.

6.17B Ending suspension

No questions and answers are available at this time.

6.17C Recoupment

No questions and answers are available at this time.