

# CCWIS Final Rule Data Exchange Requirements



January 12, 2017

# What requirements are covered in this webinar?

- 1355.50 – Purpose
- 1355.51 – Definitions
- 1355.52 – CCWIS project requirements
  - 1355.52(a) – Efficient, economical, and effective ✓
  - 1355.52(b) – CCWIS data ✓
  - 1355.52(c) – Reporting ✓
  - 1355.52(d) – Data quality ✓
  - 1355.52(e) – Bi-directional data exchanges ✓
  - 1355.52(f) – Data exchange standard ✓
    - 1355.52(g) – Automated eligibility determination
    - 1355.52(h) – Software provision
    - 1355.52(i) – Submission ✓
    - 1355.52(j) – Other applicable requirements
- 1355.53 – CCWIS design requirements
- 1355.54 – CCWIS options ✓
- 1355.55 – CCWIS reviews and assessment
- 1355.56 – Transition period ✓
- 1355.57 – Cost allocation ✓
- 1355.58 – Failure to meet APD conditions
- 1355.56.60 & 45 CFR 95, Subpart F – Conforming regulations

# Previous CCWIS Presentations

Find CCWIS introductory presentations at:  
<http://www.acf.hhs.gov/cb/research-data-technology/state-tribal-info-systems/training>

Available presentations:

- CCWIS Transition Requirements
- CCWIS Cost Allocation
- CCWIS Submission Requirements
- CCWIS Data & Reporting Requirements
- CCWIS Data Quality Requirements

# Agenda

- CCWIS Definitions – 1355.51
- Data Exchange Overview
- Data Exchange Standard – 1355.52(f)
- Mandatory Data Exchanges, if applicable – 1355.52(e)(1)
- Mandatory Data Exchanges – 1355.52(e)(2)
- Optional Data Exchanges – 1355.54
- Data Exchange Tips
- Next Steps
- Take – Aways

# CCWIS Definitions

The following terms are defined at the end of this slide deck:

- Child welfare contributing agency (CWCA)
- Data Exchange
- Data Exchange Standard

# Data Exchange Overview

## Data exchanges:

- Support improved outcomes for children & families
- Promote comprehensive & coordinated services
- Support continuity of care when clients are served by different workers & agencies
- Help identify duplicate or unnecessary services
- Reduce duplicate work
- Improve data quality

# Data Exchange Overview (continued...1 of 2)

- Data exchanges provide relevant CCWIS information to partners:
  - CCWIS regulations requires the exchange of **relevant data, including data that may benefit IV-E agencies and data exchange partners in serving clients & improving outcomes**
  - Relevant CCWIS data is determined from legal requirements, program needs & goals
  - CCWIS funding is not available for CCWIS to collect data relevant to data exchange partners, but not the title IV-E agency

# Data Exchange Overview (continued...2 of 2)

- Data must **be exchanged and maintained in accordance with confidentiality requirements in:**
  - 471(a)(8) of the Social Security Act;
  - 42 U.S.C. 5106a(b)(2)(B)(viii) of the Child Abuse Prevention and Treatment Act;
  - 45 CFR 205.50; and
  - other applicable federal & state or tribal laws



# Data Exchange Standard 1355.52(f)

Requirements:

- **A single data exchange standard** selected by the title IV-E agency
- The standard has to describe **data, definitions, formats, and other specifications**

Applies only to data exchanges between CCWIS and:

- Child welfare contributing agency systems
- External systems used by title IV-E agency staff

# Data Exchange Standard (continued...)

## Benefits:

- Reuse lowers development costs
- Enhanced interoperability
- Publically available standards increase competition and may result in:
  - Lower costs
  - Increased innovation leading to technological advances

## The standard may:

- Be updated; it is not unchanging
- May accommodate variation.

# Mandatory Data Exchanges, if applicable 1355.52(e)(1)

- **If applicable** means...if conditions apply, the data exchange is required without exception
- Required data exchanges must be **efficient, economical, effective, & bi-directional**:
  - May be more than a single data exchange (for example, if placement providers require different data than case management providers)
  - Data exchange may have several components; it may send different data at different times for different purposes (for example, establish a new case; request & report services; provide data updates; request & supply data for federal reports. )
- The title IV-E agency is responsible for the quality of data from these exchanges.

# Mandatory Data Exchanges, if applicable Financial – 1355.52(e)(1)(i)

Data exchange with **systems generating the financial payments and claims for title IV-B & IV-E:**

- Not new; required under S/TACWIS
- Required only if financial functions are in an external system

Benefits:

- Efficient processing of claims, payments, & receivables
- Access to data & reports, such as: cost analysis, budget projections, audits & reviews

# Mandatory Data Exchanges, if applicable

## Financial (continued...)

Exchange relevant CCWIS data such as:

- CCWIS may provide the financial system:
  - Service authorizations & service codes
  - Client information
  - Vendor information
  - IV-E eligibility status of children
- Financial system may provide CCWIS:
  - Payment information such as check/transaction numbers, dates & amounts
  - Invoice copies
  - Payment status
  - Funding allocations

# Mandatory Data Exchanges, if applicable CWCAs – 1355.52(e)(1)(ii)

Data exchange with **systems operated by child welfare contributing agencies:**

- New; not permitted under S/TACWIS
- Required if CWCAs collect or use CCWIS data
- Data exchange standard required (1355.52(f)(1))

Benefits:

- CCWIS manages records transfer as clients move among CWCAs
- Supports consistent and coordinate service delivery
- Compiles comprehensive case files
- Supports seamless transfer of cases & clients between the agency and CWCAs
- Reduces duplicate data capture

# Mandatory Data Exchanges, if applicable CWCAs (continued...)

Exchange relevant CCWIS data between CCWIS and CWCAs such as:

- Intake & investigation data, for example:
  - Demographic information
  - Abuse & neglect allegations
  - Existing histories on perpetrators, families, and children
  - Reporter contact information
  - Required response time
  - Safety & risk assessments
  - Investigation findings & outcomes

# Mandatory Data Exchanges, if applicable CWCAs (continued...)

Exchange relevant CCWIS data between CCWIS and CWCAs such as:

- Placement information, for example:
  - Home studies
  - Licensing information & available services
  - Foster parent demographics
- Case management files, for example:
  - Assessments
  - Services
  - Progress toward goals



# **Mandatory Data Exchanges, if applicable IV-E Eligibility – 1355.52(e)(1)(iii)**

Data exchange with **each system used to calculate one or more components of title IV-E eligibility determinations:**

- Not new; required under S/TACWIS
- Required only if any eligibility calculations are in an external system

Benefits:

- Supports the efficient and consistent determination of title IV-E eligibility
- Provides information for federal title IV-E reviews and internal audits.

# Mandatory Data Exchanges, if applicable IV-E Eligibility (continued...)

Exchange relevant CCWIS data, such as:

- Placement data, for example:
  - Placement licensed
  - Placement eligible for title IV-E reimbursement
  - Placement history & dates
- Court data, for example:
  - Date of removal & date agency responsible for child
  - Court findings of “reasonable efforts” and “contrary to the welfare of the child”
- AFDC data, for example:
  - Citizenship
  - Social security number
  - Income, assets & resources
  - Living with a specified relative

# Mandatory Data Exchanges, if applicable External Systems–1355.52(e)(1)(iv)

Data exchange with **each system external to CCWIS used by title IV-E agency staff to collect CCWIS data:**

- New; not permitted under S/TACWIS
- Required only if the agency uses external systems, such as
  - child assessment tools
  - mobile applications
  - applications to conduct foster home studies
  - county child welfare information systems.
- Data exchange standard required (1355.52(f)(2))

Benefits:

- Incorporate case data from specialized child welfare tools into CCWIS
- Compile complete, timely, & accurate case files.
- Reduce duplicate data capture

# Mandatory Data Exchanges, if applicable External Systems (continued...)

Exchange relevant CCWIS data, such as:

- Demographic data
- Case plans
- Services delivered
- Home visiting information

# Mandatory Data Exchanges

## 1355.52(e)(2)

This section describes seven mandatory data exchanges. **To the extent practicable** the title IV-E agency must develop one bi-directional data exchange to each of these systems.

- May have multiple instances of the one bi-directional data exchange, such as:
  - Using one CCWIS/court data exchange to exchange data with multiple district courts on different schedules
  - Using one CCWIS/education exchange to exchange data with different school districts
- The single data exchange must accommodate all partners
- All exchange partners are not required to supply all data accommodated by the exchange

# Mandatory Data Exchanges (continued...1 of 2)

If a title IV-E agency cannot meet all of a data exchange's requirements, the agency:

1. implements the data exchange to the extent practicable (i.e., data exchanges are not "all or nothing");
2. submits a business case for ACF's consideration, with the applicable APD, explaining the conditions preventing the agency from meeting all data exchange requirements;
3. annually reviews the data exchange and, if conditions have changed, enhances the data exchange; and
4. annually updates the business case in the applicable APD to report current conditions and the status of the data exchange.

# Mandatory Data Exchanges (continued...2 of 2)

A data exchange is not required if complete, timely, and accurate relevant CCWIS data is provided at the needed time by other means, such as:

- A data warehouse collecting data from, and providing timely and relevant CCWIS data to data exchange partners
- The CCWIS is included in an enterprise system supporting data exchange partners

Title IV-E agencies are required to evaluate quality of data collected from partners and take appropriate steps if data quality does not meet standards, such as:

- Working with data exchange partners to correct data quality issues to data exchange partners
- Not using suspect data in reports or to support decisions until it is corrected

# Mandatory Data Exchanges

## Child Abuse & Neglect – 1355.52(e)(2)(i)

Data exchange with **child abuse and neglect system(s)**:

- Not new; required under S/TACWIS
- CAN systems are frequently integrated into child welfare case management system, so that no data exchange is needed

Benefits:

- Contribute to complete client case histories
- Provide required NCANDS data (for States)
- Prevent duplicate data entry



# Mandatory Data Exchanges

## Child Abuse & Neglect (continued...)

Exchange relevant CCWIS data, such as:

- Demographics
- Case histories
- Intake reports
- Child abuse & neglect investigations & findings
- Safety & risk assessments
- Reasons for removal from home

# Mandatory Data Exchanges

## Title IV-A – 1355.52(e)(2)(ii)

Data exchange with **system(s) operated under title IV-A of the Act:**

- Not new; required under S/TACWIS

Benefits:

- Identify potential duplicate payments under the TANF & child welfare programs
- Provide new and updated case information to both programs
- Prevent duplicate data entry by exchanging common data

# Mandatory Data Exchanges Title IV-A (continued...)

Exchange relevant CCWIS data, such as:

- Demographics
- Case information, such as:
  - Services received under TANF or child welfare
  - Calendars of client appointments & trainings to prevent double-scheduling.
- Information to determine title IV-E eligibility, such as:
  - Income, assets, & other resources
  - Child deprivation factors
- AFCARS information

# Mandatory Data Exchanges

## Medicaid Eligibility – 1355.52(e)(2)(iii)(A)

Data exchange with **systems to determine Medicaid eligibility:**

- Not new; required under S/TACWIS

Benefits:

- Assist with calculating & tracking Medicaid eligibility for
  - Title IV-E eligible clients (categorical eligibility)
  - Non title IV-E clients (income-based eligibility)
- Prevent duplicate data capture

# Mandatory Data Exchanges Medicaid Eligibility (continued...)

Exchange relevant CCWIS data, such as:

- Demographics
- Medicaid eligibility data
- AFCARS information

# Mandatory Data Exchanges

## MMIS – 1355.52(e)(2)(iii)(B)

### Data exchange with **Medicaid Management Information Systems:**

- New; optional under S/TACWIS

### Benefits:

- Support deliver of appropriate medical services consistently
- Identification of inappropriate health care
- Support generation of medical passports for foster care children

# Mandatory Data Exchanges

## MMIS (continued...)

Exchange relevant CCWIS data, such as:

- Demographic information
- Foster parent information
- Immunizations
- Prescriptions
- Other health services

# Mandatory Data Exchanges

## Title IV-D – 1355.52(e)(2)(iv)

Data exchange with **systems operated under title IV-D of the Act:**

- Not new; required under S/TACWIS
- Systems supporting the child support program

Benefits:

- Assist with establishing a child support case
- Identify parent & other relative resources
- Prevent duplicate data capture



# Mandatory Data Exchanges Title IV-D (continued...)

Exchange relevant CCWIS data, such as:

- Demographic information
- Foster care maintenance payment information
- Parent and relative location information
- Child support payments
- AFCARS information

# Mandatory Data Exchanges Courts – 1355.52(e)(2)(v)

Data exchange with **systems operated by the court(s) of competent jurisdiction over title IV-E foster care, adoption, and guardianship programs:**

- New; optional under S/TACWIS

Benefits:

- Provide child welfare information needed for judicial determinations & case monitoring
- Provide court decisions, findings, & orders for action by child welfare agency

# Mandatory Data Exchanges Courts (continued...)

Exchange relevant CCWIS data, such as:

- Child welfare case information
- Court dates for scheduling
- Court orders, such as:
  - Termination of parental rights
  - Removal decisions & custody assignment
- Court findings, such as:
  - Contrary to child's best interest to remain at home
  - Agency made reasonable efforts to keep the child in the home

# Mandatory Data Exchanges Education – 1355.52(e)(2)(vi)

Data exchange with **systems operated by the state or tribal education agency, or school districts, or both:**

- New; optional under S/TACWIS
- Data exchange aided by new federal legislation

Benefits:

- Improve educational outcomes for foster care children & youth
- Provide continuity for foster care children & youth in school transfers
- Address legislative requirements of both agencies.

# Mandatory Data Exchanges Education (continued...)

Exchange relevant CCWIS data, such as:

- Placement information
- Foster parent contact information
- Child welfare assessments
- Immunization records
- Education records, such as:
  - School & course enrollment
  - Academic performance
  - Disciplinary history
  - Services for children with an individualized education plan (IEP)

# Optional Data Exchanges

## 1355.54

- CCWIS cost allocation for optional data exchanges may be approved if:
  - The CCWIS **project meets, or when completed will meet, the requirements of section 1355.52;**
  - The data exchanges **are necessary to achieve title IV-E or IV-B program goals;** and
  - ACF **approves CCWIS funding**
- Not new; permitted under S/TACWIS
- Optional data exchanges may be uni-directional or bi-directional

# Optional Data Exchanges (continued...)

Optional data exchange examples:

- Social security administration
- Law enforcement to:
  - Request criminal background checks
  - Report foster care runaways
- State or Tribal agencies, such as
  - Labor department
  - Employment agency

# Data Exchange Tips Overview

Establish & implement data governance that includes:

- Decision-making procedures and authority
- Data exchange agreements, policies and procedures
- Data inventories & content management
- Data quality management
- Records management
- Data security & access



# Data Exchange Tips Overview (continued...)

Develop data sharing Memoranda of Understanding (MOUs) that:

- Address administrative issues:
  - Identify authorities or decision-makers
  - List the purpose or goals of the exchange
  - Process for amending the MOU
- Address data and data quality:
  - Identify data elements exchanged
  - Specify data quality requirements
  - Define processes to address data quality issues

# Data Exchange Tips Overview (continued...)

Develop data sharing MOUs that:

- Address confidentiality & security, such as:
  - Access rights
  - Permissible re-sharing
  - Data retention or purge schedules
  - Worker confidentiality training
- Address technical specifications:
  - Exchange methods including file & data formats, & data receipts
  - Exchange schedules
  - Required software
  - Security technical requirements

# Next Steps

- If needed, develop & implement agency data governance structures & procedures
- Inventory current data exchanges & determine if they meet CCWIS requirements
- Identify missing data exchanges & reach out to data exchange partners & establish MOUs
- If your agency works with CWCAs with their own systems, amend contracts to include data sharing
- Consult with your federal analyst regularly

# Next Steps (continued...)

Access training & technical assistance:

- Review data exchange questions & answers at the child welfare policy manual here:  
[http://www.acf.hhs.gov/cwpm/programs/cb/laws\\_policies/laws/cwpm/policy.jsp?idFlag=6](http://www.acf.hhs.gov/cwpm/programs/cb/laws_policies/laws/cwpm/policy.jsp?idFlag=6)
- Participate in upcoming webinars
- Submit questions to [CCWIS.Questions@acf.hhs.gov](mailto:CCWIS.Questions@acf.hhs.gov)
- Sign up for announcements  
(<https://www.acf.hhs.gov/programs/cb/resource/ccwis-announcements-listserv>) to learn about:
  - Upcoming webinars
  - Updates to the Child Welfare Policy Manual
  - Other technical assistance

# Take-Aways

- Data exchanges may vary depending on administrative structures & IT architectures
- Data exchanges are not “all or nothing” – they can be developed in stages.
- Mandatory exchanges that do not meet all CCWIS requirements must be re-evaluated annually and enhanced, when practicable
- CCWIS requirements require the exchange of relevant CCWIS data but do not specify a complete set of data elements that must be exchanged

# Questions?

# **CCWIS Definition: Child Welfare Contributing Agency**

*Child welfare contributing agency (CWCA)* is defined in the CCWIS regulations at 45 CFR 1355.51 and means an 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.

# CCWIS Definition: Data Exchange

*Data exchange* is defined in the CCWIS regulations at 45 CFR 1355.51 and means the automated, electronic submission or receipt of information, or both, between two automated data processing systems.



# CCWIS Definition: Data Exchange Standard

*Data exchange standard* is defined in the CCWIS regulations at 45 CFR 1355.51 and means the common data definitions, data formats, data values, and other guidelines that the state's or tribe's automated data processing systems follow when exchanging data.