DATA EXCHANGES SELF-ASSESSMENT TOOL   v1.0

Introduction

Title IV-E agencies best achieve positive outcomes for the children and families they serve when they have a holistic view of the children and families. Data exchanges between an agency's CCWIS and external systems are crucial for creating a comprehensive view of a family's unique strengths and challenges. However, it is difficult to obtain a comprehensive picture when child welfare services are delivered across a network of government and private entities and critical information is then stored in silos across these entities' technology systems.

The regulations for CCWIS describe 11 mandatory bi-directional exchanges s that a title IV-E agency must have to support the efficient, economical, and effective exchange of relevant data with other information systems: four of the exchanges are mandatory if applicable, and seven of the exchanges are mandatory, to the extent practicable.[1] [2] The regulations also allow title IV-E agencies the option to use additional data exchanges. In addition, the regulations require title IV-E agencies to use an electronic data exchange standard to improve efficiency, ensure data quality, and reduce duplicate data collection for exchanges with child welfare contributing agencies (CWCAs) and systems external to CCWIS that title IV-E agency staff use to collect CCWIS data. A data exchange standard provides all parties with consistently defined information and promotes a common understanding of data across systems, so all users have a shared, clear, and precise understanding of what the data means.

This Data Exchanges Self-Assessment Tool helps agencies assess compliance with CCWIS requirements regarding exchanges, exchange standards, and the effectiveness of data-sharing practices in strengthening program integrity and supporting improved outcomes for children and families. Additional resources are included on optional exchanges and best practices in developing data sharing agreements. See also CCWIS Technical Bulletin #8: CCWIS Data Exchange Standards for guidance on exchange-related topics such data quality, data sharing agreements, data governance, and security.

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[1] See 45 CFR 1355.52(e).

[2] Examples of relevant data are provided in the discussion of several of the bi-directional data exchange requirements in the CCWIS notice of proposed rulemaking (NPRM), starting on page 14.

Tool Format

This self-assessment tool is divided into sections as outlined on the chart below. Unique Element #s are assigned to every question for reference. Please refer to the instructions in CCWIS [Technical Bulletin #7: CCWIS Technical Assistance, Self-Assessment Tools, and Monitoring Reviews](#) or contact your federal analyst if you have questions about the tool or a specific element.

Section	Element #
Overview – *Background Information*	M.A.xx
Self-Assessment – *Mandatory Exchanges*	M.B.xx

Resources and Additional Considerations
 	
      Resource 1 – *Optional Exchanges*
      Resource 2 – *Data Sharing Agreements*
      Resource 3 – *Additional Considerations*
	
	M.C1.xx
	M.C2.xx
	M.C3.xx

A. Overview and Background Information

A title IV-E agency may use this self-assessment tool to collect information describing how the mandatory and optional exchanges associated with the CCWIS have been developed and implemented. Sections A and B of this tool focus on mandatory exchanges. Section C includes resources for optional exchanges. Agencies may cross-reference information if it is already in another self-assessment tool, APD, or project artifact. *If a question is not applicable to the CCWIS, indicate "NA" and provide the reason it is not applicable.*

M.A.01 Date this assessment was completed.

M.A.02 This table includes mandatory exchanges, if applicable, as described in §1355.52(e)(1). Document if an exchange is bi-directional, if data is exchanged automatically, and the frequency of data exchange. If an exchange is not in production, add the anticipated go-live date.

Add more rows as needed to address additional exchanges.

Mandatory Exchanges, *if Applicable*	In Production *(yes or projected completion date)*	Bi-directional *(yes or no)*	Exchanged Automatically *(yes or no)*	Frequency *(real time, batch, etc.)*
Systems that generate the financial payments and claims for titles IV-B and IV-E, if applicable.				
Fill in name of system and/or exchange				
A CWCA that uses its own information system to support investigations, placements, or case management.				
Fill in name of system and/or exchange				
Systems that calculate one or more components of title IV-E eligibility determinations, if applicable.				
Fill in name of system and/or exchange				
Systems external to CCWIS used by title IV-E agency staff to collect CCWIS data.				
Fill in name of system and/or exchange				

M.A.03 This table includes exchanges that are mandatory, to the extent practicable, as described in §1355.52(e)(2). Document if an exchange is bi-directional, if data is exchanged automatically, and the frequency of data exchange. If an exchange is not in production, add the anticipated go-live date.

Add more rows as needed to address additional exchanges.

Mandatory Exchanges, *to the Extent Practicable*	In Production *(yes or projected completion date)*	Bi-directional *(yes or no)*	Exchanged Automatically *(yes or no)*	Frequency *(real time, batch, etc.)*
Child abuse and neglect system if this component is separate from the CCWIS.				
Fill in name of system and/or exchange				
Systems operated under title IV-A.				
Fill in name of system and/or exchange				
Systems operated under title IV-D.				
Fill in name of system and/or exchange				
Systems operated under title XIX.				
Fill in name of system and/or exchange used to determine Medicaid eligibility.				
Fill in name of system and/or exchange used to mechanize claims processing and information retrieval.				
Systems operated by the court(s) of competent jurisdiction over title IV-E foster care, adoption, and guardianship programs.				
Fill in name of system and/or exchange				
Systems operated by the state or tribal education agency, or				

school districts, or both.				
Fill in name of system and/or exchange				

M.A.04 Describe any barriers to implementing each mandatory exchange in M.A.02 and M.A.03 not in production.

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M.A.05 Are there any additional comments you would like to provide as background?

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In this section, the agency may document components, factors, and design elements of the functions or exchanges that support the goals of automated bi-directional exchanges with the CCWIS. If the agency has additional goals, please include them below and add new rows as needed. We encourage agencies to simplify their responses by referencing submitted documentation, such as APDs, or attaching design documents and screenshots.

Please answer each question fully. Evidence for exchanges should address or demonstrate how the agency uses data from the exchange to meet program goals. If a question is not applicable, indicate "N/A" and provide a reason.

Mandatory Exchanges

A CCWIS has four mandatory, if applicable, bi-directional data exchanges and seven mandatory, to the extent practicable, bi-directional data exchanges. Automated bi-directional exchanges are useful tools to prevent duplication, support quality data, and ensure timely access to information to improve service delivery and support a holistic approach to engaging families. For this tool, "automated" refers to *the exchange of data without human intervention.* The CCWIS should utilize automated business rules to prevent and resolve data conflicts. Human intervention may be necessary at times to resolve data conflicts, but this should be an exception and not typical practice.

#	Exchange Goal	Evidence the System/Exchange Supports the Goal
M.B.01	Data exchanges provide information for the agency to strengthen program integrity, support improved outcomes for children and families, and create a comprehensive view of a family's unique strengths and challenges.	*Evidence may include:* • *Explanation of how exchanges meet program, data, and reporting requirements described in the project's Implementation APD (IAPD).* • *Sample reports and/or dashboards using data received through exchanges.* • *User feedback.*
M.B.02	Data exchanges are included in the agency's data governance process and governed by a formal data sharing agreement signed by all entities sending, receiving, or using the data. *Suggested language and/or topics to include in a data sharing agreement can be found below in Resource 2 – Data Sharing Agreements.*	*Evidence may include:* • *Index of formal data sharing agreements.* • *Sample data sharing agreement(s) that include suggested language found below in Resource 2 – Data Sharing Agreements.*

#	Exchange Goal	Evidence the System/Exchange Supports the Goal
M.B.03	Data sharing agreements address every data element in the exchange.	*Evidence may include:* • *A data dictionary or model that describes data elements, identifies confidentiality requirements, defines exchange conditions, and standardizes data definitions across systems and divisions.* • *Sample data sharing agreement(s) that include suggested language found below in Resource 2 – Data Sharing Agreements.*
M.B.04	The agency ensures the context and meaning of the data from the original source are preserved.	*Evidence may include:* • *Schedule demonstrating that data sharing agreements and data dictionaries are reviewed with regular periodicity.* • *On-screen guides and/or definitions of data elements received through data exchanges.* • *Shared data dictionary that describes each data element.*
M.B.05	The system performs automated data quality checks according to the agency's CCWIS Data Quality Plan (DQP).	*An agency may reference its CCWIS DQP or* CCWIS Data Quality Self-Assessment Tool *if evidence for automated data quality checks in data exchange are already addressed in that document. If exchanges are not included in the DQP, the agency should describe automated data quality checks and incorporate plans in the DQP and biennial review activities.* *Evidence may also include:* • *A description of how exchange data are reviewed/included in the agency's data governance processes.* • *A requirements document, data model, and/or data dictionary describing automation to ensure data are entered accurately, completely, and timely.*
M.B.06	The agency ensures that exchanged data meets agency data quality standards for completeness, timeliness, and accuracy.	*An agency may reference its CCWIS Data Quality Plan or* CCWIS Data Quality Self-Assessment Tool *if evidence for this goal is already addressed in that document.* *Evidence may also include:* • *A data dictionary developed to standardize data definitions across different data systems or divisions.* • *Automated cross-reference checks to ensure accuracy when data is transferred or stored in a data warehouse.* • *Real-time or near real-time data transfers to support timely decisions.* • *Defined protocols for addressing data inconsistencies between systems.*
M.B.07	The agency implements practice standards	*Evidence may include:*

#	Exchange Goal	Evidence the System/Exchange Supports the Goal
	that address the use of data and continuously trains the workforce to ensure the integrity of data sent and/or received through exchanges.	• *Policy language that addresses use of data received through exchanges. For example, appropriate use of Medicaid numbers and other medical information.* • *Descriptions of an ongoing training schedule targeting data quality and exchanges.* • *Summary reports of completed trainings that describe measures for assessing the quality and/or need for training in specific data quality/exchange areas.* • *Descriptions of data quality checks before data are sent or received through the exchange. Automation to assist users may also be included in the descriptions.*
M.B.08	The title IV-E agency uses a single exchange standard, when applicable[3], that describes: • data • definitions • formats • other specifications *The agency need not specify the technology used to transfer data or specify a single communication protocol.*	*Evidence may include:* • *Description of the data exchange standard in the APD.* • *System architecture documentation that describes the standard.*
M.B.09	The agency uses industry standards for security. Confidentiality and security are assured for exchanged data, with issues addressed, such as: • Who may view data? • How may data be used? • May data be shared with other agencies/programs? • Must data be purged under certain conditions or by a certain time?	*An agency may reference the CCWIS Security Self-Assessment Tool if evidence for this goal is already addressed in that document.* *Evidence may also include:* • *Sample data sharing agreements that address access and confidentiality. These agreements should address measures taken to safeguard protected health information (PHI) and personal identifiable information (PII).* • *A thorough data dictionary and data model describing data definitions, identity management, and access controls.*

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[3] 45 CFR §1355.52(f) describes two types of exchanges where this is applicable: 1) a bi-directional data exchange between CCWIS and each CWCA, and 2) data exchanges with each system external to CCWIS and used by title IV-E agency staff to collect CCWIS data.

C. Resources and Additional Considerations

The resources below are examples, not exhaustive lists, that title IV-E agencies may consider in developing exchanges. Title IV-E agencies are encouraged to collect data to support child welfare program outcomes, user needs, and CCWIS and program regulations.

Resource 1 – Optional Exchanges

Resource 2 – Data Sharing Agreements

Resource 3 – Additional Considerations

C. Resources and Additional Considerations

Resource 1 – Optional Exchanges

If a project meets or when completed will meet the requirements of § 1355.52, then ACF may approve CCWIS funding described at § 1355.57 for other ACF-approved optional exchanges necessary to achieve title IV-E or IV-B program goals.[4]

The table below includes a non-exhaustive list of optional exchanges a title IV-E agency may wish to consider including in a CCWIS. ACF provides several uses for each exchange for your consideration. All exchanges should be guided by a data sharing agreement and meet confidentiality requirements. Title IV-E agencies are encouraged to assess local program needs, federal and agency policies, and user-centric design as they develop, maintain, and enhance the CCWIS to support positive program outcomes. *If the agency is including these exchanges in the CCWIS, please write "Yes" in the "Included in Agency's CCWIS?" column and complete the remaining fields. Add rows as needed for optional exchanges not included in the list below.*

#	Exchange	Included in Agency's CCWIS? *(yes/no)*	Target Production Date	Bi-directional? *(yes/no/partial)*	Automated? *(yes/no/partial)*	Frequency *(real time, batch, etc.)*
M.C1.01	Electronic interstate case-processing system • supports an interstate compact • improved cross-state communication					
Brief Description:						
M.C1.02	Interstate Compact on Adoption and Medical Assistance (ICAMA) • ensures the provision of medical assistance to children receiving state-funded adoption assistance when children move state to state					
Brief Description:						
M.C1.03	Local, State, and/or Tribal Law Enforcement					

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[4] 45 CFR § 1355.54

#	Exchange	Included in Agency's CCWIS? (yes/no)	Target Production Date	Bi-directional? (yes/no/partial)	Automated? (yes/no/partial)	Frequency (real time, batch, etc.)
	• background checks • support for locating missing/runaway/trafficked youth • person finder and/or identity verification • coordination of services *See the Law Enforcement Exchange: State Panel Discussion Webinar for more information.*					
Brief Description:						
M.C1.04	Social Security Administration (SSA) • verify SSN and client identity • verify benefits • coordinate benefits and support applications for o Medicaid o Supplemental Nutrition Assistance Program (SNAP) o Temporary Assistance for Needy Families (TANF) o subsidized housing o Women, Infants, and Children (WIC) • reduce need for office visits *See the SSA Data Exchanges and Child Welfare Webinar for more information.*					
Brief Description:						

C. Resources and Additional Considerations

#	Exchange	Included in Agency's CCWIS? (yes/no)	Target Production Date	Bi-directional? (yes/no/partial)	Automated? (yes/no/partial)	Frequency (real time, batch, etc.)
M.C1.05	National Center for Missing & Exploited Children (NCMEC) • tool to help locate missing/runaway/trafficked youth					
Brief Description:						
M.C1.06	Housing Authority • coordination of services • simplified application process • person finder					
Brief Description:						
M.C1.07	Department, Division, or Bureau of Motor Vehicles • person finder • identity verification or Master Client Indexing (MCI) • digital pictures • background checks					
Brief Description:						
M.C1.08	Juvenile Justice • coordination of services • title IV-E eligibility and/or payment coordination • discharge/transition planning					
Brief Description:						
M.C1.09	Tribes					

#	Exchange	Included in Agency's CCWIS? (yes/no)	Target Production Date	Bi-directional? (yes/no/partial)	Automated? (yes/no/partial)	Frequency (real time, batch, etc.)
	• Indian Child Welfare Act (ICWA) eligibility and/or documentation • coordination of services • shared communication tool					
Brief Description:						

M.C1.10	Service Providers
	
	• library of services
	  o type
	  o eligibility
	  o cost
	  o location
	  o availability
	• completing and submitting referrals
	• coordination of services and payments
	• reporting and shared communication tool
	
	See the CCWIS Foster Care and Service Provider Management Self-Assessment Tool for more information.					

Brief Description:						
M.C1.11	Licensing • foster parent and/or provider approvals • collection of demographic and other required information • family matching					

C. Resources and Additional Considerations

#	Exchange	Included in Agency's CCWIS? (yes/no)	Target Production Date	Bi-directional? (yes/no/partial)	Automated? (yes/no/partial)	Frequency (real time, batch, etc.)
	• shared communication tool *See ACYF-CB-IM-20-03 and the CCWIS Foster Care and Service Provider Management Self-Assessment Tool for more information.*					
Brief Description:						
M.C1.12	Health/Vital Statistics • birth records • immunization records • adoptee searches • identity verification or MCI					
Brief Description:						

C. Resources and Additional Considerations

Resource 2 – Data Sharing Agreements

Data sharing agreements are an essential tool for title IV-E agencies when developing data exchanges with both internal and external systems. Developing a data sharing agreement encourages communication and supports a shared understanding and standard for how data will be exchanged, stored, and used. For the entity sending the data, a data sharing agreement provides assurance that data will not be misused or shared with unauthorized users.

Title IV-E agencies have flexibility in developing their own data sharing agreements, but ACF provides the following list of topics as a technical assistance resource based on historical perspectives gathered from previous reviews and industry standards for data sharing agreements. Agencies may also reference the Data Sharing for Child Welfare Agencies and Medicaid Toolkit or the Data Sharing for Courts and Child Welfare Agencies Toolkit for additional ideas.

If the agency includes the topic in all CCWIS data sharing agreements, please write "Yes" in the "Included in all CCWIS Data Sharing Agreements?" column.

#	Included in all CCWIS Data Sharing Agreements?	Suggested Language to Include in Data Sharing Agreement
M.C2.01		Clear statement of purpose and authorized use of the data by the receiving agency.
M.C2.02		Name of parties agreeing to the data exchange, and authority and/or basis for the data sharing agreement.
M.C2.03		Detailed list of specific data elements to be shared.
M.C2.04		Shared expectations and standards for completeness, timeliness, and accuracy.
M.C2.05		Authority and expectations for the receiving agency to share, report, or publish data.
M.C2.06		Roles and responsibilities of individuals authorized to share and access data.
M.C2.07		Clear designation of data ownership.
M.C2.08		Defined process to modify the data exchange and the data sharing agreement.
M.C2.09		Data exchange format and frequency of data exchange.
M.C2.10		Data quality standards for exchanged data.
M.C2.11		Expectations and timeline for correcting data errors. This includes automations and help desk functions.
M.C2.12		Identification of federal, and state or tribal regulations and policies applicable to confidentiality, security, access, and record retention or disposal.
M.C2.13		Acknowledgement that data shared with the agency may be subject to a Freedom of Information Act (FOIA) request, or similar federal, state, tribal, or

C. Resources and Additional Considerations

		local laws governing public disclosure.
M.C2.14		Dispute resolution procedures and penalties for failure to meet provisions of the data sharing agreement.
M.C2.15		Time limit and provisions for renewing the agreement.

C. Resources and Additional Considerations

Resource 3 – Additional Considerations

The Additional Considerations section describes useful features or practices an agency may wish to incorporate into the CCWIS to support data exchanges. *If the agency is including these additional considerations in the CCWIS, please write "Yes" in the "Included in Agency's CCWIS?" column.*

#	Included in Agency's CCWIS?	Additional Considerations
M.C3.01		The agency has formalized a data governance plan/charter that addresses how staff will manage, access, use, and share data received or sent through each exchange.
M.C3.02		The agency has developed a schedule and assigned ownership to review all exchanges and data sharing agreements using a standardized process.
M.C3.03		The agency has established non-repudiation standards to prevent disputes over data integrity. Examples may include: • digital receipts (acknowledgement) • digital signing
M.C3.04		The agency has documented and distributed a procedure to address security breaches and unauthorized use of exchanged data.
M.C3.05		Data is exchanged in real time or near real time to support the agency in making critical decisions.

> We encourage agencies to add examples of additional considerations from their CCWIS function(s) and feature(s) not on the list above they wish to highlight.

#	Agency-Submitted Additional Considerations