



**Children's
Bureau**

Comprehensive Child Welfare Information System

Technical Bulletin #5: CCWIS Cost Allocation

November 28, 2018

This Technical Bulletin (TB) provides title IV-E agencies with information regarding the process for allocating CCWIS project costs and the associated federal financial participation (FFP) funding implications. Understanding the cost allocation requirements and their impact on funding may influence how title IV-E agencies plan, design, develop, implement, and operate their CCWIS. This guidance is not applicable to a title IV-E agency that is developing or operating a non-CCWIS application.

Table of Contents

1. Purpose of the Technical Bulletin	3
2. Audience	3
3. Background	3
4. CCWIS and non-CCWIS Cost Allocation Overview	4
5. CCWIS Development Cost Allocation Steps	6
6. CCWIS Operational Cost Allocation Steps.....	21
7. CCWIS Budget and Cost Allocation Submission Requirements	29
8. Glossary.....	33

1. Purpose of the Technical Bulletin

This Technical Bulletin (TB) provides title IV-E agencies with information regarding the process for allocating CCWIS project costs and the associated federal financial participation (FFP) funding implications. Understanding the cost allocation requirements and their impact on funding may influence how title IV-E agencies plan, design, develop, implement, and operate their CCWIS. This guidance is not applicable to a title IV-E agency that is developing or operating a non-CCWIS application.

2. Audience

We developed this TB to assist fiscal and information technology (IT) project staff responsible for the development of cost allocation plans (CAPs) and cost allocation methodologies for CCWIS projects. We recommend that child welfare program and CCWIS project management staff also review the TB to understand the FFP funding implications associated with the application of certain CCWIS requirements.

3. Background

The Administration for Children and Families (ACF) replaced the regulations for Statewide/Tribal Automated Child Welfare Information Systems (S/TACWIS) with the regulations for CCWIS on August 1, 2016. The regulations for CCWIS at [45 CFR 1355.50 – 1355.59](#) include requirements that title IV-E agencies must address when developing CAPs.

CAPs describe the procedures used by title IV-E agencies to identify, measure, and equitably distribute system costs among benefiting federal, state, tribal, and local programs. Title IV-E agencies must continue to follow the applicable cost allocation guidance in 2 CFR Part 200 and 45 CFR Part 75 when developing initial CAPs for their CCWIS. The general guidance requires that title IV-E agencies equitably distribute costs to all benefiting federal, state, and tribal programs, whether the project is a stand-alone child welfare system or a multiple program system. In this TB we will refer to this general cost allocation process as the “initial cost allocation approach.”

To assist title IV-E agencies in developing an initial cost allocation approach that complies with 2 CFR 200, ACF developed the [Cost Allocation Methodologies \(CAM\) Toolkit](#). We suggest that title IV-E agencies use the optional CAM Toolkit. In addition, the Department of Health and Human Services (DHHS) Cost Allocation Services (CAS) provides cost allocation guidance. CAS guidance is available at DHHS’s Program Support Center website (<https://rates.psc.gov/fms/dca/pa1.html>) and <https://rates.psc.gov/fms/dca/pa.html>). ACF’s cost allocation guidance for tribes is found in Program Instruction (PI) [ACYF-CB-PI-10-13](#).

After applying the initial cost allocation approach, title IV-E agencies implementing a CCWIS must follow additional steps to allocate the share of their system costs supporting child welfare related programs. These additional steps, which follow the regulations for CCWIS, are necessary to determine if a system or parts of the system may qualify for a more favorable title IV- E cost allocation for system development and operational activities (45 CFR 1355.57(e)).

We refer to the more favorable title IV-E cost allocation methodologies for development and operations in this TB as, respectfully, “CCWIS development cost allocation,” “CCWIS operational cost allocation,” and generically as “CCWIS cost allocation.” We will also refer to CCWIS project costs that may qualify

for CCWIS development or operational cost allocation as “CCWIS eligible costs.” We will refer to CCWIS project costs that may qualify for the non-CCWIS cost allocation as “non-CCWIS costs.”

In summary, when developing CAPs for a CCWIS, title IV-E agencies must apply the initial cost allocation approach followed by the steps required by the regulations for CCWIS to identify CCWIS eligible costs and non-CCWIS costs.

In section 4, we describe the differences between CCWIS and non-CCWIS cost allocation. Section 5 describes how title IV-E agencies may allocate development costs. Section 6 describes how title IV-E agencies may allocate operational costs.

Title IV-E agencies must submit their CCWIS development cost allocation when beginning their CCWIS project in order to claim FFP for development costs. In order to claim FFP for operational costs, agencies must submit their CCWIS operational cost allocation when any portion of the CCWIS becomes operational. In short, CCWIS funding is available at project inception. See section 7 for further details on the CCWIS budget and cost allocation submission requirements.

4. CCWIS and non-CCWIS Cost Allocation Overview

Overview

Both CCWIS eligible and non-CCWIS costs may qualify for title IV-E FFP at the 50% rate; however, under the CCWIS cost allocation, a higher percentage of an activity or work product’s costs may be eligible for title IV-E FFP when compared to the same costs under a non-CCWIS cost allocation.

Non-CCWIS Cost Allocation

Under a non-CCWIS cost allocation, the title IV-E agency typically allocates system project costs supporting title IV-E programs according to the ratio of title IV-E eligible children to the total child welfare population served by the title IV-E agency (we refer to this ratio as the title IV-E participation rate). For example, if there are 400 title IV-E eligible children in a child welfare population of 1,000, then the title IV-E participation rate is 40%. Continuing this example, if 40% of the child welfare population in a state are title IV-E eligible, the FFP for non-CCWIS costs of \$1,000,000 is calculated by first applying the title IV-E participation rate (40%) and then applying the 50% FFP rate to the remaining balance, as follows:

- $\$1,000,000 * 40\% = \$400,000$ (This is the amount eligible for FFP after applying the title IV-E participation rate.)
- $\$400,000 * 50\% = \$200,000$ (This is the amount of FFP that the title IV-E agency may claim for these non-CCWIS costs.)

We note that the above is a simplified illustration of the application of the title IV-E participation rate during the cost allocation process. If the title IV-E agency’s system supports activities outside of those allowable for title IV-E programs (e.g., title IV-B activities such as child protective investigations, the delivery of social services, and juvenile justice activities), the agency must appropriately allocate those costs to those other programs before applying the title IV-E participation rate as done in this example.

CCWIS Cost Allocation

Cost allocation regulations generally require that benefiting programs¹ pay costs proportional to the benefits the programs receive (45 CFR 95.631). Therefore, there is either a diminished or no federal share (at least through the title IV-E program) for non-CCWIS eligible costs. However, the regulations for CCWIS provide an exception to the rule that all benefiting programs pay proportional costs. The regulations for CCWIS allow title IV-E agencies to allocate, for CCWIS eligible costs, some costs benefiting other child welfare related programs and services to the title IV-E program (45 CFR 1355.57(e)).

The regulations for both CCWIS development and operational cost allocation permit title IV-E agencies to allocate most CCWIS eligible costs benefiting federal, state, or tribal funded participants in programs and allowable activities described in title IV-E (45 CFR 1355.57(e)(1)(iii))². This means that the agency does not apply the title IV-E participation rate to CCWIS eligible costs.

For example, the title IV-E agency will calculate FFP for CCWIS eligible costs by multiplying the costs (in this example \$1,000,000) by the title IV-E 50% FFP rate, as follows:

- \$1,000,000 (This is the amount of CCWIS eligible costs that the title IV-E agency will use to calculate FFP; the title IV-E participation rate is not applied. The populations included in this example include title IV-E and non-title IV-E funded programs described above.)
- $\$1,000,000 * 50\% = \$500,000$ (This is the amount of FFP that the title IV-E agency may claim for these CCWIS eligible costs.)

As this example demonstrates, title IV-E agencies may benefit from CCWIS cost allocation by allocating additional eligible costs to title IV-E. Although both systems cost \$1,000,000, the CCWIS eligible costs qualify for \$500,000 in FFP vs. \$200,000 in FFP for a non-CCWIS.

The regulations for CCWIS development cost allocation also permit title IV-E agencies to allocate additional child welfare program-related costs to title IV-E. These costs are:

- CCWIS development costs benefiting the title IV-B program; and
- CCWIS development costs benefiting both title IV-E and child welfare related programs (at this time, ACF only classifies juvenile justice and adult protective services as child welfare related programs (80 FR 48200 at 48220)).

CCWIS Cost Allocation Regulations and the CCWIS Automated Function Checklist

The regulations for CCWIS specify that only costs incurred within systems that ACF has classified as CCWIS may qualify for CCWIS cost allocation (45 CFR 1355.57). ACF must approve the documents a title IV-E agency submits in accordance with 45 CFR 1355.52(i)(1) in order to classify a system as CCWIS. You may contact [your Division of State Systems \(DSS\) federal analyst](#) with questions about your title IV-E agency's CCWIS status.

¹ An IT system's benefiting programs may include:

- state or tribal programs (such as non-title IV-E foster care, juvenile justice and adult protective services); and
- federal programs, such as title IV-E, IV-B, IV-A, IV-D, XIX, juvenile justice, and adult protective services.

² This includes title IV-E funded programs such as foster care, adoption assistance, prevention services, Chafee program services, the kinship navigator program and guardianship as well as state or tribal funded programs, such as foster care. We also note that the list of title IV-E programs may be expanded by legislation.

The regulations for CCWIS further specify that within a CCWIS designated system only those automated functions meeting certain requirements (which are discussed in detail in section 5) may qualify for CCWIS cost allocation, while functions not meeting these requirements must use a non-CCWIS cost allocation, where the title IV-E participation rate is applied to the identified costs (45 CFR 1355.57(a), (b), and (f)). Title IV-E agencies must annually submit to ACF the list of all automated functions in their system. The agency must add or remove automated functions listed on the CCWIS automated function list annually. An updated list may also reclassify some automated functions. For example, functions that were eligible for CCWIS cost allocation may no longer be eligible (and vice-versa). Therefore, the title IV-E agency may need to repeat the steps outlined in Section 5 to develop updated CAPs to account for changes in an updated automated function list. See Section 7 for a listing of other events that may require the title IV-E agency to develop updated CAPs.

ACF published an optional CCWIS Automated Function Checklist (the CCWIS Checklist) to help title IV-E agencies identify automated functions that may qualify for CCWIS cost allocation. Title IV-E agencies may also use an automated function list of its own design, if it captures the same information as the ACF optional CCWIS checklist. Please see the following documents for further information on the CCWIS Checklist:

- [ACYF-CB-IM-16-07](#) - This Information Memorandum (IM) provides title IV-E agencies that choose to develop a CCWIS and expect expenditures to meet or exceed thresholds defined in the regulations for Advance Planning Documents (APDs) with information on the use of an optional checklist to document automated functions as described in the regulations for CCWIS at 45 CFR 1355.56. See 45 CFR 95.611 for the APD thresholds.
- [ACYF-CB-IM-16-04](#) - This IM provides title IV-E agencies submission instructions for a Notice of Intent (NOI) as described in the regulations for CCWIS at 45 CFR 1355.52(i)(1) and 1355.56(d)(1). This IM also provides an optional NOI automated functions checklist that title IV-E agencies may use.
- [Technical Bulletin #1](#) - This technical bulletin provides title IV-E agencies that choose to develop a CCWIS with information on identifying and reporting automated functions with either an APD or NOI.

The CCWIS Checklist contains information to assist title IV-E agencies in identifying project activities that may qualify for CCWIS cost allocation, therefore we recommend that title IV-E agencies complete an automated function list (either the optional CCWIS Checklist included in one of the IMs or an alternative design) prior to following the steps outlined in Section 5.

5. CCWIS Development Cost Allocation Steps

Introduction

The regulations for CCWIS, unlike the regulations for S/TACWIS, provide flexibility to allow title IV-E agencies to use other systems to support child welfare business practices. To support this flexibility, the regulations for CCWIS allocate costs differently depending on whether an automated function is duplicated or consistently used:

- automated functions in the CCWIS that are consistently used and not duplicated may qualify for CCWIS cost allocation;
- automated functions that are duplicated or not consistently used or both may only qualify for non-CCWIS cost allocation.

This section will help title IV-E agencies identify the automated functions in its CCWIS and determine which qualify for CCWIS or non-CCWIS cost allocation. Below is a list of the steps for creating a CAP for development costs. Section 6 describes the steps to create a CAP for operational costs.

Steps to Develop a CAP for CCWIS Development Costs

In this section, we will refer to the specific approach the title IV-E agency uses to determine each benefiting program's portion of the shared system costs for CCWIS development as the Cost Allocation Methodology (CAM).³ State and tribes follow the same process to develop the CAM, which may include use of the CAM Toolkit guidance. Use of the CAM Toolkit is optional and title IV-E agencies may submit an alternative initial cost allocation approach to the applicable federal funding agencies for their consideration.

CAM Step 1 – Determine if the CCWIS, when complete, will be a stand-alone child welfare information system or a multiple program system

As described below, the initial step depends on whether a title IV-E agency's CCWIS will be a stand-alone child welfare system or a multiple program system.

A stand-alone child welfare information system is a system that supports only child welfare and child welfare related programs. At the time of this TB's publication, child welfare and related programs include:

- title IV-E funded programs including foster care, adoption assistance, prevention services, Chafee program services, the kinship navigator program, and guardianship;
- state and tribal funded programs and activities described in title IV-E (such as foster care);
- title IV-B funded programs; and
- other child welfare related programs approved by ACF, such as juvenile justice and adult protective services.

For more information on whether the CCWIS is a stand-alone child welfare information system or a multiple program system, please contact your [DSS federal analyst](#) for guidance.

If the CCWIS, when complete, will be a stand-alone child welfare information system, skip CAM Step 2. Go to CAM Step 3. If the CCWIS when complete, will be a multiple program system, go to CAM Step 2.

CAM Step 2 – If the CCWIS, when complete, will be a multiple program system, conduct an initial system-wide cost allocation analysis of development activities

In addition to child welfare related programs, a multiple program system supports the administration of other health and human service programs such as: Medicaid, Child Care, Child Support, Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance to Needy Families (TANF), and/or other non-child welfare programs. A multiple program system may fully support other programs (i.e., it is the system that provides all administrative support for other programs in addition to child welfare) or it may

³ "CAM" is also the term commonly used for ACF's CAM Toolkit

This TB also uses the similar term "title IV-E CAM" to refer to the CCWIS operational cost allocation documents for tribes.

provide limited support (i.e., it supports only specific tasks for other programs, such as eligibility determination or the provision of services).

If a CCWIS, when completed, will be a part of a multiple program system, before developing your CCWIS CAM, the title IV-E agency must conduct an initial system-wide cost allocation analysis of development activities (including activities to plan, design, develop, and implement the system). The purpose of this analysis is to identify shared and unique costs allocated to all benefiting programs and results in a system-wide CAM that you will submit to the federal agencies that require an APD and are supporting the multiple program CCWIS project (e.g., Child Welfare, Child Support, Medicaid, and/or SNAP).⁴ While a title IV-E agency may develop its own methodology for the initial system-wide CAM, the agency may also use an existing methodology, such as ACF's [CAM Toolkit](#) for determining the equitable distribution of development costs to all benefiting programs.

Once the agency completes the initial system-wide CAM, the title IV-E agency will identify and segregate the child welfare costs of the multiple program system from the non-child welfare costs. The agency's system-wide CAM also allocates the non-child welfare costs to the appropriate benefiting programs. The CCWIS CAM, which is developed after the initial system-wide CAM, allocates the identified child welfare costs in accordance with the regulations for CCWIS (1355.57).

After developing the initial system-wide CAM, go to CAM Step 3 to apply the regulations for CCWIS and begin the process of developing the CCWIS CAM to allocate the share of system development costs supporting child welfare related programs.

CAM Step 3 – Complete or update the automated function list

The title IV-E agency must list all automated functions of the system (45 CFR 1355.52(i)(1)(ii)). The title IV-E agency must evaluate all existing and planned automated functions in the system (regardless of whether it is a stand-alone child welfare system or multiple program system) to determine if each automated function meets or is exempt from the CCWIS design requirements. We emphasize that even automated functions of a multiple program system that do not support child welfare (such as automated functions that support Medicaid and/or SNAP) must be included on the automated function list.

⁴ 7 CFR 277.18 and 45 CFR 95.601

Although title IV-E agencies may use an automated function list of their own design, this TB uses the optional CCWIS Checklist, shown below, as an example to illustrate these steps:

Function Name <i>List all automated functions that will be part of your CCWIS</i>	Supports at least one requirement section 1355.52 and/or 1355.54	The function is duplicated	Function is consistently used	The function complies with the CCWIS design requirements defined at 1355.53 (a), unless exempt by 1355.53 (b)	Check if update to previous submission
	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> Exempt	<input type="checkbox"/>
	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> E	<input type="checkbox"/>
	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> E	<input type="checkbox"/>
	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> E	<input type="checkbox"/>
	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> E	<input type="checkbox"/>
	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> E	<input type="checkbox"/>
	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> E	<input type="checkbox"/>
	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> E	<input type="checkbox"/>
	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> E	<input type="checkbox"/>
	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> E	<input type="checkbox"/>

Optional CCWIS Checklist

After listing all automated functions, the title IV-E agency notes which requirements of 45 CFR 1355.52(i)(1)(iii)(A) – (C) each automated function meets. This information will help the title IV-E agency determine:

- if its system as a whole meets the CCWIS requirements at 45 CFR 1355.53(a);
- which automated functions are eligible for title IV-E FFP at the CCWIS cost allocation level (also referred to as the CCWIS cost allocation rate);
- which automated functions are eligible for title IV-E FFP at the non-CCWIS cost allocation level (also referred to as the non-CCWIS cost allocation rate); and
- which automated functions do not qualify for title IV-E FFP.

The title IV-E agency may use the optional CCWIS Checklist to identify each automated function in the system (regardless of whether the system is a stand-alone CCWIS or a multiple program system) and determine if each automated function meets the requirements of 45 CFR 1355.52(i)(1)(ii)(A) – (C). This TB explains the requirements of 45 CFR 1355.52(i)(1)(iii)(A) – (C) as the four CCWIS-related questions on the CCWIS Checklist below. The CCWIS Checklist records the answers in checkboxes. However, when using an alternative design for the automated function list, the title IV-E agency will record the information as specified by the alternative design.

The four questions are:

1. Does the automated function support at least one requirement of 45 CFR 1355.52 and/or 1355.54?

Check the ‘Y’ (Yes) box of the CCWIS Checklist (or record the answer as specified by your design) if the automated function supports at least one requirement of 45 CFR 1355.52 or 1355.54. This does not mean that the automated function must fully satisfy the requirement. It is sufficient that it contributes to meeting the requirement. For example, an automated function that generates the AFCARS report contributes toward meeting the CCWIS federal reporting requirement at 45 CFR 1355.52(c)(1), although the automated function does not fully satisfy the requirement by generating all other required on-going federal reports. Also, check the ‘Y’ box if the automated function supports, in addition to CCWIS, another health or human service program. For example, if the child welfare intake screen also collected data used by the TANF program, it supports both CCWIS and

TANF requirements and may be checked 'Y.'

Check the 'N' (No) box of the CCWIS Checklist (or record the answer as specified by your design) if the automated function does not support at least one requirement of 45 CFR 1355.52 or 1355.54.

If the agency has a multiple program system, it may have many automated functions that are answered as no. For example, any automated functions that only support TANF, SNAP, Medicaid, and/or Child Support would be answered no.

If the title IV-E agency has a stand-alone child welfare system, it may have some automated functions answered no. For example, if an automated function only supports the juvenile justice program, you would answer 'no' for that automated function. However, if an automated function supports both juvenile justice and title IV-E, you would answer yes.

2. Is the automated function duplicated?

Check the 'Y' box of the CCWIS Checklist (or record the answer as specified by your design) if the automated function duplicates a similar function. The duplication may occur within the CCWIS, such as when two CCWIS automated functions perform the same business function. The duplication may also occur in a different system supporting the child welfare program (e.g., a child welfare contributing agency (CWCA) system, a child welfare county agency system, or another system external to CCWIS used by any title IV-E agency staff to perform title IV-E program functions).

Check the 'N' box of the CCWIS Checklist (or record the answer as specified by your design) if no other automated functions or systems supporting the child welfare program duplicate the automated function in the CCWIS. For example, the agency would answer 'no' if a CCWIS automated function supports child abuse and neglect investigations and no other system supports investigations.

3. Is the automated function consistently used?

Check the 'Y' box of the CCWIS Checklist (or record the answer as specified by your design) if all public and private agency staff responsible for the activities supported by this automated function use the same CCWIS processes to perform their work. For example, a title IV-E agency would answer 'yes' if all public and private agency staff used CCWIS to conduct child welfare case management activities.

Check the 'N' box of the CCWIS Checklist (or record the answer as specified by your design) if the automated function is not consistently used. For example, if workers are expected to complete screens documenting every home visit, but some workers instead record home visits in paper files or in a separate database, the automated function is not being consistently used. Or if workers interpret data entry fields differently so that entered data is not consistent and uniform as required by 1355.52(d)(1)(ii), the function is not used consistently. Another example may be if the title IV-E agency deploys new child safety assessment tools that it requires all workers to use, but some workers continue to use outdated assessment tools.

4. Does the automated function comply with the CCWIS design requirements defined at 1355.53(a), unless exempt by 1355.53(b)? The CCWIS design requirements specify that the automated functions in the CCWIS must:
- follow a modular design that includes the separation of business rules from core programming;
 - be documented using plain language;
 - adhere to a state, tribal, or industry designed standard that promotes efficient, economical, and effective development and produces reliable systems; and
 - be capable of being shared, leveraged, and reused as a separate component.

Check the ‘Y’ box of the CCWIS Checklist (or record the answer as specified by your design) if the automated function meets, or when completed will meet, the CCWIS design requirements.

Check the ‘N’ box of the CCWIS Checklist (or record the answer as specified by your design) if the automated function does not meet, or will not meet when completed, all of the CCWIS design requirements.

If the automated function will not meet the CCWIS design requirements, the title IV-E agency must determine if the automated function is exempt from the design requirements. An automated function may be exempt from the CCWIS design requirements if:

- the automated function is part of a system transitioning to CCWIS and the development of the automated function was completed by July 31, 2018; or
- ACF has approved an alternative design proposed by the title IV-E agency that is determined to be more efficient, economical, and effective than the CCWIS design requirements.

Check the ‘E’ (Exempt) box of the CCWIS Checklist (or record that the automated function is exempt as specified by your design) if either of these conditions is true.

The following illustration is an example simplified CCWIS Checklist showing the responses to the questions for ten automated functions:

Function Name <i>List all automated functions that will be part of your CCWIS</i>	Supports at least one requirement section 1355.52 and/or 1355.54		The function is duplicated		Function is consistently used		The function complies with the CCWIS design requirements defined at 1355.53 (a), unless exempt by 1355.53 (b)			Check if update to previous submission
Intake & Screening	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> Exempt	<input type="checkbox"/>
Investigations & Initial Assessment	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> E	<input type="checkbox"/>
Case Management	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> E	<input type="checkbox"/>
Foster & Adoptive Family Recruitment	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> E	<input type="checkbox"/>
Licensing & Placement	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> E	<input type="checkbox"/>
Adoptions	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> E	<input type="checkbox"/>
Reporting	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> E	<input type="checkbox"/>
NYTD Survey Tool	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> E	<input type="checkbox"/>
Title IV-E Eligibility Determination	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> E	<input type="checkbox"/>
Court Data Exchange	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> E	<input type="checkbox"/>

Completed CCWIS Checklist

In CAM Steps 4 – 6, the title IV-E agency uses its automated function list to determine if its system as a whole meets the CCWIS requirements at 45 CFR 1355.53(a) as well as which automated functions will be eligible for CCWIS cost allocation, non-CCWIS cost allocation, or allocated to other child welfare related programs.

CAM Step 4 – Confirm that your stand-alone child welfare information system or multiple program system is a CCWIS

In this step the title IV-E agency must review the automated function list it completed or updated in CAM Step 3 to confirm the classification of the system as a CCWIS. Although the title IV-E agency is following this cost allocation process because ACF has classified the system as a CCWIS, we strongly encourage title IV-E agencies to carefully review their automated function checklist to confirm that they have recorded the correct information and their system is correctly classified as a CCWIS. *Incorrect information regarding compliance with the CCWIS design requirements at 45 CFR 1355.53(a) may subject the title IV-E agency to recoupment of title IV-E funds in accordance with 1355.58(d).*

In order to be classified as a CCWIS, all automated functions of the system must either 1) meet the CCWIS design requirements, or 2) be exempted from those requirements (45 CFR 1355.53). Review your responses to the CCWIS design requirements for all automated functions. A title IV-E agency's system is classified as a CCWIS if every automated function has either:

- The 'Y' box of the CCWIS Checklist checked (or the title IV-E agency has otherwise indicated the automated function meets the design requirements); or
- The 'N' and 'E' boxes of the CCWIS Checklist checked (or the title IV-E agency has otherwise indicated that the automated function is exempt from the design requirements).

If even one automated function is only answered 'no,' the system is classified as a non-CCWIS. The system may qualify for non-CCWIS cost allocation; it is not eligible for CCWIS cost allocation. As noted above, the title IV-E agency must comply with 2 CFR 200 when allocating development costs among all benefiting programs. We suggest agencies use ACF's CAM Toolkit to assist them in implementing the cost allocation requirements.

As noted above, the system may be subject to recoupment of title IV-E funding. However, the title IV-E agency may submit an As-Needed APD to indicate how it will modify the system to meet the CCWIS design requirements. If ACF approves the As-Needed APD, the system will be classified as a CCWIS. Please contact your [DSS federal analyst](#) for further guidance.

If the title IV-E agency confirms that the system is a CCWIS, continue to CAM Step 5. If the system is a non-CCWIS, apply the general cost allocation guidance to the entire system.

CAM Step 5 – Identify the automated functions that support CCWIS requirements

In CAM Step 4 the title IV-E agency confirmed that the system meets the CCWIS design requirements (or is exempted) and therefore may be classified as a CCWIS.

In CAM Step 5 the title IV-E agency will use its automated function list to flag the specific automated functions of the system that support CCWIS requirements. The title IV-E agency will use these identified automated functions in CAM Step 6 to determine if they qualify for CCWIS or non-CCWIS cost allocation.

The agency must review its automated function list to identify those automated functions that the title IV-E agency determined meets at least one requirement of 45 CFR 1355.52 and/or 1355.54. If the agency completed the CCWIS Checklist, this can be determined by reviewing the column titled "Supports at least one requirement of section 1355.52 and/or 1355.54." Only automated functions with the 'Y'

box of the CCWIS Checklist marked will be assessed for compliance with the regulations for CCWIS at 45 CFR 1355.57(a)(2) and (b)(2).

Automated functions with the 'N' box of the CCWIS Checklist marked (or the title IV-E agency has otherwise indicated that the automated function does not meet at least one requirement of 45 CFR 1355.52 and/or 1355.54) should have already been cost allocated to other programs according to the guidance in ACF's CAM Toolkit. If the CCWIS is a multiple program system, it is likely that many automated functions fall into this category. If the CCWIS is a stand-alone child welfare information system, it is likely that most automated functions support at least one requirement of 45 CFR 1355.52 or 1355.54. If there are automated functions that only support other child welfare related programs, such as juvenile justice or adult protective services, the title IV-E agency will allocate the costs of those functions in CAM Step 8.

The title IV-E agency evaluates all automated functions that meet at least one requirement of 45 CFR 1355.52 and/or 1355.54) in CAM Step 6.

CAM Step 6 – Determine if the identified automated functions may qualify for CCWIS or non-CCWIS cost allocation.

In this step the title IV-E agency must review the list of automated functions that support at least one requirement of 45 CFR 1355.52 or 1355.54 (identified in CAM Step 5 above) to determine which automated functions may qualify for CCWIS cost allocation and which automated functions may qualify for non-CCWIS cost allocation. In accordance with 1355.57(a)(2)(ii) and (b)(2)(ii):

- An automated function may qualify for CCWIS cost allocation if the title IV-E agency indicated on its automated function list that it is not duplicated and it is consistently used.
- An automated function may qualify for non-CCWIS cost allocation if the title IV-E agency indicated on its automated function list that it is duplicated, it is not consistently used, or both.

If the title IV-E agency used an automated function checklist of its own design, the agency must review the answers to determine which automated functions may qualify for CCWIS or non-CCWIS cost allocation. If the title IV-E agency used the CCWIS Checklist, it must review the columns titled "The function is duplicated" and "Function is consistently used" for each automated function:

- An automated function may qualify for CCWIS cost allocation only if both the 'N' box is checked for "the function is duplicated" and the 'Y' box is checked for "Function is consistently used."
- An automated function may qualify for non-CCWIS cost allocation if either the 'Y' box is checked for "the function is duplicated" or the 'N' box is checked for "Function is consistently used."

To illustrate this step and the following steps, we will use an example completed CCWIS Checklist, reproduced on the following page.

Function Name <i>List all automated functions that will be part of your CCWIS</i>	Supports at least one requirement section 1355.52 and/or 1355.54	The function is duplicated	Function is consistently used	The function complies with the CCWIS design requirements defined at 1355.53 (a), unless exempt by 1355.53 (b)	Check if update to previous submission
Intake & Screening	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> Exempt	<input type="checkbox"/>
Investigations & Initial Assessment	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input checked="" type="checkbox"/> E	<input type="checkbox"/>
Case Management	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input checked="" type="checkbox"/> E	<input type="checkbox"/>
Foster & Adoptive Family Recruitment	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> E	<input type="checkbox"/>
Licensing & Placement	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> E	<input type="checkbox"/>
Adoptions	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input checked="" type="checkbox"/> E	<input type="checkbox"/>
Reporting	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input checked="" type="checkbox"/> E	<input type="checkbox"/>
NYTD Survey Tool	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input checked="" type="checkbox"/> E	<input type="checkbox"/>
Title IV-E Eligibility Determination	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> E	<input type="checkbox"/>
Court Data Exchange	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> E	<input type="checkbox"/>

Completed CCWIS Checklist

The example CCWIS checklist has ten automated functions that support one or more child welfare programs and after completing CAM Step 5:

- seven automated functions may qualify for CCWIS cost allocation (each function is not duplicated and is consistently used). These automated functions are: intake & screening, investigations and initial assessment, foster & adoptive family recruitment, adoptions, reporting, title IV-E eligibility determination, and the court data exchange.
- three automated functions may qualify for non-CCWIS cost allocation (each function is either duplicated, is not consistently used, or both). These automated functions are: case management, licensing & placement, and the National Youth in Transition Database (NYTD) survey tool.

Diagram 1 depicts the CCWIS as a pie chart with a separate equal-sized slice for each automated function that supports at least one requirement of 45 CFR 1355.52 or 1355.54. The diagram separately groups the seven automated functions that may qualify for CCWIS cost allocation (in blue) and the three automated functions that may qualify for non-CCWIS cost allocation (in grey) automated functions for easier analysis in subsequent steps.

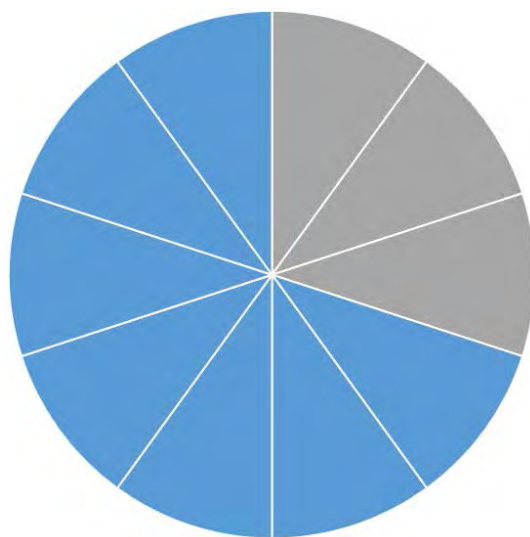


Diagram 1

CAM Step 7 – Calculating the CCWIS Development CAM: Calculate the level of effort for child welfare related automated functions.

Now that the title IV-E agency has classified child welfare automated functions as either CCWIS or non-CCWIS automated functions, the next step is to determine the specific CCWIS Development CAM. The CCWIS Development CAM is the specific method or approach the title IV-E agency uses to determine each benefiting program’s portion of the shared system cost. The CAM incorporates costs for the design, development, and implementation of the CCWIS. Planning costs are typically covered in a simplified CAM presented in a Planning APD. See the CAM Toolkit for additional information about allocating costs during a planning phase.

To develop the specific CCWIS Development CAM, the title IV-E agency starts by determining the level of effort required to design, develop, and implement the ten automated functions in the completed CCWIS Checklist above. This process should be familiar to staff who have previously developed cost allocation approaches.

The title IV-E agency must select a metric to weight each CCWIS and non-CCWIS automated function (in particular, see Chapter 4 of the CAM Handbook for more information on weighting the automated functions). For example, the agency may propose weighting each automated function by a level of effort metric that indicates the relative complexity of each automated function, such as development hours or number of screens. This metric serves as the agency's allocation base. The title IV-E agency will calculate the level of effort as a percentage of the total CCWIS portion of the system by applying the allocation base to each automated function. The title IV-E agency must describe the allocation base and the process of applying the allocation base to its system in its CAM.

After we apply an allocation base to each of the ten automated functions in our example and calculate the level of effort as a percentage of the total CCWIS portion of the system, we see that:

- 90% of the total level of effort is applied to the seven automated functions that may qualify for CCWIS cost allocation and
- 10% of the total level of effort is applied to the three CCWIS automated functions that may qualify for non-CCWIS cost allocation.

In *Diagram 2* the original pie slices in *Diagram 1* are re-sized to illustrate the different level of effort required for each automated function:

- The blue wedges represent the weighted level of effort of the seven automated functions that may qualify for CCWIS cost allocation. In this example, these functions represent 90% of the development work.
- The grey wedges represent the weighted level of effort of the three automated functions that may qualify for non-CCWIS cost allocation. In this example, the three grey wedges represent 10% of the development work.

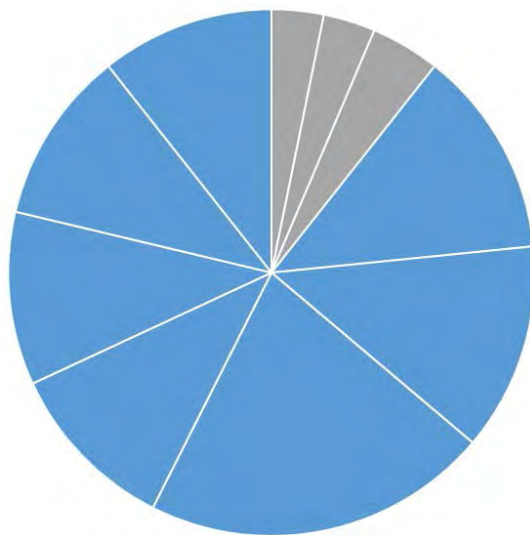


Diagram 2

CAM Step 8 – Identify Excluded Program Functionality & Re-calculate the CCWIS Development CAM

In the previous step, the title IV-E agency weighted each automated function to reflect the level of effort required to develop each function and grouped functions to determine the percentage of the level of effort that may qualify for CCWIS cost allocation or non-CCWIS cost allocation. (As a reminder, the title IV-E agency describes this process in the CAM.)

In step 8, the title IV-E agency must segregate components of the CCWIS that must be allocated to other child welfare programs (e.g., juvenile justice and adult protective services) and re-weight the system using the same allocation base we used in step 7. These child welfare related components may comprise one or more

automated functions or they may be embedded in automated functions that also support the title IV-E

program. If the child welfare related components are embedded, for the purposes of developing a CCWIS CAM, the title IV-E agency must segregate those specific components and add them to the automated functions that only support juvenile justice or adult protective services to complete the CAM.

Title IV-E agencies begin this step by selecting the components of the CCWIS system that only support child welfare related programs (e.g., juvenile justice and adult protective services). Using adult protective services as an example, the title IV-E agency will only select screens, reports, or data collected for that program. In contrast, the agency will not select a screen used by both the title IV-E program and adult protective services.

After the agency segregates the unique automated functions (and components of automated functions, such as specific screens or reports) of the CCWIS that only support juvenile justice or adult protective services or both, the agency must weight them individually by applying the allocation base that was previously used in CAM Step 7. Since segregating these components will reduce the size of the remaining components, the agency must also re-weight the CCWIS and non-CCWIS portions.

Continuing with our example using the ten automated functions on the completed CCWIS Checklist, once the agency recalculates the allocation percentages to separate the functionality in the CCWIS that only supports child welfare related programs, the allocation is:

- 89% of the level of effort is allocated to the seven automated functions eligible for the CCWIS cost allocation,
- 9% of the level of effort is allocated to the three automated functions eligible for the non-CCWIS cost allocation, and
- 2% of the level of effort is allocated to the other child welfare related programs. In this example, the 2% represents the components of the CCWIS that only support juvenile justice and adult protective services that are funded by the state or tribe.

As a reminder, this step and the related calculations are described in the title IV-E agency's CAM.

In *Diagram 3* we display the three weighted groups in the pie chart:

- The blue wedges represent the weighted level of effort allocated to the seven automated functions that may qualify for CCWIS cost allocation. In *Diagram 3* these functions represent 89% of the development work.
- The grey wedges represent the weighted level of effort allocated to the three automated functions that may qualify for non-CCWIS cost allocation. In *Diagram 3* these functions represent 9% of the development work.
- The orange/yellow wedge represents the weighted level of effort that only supports juvenile justice and adult protective services. In *Diagram 3* these functions represent 2% of the development work. For the purposes of this example, both programs are funded by the state or tribe and labeled “Non-federal funds” in the tables below.

Diagram 3 illustrates a complete CCWIS development CAM. If this project is a stand-alone child welfare system, 89% of the project development costs are allocated to title IV-E at the CCWIS cost allocation rate, 9% are allocated to title IV-E at the non-CCWIS cost allocation level, and a total of 2% are allocated to the juvenile justice and adult protective service programs. If this project is a multiple program system, these shares are proportionally distributed to the total child welfare share we identified in CAM step 1.

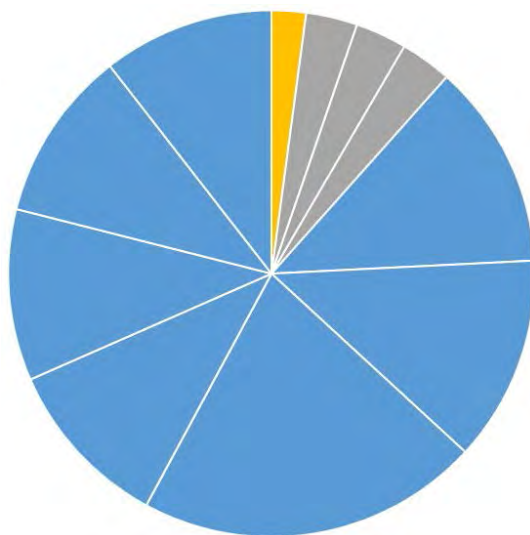


Diagram 3

The title IV-E agency must describe the CAM process, including contributing factors, calculations, and logic in its APD or CAM.

In the final two CAM steps, we discuss the fiscal implications of the finalized CAM and apply it to a sample APD budget.

CAM Step 9 – Apply CCWIS Development CAM percentages to the CCWIS Development Budget.

In this final step, the title IV-E agency calculates the costs that may qualify for title IV-E FFP by applying the cost allocation percentages provided by the CCWIS Development CAM to the CCWIS development budget.

The sample CCWIS project development budget below is based on a CCWIS stand-alone child welfare system with annual total development costs of \$10,000,000:

**Sample CCWIS Project
CCWIS Development Budget**

Cost Category	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Annual Total Project Cost
Direct Personnel	\$200,000	\$350,000	\$500,000	\$200,000	\$1,250,000
Contractor Services	\$312,500	\$312,500	\$312,500	\$312,500	\$1,250,000
System Hardware	\$0	\$75,000	\$175,000	\$1,000,000	\$1,250,000
System Software	\$500,000	\$500,000	\$200,000	\$50,000	\$1,250,000
Training	\$500,000	\$312,500	\$250,000	\$187,500	\$1,250,000
Overhead	\$312,500	\$312,500	\$312,500	\$312,500	\$1,250,000
Supplies	\$1,000,000	\$83,333	\$83,333	\$83,334	\$1,250,000
Other	\$300,000	\$500,000	\$200,000	\$250,000	\$1,250,000
Quarterly Budget Totals	\$3,125,000	\$2,445,833	\$2,033,333	\$2,395,834	\$10,000,000

After the title IV-E agency prepares the budget, it will apply the cost allocation percentages developed in CAM Step 7 to the annual total project costs to determine the costs allocated to title IV-E. For this example, the title IV-E agency:

Calculates title IV-E CCWIS project development costs using CCWIS cost allocation as follows:

- \$10,000,000 (Annual Total Project Development Costs) * 89% (the percentage of total development costs that may be claimed as title IV-E at the CCWIS cost allocation level, as calculated in CAM Step 7) = \$8,900,000.

Calculates title IV-E CCWIS project development costs using non-CCWIS cost allocation as follows:

- \$10,000,000 (Annual Total Project Development Costs) * 9% (the percentage of total development costs that may be claimed as title IV-E at the non-CCWIS cost allocation level, as calculated in CAM Step 7) = \$900,000.

Calculates non-title IV-E costs as follows:

- \$10,000,000 (Annual Total Project Development Costs) * 2% (the percentage of total development costs that are charged to the other child welfare related programs as calculated in CAM Step 7) = \$200,000 (costs charged to the title IV-E agency). These costs are not eligible for title IV-E reimbursement.

The following table carries forward the Quarterly Budget Totals from our CCWIS Development Budget. The table demonstrates how the agency must allocate the annual costs by quarter for the three cost pools in the development CAM. For each quarter:

- 89% of the quarter's costs are allocated to title IV-E using CCWIS cost allocation,
- 9% is allocated to title IV-E using non-CCWIS cost allocation and
- the remaining 2% is allocated to non-title IV-E programs (in our example, these costs are allocated to the state or tribal funds). While the CCWIS development CAM was developed based on the automated functions, it is applied to all CCWIS project costs.

**Sample CCWIS Project
CCWIS Development Cost Allocation**

Cost Category	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Annual Total Project Cost
<i>Quarterly Budget Totals</i>	\$3,125,000	\$2,445,833	\$2,033,333	\$2,395,834	\$10,000,000
<i>Title IV-E: CCWIS Cost Allocation (89%)</i>	\$2,781,250	\$2,176,791	\$1,809,666	\$2,132,292	\$8,900,000
<i>Title IV-E: Non-CCWIS Cost Allocation (9%)</i>	\$281,250	\$220,125	\$183,000	\$215,625	\$900,000
<i>Non-federal funds (2%):</i>	\$62,500	\$48,917	\$40,667	\$47,917	\$200,000

Finally, the title IV-E agency calculates the total federal and non-federal funding shares for CCWIS development. For example, the title IV-E agency:

Calculates the federal share of title IV-E using CCWIS cost allocation as follows:

- \$8,900,000 (costs that may be allocated to title IV-E at the CCWIS cost allocation level) * 50% (the title IV-E FFP rate) = \$4,450,000 (the total FFP share)

Calculates the federal share of title IV-E using non-CCWIS cost allocation as follows:

- \$900,000 (costs that may be allocated to title IV-E at the non-CCWIS cost allocation level) * 60% (IV-E participation rate of 60%) * 50% (the title IV-E FFP rate) = \$270,000 (the total FFP share)

Calculates the share of other child welfare program costs⁵ as follows:

- \$200,000 (costs allocated to non-federal funded child welfare program)

The following table carries forward the Quarterly Budget Totals from our CCWIS Development Budget. The table demonstrates how a title IV-E agency allocates the federal and non-federal shares by quarter, applies the applicable title IV-E participation rate, and displays the requested FFP amount.

**Sample CCWIS Project
Federal & State Funding Shares for CCWIS Development**

Cost Category	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Annual Total Project Cost	IV-E % Eligible	IV-E FFP at 50% ⁶
Quarterly Budget Totals	\$3,125,000	\$2,445,833	\$2,033,333	\$2,395,834	\$10,000,000	N/A	N/A
Title IV-E: CCWIS Cost Allocation (89%)	\$2,781,250	\$2,176,792	\$1,809,666	\$2,132,292	\$8,900,000	100%	\$4,450,000
Title IV-E: Non-CCWIS Cost Allocation (9%)	\$281,250	\$220,125	\$183,000	\$215,625	\$900,000	60%	\$270,000
Non-federal costs (2%)	\$62,500	\$48,916	\$40,667	\$47,917	\$200,000	NONE	NONE

As noted above, the title IV-E agency may propose an alternative methodology to the approach described in this TB, but the alternative must address all the rules discussed above. Regardless of whether the title IV-E agency follows the process described in the TB or develops an alternative methodology, the APD must explain the process by documenting the assumptions used, steps taken,

⁵ In this example, we have combined the juvenile justice and adult protective services costs; typically, the APD budget would present these program costs separately.

⁶ This column lists the reimbursement the title IV-E agency may receive from ACF. In this example, all remaining costs are charged to the state/tribal funds:

\$4,450,000 (50% share of CCWIS eligible title IV-E) +
 \$270,000 (50% share of non-CCWIS title IV-E) +
 \$200,000 (total share of other child welfare costs) = \$5,280,000 (total annual development costs charged to the state/tribal funds).

and calculations made to develop the CCWIS CAM (45 CFR 95.610). The agency must clearly describe how the CCWIS CAM is applied to the complete CCWIS development budget.

For a stand-alone child welfare system, the title IV-E agency must describe in the CCWIS development budget all system development costs. If a CCWIS is part of a multiple program system, the title IV-E agency must incorporate the CCWIS development budget into the overall multiple program system development budget. Title IV-E agencies must also “include the approved APD methodology for the identification, assignment, and distribution of the development costs” in the CCWIS CAM in accordance with 45 CFR 95.631(a). Please contact your [DSS federal analyst](#) for guidance on incorporating CCWIS cost allocation into the overall budget and cost allocation structure of your multiple program system.

6. CCWIS Operational Cost Allocation Steps

Introduction

This section describes the steps for developing a CAP for CCWIS operational costs. States prepare a Public Assistance Cost Allocation Plan (PACAP), while tribes prepare a different operational cost allocation document, which the TB refers to as the “Tribal Operational CAM”. While the CCWIS PACAP (or Tribal Operational CAM) process is similar to the CCWIS CAM process discussed in Section 5, states and tribes follow slightly different steps for allocating operational costs. We highlight those differences below.

PACAP (Tribal Operational CAM) Step 1 – Determine if the CCWIS, when complete, will be a stand-alone child welfare information system or a multiple program system

The title IV-E agency completed this task in Section 5, CAM Step 1 above.

If the CCWIS, when completed, will be a stand-alone child welfare information system, skip PACAP (Tribal Operational CAM) Step 2 and go to PACAP (Tribal Operational CAM) Step 3. If the CCWIS, when complete, will be a multiple program system, go to PACAP (Tribal Operational CAM title IV-E CAM) Step 2.

PACAP (Tribal Operational CAM) Step 2 – If the CCWIS, when complete, will be a multiple program system, conduct an initial, system-wide cost allocation analysis of operational activities

In addition to child welfare related programs, a multiple program system supports the administration of other health and human service programs such as: Medicaid, Child Care, Child Support, Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance to Needy Families (TANF), and/or other non-child welfare programs. A multiple program system may fully support other programs (i.e., it is the system that provides all administrative support for other programs in addition to child welfare) or it may provide limited support (i.e., it supports only specific tasks for other programs, such as eligibility determination or the provision of services). For more information on whether the CCWIS is a stand-alone child welfare information system or a multiple program system, please contact your [DSS federal analyst](#) for guidance.

If the CCWIS, when completed, will be a part of a multiple program system, the title IV-E agency must first conduct an initial system-wide cost allocation analysis of operational activities. The purpose of this analysis is to identify shared and unique costs allocated to all benefiting programs.

The initial system-wide operational cost allocation of a multiple program system allows the state or tribe to identify and segregate child welfare and non-child welfare costs to the appropriate benefiting programs. The PACAP (Tribal Operational CAM), which is developed after the initial system-wide operational cost allocation process is completed, allocates the identified child welfare costs in accordance with the regulations for CCWIS (1355.57).

For **state title IV-E agencies** operating a multiple program system and developing an initial system-wide PACAP, follow the guidance from CAS to identify the shared and unique operational costs that are allocated to all benefiting programs across the entire system. Please see the following websites for more information: <https://rates.psc.gov/fms/dca/pa1.html> and here: <https://rates.psc.gov/fms/dca/pa.html>. This will result in an initial system level PACAP for operational costs.

For **tribal title IV-E agencies** allocating the operational costs for a multiple program system, follow ACF's guidance in PI [ACYF-CB-PI-10-13](#).

After developing the initial system-wide operational cost allocation, go to PACAP (Tribal Operational CAM) Step 3 to apply the regulations for CCWIS to allocate the share of system operational costs supporting child welfare related programs.

PACAP (Tribal Operational CAM) Step 3 – Complete or update the automated function list

The title IV-E agency completed this task in Section 5, CAM Step 3 above.

When a title IV-E agency needs to develop or amend its PACAP (Tribal Operational CAM), it will use the most recent version of the automated function list to apply the regulations for CCWIS (45 CFR 1355.57). Title IV-E agencies must continue to update their automated function list on an annual basis, even after development is complete, to address any changes, pursuant to 45 CFR 1355.52(i)(2).

For example, if the agency's CCWIS initially had a non-duplicated case management automated function that qualified for CCWIS cost allocation, but after several years the agency contracts with a CWCA that uses its own system to provide case management services, the title IV-E agency would note this change in the annual update to the CCWIS Checklist. Because the CCWIS case management function is now duplicated by the CWCA's system, the CCWIS automated function no longer qualifies for CCWIS cost allocation. The PACAP (Tribal Operational CAM) must be updated to reflect this change.

In PACAP (Tribal Operational CAM) Steps 4 – 6, the title IV-E agency uses the completed checklist to determine if its system as a whole meets the CCWIS requirements at 45 CFR 1355.53(a) as well as which automated functions will be eligible for CCWIS cost allocation, non-CCWIS cost allocation, or allocated to other child welfare related programs.

PACAP (Tribal Operational CAM) Step 4 – Confirm that your stand-alone child welfare information system or multiple program system is a CCWIS or a non-CCWIS

The title IV-E agency completed this task in Section 5, CAM Step 4 above.

That determination of a title IV-E agency system's status as a CCWIS or non-CCWIS should still apply. If the classification of the system changes, the agency must report that to ACF, pursuant to 45 CFR 95 Subpart E and 45 CFR 95 Subpart F. **State title IV-E agencies** with a non-CCWIS follow the guidance from CAS to allocate operational costs. **Tribal title IV-E agencies** with a non-CCWIS follow ACF's guidance in PI [ACYF-CB-PI-10-13](#).

If the system remains classified as a CCWIS, continue to PACAP (Tribal Operational CAM) Step 5.

PACAP (Tribal Operational CAM) Step 5 – Identify the automated functions that support CCWIS requirements

The title IV-E agency completed this task in Section 5, CAM Step 4 above.

Continue with the list of all automated functions that meet at least one requirement of section 1355.52 and/or 1355.54) to PACAP (Tribal Operational CAM) Step 6.

PACAP (Tribal Operational CAM) Step 6 – Determine if the identified automated functions may qualify for CCWIS or non-CCWIS cost allocation.

The title IV-E agency completed this task in Section 5, CAM Step 6 above. The classification of automated functions that may qualify for CCWIS cost allocation or non-CCWIS cost allocation should still apply.

We will continue our discussion of the following steps using the results of Section 5, CAM step 6. As a reminder, we determined in CAM Step 6 that:

- seven automated functions may qualify for CCWIS cost allocation (each function is not duplicated and is consistently used); and
- three automated functions may qualify for non-CCWIS cost allocation (each function is either duplicated or not consistently used or both).

Refer to *Diagram 1* on page 14 to view the CCWIS as a pie with equally-sized, separately grouped CCWIS and non-CCWIS automated functions.

PACAP (Tribal Operational CAM) Step 7 – Determining a CCWIS operational PACAP (Tribal Operational CAM): Calculate the operational use for child welfare related automated functions.

The next step is for the title IV-E agency to determine the PACAP (Tribal Operational CAM) for CCWIS operational costs.

The process for developing the CCWIS operational PACAP (Tribal Operational CAM) is similar to Section 5, CAM Step 7. However, the title IV-E agency will use a different allocation base. For development costs, the agency used a level of effort metric to measure the work to design, develop, and implement each automated function, however for operational costs the agency must select an allocation base that quantifies the activities associated with system usage (e.g., system time to support different users or clients). Title IV-E agencies should select a metric that fairly and equitably allocates operational costs to the benefiting programs. When the agency applies the operational allocation base to an automated function, the function's proportional system usage is calculated.

In this example, after the agency applies the operational allocation base to each of the ten automated functions and groups and aggregates the system usage by CCWIS and non-CCWIS automated functions:

- 80% of the proportional system usage applies to the seven automated functions that may qualify for CCWIS cost allocation and
- 20% of the proportional system usage applies to the three CCWIS automated functions that may qualify for non-CCWIS cost allocation.

Diagram 4 re-sizes the original pie slices in *Diagram 1* to illustrate the proportional system usage for each automated function.

- The blue represents 80% of the weighted seven automated functions that may qualify for CCWIS cost allocation.
- The grey represents 20% of the weighted three automated functions that may qualify for non-CCWIS cost allocation.

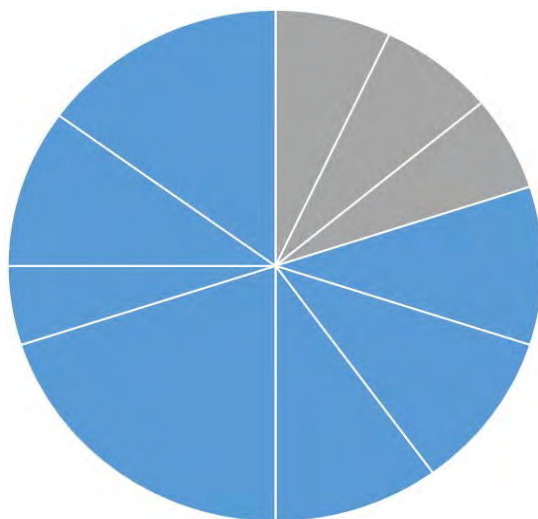


Diagram 4

PACAP (Tribal Operational CAM) Step 8 – Identify Excluded Programs Functionality & Re-calculate using the operational allocation base

In PACAP (Tribal Operational CAM) step 7, we weighted each automated function to reflect system usage for each function and grouped functions to determine the percentage of system use that may qualify for CCWIS operational cost allocation or non-CCWIS operational cost allocation.

In PACAP (Tribal Operational CAM) Step 8, the title IV-E agency segregates components of the CCWIS that the title IV-E agency must allocate to other child welfare programs and re-weights the system using the same operational allocation base used in PACAP (Tribal Operational CAM) Step 6.

Again, the operational cost allocation approach is different than the development cost allocation approach followed in Section 5, CAM Step 8. During system development, title IV-E agencies may allocate the development costs supporting title IV-B and the shared costs of other child welfare programs to title IV-E. During operations, these non-title IV-E programs must cover their unique and shared system costs (refer back to [Section 4. CCWIS and non-CCWIS Cost Allocation Overview](#) for more details). Please contact your [DSS federal analyst](#) if you have additional questions.

In this step, the agency must select components of the CCWIS that:

- only support child welfare related programs (i.e., juvenile justice and adult protective services).
- only support title IV-B programs.

This unique functionality may all reside in stand-alone automated functions or it may be contained in portions of several CCWIS and non-CCWIS automated functions. The title IV-E agency must separate this functionality from the rest of the CCWIS.

The agency must also select components of the CCWIS that:

- support both title IV-E and other child welfare related programs (i.e., juvenile justice and adult protective services).
- support both title IV-E and title IV-B programs.

Similar to the process of identifying the unique functionality supporting title IV-B, juvenile justice, and adult protective services, the shared functionality may all reside in stand-alone automated functions or it may be contained in portions of several CCWIS and non-CCWIS automated functions. Separate this functionality from the rest of the CCWIS and allocate appropriate proportional shares to other child welfare related programs and title IV-B, following guidance from CAS (for states) and ACF (for tribes).

To illustrate this step, the following is re-weighted by our operational allocation base:

- 76% of the system usage is assigned to the seven CWIS automated functions,
- 18% of the system usage is assigned to the three non-CCWIS automated functions,
- 2% of the system usage is assigned to the portions of the CCWIS that only support the juvenile justice and adult protective services programs,
- 1% of the system usage is assigned to the shared support of the juvenile justice and adult protective services programs,
- 2% of the system usage is assigned to the portions of the CCWIS that only support title IV-B, and
- 1% of the system usage is assigned to the shared support of title IV-B.

In *Diagram 5* the pie chart displays four groups:

- The blue represents 76% of the proportional system usage allocated to the seven CCWIS automated functions.
- The grey represents 18% of the proportional system usage allocated to the three non-CCWIS automated functions.
- The orange represents 3% of the proportional system usage allocated to the juvenile justice and adult protective services programs. It includes both the 1% of shared support and the 2% of system usage that only supports those programs.
- The green represents 3% of the proportional system usage allocated to the title IV-B program. It includes both the 1% of shared support and the 2% of system usage that only supports the title IV-B program.

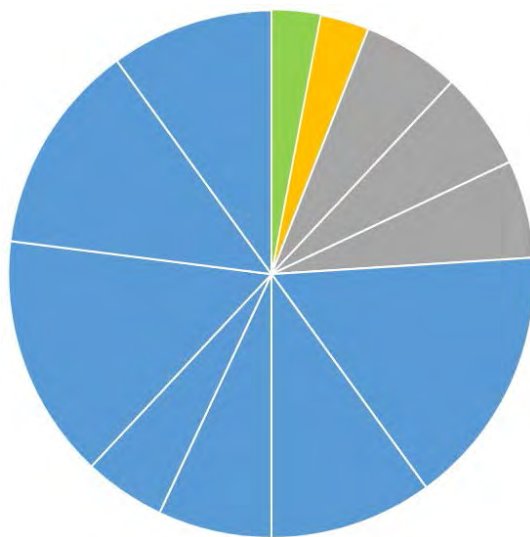


Diagram 5

In our example, the CCWIS operational PACAP (Tribal Operational CAM) is now complete. If this project is a standalone child welfare system, 76% of costs are allocated to title IV-E at the CCWIS cost allocation level, 18% are allocated to title IV-E at the non-CCWIS cost allocation level, 3% are allocated to the juvenile justice and adult protective service programs, and 3% are allocated to the title IV-B program. If this is a multiple program system, these shares would be proportionally distributed to the total child welfare share we identified in PACAP (Tribal Operational CAM) step 2.

States must describe the PACAP process and logic in their submission to CAS and the appropriate ACF Regional

Office; tribes must describe the title IV-E CAM process and logic in their submission to ACF in accordance with PI [ACYF-CB-PI-10-13](#). In the next two steps, we will discuss the fiscal implications of the finalized PACAP (Tribal Operational CAM) and apply it to a sample APD budget.

PACAP (Tribal Operational CAM) Step 9 – Apply CCWIS Operational PACAP (Tribal Operational CAM) percentages to the CCWIS Operational Budget

In this final step, the title IV-E agency applies the cost allocation percentages provided by the CCWIS operational PACAP (Tribal Operational CAM) to the CCWIS operational budget to calculate the costs that may qualify for title IV-E FFP.

For the purposes of this example, the CCWIS is a stand-alone child welfare system with annual total operational costs of \$5,000,000 as represented in this simplified operational budget:

**Sample CCWIS Project
CCWIS Operations Budget**

Cost Category	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Annual Total Project Cost
Direct Personnel	\$100,000	\$175,000	\$250,000	\$100,000	\$625,000
Contractor Services	\$156,250	\$156,250	\$156,250	\$156,250	\$625,000
Software Maintenance	\$0	\$37,500	\$87,500	\$500,000	\$625,000
Licensing Fees	\$250,000	\$250,000	\$100,000	\$25,000	\$625,000
IT Usage Fees	\$250,000	\$156,250	\$125,000	\$93,750	\$625,000
Overhead	\$156,250	\$156,250	\$156,250	\$156,250	\$625,000
Supplies	\$500,000	\$41,667	\$41,667	\$41,667	\$625,000
Other	\$150,000	\$250,000	\$100,000	\$125,000	\$625,000
Quarterly Budget Totals	\$1,562,500	\$1,222,917	\$1,016,667	\$1,197,917	\$5,000,000

After the budget is prepared, the title IV-E agency applies the cost allocation percentages we developed in PACAP (Tribal Operational CAM) Step 7 to the annual total project costs of \$5,000,000 to determine the costs allocated to title IV-E, title IV-B and, for this example, to the non-federal funds.

Calculate title IV-E CCWIS project operational costs using CCWIS cost allocation as follows:

- \$5,000,000 (Annual Total Project Operational Costs) * 76% (the percentage of total operational costs that may be claimed as title IV-E at the CCWIS cost allocation level, as calculated in PACAP Step 7) = \$3,800,000.

Calculate title IV-E CCWIS project operational costs using non-CCWIS cost allocation as follows:

- \$5,000,000 (Annual Total Project Operational Costs) * 18% (the percentage of total operational costs that may be claimed as title IV-E at the non-CCWIS cost allocation level, as calculated in PACAP Step 7) = \$900,000.

Calculate non-title IV-E costs as follows:

- \$5,000,000 (Annual Total Project Operational Costs) * 3% (percentage of total operational costs that are charged to other child welfare related programs, as calculated in PACAP Step 7) = \$150,000 (costs that may be allocated to the state or tribal funds). These costs are not eligible for title IV-E reimbursement.

Calculate title IV-B costs as follows:

- \$5,000,000 (Annual Total Project Operational Costs) * 3% (percentage of total operational costs that may be claimed as title IV-B, as calculated in PACAP Step 8) = \$150,000 (costs that may be allocated to title IV-B). These costs are not eligible for title IV-E reimbursement.

The following table, which carries forward the Quarterly Budget Totals from our CCWIS Operations Budget, demonstrates how a title IV-E agency allocates the annual costs by quarter for the four cost pools. For each quarter, 76% of the quarter’s costs are allocated to title IV-E using CCWIS cost allocation, 18% are allocated to title IV-E using non-CCWIS cost allocation, 3% are allocated to non-title IV-E (in our example, these costs are allocated to the state or tribal funds – the non-federal share), and the remaining 3% are allocated to title IV-B.

**Sample CCWIS Project
CCWIS Operational Cost Allocation**

Cost Category	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Annual Total Project Cost
<i>Quarterly Budget Totals</i>	\$1,562,500	\$1,222,917	\$1,016,666	\$1,197,917	\$5,000,000
<i>Title IV-E: CCWIS Cost Allocation (76%)</i>	\$1,187,500	\$929,417	\$772,666	\$910,417	\$3,800,000
<i>Title IV-E: Non-CCWIS Cost Allocation (18%)</i>	\$281,250	220,125	\$183,000	\$215,625	\$900,000
<i>Non-federal Share (3%)</i>	\$46,875	\$36,688	\$30,500	\$35,937	\$150,000
<i>Title IV-B (3%)</i>	\$46,875	\$36,688	\$30,500	\$35,937	\$150,000

Finally, the title IV-E agency must calculate both the total federal and non-federal funding shares for CCWIS operations.

Calculate the federal share of title IV-E using CCWIS cost allocation as follows:

- \$3,800,000 (costs that may be allocated to title IV-E) * 50% (the title IV-E FFP rate) = \$1,900,000 (the total FFP share)

Calculate the federal share of title IV-E using non-CCWIS cost allocation as follows:

- \$900,000 (costs that may be allocated to title IV-E at the non-CCWIS cost allocation level) * 60% (IV-E participation rate of 60%) * 50% (the title IV-E FFP rate) = \$270,000 (the total FFP share)

Calculate the share of other child welfare program costs⁷ as follows:

- \$150,000 (costs allocated to other non-federally funded child welfare programs)

Calculate the federal share of eligible title IV-B as follows:

- \$150,000 (costs that may be allocated to title IV-B) * 75% (the title IV-B FFP rate)⁸ = \$112,500 (the total costs eligible for title IV-B reimbursement)

The following table, which carries forward the Quarterly Budget Totals from our CCWIS Operations Budget, demonstrates how a title IV-E agency must allocate the federal and non-federal shares by quarter, applies the applicable titles IV-B and IV-E participation rates, and displays the requested FFP amount. Please note that title IV-B is a capped entitlement, and FFP is dependent on its availability.

**Sample CCWIS Project
Federal & State Funding Shares for CCWIS Operations**

Cost Category	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Annual Total Project Cost	Percent Eligible for FFP	FFP ⁹
<i>Quarterly Budget Totals</i>	\$1,562,500	\$1,222,917	\$1,016,666	\$1,197,917	\$5,000,000	N/A	N/A
<i>Title IV-E: CCWIS Cost Allocation (76%)</i>	\$1,187,500	\$929,417	\$772,666	\$910,417	\$3,800,000	100%	\$1,900,000 (50% IV-E FFP)
<i>Title IV-E: Non-CCWIS Cost Allocation (9%)</i>	\$281,250	\$220,125	\$183,000	\$215,625	\$900,000	60%	\$270,000 (50% IV-E FFP)
<i>Non-federal Share (3%)</i>	\$46,875	\$36,688	\$30,500	\$35,937	\$150,000	NONE	NONE
<i>Eligible title IV-B (3%)</i>	\$46,875	\$36,688	\$30,500	\$35,937	\$150,000	100%	\$112,500 (75% IV-B FFP)

As noted above, the title IV-E agency may propose an alternative approach to the approach described in this TB, but the alternative must address all the rules discussed above.

⁷ In this example, we have combined the juvenile justice and adult protective services costs; typically, the APD budget would present these program costs separately.

⁸ Title IV-E agencies are not required to allocate their capped title IV-B funds to CCWIS. For this example, the title IV-E agency is allocating all allowable CCWIS activities to title IV-B and receiving the 75% FFP provided for title IV-B eligible costs.

⁹ This column lists the reimbursement the title IV-E agency may receive from ACF. In this example, all remaining costs are charged to the state/tribal funds:

\$1,900,000 (50% share of CCWIS eligible title IV-E) +
 \$270,000 (50% share of non-CCWIS title IV-E) +
 \$150,000 (total share of other child welfare costs) +
 \$37,500 (25% share of eligible title IV-B costs) = \$2,717,500 (total annual development costs charged to the state/tribal funds).

7. CCWIS Budget and Cost Allocation Submission Requirements

This TB does not change the document submission procedures title IV-E agencies currently must follow to submit cost allocation documents to CAS, DSS, and the ACF Regional Office fiscal staff. We summarize these procedures below.

Submitting CCWIS Development and Operational Budgets

The title IV-E agency must include the development and operational budgets developed after finalizing its CAPs in the applicable APD. For a stand-alone child welfare system, the CCWIS development and operational budgets report all system costs. If the CCWIS is part of a multiple program system, the title IV-E agency must incorporate the CCWIS development and operational budgets into the overall multiple program system development and operations budgets. Please contact your [DSS federal analyst](#) for further guidance on submitting your CCWIS budgets.

CAM and PACAP Documents to Submit to CAS and ACF

In addition to submitting the CCWIS CAM (for development cost allocation) and the PACAP or tribal Operational CAM (for operational cost allocation), title IV-E agencies must also submit supporting documentation including: a detailed description of how its cost allocation was derived and calculated (e.g., the automated function list, assumptions used, steps taken, and calculations made), a chart listing the percentage of costs allocated to each program, and a budget reporting the dollar amounts for each program.

As appropriate, the Regional Office fiscal staff and/or DSS will use the documents to evaluate the CCWIS implications of the CAM, PACAP, and tribal title IV-E CAM. CAS will review the PACAP to confirm if the documents are for a CCWIS or non-CCWIS application.

Submitting CAMs and PACAPs for Federal Approval

This section describes where the title IV-E agency must submit its *CAMs and PACAPs* for approval. State and tribal title IV-E agencies follow different procedures to submit their cost allocation documents for approval, as described below.

State title IV-E agencies must submit their CCWIS CAM (for development cost allocation) and PACAP (for operational cost allocation) to the following agencies for approval:

1. The state title IV-E agency submits the CCWIS CAM as part of an APD or Notice of Intent that is submitted to ACF for approval (45 CFR 95.610(a)). Find more information on submitting CCWIS CAMs see: <https://www.acf.hhs.gov/cb/research-data-technology/state-tribal-info-systems/managers/submit>
2. The state title IV-E agency submits the CCWIS PACAP to CAS and the ACF fiscal staff in the appropriate Regional Office for approval. Find more information on submitting PACAPs here: <https://rates.psc.gov/fms/dca/pa1.html> and here: <https://rates.psc.gov/fms/dca/pa.html>.

Tribal title IV-E agencies must submit both their CCWIS CAM (for development cost allocation) and a separate tribal Operational CAM (for operational cost allocation) to ACF for approval. For further information about requirements for tribal operational cost allocation plans, see PI [ACYF-CB-PI-10-13](#).

When to submit the CCWIS CAM, PACAP, and tribal title IV-E CAM

45 CFR 95.611 identifies conditions that will require the submission of a new or updated CCWIS CAM for development costs in an APD. These conditions include: starting a new child welfare information systems project, changes in the scope of a project, a decision to integrate several programs into one system, or a decision to transition an existing system to a CCWIS compliant system.

Regulations at 45 CFR 95.507 describe the requirements for the submission of a new state CCWIS PACAP for operational expenses. Regulations at 45 CFR 95.509(a) describe conditions that require the submission of an amendment to the IV-E agency’s CCWIS PACAP. Some conditions that may require the submission of a new or updated CCWIS PACAP include changes in the title IV-E agency’s plans for titles IV-B or IV-E, organizational changes, change in program operations, or when an error in currently approved documents is discovered. Answers to other frequently asked questions about PACAP submissions are available here: <https://rates.psc.gov/fms/dca/faq-pa.pdf>

As described in Section J of [ACYF-CB-PI-10-13](#), a tribe’s title IV-E CAM must be updated as needed to address organizational changes, modification to the Department of Interior negotiated indirect rate, change in federal law or regulations or any other change that affects the allocation methodology. In the absence of any updates, each tribe must annually submit a certification that there have been no changes warranting a revision of the title IV-E CAM.

Development and operational CAPs may also need to be changed when federal law or regulations affect the validity of approved documents. For example, a title IV-E agency may need to modify existing cost allocation documents approved for a SACWIS or non-SACWIS, regardless of whether the system transitions to CCWIS (45 CFR 1355.56(b), (d), and (f)(1)). In addition, a title IV-E agency may need to submit new CAPs for a new CCWIS project (45 CFR 1355.51). Finally, changes to the annually submitted automated function list may result in changes to the CAPs.

The following tables for state and tribal title IV-E agencies list events that require the IV-E agency to submit new or updated CAPs. The arrow symbol “→” indicates a transition from one type of system to another.

For a state title IV-E agency with a...	the...	is due...	and the...	is due...
1. SACWIS→ non-CCWIS	non-CCWIS CAM	prior to the end of the transition period to be effective prior to incurring any development funds after 8/1/2018	non-CCWIS PACAP	by the date set by CAS to be effective by 10/1/2018 ¹⁰

¹⁰ Although ACF will classify child welfare information systems as either CCWIS or non-CCWIS after the transition period ends on 7/31/2018, 45 CFR 95.515 established the effective date of a PACAP amendment as the first day of the calendar quarter following the date of the event that required the amendment. This date is 10/1/2018 for a system that transitioned to either CCWIS or non-CCWIS after the transition period ends.

For a state title IV-E agency with a...	the...	is due...	and the...	is due...
2. SACWIS→CCWIS	CCWIS CAM	prior to the end of the transition period to be effective prior to incurring any development funds after 8/1/2018; and when the automated function list or CCWIS APD ¹¹ or both are updated	CCWIS PACAP	when any CCWIS functions are operational; and when changes made in an automated function list or updated CCWIS APD or both are operational
3. Non-SACWIS→ non-CCWIS	non-CCWIS CAM	if there is a change in the CAM	non-CCWIS PACAP	if there is a change in the PACAP
4. Non-SACWIS→ CCWIS	CCWIS CAM	with the APD requesting FFP for CCWIS planning or development; and when the automated function list or CCWIS APD or both are updated	CCWIS PACAP	when any CCWIS functions are operational; and when changes made in an automated function list or updated CCWIS APD or both are operational
5. New CCWIS	CCWIS CAM	with the APD notifying ACF of the state’s intention to build a CCWIS; and when the automated function list or CCWIS APD or both are updated	CCWIS PACAP	when any CCWIS functions are operational; and when changes made in an automated function list or an updated CCWIS APD or both are operational

¹¹ The APD has the budget for CCWIS activities, beyond the automated functions list, and a change in one of these may affect the CAM or PACAP.

For a tribal title IV-E agency with a ...	the...	is due...	and the...	is due...
6. Non-TACWIS→ non-CCWIS	non-CCWIS CAM (development)	if there is a change in the CAM	non-CCWIS CAM (operations)	in accordance with guidance provided by ACF
7. Non-TACWIS→ CCWIS	CCWIS CAM (development)	with the APD requesting FFP for CCWIS planning or development; and when the automated function list or CCWIS APD or both are updated	CCWIS CAM (operations)	when any CCWIS functions are operational; and when changes in an automated function list or updated CCWIS APD or both are operational
8. New CCWIS	CCWIS CAM (development)	with the APD notifying ACF of the tribe’s intention to build a CCWIS; and when the automated function list or CCWIS APD or both are updated	CCWIS CAM (operations)	when any CCWIS functions are operational; and when changes made in an automated function list or updated CCWIS APD or both are operational

We note that more than one of these circumstances may apply to your title IV-E agency. For example, a state may continue to use its SACWIS as a non-CCWIS system (row 1) while developing a new CCWIS system (row 5). In cases where two or more systems are simultaneously in development or operations, each system requires its own CAM, and PACAP or Tribal Operational CAM. Title IV-E agencies should always clearly note if a CAP is for a CCWIS or non-CCWIS system, even if you are submitting CAPs with minor updates or corrections.

In many cases it may save the title IV-E agency time to update its existing CAPs rather than create new documents. For example, if a transition from S/TACWIS to CCWIS requires limited enhancements to comply with CCWIS requirements, the cost allocation documents may require only minor changes. Likewise, updates to an existing automated function list may require small updates to your CAPs. However, the agency will need to develop new CAPs when developing a new CCWIS.

CAPs that allocate costs to multiple federal programs must be approved by each program. Please contact the affected federal programs for information on their cost allocation submission requirements.

8. Glossary

Term	Definition
Allocation base	<p>The cost allocation measurement selected to track and calculate the cost allocation for all benefitting programs.</p> <p>Examples of allocation bases title IV-E agencies may propose for software development include: Software development hours, function points, and number of screens. Title IV-E agencies may propose other metrics for as an allocation base.</p>
Automated function	<p>A computerized process or collection of related processes to achieve a purpose or goal. (45 CFR 1355.51)</p>
Benefiting program	<p>State or Federal public assistance program that uses some or all of the functions of a state agency’s automated computer system.</p> <p>For example, the Federal SNAP Program benefits from state computer systems that determine applicants’ eligibility for SNAP benefits.</p>
CCWIS CAM	<p>The CCWIS Cost Allocation Methodology (CAM) is the document containing the CCWIS development CAP. It allocates costs for the planning design, development and implementation of the CCWIS.</p>
CCWIS cost allocation	<p>The cost allocation available to systems meeting CCWIS requirements.</p> <p>There are two CCWIS cost allocation types: CCWIS development cost allocation and CCWIS operational cost allocation.</p>
CCWIS design requirements	<p>The requirements describing how CCWIS systems must be designed. Unless exempted, automated functions of a CCWIS must:</p> <ul style="list-style-type: none"> • Follow a modular design that includes the separation of business rules from core programming; • Be documented using plain language; • Adhere to a state, tribal, or industry designed standard that promotes efficient, economical, and effective development and produces reliable systems; and • Be capable of being shared, leveraged, and reused as a separate component.
CCWIS development cost allocation	<p>The cost allocation requirements applicable to CCWIS development activities (such as system planning, design, development and implementation). These requirements permit title IV-E agencies to allocate costs to title IV-E for the development activities supporting the following programs:</p> <ul style="list-style-type: none"> • Costs benefiting title IV-E eligible children and young adults. This includes foster care, adoption assistance, prevention services, Chafee program services, the kinship navigator program, and guardianship. • Costs benefiting state or tribal funded participants in programs and allowable activities described in title IV-E, such as foster care. • Costs benefit title IV-B activities. • Costs benefiting both title IV-E and other child welfare related programs (at this time ACF only classifies juvenile justice and adult protective services as child welfare related programs).

Term	Definition
CCWIS eligible costs	<p>CCWIS project costs that may qualify for CCWIS cost allocation. Some of the factors that determine if a cost may qualify for CCWIS cost allocation include:</p> <ul style="list-style-type: none"> • If the system meets CCWIS design requirements • If an automated function is duplicated • If an automated function is consistently used • If an automated function supports the title IV-E program
CCWIS operational cost allocation	<p>The cost allocation requirements applicable to CCWIS operational activities (this includes activities related to the automated processing of data, such as the use of supplies, software, hardware, and personnel directly associated with the system’s functioning). These requirements permit title IV-E agencies to allocate costs to title IV-E for operational activities supporting the following programs:</p> <ul style="list-style-type: none"> • Costs benefiting title IV-E eligible children and young adults. • Costs benefiting state or tribal funded participants in programs and allowable activities described in title IV-E, such as foster care.
CCWIS PACAP	<p>The CCWIS Public Assistance Cost Allocation Plan (PACAP) is the document containing the CCWIS operational CAP. It allocates costs for the operations and maintenance of the CCWIS.</p>
CCWIS project	<p>A child welfare information system that meets all CCWIS project requirements. If the CCWIS project is:</p> <ul style="list-style-type: none"> • a new CCWIS, all automated functions must meet the CCWIS design requirements. • a SACWIS or non-SACWIS transitioning to CCWIS, all automated functions developed after 7/31/2018 must meet the CCWIS design requirements. <p>For both new CCWIS and transiting systems, automated functions may be exempted from CCWIS design requirements if ACF approves an alternative design proposed by the title IV-E agency that is more efficient, economical and effective than the CCWIS design requirements.</p>
CCWIS project requirements	<p>The requirements described in 45 CFR 1355.52, which include:</p> <ol style="list-style-type: none"> a) Efficient, economical and effective requirement b) CCWIS data requirements c) Reporting requirements d) Data quality requirements e) Bi-directional data exchanges f) Data exchange standard requirements g) Automated eligibility determination requirements h) Software provision requirement i) Submission requirements j) Other applicable requirements
Child welfare contributing agency (CWCA)	<p>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. (45 CFR 1355.51)</p> <p>See CCWIS Technical Bulletin #2: Data Sharing Between CCWIS and Child Welfare Contributing Agencies for more information.</p>

Term	Definition
Child welfare related program	<p>Programs defined by ACF as serving child welfare or closely related programs.</p> <p>Examples include programs supporting titles IV-B and IV-E of the Social Security Act, state or local child welfare programs, and the closely related juvenile justice and adult protective services programs.</p>
Development	<p>Development means the definition of system requirements, detailing of system and program specifications, programming and testing. This includes the use of hardware to the extent necessary for the development phase. (45 CFR 95.605)</p>
Direct allocation type	<p>The allocation type used when only a single federal or state program uses an automated function.</p>
FFP	<p>Federal Financial Participation (45 CFR 95.605)</p>
Level of effort	<p>A weight that indicates the relative complexity of software development work. The more complex the work, the higher the level of effort required.</p>
Multiple program system	<p>An information system that supports multiple programs.</p> <p>One example is an enterprise system that supports several programs such as child welfare, childcare, juvenile justice, Medicaid, Temporary Assistance to Needy Families (TANF), the Supplemental Nutrition Assistance Program (SNAP), and child support.</p> <p>Another example is a child welfare system that provides limited support to other programs (such as a child welfare system that contains functions used by other programs, but does not fully support the other program).</p> <p>Multiple programs systems must typically submit APDs to multiple federal operating divisions.</p>
New CCWIS project	<p>A project to build an automated data processing system meeting all requirements in 45 CFR 1355.52 and all automated functions meet the requirements in 45 CFR 1355.53(a). (45 CFR 1355.51)</p>
Non-CCWIS cost allocation	<p>Allocating system project costs according to the ratio of title IV-E eligible children to the total child welfare population served by the title IV-E agency. This ratio is also referred to as the title IV-E participation rate.</p>
Non-CCWIS costs	<p>CCWIS project costs that may qualify for non-CCWIS cost allocation.</p>
Non-CCWIS project	<p>A child welfare information project that:</p> <ol style="list-style-type: none"> 1. supports the administration of the title IV-B or IV-E plans, and 2. does not meet the requirements of 45 CFR 1355.52 or 45 CFR 1355.53 or both. <p>We remind title IV-E agencies that a project must meet the submission requirements of 45 CFR 1355.52(i) before ACF will classify the project as a CCWIS. If the child welfare information project has not been classified as a CCWIS by ACF, it is a non-CCWIS.</p>
Non-S/TACWIS project	<p>An active automated data processing system or project that, prior to the effective date of these regulations, ACF had not classified as a S/TACWIS and for which:</p> <ol style="list-style-type: none"> (i) ACF approved a development procurement; or (ii) The applicable state or tribal agency approved a development procurement below the thresholds of 45 CFR 95.611(a); or

Term	Definition
	(iii) The operational automated data processing system provided the data for at least one AFCARS or NYTD file for submission to the federal system or systems designated by ACF to receive the report. (45 CFR 1355.51)
Operation	Operations include the automated processing of data used in the administration of State plans for titles IV-B, IV-E of the Social Security Act. Operation includes the use of supplies, software, hardware, and personnel directly associated with the functioning of the mechanized system. (45 CFR 95.605)
Shared allocation type	The allocation type used when two or more federal or state program use an automated function.
Shared Costs	Automated function costs benefiting two or more programs.
S/TACWIS project	An active automated data processing system or project that, prior to the effective date of these regulations, ACF classified as a S/TACWIS and for which: (i) ACF approved a procurement to develop a S/TACWIS; or (ii) The applicable state or tribal agency approved a development procurement for a S/TACWIS below the thresholds of 45 CFR 95.611(a). (45 CFR 1355.51)
Software maintenance	The routine support activities that normally include corrective, adaptive, and perfective changes, without introducing additional functional capabilities. Corrective changes are tasks to correct minor errors or deficiencies in software. Adaptive changes are minor revisions to existing software to meet changing requirements. Perfective changes are minor improvements to application software so it will perform in a more efficient, economical, and/or effective manner. Software maintenance can include activities such as revising/creating new reports, making limited data element/data base changes, and making minor alterations to data input and display screen designs. (45 CFR 95.605)
Stand-alone child welfare system	An information system that benefits only child welfare related programs.
Transition system	A STACWIS or non-SACWIS project that a title IV-E agency plans to enhance to meet CCWIS requirements. Title IV-E agencies must notify ACF by July 31, 2018 of the plan to transition their system to a CCWIS.
Title IV-E participation rate	The proportion of children served by the State or Tribal child welfare program that also meet title IV-E program eligibility requirements.
Regular Administrative rate cost allocation	Allocating system costs to title IV-E by the title IV-E participation rate. Also referred to as non-CCWIS cost allocation in this TB.
Unique costs	Automated function costs benefiting only a single program.
Weight	For the CCWIS CAM, the weight is the proportion of the total system development effort that is assigned to an automated function. For the CCWIS PACAP, the weight is the proportion of the total system usage that is assigned to an automated function