



# **Comprehensive Child Welfare Information System**

## **Technical Bulletin #2:**

### **Data Sharing between CCWIS and Child Welfare Contributing Agencies**

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**September 29, 2017**

This technical bulletin provides title IV-E agencies that choose to develop a Comprehensive Child Welfare Information System (CCWIS) with information on the data sharing and data exchange requirements for child welfare contributing agencies (CWCAs) and related cost allocation requirements.



## Table of Contents

1. Purpose of the Technical Bulletin .....	3
2. CCWIS Background.....	3
3. Identifying a Child Welfare Contributing Agency.....	3
4. Data Sharing Between CCWIS and CWCAs.....	5
5. Bi-directional CCWIS/CWCA Data Exchange. ....	6
6. Cost allocation for CCWIS/CWCA Data Sharing .....	8



## 1. Purpose of the Technical Bulletin

This technical bulletin provides title IV-E agencies<sup>1</sup> that choose to develop a CCWIS with information about the data sharing and exchange requirements for CWCAs and related cost allocation requirements.

## 2. CCWIS Background

On June 2, 2016, The Administration for Children and Families (ACF) published the CCWIS final rule.<sup>2</sup> The CCWIS final rule replaces the Statewide and Tribal Automated Child Welfare Information System (S/TACWIS) regulations at 45 CFR 1355.50 – 59.<sup>3</sup> A CCWIS is a case management information system that title IV-E agencies may, at their option, develop to support their child welfare program needs. If a state or tribe elects to build a CCWIS, the federal government will provide a more favorable cost allocation than is provided for non-CCWIS systems.

The CCWIS final rule: (1) promotes data sharing with other agencies; (2) requires data quality plans; (3) reduces mandatory functional requirements; (4) allows agencies to build systems tailored to their needs; and 5) requires systems to be built modularly. Sharing CCWIS data ensures that CCWIS maintains comprehensive case files that combine current and historical data from the CCWIS database with information on activities and services from all CWCAs serving each child and family. CCWIS data must be shared, subject to confidentiality requirements,<sup>4</sup> with all CWCAs working with families, thereby providing each CWCA with the information that the title IV-E agency determines is needed for monitoring, decision-making, and delivering effective services to children and families. CWCAs are one type of the specified agencies that is required to share data with CCWIS.

## 3. Identifying a Child Welfare Contributing Agency

The regulations define a “CWCA” as “a public or private entity that, by contract or agreement with the title IV–E agency, provides child abuse and neglect investigations, placements, or child welfare case management (or any combination of these) to children and families.”<sup>5</sup> Examples of CWCAs include:

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<sup>1</sup> Title IV-E agency is defined at 45 CFR 1355.20.

<sup>2</sup> The CCWIS final rule is available here: <https://www.gpo.gov/fdsys/pkg/FR-2016-06-02/pdf/2016-12509.pdf>

<sup>3</sup> Links to the current text of 45 CFR 1355.50 – 59 are available here:

<https://www.gpo.gov/fdsys/browse/collectionCfr.action?collectionCode=CFR&searchPath=Title+45%2FSubtitle+B%2FChapter+XIII%2FSubchapter+G%2FPart+1355&oldPath=Title+45%2FSubtitle+B%2FChapter+XIII%2FSubchapter+G&isCollapsed=true&selectedYearFrom=2016&ycord=1897>.

<sup>4</sup> 45 CFR 1355.52(d)(1)(iii); 80 FR 48200 at 48209 We note the “other applicable federal and state or tribal laws” referenced in this regulation may be more restrictive than the cited federal laws. We also recommend agencies contact CB if confidentiality requirements prevent the sharing of CCWIS data needed by partners as such restrictions may require CB to classify the system as non-CCWIS.

<sup>5</sup> 45 CFR 1355.51



- An agency with an agreement with the title IV-E agency to perform home studies, safety checks, and other licensure services on foster or adoptive homes.
- A private provider that contracts with the title IV-E agency to provide placement services through the private provider's network of foster homes, kinship providers, group homes, or residential treatment homes. The private provider is considered a CWCA regardless of whether it is granted authority to make placement determinations.
- An agency that contracts with the IV-E agency to provide child welfare case management services.
- An organization that does not provide direct services but contracts with the title IV-E agency to manage child abuse and neglect investigations, placements, or child welfare case management through a network of subcontractors.
- Entities with contracts or agreements with county child welfare agencies to provide child abuse and neglect investigations, placements, or child welfare case management services (or any combination of these) to children and families.<sup>6</sup>

Other entities that are not considered CWCAs, include:

- County child welfare agencies in state-supervised, county-administered states.<sup>7</sup> A county child welfare agency authorized to use its system rather than CCWIS to support child welfare business practices must establish a bi-directional electronic data exchange between its system and CCWIS to share data.<sup>8</sup>
- State or tribal law enforcement agencies that conduct child abuse and neglect investigations on behalf of the title IV-E agency. Systems used by these agencies are considered external systems required to have a bi-directional data exchange with CCWIS, if they do not utilize the CCWIS directly.<sup>9</sup>
- Organizations that contract with the title IV-E agency to provide other services such as outpatient substance abuse treatment, parenting classes, behavioral health services, or family group therapy would only be required to provide the data to CCWIS if the title IV-E agency classifies the data as CCWIS data. However, if such a service provider also provides child abuse and neglect investigation, placements, and/or child welfare case management services, it would be a CWCA.<sup>10</sup>

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<sup>6</sup> Child Welfare Policy Manual (CWPM) Section 6.1, Question 5.

<sup>7</sup> Counties are political subdivisions of the state, and the single state title IV-E agency designated in the state's title IV-B and title IV-E plan supervises the administration of county-administered title IV-B and IV-E programs. Therefore, counties in county-administered states are not considered CWCAs. Section 471(a)(2) of the Social Security Act and 45 CFR 205.100 provide the authority and parameters by which a single state title IV-E agency may delegate the administration of the title IV-E program to the state's political subdivisions and local agencies or offices. See 81 FR 35450 at 35453; CWPM Section 6.1, Question 3.

<sup>8</sup> 45 CFR 1355.52(e)(1)(iv)

<sup>9</sup> 45 CFR 1355.52(e)(1)(iv)

<sup>10</sup> 81 FR 35450 at 35453



#### 4. Data Sharing Between CCWIS and CWCAs

ACF provides title IV-E agencies with two approaches for sharing data between CCWIS and CWCAs. The title IV-E agency determines which data sharing approach(es) to use and describes the approach(es) in the applicable Advance Planning Document (APD).

1. A CWCA exclusively uses CCWIS for child welfare tasks.  
Under the first approach, a title IV-E agency requires that a CWCA exclusively uses CCWIS to support the activities listed in the definition.<sup>11</sup> This means CCWIS data is directly entered in the CCWIS by CWCA staff. This approach may be appropriate in situations where the CWCA does not have an information system or the information system used by the CWCA is incapable of receiving or exchanging CCWIS data.
2. A CWCA uses a bi-directional data exchange to share data with CCWIS.  
Under the second approach, a title IV-E agency does not require a CWCA to exclusively use CCWIS, but instead allows the CWCA to use its own information system to support the activities listed in the definition. The CWCA provides data collected by the CWCA system to CCWIS via a bi-directional electronic data exchange<sup>12</sup>.

In county administered states where a county uses an external system, the title IV-E agency may allow the county's CWCAs to exchange data electronically with a county external system that in turn exchanges data with the CCWIS. This two-step data exchange may be used when: 1) the title IV-E agency permits a county-related CWCA to use its own child welfare system to collect CCWIS data; 2) the county CWCA system is capable of exchanging data with the external county system; and 3) the county external system exchanges the CCWIS data collected by its CWCA with the title IV-E agency. The bi-directional data exchange approach is described in greater detail in Section 5.

The title IV-E agency may require some CWCAs to use the CCWIS (approach one) and permit other CWCAs to use their own systems and exchange data with CCWIS (approach two). Regardless of whether CWCAs use the CCWIS exclusively or provide CCWIS data via a data exchange, data CWCAs provide must meet CCWIS data quality requirements.<sup>13</sup> We note that the title IV-E agency's data quality reviews must determine if CWCAs meet the CCWIS data

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<sup>11</sup> CWCA activities defined at 45 CFR 1355.51 are: 1) child abuse and neglect investigations; 2) placement; and 3) child welfare case management.

<sup>12</sup> 45 CFR 1355.52(e)(1)(ii)

<sup>13</sup> 45 CFR 1355.52(d)(1)



quality requirements<sup>14</sup> and address CWCA-related review findings.<sup>15</sup> ACF may also include any CWCA in CCWIS reviews.<sup>16</sup>

## **5. Bi-directional CCWIS/CWCA Data Exchange.**

Under the second approach discussed above, title IV-E agencies that share data using a bi-directional data exchange must determine: whether to establish one, or a limited number of, data exchange(s), with CWCA to support efficient, economical, and effective bi-directional data exchanges with systems operated by child welfare contributing agencies; the timing of data exchanges that best support the title IV-E agency and CWCA's business needs; the applicable data exchange standard; and the data included in the exchange.

One data exchange is appropriate when generally uniform data is collected from all CWCA, such as when CWCA provide similar services. For example, one data exchange can accommodate the needs of many CWCA providing placement services. The regulations do not require that every CWCA use all exchanged data; the title IV-E agency may modify the data exchange to add data needed by only a few CWCA to support unique placement processes.

More than one data exchange may be appropriate in other circumstances. For example, if a title IV-E agency contracts with one group of CWCA to provide placement services and a second group to provide child welfare case management services, the title IV-E agency may determine that it is less expensive to develop and maintain a different data exchange for each group than try to manage all requirements with one large data exchange.

Title IV-E agencies may exchange different data with one CWCA at different times to support business needs. For example, the title IV-E agency and a CWCA may need to first establish a new case, then request client services, follow-up with data corrections, and provide data for a federal report. These four separate communications are part of a single data exchange supporting a common business need, provided the two agencies exchange all data using the same communication protocols.<sup>17</sup>

Bi-directional CCWIS/CWCA data exchanges must follow a data exchange standard selected or established by the state or tribe that describes the data, definitions, formats, and other specifications of the information exchanged.<sup>18</sup> The same data exchange standard must be used for all data exchanges between CCWIS and all CWCA systems.

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<sup>14</sup> 45 CFR 1355.52(d)(3)(i). Title IV-E agencies are to design efficient, economical, and effective processes to review CWCA data, such as establishing a schedule of on-site reviews for a subset of CWCA during each biennial review cycle. See 81 FR 35450 at 35460 for other suggested methods to consider for CWCA reviews.

<sup>15</sup> 45 CFR 1355.52(d)(4)

<sup>16</sup> 45 CFR 1355.55

<sup>17</sup> 81 FR 35450 at 35461 – 35462

<sup>18</sup> 45 CFR 1355.52(f)(1)



The bi-directional CCWIS/CWCA data exchange must exchange relevant data<sup>19</sup> that is useful for meeting child welfare goals and objectives.<sup>20</sup> While the regulations provide a comprehensive definition of CCWIS data needed for federal, state and tribal purposes,<sup>21</sup> the CCWIS and CWCAs are not required to exchange all the data listed in the regulations. The title IV-E agency determines, subject to ACF review, what data will be collected and shared to support agency defined reporting, program, and audit requirements. When making this determination, we recommend that the title IV-E agency collaborate with CWCAs to identify:

- Data maintained in the CCWIS that may assist CWCAs in serving children and families. For example, if CCWIS processes child abuse and neglect intakes, but CWCAs conduct investigations, CCWIS must provide intake information needed by CWCAs to carry out their responsibilities. However, we note that the CCWIS regulations do not require the title IV-E agency to share all data in the CCWIS with CWCAs.
- CCWIS data collected by CWCAs. CWCAs must provide all CCWIS data to CCWIS. For example, if CWCAs are responsible for managing networks for foster homes and/or placing children, this data must be provided to CCWIS so the agency knows the location and housing circumstances of children.
- Common data collected by different CWCAs not identified in the above recommendations. For example, different CWCA systems may capture data to track child and family progress. Including such data in exchanges allows CCWIS to serve as a conduit to share data among CWCAs on an as needed basis, such as when a child receives services from two or more CWCAs. Data sharing promotes coordination of services, continuity of care and reduces duplicate data entry by the CWCAs.

In general, bi-directional data exchanges with CWCAs must support the goals of serving clients and improving outcomes by sharing data required for purposes such as reporting, program administration, title IV-E eligibility determinations, and audits. The following table lists examples of data title IV-E agencies may identify as relevant for data exchanges with CWCAs.

Examples of Relevant Data Needed to Support....		
Investigations	Case Management	Placements
<ul style="list-style-type: none"><li>• Client demographics</li><li>• Intake allegations</li><li>• Case histories</li><li>• Safety alerts</li><li>• Interviews</li><li>• Safety and risk assessments</li><li>• Investigation findings</li></ul>	<ul style="list-style-type: none"><li>• Client demographics</li><li>• Family and child assessments</li><li>• Service plans</li><li>• Family contacts</li><li>• Client progress</li><li>• Goal tracking</li><li>• Data needed for federal</li></ul>	<ul style="list-style-type: none"><li>• Client demographics</li><li>• Foster home recruitment</li><li>• Foster parent demographics</li><li>• Foster parent training</li><li>• Licensing documents</li><li>• Home studies</li><li>• Services provided by</li></ul>

<sup>19</sup> 45 CFR 1355.52(e)(1)

<sup>20</sup> 80 FR 48200 at 48211

<sup>21</sup> 45 CFR 1355.52(b)



Examples of Relevant Data Needed to Support....		
Investigations	Case Management	Placements
<ul style="list-style-type: none"><li>• Data needed for federal reviews, audits, and reports</li></ul>	reviews, audits, and reports	<ul style="list-style-type: none"><li>• placements</li><li>• Invoices</li><li>• Placement disruptions</li><li>• Runaways</li><li>• Data needed for federal reviews, audits, and reports</li></ul>

Once the title IV-E agency identifies the required CCWIS data, we recommend the agency clarify data exchange expectations so that CWCAs can plan to meet the requirements. For example, agencies may detail data exchange requirements in contracts or memoranda of understanding with CWCAs, establish the requirements in agency policy bulletins, or codify CCWIS data in statute or regulation. Regardless of the approach used, agencies should remind CWCAs that the required CCWIS data will change in response to changing laws, policies, and practices, which will in turn change the data that must be shared.

## 6. Cost allocation for CCWIS/CWCA Data Sharing

We encourage the title IV-E agency to assess program needs when deciding whether to require CWCAs to share CCWIS data by: exclusively using CCWIS for child welfare tasks, or using a bi-directional data exchange. CCWIS cost allocation<sup>22</sup> may be available for certain CCWIS development and operational activities, depending on which approach the title IV-E agency selects. For example:

CCWIS cost allocation may be available for:

- Development costs of a CCWIS automated function used by CWCAs, provided the automated function is not duplicated elsewhere.
- Operational costs associated with CWCA's exclusive use of CCWIS for child welfare activities.
- Appropriate CCWIS development and operational costs<sup>23</sup> of efficient, economical, and effective bi-directional data exchanges with CWCA information systems.

<sup>22</sup> See the APD regulations at 45 CFR 95, Subpart F for information on the procedures and documentation required for requesting federal financial participation (FFP) for CCWIS projects.

45 CFR 1355.57 describes the CCWIS cost allocation regulations applicable to all projects.

1355.52(j) lists the APD regulations applicable to projects under APD submission thresholds.

<sup>23</sup> Examples of appropriate costs include: costs to export data from CCWIS to the data exchange; costs to import data from the data exchange into CCWIS; and costs for other changes to CCWIS to support the data exchange. Modifications to CWCA systems to support the data exchange are not eligible for CCWIS cost allocation.





CCWIS cost allocation is not available for:

- Automated functions in CCWIS that are duplicated by any CWCA information system. For example, if CCWIS supports foster care placement activities and a CWCA system duplicates that support, the CCWIS foster care placement automated functions do not qualify for CCWIS cost allocation.<sup>24</sup>
- Costs incurred to plan, design, develop, install, and operate systems outside of the CCWIS. For example, a title IV-E agency that shares data with a CWCA through a bi-directional data exchange may not apply CCWIS cost allocation to costs the CWCA incurs to design, develop, install and operate the CWCA's information system that interfaces with the bi-directional data exchange.

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<sup>24</sup> CCWIS automated functions that are duplicated by automated functions in a CWCA may qualify for non-CCWIS cost allocation. See 45 CFR 1355.57(f).