

CCWIS Final Rule IV-E Eligibility Requirements



February 2, 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](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
- CCWIS Data Exchange Requirements – coming soon!

Agenda

- CCWIS Definitions
- Title IV-E Eligibility Overview
- CCWIS Title IV-E Eligibility Requirements
- Related CCWIS Requirements
- Automated Support Requirements
- How Factors does DSS Consider When Reviewing IV-E Functionality?
- Cost Allocation for Title IV-E Functionality
- Next Steps
- Take – Aways
- Questions

CCWIS Definitions

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

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

Title IV-E Eligibility Overview

CCWIS title IV-E eligibility requirements apply to all title IV-E eligible programs, including:

- Foster care
- Adoption assistance
- Guardianship assistance programs

Title IV-E Eligibility Overview (Continued...1 of 3)

For more information on title IV-E eligibility programmatic requirements:

- Visit the Title IV-E Reviews webpage at <https://www.acf.hhs.gov/cb/monitoring/title-ive-reviews>
- Visit the Child Welfare Policy Manual at https://www.acf.hhs.gov/cwpm/programs/cb/laws_policies/laws/cwpm/policy.jsp?idFlag=8
- Contact your assigned DSS federal analyst as listed at <https://www.acf.hhs.gov/cb/resource/state-tribe-assignments> for assistance with identifying other Children's Bureau and Regional Office resources to assist you.

Title IV-E Eligibility Overview (Continued...2 of 3)

Benefits of automated CCWIS title IV-E eligibility determination(s):

- Consistent title IV-E eligibility determinations for all children
- Supports CCWIS as the system of record for eligibility determinations
- Supports IV-E reviews, audits & other monitoring
- Increased worker efficiency:
 - Eliminates the necessity for duplicate data entry
 - Automated calculation reduces manual steps
 - Reduces the likelihood of eligibility determination errors

Title IV-E Eligibility Overview (Continued...3 of 3)

- Title IV-E waivers authorized by titles IV-B, IV-E, & Section 1130 of the Social Security Act
- States with Title IV-E waivers/demonstration projects must continue to determine IV-E eligibility of all children and youth:
 - CCWIS title IV-E eligibility requirements apply in jurisdictions with title IV-E waivers
 - CCWIS systems may also support waiver requirements
- See the Child Welfare Waivers webpage at <https://www.acf.hhs.gov/cb/programs/child-welfare-waivers> for more information

CCWIS Title IV-E Eligibility Requirements: State Eligibility – 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:

- Not new; required under S/TACWIS
- All users must use the same eligibility automated functions, such as those used for:
 - title IV-E financial determinations
 - adoption assistance
 - tracking court and licensing eligibility requirements

CCWIS Title IV-E Eligibility Requirements: State Eligibility (Continued...)

Different approaches are acceptable, such as:

- All IV-E eligibility performed within CCWIS, or
- All IV-E eligibility performed in an external system (e.g., all eligibility performed in an enterprise system) or
- Different IV-E eligibility steps performed by different external systems

*** Only one system supports each step in the eligibility determination process ***

CCWIS Title IV-E Eligibility Requirements: Tribal Eligibility – 1355.52(g)(2)

A tribal title IV-E agency must, to the extent practicable, use the same automated function or the same group of automated functions for all title IV-E eligibility determinations:

- Similar to state requirement except “to the extent practicable”
- Provides greater implementation flexibility

Related CCWIS Requirements

CCWIS requirements related to title IV-E eligibility determinations:

- CCWIS data requirement – 1355.52(b)(1)(ii)
- CCWIS data exchange requirement – 1355.52(e)(1)(iii)
- CCWIS data exchange standard requirement – 1355.52(f)

Related CCWIS Requirements: CCWIS Data – 1355.52(b)(1)(ii)

Data required for title IV-E eligibility determinations, authorizations of services, and expenditures under IV-B and IV-E:

- Not new; required under S/TACWIS

Required data includes:

- Court data, such as:
 - Court ordered or voluntary removal
 - Dates of court decisions
 - “Contrary to welfare” determination
 - “Reasonable efforts to prevent removal” determination

Related CCWIS Requirements: CCWIS Data (Continued...1 of 2)

Required data includes:

- Placement data, such as:
 - Placement dates
 - Placement types
 - Criminal record checks
 - Placement license status
- Data used to determine eligibility according AFDC 1996 rules, such as:
 - Removal from specified relative
 - Circumstances in specified relative's home
 - Financial need
 - Deprivation of parental support

Related CCWIS Requirements: CCWIS Data (Continued...2 of 2)

Required data includes:

- Financial data, such as:
 - Histories of provider payments
 - IV-E claims & federal reimbursement
 - Payment dates, including start & end dates
 - Placement dates, including start & end dates.

Related CCWIS Requirements: Data Exchange – 1355.52(e)(1)(iii)

A data exchange with **each system used to calculate one or more components of title IV-E eligibility determinations per paragraph (b)(1)(ii) of this section, if applicable:**

- Not new; required under S/TACWIS
- Not applicable if all IV-E eligibility processes performed by CCWIS

Related CCWIS Requirements: Data Exchange Standard – 1355.52(f)

The title IV-E agency must use a single data exchange standard that describes data, definitions, formats, and other specifications upon implementing a CCWIS: (1) For bi-directional data exchanges between CCWIS and each child welfare contributing agency; and (2) For data exchanges with systems described under paragraph (e)(1)(iv) of this section.

- New; optional under S/TACWIS
- Not applicable if all IV-E eligibility processes performed by CCWIS

Related CCWIS Requirements: Data Exchange Standard (continued...)

- Data exchange standard applicable to systems, such as:
 - External systems used by title IV-E agency staff to collect eligibility data (e.g., county case management systems; adoption assistance systems)
 - CWCA systems used to collect eligibility information
- Data exchange standard not applicable to systems supporting other programs, such as:
 - An enterprise system performing eligibility for multiple human service programs
 - Court systems
 - Title IV-A systems

Automated Support Requirements

The title IV-E process must:

- Automatically calculate title IV-E eligibility from supporting data.
 - Decision may not be manually overridden
 - Decision may be corrected by revising data supporting decision
- Facilitate user review, validation and correction of title IV-E eligibility data
- Preserve the title IV-E eligibility information for reviews & audits, including:
 - All title IV-E eligibility determinations
 - Data supporting each eligibility determination
 - IV-E financial claims, including adjustments
- Prevent duplicate data capture

What Factors does DSS Consider When Reviewing IV-E Eligibility?

DSS will continue the process from S/TACWIS reviews that includes:

- Is the determination automated? – The system must meet automation requirements*
- Does the automaton apply appropriate rules?
- Does the CCWIS capture the information used to calculate eligibility?
- Supports title IV-E agency's practice & policy?

DSS is developing guidance on CCWIS Reviews

Accuracy of the CCWIS title IV-E decisions will ultimately be verified by our title IV-E Reviews

Cost Allocation for Title IV-E Functionality

- Title IV-E automated functions that are part of CCWIS may qualify for CCWIS cost allocation
- Automated functions in non-CCWIS systems do not qualify for CCWIS cost allocation, as the system is outside of the CCWIS
- The external system may qualify for IV-E funds as a separate system
- The share of the external system used to calculate IV-E eligibility may qualify for IV-E funds
- For additional guidance on CCWIS cost allocation, see section 6.16 (Cost Allocation) of the Child Welfare Policy Manual:

https://www.acf.hhs.gov/cwpm/programs/cb/laws_policies/laws/cwpm/policy.jsp?idFlag=6

Next Steps

- If your agency currently automates title IV-E determinations, assess whether it meets the applicable CCWIS requirements
- Review your most recent title IV-E review findings to identify potential issues with eligibility calculations, related data, or associated claims
- Evaluate your agency's IV-E eligibility processes to make sure CCWIS will support them
- Identify steps & tasks to comply with CCWIS title IV-E eligibility determination requirements
- Consult with your federal DSS analyst regularly

Next Steps (Continued...)

Access training & technical assistance:

- Review title IV-E eligibility determination 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
- Participate in upcoming webinars
- Submit questions to 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

- When designing CCWIS title IV-E eligibility, address all requirements:
 - 1355.52(b)(1)(iii): Title IV-E eligibility data CCWIS maintains
 - 1355.52(e)(1)(iii): Title IV-E eligibility data exchanges
 - 1355.52(f): Data exchange standard
 - 1355.52(g): State and tribal title IV-E eligibility automation
- CCWIS regulations provide flexibility to:
 - Design title IV-E automated support to accommodate your business model
 - Use data exchanges to incorporate existing systems collecting title IV-E eligibility determination data

Take-Aways (Continued...)

- CCWIS is the system of record for title IV-E eligibility data, such as:
 - The history of all title IV-E eligibility decisions
 - Data contributing to title IV-E eligibility decisions, such as
 - Court findings
 - Placement histories
 - Information contributing AFDC eligibility
 - Data needed for audits, such as financial data

Questions?

CCWIS Definition: Automated Function

Automated function is defined in the CCWIS regulations at 45 CFR 1355.51 and means a computerized process or collection of related processes to achieve a purpose or goal.

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.