

# Child Welfare Policy Manual

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## Questions & Answers

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### 6.3 CCWIS data

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

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

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(b); 81 FR 35450 at 35454 (issued June 2, 2016); 80 FR 48200 at 48207 (issued August 11, 2016)

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

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

- **Source/Date:** 10/27/2016
- **Legal and Related References:** 45 CFR 1355.52(b); 45 CFR 1355.52(e)(1)(ii); 81 FR 35450 at 35454 and 35463 (issued June 2, 2016); 80 FR 48200 at 48203, 48207 and 48212 (issued August 11, 2016)

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

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

- **Source/Date:** 10/27/2016

- **Legal and Related References:** 45 CFR 1355.52(b); 81 FR 35450 at 35454 (issued June 2, 2016)

#### **4. Question: How long must a title IV-E agency maintain CCWIS data?**

**Answer:** The regulations for CCWIS require that CCWIS data "be maintained in accordance with confidentiality requirements in section 471(a)(8) of the Act, and 45 CFR 205.50, and 42 U.S.C. 5106a(b)(2)(B)(viii) through (x) of the Child Abuse Prevention and Treatment Act, if applicable, and other applicable federal and state or tribal laws" (paragraph 1355.52(d)(1)(iii)).

- **Source/Date:** 09/19/2019
- **Legal and Related References:** 45 CFR 1355.52(d)(1)(iii); 45 CFR 1355.30(i); 45 CFR 75.361

#### **5. Question: How should the title IV-E agency collect CCWIS data that must be maintained in a CCWIS but is not required to be provided through the bi-directional data exchanges?**

**Answer:** The title IV-E agency should collect such data in a CCWIS using methods that support the efficient, economical, and effective administration of the program, pursuant to paragraph 1355.52(a).

Different data collection methods should be considered. For example, the agency may:

- design a CCWIS automated function to support data capture in a CCWIS;
- establish an optional data exchange to capture data in a CCWIS;
- build a portal or mobile application so that data may be entered into a CCWIS;
- receive information from a data warehouse shared with other programs and/or agencies not requiring a CCWIS bi-directional data exchange; or
- assign workers to enter in hard-copy reports from other agencies not requiring a CCWIS bi-directional data exchange.

- **Source/Date:** 4/3/2020
- **Legal and Related References:** 45 CFR 1355.52(a); 45 CFR 1355.52(b); 45 CFR 1355.52(e); 81 FR 35450 at 35453 - 35456 and 35461 - 35466 (issued June 2, 2016); 80 FR 48200 at 48206 - 48208 and 48211 - 48215 (issued August 11, 2015)

#### **6. Question: What data must the title IV-E agency collect and maintain in its CCWIS from a tribe with a title IV-E agreement under section 472(a)(2)(B)(ii) of the Act with the title IV-E agency?**

**Answer:** Title IV-E agencies must maintain in the CCWIS data collected by the tribe with a title IV-E agreement under section 472(a)(2)(B)(ii) of the Act that is described at 45 CFR 1355.52(b).

- **Source/Date:** (4/17/20)
- **Legal and Related References:** 45 CFR 1355.52(b)

**7. Question: How may CCWIS data (such as prevention program data) collected by systems external to CCWIS be provided to CCWIS?**

**Answer:** It depends on who is collecting the CCWIS data:

- Title IV-E agency staff collecting CCWIS data through an external system must use a bi-directional data exchange (See 45 CFR 1355.52(e)(1)(iv); CWPM 6.6 #3 and CWPM 6.6D#1).
- Child Welfare Contributing Agencies (CWCAs) may either enter CCWIS data directly into CCWIS or enter CCWIS data into a CWCA system that provides the data to CCWIS through a bi-directional data exchange.
- A community provider that is not a CWCA may provide CCWIS data to a CCWIS using an optional data exchange, a portal, a data warehouse or by other methods described in CWPM 6.3 #5.

- **Source/Date:** 07/18/2022
- **Legal and Related References:** 45 CFR 1355.52(e)(1)(ii) and(iv)