

OTERO COUNTY DEPARTMENT OF HUMAN SERVICES

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POLICY SCOPE/PROGRAM AREA: Child Welfare Adult Protective Services	Protocol Compliance: § 26-1-118(2), C.R.S. § 18-8-114(1)(a), C.R.S. Volume VII, (7.601.81) Trails – Colorado Child Protective Services system, CAPS – Colorado Adult Protective Services system
TITLE: Falsification of Documentation	Effective: September 1, 2024

Underlying Value- Transparency: We embrace open, honest, and clear communication with those served, our teammates, and the community.

Trust and accuracy are at the center of all our work. Falsifying records is serious and has serious consequences. Falsification includes but is not limited to documenting records with any fraudulent or intentionally false or misleading information. DHS employees in violation will be subject to disciplinary action, up to and including termination of employment. Employees may also be subject to civil or criminal liability for any violation.

Protocol Steps:

If at any time a Supervisor, Manager, or the Otero County Director has or has been given information that a staff member in the Child Welfare has falsified documentation in the comprehensive child welfare information system known as Trails.

- I. Examples of falsification are as follows:
 - a. *Representing that contact occurred when it did not.*
 - b. *Representing specific content was discussed during a contact when it was not.*
 - c. *Representing facts about a contact that was not true (e.g., representing that someone was not part of a contact because they were out of the state when they were not).*
 - d. *Representing that information was sent to a client or collateral (e.g., letter, text, etc.) when it was not sent.*
 - e. *Representing that someone was present during a contact or meeting when that individual was not present.*
 - f. *Changing information in an area of Trails then renders the information, or part of the information, inaccurate.*
- II. Upon a suspected incident of falsification of documentation, the Manager of record will notify the Otero County Director.

- a. The Manager or Supervisor that identifies the suspected incident/information of falsification, must take a screenshot or 'print screen' of the documentation in question to capture point-in-time information. This captured point-in-time information will assist in the formal review.
- III. The Otero County Director will subsequently notify Human Resources and the Commissioners' Office within **one (1) working day**.
- IV. The Otero County Director will consult with Human Resources to identify appropriate disciplinary action including paid administrative leave during the investigation.
- V. If the staff person is put on paid administrative, the employee's access to all work technology items shall be suspended. Suspension of access to work technology shall be at a minimum at the same time of the employee's notice of administrative leave and may be prior to notification of administrative leave.
 - a. The Manager shall request suspension of access to state systems within **one (1) working day** from the date the employee is placed on leave in accordance with Volume 7.601.81 (B, 1).
- VI. Once an incident of falsification is confirmed, through consultation with the Otero County Director and Otero County Human Resources
 1. The Otero County Director shall notify the Division of Child Welfare or the Division of Adult Protection, whichever is applicable, within **three (3) working days**.
 2. The Supervisor or Manager of record shall create an addendum with the original date where information was falsified to outline accurate information and captured in the system of record, but the original documentation will not be deleted. The notice to the individuals of the corrected record shall be documented in the respective systems.
 3. **No later than 10 working days** from the date of a confirmed incident of falsification the information shall be shared with the District Attorney's Office or local Law Enforcement Agency. The referral to the appropriate investigatory agency or the district attorney shall be documented by the county department in the staff member's personnel record.
 4. If a falsified child welfare record relates to an open dependency and neglect or juvenile delinquency case, the county department shall notify the court, parties to the case, their legal counsel, and/or Guardian ad Litem that a record in the comprehensive child welfare information system known as Trails has been corrected.
 5. If a falsified child welfare record relates to an assessment, referral, or case for which there is no corresponding dependency and neglect or juvenile delinquency case, the county department shall notify the parents and guardians of the child/youth who was alleged or found to be the victim of abuse or neglect or a youth in conflict, the person found or alleged to be responsible for the abuse or neglect, and the child/youth if the age is 10 years or older.

Continuous Quality Improvement to support documentation integrity:

- Supervisors can accompany a caseworker to interviews, court, and/or home visits for performance improvement and training.
- Child Welfare / Adult Protective Services Case Review Requirements- Supervisor pre-audit cases for Foster Care Reviews/Foster and Kin Desk Review/In-home and Assessment Reviews.
- Supervisors shall engage each caseworker in various ways, formal and informal, through 1:1's, case consults, case reviews, group supervisions, and shadowing on what the caseworker observed to inform safety, permanency, and well-being of the assigned population.
- Supervisors, Managers, Service Administrator, and Otero County Director shall regularly monitor for worker fatigue, burnout, and missed deadlines, as well as other predictive indicators to prevent falsification.
- Supervisors, Managers, and assistant managers will complete random Q&A outreach with the families their staff is serving for the purpose of quality customer service and continuous quality improvement.
 - The Q&A methods: direct phone calls, text messages, and field observations.
 - Minimum of one phone call to a client/placement on their workload per worker per year
 - Managers will be responsible for overseeing the data, information, and outcomes of the CQI Process