

# Child Welfare Policy Manual

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## Questions & Answers

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### 6.14 CCWIS reviews

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**1. Question: Will ACF review CCWIS projects over Advance Planning Document (APD) thresholds and CCWIS projects under these thresholds in accordance with the same review and assessment process described in section 1355.55?**

**Answer:** Yes. ACF will review, assess and inspect the planning, design, development, installation, operation and maintenance of each CCWIS project on a continuing basis to determine the extent to which the project meets CCWIS requirements, regardless of whether the project was over or under the \$5 million APD threshold.

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 95.611, 45 CFR 1355.55; 81 FR 35450 at 35471 (issued June 2, 2016); 80 FR 48200 at 48219 (issued August 11, 2015)

**2. Question: What data quality metrics will ACF use during the CCWIS reviews described at paragraph 1355.55?**

**Answer:** ACF will use the standards in federal laws, regulations, and policies for evaluating data quality for federally required data described in section 1355.52(b)(1). We will apply the standards established by the state or tribe when evaluating the quality of required data described in section 1355.52 (b)(2). If two or more standards apply to the same data, ACF will apply the more rigorous standard, per 1355.52(d)(1)(i) in reviewing data quality. For example, if one standard required updating certain CCWIS data in seven days and a second standard set a two-day limit, we will hold the title IV-E agency to the two-day limit.

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 1355.52(b)(1) - (2); 1355.52(d)(1); 45 CFR 1355.55; 81 FR 35450 at 35454 - 35455, 35457 and 35471 (issued June 2, 2016); 80 FR 48200 at 48207 - 48209 and 48219 (issued August 11, 2015)

**3. Question: Will ACF conduct CCWIS reviews as described in section 1355.55 solely based on the title IV-E agency's CCWIS data quality plan submitted per paragraph 1355.52(d)(5)?**

**Answer:** No. During a CCWIS review described by section 1355.55, ACF will review the extent to which the CCWIS project meets requirements in sections 1355.52, 1355.53, 1355.56, and, if applicable, 1355.54 which will include, but is not limited to a review of the

title IV-E agency's data quality plan.

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 1355.52(d)(5); 45 CFR 1355.55; 81 FR 35450 at 35460 - 35461 and 35471 (issued June 2, 2016); 80 FR 48200 at 48211 and 48219 (issued August 11, 2015)

**4. Question: Are title IV-E agencies required to conduct an independent verification and validation (IV&V) review for CCWIS design, implementation, and data quality reviews as part of the CCWIS review process?**

**Answer:** No. Section 1355.55 does not specifically require title IV-E agencies to conduct an IV&V review as part of the CCWIS review process. However, ACF may require a title IV-E agency to complete an IV&V per Advance Planning Document (APD) regulations at 45 CFR 95.626.

- **Source/Date:** 4/24/2017
- **Legal and Related References:** 45 CFR 95.626; 45 CFR 1355.55; 81 FR 35450 at 35471 - 35472 (issued June 2, 2016); 80 FR 48200 at 48219 (issued August 11, 2015)