

# Family First Prevention Services Act: Community Pathways and Data Reporting

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As jurisdictions consider how to provide Title IV-E prevention services to children and families who are served in the community and are otherwise unknown to the Title IV-E agency (also known as a Community Pathway), they must develop processes to collect and report data that is required by the federal Administration for Children and Families (ACF). Below, we provide insight into two key questions that state and tribal Title IV-E agencies must consider as they prepare to implement a Community Pathway.

**If a community-based agency provides Title IV-E prevention services to a child and family who are otherwise unknown to the Title IV-E agency, under an approved Title IV-E prevention services plan, what data is the community-based agency required to provide the Title IV-E agency under federal reporting guidelines?**

The Family First Prevention Services Act (FFPSA) data elements to be reported to ACF are defined in [Revised Technical Bulletin #1](#)<sup>1</sup>, and one of these elements is a unique child identifier (current or future AFCARS record number). The existence of a unique identifier implies a matching name stored within the community-based agency's system, but that does not necessarily mean the name must be shared with the Title IV-E agency. The data file definitions for FFPSA reporting do not include a data element for name.

Within State or Tribal jurisdictions, community-based agencies that are developing Community Pathways may collect and store data at the child level regarding prevention services. The community-based agency must report required data elements to the Title IV-E agency. The Title IV-E agency implementing a Title IV-E prevention program must report the data to ACF, and the data must be complete enough for the Title IV-E agency to determine the candidacy of the child. Title IV-E agencies should begin exploring [CCWIS Technical Bulletin #8 – Data Exchange Standards](#)<sup>2</sup> to help them define the data exchange standards that will allow the Community Pathway data to be shared with the Title IV-E agency.

The Title IV-E agency is required to report to ACF if a child who received a prevention service enters foster care within 12 months of receiving the service. A [hashing algorithm](#) is one option that would allow a Title IV-E agency to associate a child's name with their unique identifier if the child enters foster care after receiving a prevention service in the community. The hashing algorithm assigns a key that would match the unique identifier (stored by the community-based agency) to the same unique identifier (stored by the Title IV-E agency and required for reporting) without exposing to the Title IV-E agency personal identifying information (e.g., name) about clients served by the community-based agency prior to a child welfare case being opened. The key could be used to match the client served by the community-based agency with the same client served by the Title IV-E agency if the child later becomes known to the Title IV-E agency through an intake.

## Under CCWIS guidelines, where does data regarding the Title IV-E prevention services that are provided to a child and family that are otherwise unknown to the Title IV-E agency have to be stored?

For Title IV-E agencies implementing a CCWIS, a community-based agency providing prevention services may be defined as a CWCA under the CCWIS rule if the community-based agency also provides child abuse and neglect investigation, placements, and/or child welfare case management services.

*"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." 45 CFR 1355.51*

CCWIS data elements and reporting requirements are defined in 45 CFR § 1355.43 - Data Reporting Requirements. Title IV-E agencies are not required to maintain prevention services data from CWCA's in the CCWIS, unless the Title IV-E agency elects to classify data elements that are collected in the course of the administering prevention services as Title IV-E data. If the Title IV-E agency elects to classify the child's name as Title IV-E data<sup>3</sup>, for example, then the child's name would need to be stored in the CCWIS system.

*Community-based agencies that provide prevention services such as outpatient substance abuse treatment, parenting classes, behavioral health services, or family group therapy are not generally classified as a Child Welfare Contributing Agency (CWCA) under the CCWIS rule. However, the Title IV-E agency may classify prevention program data as Title IV-E data, necessitating the reporting of the data to the Title IV-E agency.*

The CCWIS rule is explicit that the Title IV-E agency must own the Title IV-E data and must therefore collect and store all Title IV-E data within the CCWIS (system of record). CWCA's may collect and store the data to facilitate their operations, but they must share that information with the Title IV-E agency in an automated fashion. Additionally, recent updates to the Child Welfare Policy manual indicate that a function duplicated within the CCWIS and any CWCA information system is no longer considered "duplicative" of the CCWIS.<sup>4</sup>

States and jurisdictions are considering the following options with regard to storing Personal Identifying Information (PII) for children and families who are otherwise unknown to the Title IV-E agency but receiving Title IV-E Prevention Services through a community-based provider. We have provided information about which of these options are allowable under existing federal rules:

**Store PII in CCWIS:** If the Title IV-E agency chooses to classify PII as Title IV-E data, this data must be stored in CCWIS.

**Store PII in CCWIS behind firewall:** The Title IV-E agency may choose to store PII in the CCWIS and limit access to the data. If the data is stored in the CCWIS, regardless of access restrictions, it is considered CCWIS data.

**Third-party partner stores data and shares de-identified data with the Title IV-E agency for reporting:** If the Title IV-E agency chooses to classify only the data elements required by ACF for reporting as Title IV-E data, then the agency does not have to store PII in the CCWIS. The Title IV-E agency must assign a unique identifier to the child and must be able to associate the child with that unique identifier if the child enters foster care after receiving a Title IV-E prevention service.

**Third-party partner stores and reports data to ACF:** This is not an option. Third-party partners cannot report data to ACF. Title IV-E agencies must report the data to ACF.

**To learn more about how PCG can help with your Community Pathway needs, contact us today!**



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Endnotes

- 1 [Technical Bulletin #1 \(Originally issued on August 19, 2019 - Title IV-E Prevention Program Data Elements\), \(updated\) May 23, 2022.](#)
- 2 [Comprehensive Child Welfare Information System Technical Bulletin #8: Data Exchange Standards. February 1, 2022](#)
- 3 [Comprehensive Child Welfare Information System Technical Bulletin #2: Data Sharing between CCWIS and Child Welfare Contributing Agencies. September 29, 2017,](#) reissued January 27, 2020.
- 4 [Child Welfare Policy Manual Questions and Answers, Section 6.10A Question #13,](#) accessed 6/20/2022.