

# Child Welfare Policy Manual

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## Questions & Answers

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### 6.3A Federal data

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#### 1. Question: What federal data are required to be maintained in CCWIS per paragraph 1355.52(b)?

**Answer:** The federal data required to be maintained in CCWIS are described in federal child welfare laws and policies. Because the required federal data may change as laws and policies change, paragraph 1355.52(b) lists categories of data from these laws and policies rather than specify a comprehensive set of federal data. ACF will use the federal laws, regulations, and policies effective at the time of a CCWIS review to determine compliance with paragraph 1355.52(b). Below are examples of required federal data, based on laws and policies in effect at the time the CCWIS final rule was published.

Examples of federal data required to be maintained in CCWIS for ongoing federal child welfare reports include:

- All AFCARS data;
- For state title IV-E agencies, NYTD case management data must be maintained in CCWIS, although NYTD outcomes information collected from periodic surveys may be maintained in external systems;
- Financial information for the CB-496, such as training costs, demonstration project costs, and administrative costs may be maintained in a separate financial system that exchanges data with CCWIS per paragraph 1355.52 (e)(1)(i). Other data, such as the average monthly number of children receiving title IV-E Foster Care maintenance assistance payments, may be derived from CCWIS case management and placement records.
- Examples of federal data required for title IV-E eligibility determinations, authorizations of services, and expenditures under titles IV-B and IV-E include:
  - Data necessary for title IV-E eligibility determinations includes data such as the factors used to demonstrate the child would qualify for AFDC under the 1996 plan, placement licensing and background check information, and court findings.
  - Data required for authorizations of services and other expenditures under titles IV-B and IV-E includes data such as documentation of services authorized, records that the services were delivered, payments processed, and payment status, including whether the payment

will be allocated to one or more federal, state, or tribal programs for reimbursement, and the payment amount allocated.

- Financial information may be maintained in a financial system exchanging data with CCWIS.

Examples of federal data documenting interactions with and on behalf of clients that the title IV-E agency determines is needed to support federal child welfare laws, regulations, and policies include:

- case management information,
- recommended services,
- placement data, and
- licensing information on foster care providers.

Examples of federal case management data collected in the course of casework with clients that may be needed for a Child and Family Services Review (CFSR) includes:

- abuse and neglect reports,
- case plans, and
- placement histories.

- **Source/Date:** 10/27/2016
- **Legal and Related References:** Section 474(a)(3)(C)(i) of the Social Security Act; 45 CFR 1355.52(b); 81 FR 35450 at 35454 - 35455 (issued June 2, 2016); 80 FR 48200 at 48206 - 48207 (issued August 11, 2016); ACYF-CB-PI-10-04 (issued April 2, 2010)

## **2. Question: Is a title IV-E agency required to maintain foster parent training data in the CCWIS pursuant to paragraph 1355.52(b)(1)?**

**Answer:** Yes, if the IV-E agency claims IV-B or IV-E funding for that training. A title IV-E agency's CCWIS must maintain, "data required for expenditures under IV-B and IV-E" (1355.52(b)(1)(ii)). Since title IV-E agencies typically claim federal financial participation (FFP) for foster parent training (as reported on the CFS-101, Part II), CCWIS must maintain the data necessary to support the claim (80 FR 48200 at 48207).

- **Source/Date:** 09/19/2019
- **Legal and Related References:** 45 CFR 1355.52(b)(1)(ii); 45 CFR 1356.60(b)(1)(ii); 81 FR 35450 at 35454 - 35455 (issued June 2, 2016); 80 FR 48200 at 48206 - 48207 (issued August 11, 2016)

**3. Question: Is the title IV-E agency required to maintain information in CCWIS confirming that a service provider processed a payment for a child (such as information that the provider cashed a check)?**

**Answer:** No. The CCWIS must maintain data required for authorizations of services and other expenditures that may be claimed for reimbursement under titles IV-B and IV-E. However, the automated functions that use this information, such as those that support financial claims processing and payments, are not required to be a part of the CCWIS (45 CFR 1355.52(b)(1)(ii); 80 FR 48200 at 48207).

- **Source/Date:** 12/14/2021
- **Legal and Related References:** 45 CFR 1355.52(b)(1)(ii); 45 CFR 1356.71(b)(2); 81 FR 35450 at 35455 (issued June 2, 2016); 80 FR 48200 at 48207 (issued August 11, 2015)

**4. Question: Must a title IV-E agency include data to support title IV-E foster care and prevention candidacy determinations for children on whose behalf the agency claims title IV-E administrative costs in the agency's CCWIS system?**

**Answer:** Yes, if an agency is electing to operate a CCWIS, a title IV-E agency must collect and maintain in CCWIS information required for title IV-E eligibility determinations (45 CFR 1355.52(b)(1)(ii)). This includes candidate eligibility determinations under the title IV-E foster care program and the title IV-E prevention services program, if the agency operates such program. In addition, a title IV-E agency's CCWIS must maintain data needed for on-going federal child welfare reports (45 CFR 1355.52(b)(1)(i) and (c)(1)). One such report is the Title IV-E Programs (Foster Care, Adoption Assistance, Guardianship Assistance, Prevention Services and Kinship Navigator Programs) Quarterly Financial Report, in which a title IV-E agency must report data on candidates for title IV-E foster care and prevention services for which the agency claims title IV-E administrative costs.

- **Source/Date:** 07/18/2022
- **Legal and Related References:** 45 CFR 1355.52(b)(1) and (c)(1)

**5. Question: If the title IV-E agency has an approved title IV-E prevention plan, is the prevention program data required pursuant to sections 471(e)(4)(E) and 471(e)(5)(B)(x) of the Act considered "CCWIS data" that the agency must maintain in the CCWIS?**

**Answer:** Yes. A title IV-E agency that elects to develop and operate a CCWIS and a title IV-E prevention program must maintain required title IV-E prevention program data in the CCWIS. Federal regulations require that an agency's CCWIS maintain title IV-E and IV-B data needed for on-going federal child welfare reports, data required for eligibility determinations, authorizations of services and expenditures, and case management data to support federal audits, reviews, and other monitoring activities (45 CFR 1355.52(b)(1); CWPM 6.3A#1). Therefore, a CCWIS must maintain title IV-E prevention program data for these purposes.

- **Source/Date:** 07/18/2022
- **Legal and Related References:** Social Security Act – sections 471(e)(4)(E) and 471(e)(5)(B)(x); 45 CFR 1355.52(b)(1); CCWIS Technical Bulletin (TB) #7 Appendix J, and Title IV-E Prevention Program Data TB #2