

# Child Welfare Policy Manual

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## Questions & Answers

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### 6.6E Child abuse and neglect systems

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**1. Question: If automated functions that support the reporting and investigation of child abuse and neglect reside exclusively in a CCWIS, how must the title IV-E agency cost allocate development costs for those automated functions?**

**Answer:** Pursuant to 1355.57(a) - (e), the title IV-E agency may allocate development costs using a CCWIS cost allocation methodology unless the automated functions in the CCWIS are:

- Duplicated in other systems supporting the state or tribe's title IV-E or title IV-B programs, pursuant to 1355.57(a)(2)(ii) and (b)(2)(ii);
- Not used consistently by all child welfare users responsible for the area supported by the automatic function, pursuant to 1355.57(a)(2)(ii) and (b)(2)(ii);
- Unique child welfare related program functions (such as juvenile justice and adult protective services) not used by the title IV-E program, pursuant to 1355.57(e) and (f) and 45 CFR 95.631; and
- Common or unique functions benefiting other health and human service programs (such as child support, child care, Supplementary Nutritional Assistance Program, Temporary Assistance to Needy Families, Medicaid, courts and/or education programs), pursuant to 1355.57(e) and (f) and 45 CFR 95.631.

This question and answer is repeated in the Cost Allocation section.

- **Source/Date:** 10/26/2017
- **Legal and Related References:** 45 CFR 95.631; 45 CFR 1355.52(e)(2)(i); 45 CFR 1355.57; 81 FR 35450 at 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48213 and 48220 - 48222 (issued August 11, 2015)

**2. Question: If automated functions that support the reporting and investigation of child abuse and neglect reside in an external system and are not duplicated in CCWIS, how must the agency cost allocate development costs for those automated functions?**

**Answer:** Pursuant to 1355.57(e), the title IV-E agency must allocate development costs using a non-CCWIS cost allocation methodology if the automated functions reside in an external system.

This question and answer is repeated in the Cost Allocation section.

- **Source/Date:** 10/26/2017
- **Legal and Related References:** 45 CFR 95.631; 45 CFR 1355.52(e)(2)(i); 45 CFR 1355.57; 81 FR 35450 at 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48213 and 48220 - 48222 (issued August 11, 2015)

**3. Question: If automated functions that support the reporting and investigation of child abuse and neglect reside in both a CCWIS and an external system, how must the agency cost allocate development costs for those automated functions?**

**Answer:** Pursuant to 1355.57(e), the title IV-E agency must allocate development costs using a non-CCWIS cost allocation methodology if the automated functions reside in both a CCWIS and an external system. The duplicated development costs are allocated to the benefiting program or programs. All programs pay their share of an automated function under a non-CCWIS cost allocation methodology.

This question and answer is repeated in the Cost Allocation section.

- **Source/Date:** 10/26/2017
- **Legal and Related References:** 45 CFR 95.631; 45 CFR 1355.52(e)(2)(i); 45 CFR 1355.57; 81 FR 35450 at 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48213 and 48220 - 48222 (issued August 11, 2015)