

Adams County Human Services Department
Children and Family Services

Documentation Falsification Policy

PURPOSE

Ensure all contacts made during a family's involvement with the Adams County Children and Family Services Division are accurately documented into the Comprehensive Child Welfare Information System (known in Colorado as Trails).

POLICY

Knowingly entering false information in Trails is a criminal act and will result in disciplinary action up to and including termination. Additionally, an employee caught doing so will be reported to law enforcement and/or the District Attorney for possible filing and prosecution of criminal charges.

Any Adams County team members who become aware of suspected or confirmed falsification of casework, shall report the matter to their direct supervisor immediately. If their supervisor is unavailable, they shall notify the covering supervisor or a manager.

Supervisors and Managers shall initiate the following actions when a concern has been brought to their attention:

- Notify Pod Manager and Division Director immediately.
- The Division Director shall consult with the County Attorney's Office, Human Services Director, and People and Culture to identify the next steps; a team member may be placed on paid administrative leave during an investigation.
 - If the decision is made to place the team member on administrative leave for the purpose of investigating a suspected incident of falsification of child welfare records, then the appropriate Manager shall request that the state department suspend the team member's access to Trails within one (1) working day from the date the team member is placed on leave.
- Make reasonable efforts to promptly preserve evidence that a child welfare record has been falsified and supervise or restrict the team member's access to child welfare records including but not limited to Trails, hard copy case files, and other child welfare case related documents, such as in Mango.
- Review the caseworker's entire workload and complete quality assurance on all assessments and cases to include both open and closed assessments/cases.
- Review all supervision notes.

When a suspected concern of the falsification of child welfare records is found to be confirmed, the additional following steps will occur:

- The Human Services Division Director, in consultation with the County Attorney's Office, will refer confirmed incidents of falsification of child welfare records to the appropriate law enforcement agency or the district attorney within ten (10) working days of the confirmation. This referral shall be documented in disciplinary documents provided to the employee and placed in the employee's personnel file.
- The Division Director will consult with the Department Director, and People and Culture to determine the appropriate level of discipline.

- The Division Director shall notify the CDHS Division of Child Welfare of a confirmed incident of falsification of child welfare records within three (3) working days of the confirmation.
- The Supervisor and/or Manager will correct Trails when an incident of falsification of child welfare records is confirmed and shall make notice of the correction as follows:
 1. If the falsified record relates to an assessment, referral or case for which there is no corresponding dependency and neglect or juvenile delinquency case, the supervisor and/or manager 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 age ten (10) years old or older, that a child welfare record has been corrected if that individual would be entitled to access the corrected record pursuant to C.R.S. § 19-1-307 and any other applicable state or federal privacy requirements. Notice to the individuals shall be made through any preferred contact method for the individuals documented in Trails. Additionally, the supervisor and/or manager shall make notice to all individuals with the state approved notification letter which shall be mailed by first class U.S. mail to the last known address of each individual within ten (10) working days.
 2. If the falsified child welfare record relates to an open dependency and neglect or juvenile delinquency case, the supervisor and/or manager will work with the County Attorney's office to notify the court, parties to the case, their legal counsel, and Guardian ad Litem that a record in Trails has been corrected within ten (10) working days of making the correction. The supervisor and/or manager 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 age ten (10) years old or older, that a child welfare record has been corrected if that individual would be entitled to access the corrected record pursuant to C.R.S. § 19-1-307 and any other applicable state or federal privacy requirements. Notice to the individuals shall be made through any preferred contact method documented in Trails. Additionally, the supervisor and/or manager shall make notice to all individuals with the state approved notification letter which shall be mailed by first class U.S. mail to the last known address of each individual within ten (10) working days.
 3. To the extent permitted by C.R.S. § 19-1-307 and any other applicable state or federal privacy requirements, the supervisor and/or manager shall include a description of the corrections made to a child welfare record in its notification letters to those individuals entitled to notice. Any notice of a corrected child welfare record issued pursuant to this rule shall be documented in Trails.

These steps shall be completed even when the team member who is subject of the investigation resigns, is terminated, or is no longer employed by the Department at the time the suspected falsification of child welfare records becomes known.

PREVENTION

Individual team members are ultimately responsible for the information they put into TRAILS. To prevent the falsification of records and/or to identify potential concerns early on, the following measures shall be taken.

Team Members shall:

- Attend team meetings, Department/Division specific trainings, and CFS All Staff meetings, to ensure they are getting relevant information.
- Read and acknowledge this policy on an annual basis.
- Communicate issues with cases, missed deadlines, and support needs to their supervisor in a timely manner.

To verify that team members are accurately documenting information in Trails, Supervisors should:

- Once a month, randomly call families (minimum of three) on each caseworker's caseload to get feedback.
- At least twice a year, accompany each caseworker to interviews, court, and/or home visits and document completion of such within their supervisory notes.
- At least twice a year, randomly call community partners (minimum of three) listed as collaterals on each caseworkers' workload and document completion of such within their supervisory notes.
- Engage each caseworker in detailed discussions on what the caseworker observed to inform safety, permanency, and well-being and to verify completion of required duties.
- Assign another caseworker to follow up with a family if a caseworker frequently documents that they are unable to locate children or families.
- Ensure that casework is in compliance with all applicable laws and regulations.
- Regularly monitor for worker fatigue, burnout, and missed deadlines, as well as other predictive indicators to prevent falsification. If appropriate, a referral will be made to the Adams County Employee Assistance Program, Adams County health clinics, and/or Reaching Hope or other contracted therapeutic provider.
- Provide this policy to all new hires for review and acknowledgment.

To support the team, Managers shall:

- Once a quarter, review a sample of assessments and cases from each of their teams (minimum of one review per assigned team). This should be a qualitative review to assess, at a minimum, the quality and depth of contact notes, assess that the Safety Assessment Tool is being completed accurately, thoroughly, and timely, and to review decision-making by the caseworker and supervisor with the family.
- Provide ongoing training and communication to team members on ethics and integrity.