



<i>Department of Human Services</i>	Effective Date: 3/1/2024
Child, Adult & Family Services Division	Revision Date: 8/9/2024, 11/22/2024
Title: Documentation Falsification	Authorizing Signature:

Purpose:

To monitor Garfield County Department of Human Services (GCDHS) provision of services to ensure contacts with children, at-risk adults, families, members, consumers, stakeholders, collaterals, and community partners are documented accurately and with integrity into statewide databases (TRAILS, CCM, SUDS, and CAPS.) This policy is in accordance with the Colorado Code of Regulations Volume 7, Volume 8, Volume 30, and the State Unit on Aging/AAA.

Definition:

A confirmed incident of falsification is an incident that was found to be substantiated after an investigation by the county department where the county department establishes by a preponderance of the evidence, that a person knowingly or intentionally made a false entry in or falsely altered information in an information system.

Policy:

Knowingly making a false entry in or falsely altering any public record is a criminal act. This behavior will not be tolerated under any circumstance. Failure to comply with this policy shall include disciplinary action to include termination of employment. Confirmed falsification will be reported to Law Enforcement and is punishable by law (18-8-114(1)(a) and 18-5-102(1)(d) and/or (e) C.R.S.).

Any GCDHS employees who become aware of suspected falsification shall use one or both of the following reporting routes:

- Report the matter to the Program Manager or Division Manager.
- Report the matter using the Garfield County Ethical Hotline via phone (855-539-3736) or online at <https://gchotline.ethicaladvocate.com/>

Program Manager shall initiate the following actions when a concern has been identified:

- Notify Division Manager and Director immediately and throughout investigation.
- Program Manager and the employee's Supervisor work together to review the caseworker's closed cases/assessments and complete quality assurance.
- Notify and consult with Human Resources to inform of the Paid Administrative Leave pending investigation into the allegation concerning falsification within 1 business day. Notify DHS Finance of need for PAR related to Paid Administrative Leave.
- Notify County Attorney's Office within 1 business day.
- Retrieve all County issued devices (phone, computer, badge, purchase card) and submit help desk ticket to suspend email/Office at the time of Administrative Leave start. If devices are not retrieved, phone, badge, computer, and purchase card are to

- be suspended/disabled through the help desk ticket. Suspension of access to Trails, CCM, CAPS, or SUDS shall be requested from the state through the county security administrator within one working day of leave placement.
- Program Manager and the employee's direct Supervisor work together to review the caseworker's entire current caseload and complete quality assurance.

If falsification is confirmed:

- Confer with County Attorney and Human Resources regarding next steps.
- Correct records in the database system involved and make notice of changes in the system and agency investigation notes.
- Preserve falsified records and evidence. Affected cases Trails Laserfiche files will be restricted.
- Notify Law Enforcement within 10 working days of confirmation of falsification.
- Notify Colorado State Department of Child Welfare, Division of Adult, Aging and Disability Services, Health Care Policy and Financing, or other appropriate entity within three (3) days of confirmed fraud.
- If the falsified child welfare record relates to an open dependency and neglect or juvenile delinquency case, the county department through the county attorney shall notify the court, parties to the case, their legal counsel, and Guardian ad Litem that a record in the comprehensive child welfare information system known as Trails has been corrected within ten (10) working days of making the correction. The Supervisor of the case 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.
- If the falsified record relates to a child welfare assessment, referral or case for which there is no corresponding dependency and neglect or juvenile delinquency case, the Supervisor 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, CCM, CAPS, or SUDS.. Additionally, the county department 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.
- Any notice of a corrected record issued pursuant to this rule shall be documented in Trails, CCM, CAPS, or SUDS.
- The county is not required to share confidential personnel information.
- A Helpdesk ticket will be submitted to add documentation in closed assessment/case (does not require reopening the assessment/case).

The investigation shall be completed by Garfield County even when the employee subject of the investigation resigns, is terminated, or is no longer employed by the county department at the time the suspected falsification of child welfare records becomes known to the county department

Prevention and Early Detection

Supportive supervision

Supervision will be scheduled on a reoccurring basis based on the individual worker's experience and workload. One-on-one supervision occurs no less than once per month. Supervision is considered a priority and cancelled supervision will be rescheduled as soon as possible.

Supervisor engages the employee in detailed discussions on what the employee has observed to inform decisions (safety, permanency, and well-being, assessment for services, service provision) in scheduled individual supervision at least twice a month.

Missed deadlines are addressed and prevented in individual supervision and reviewed during supervision times.

Supervision will be documented in supervision notes. The supervisor will keep a record of these notes.

County utilizes group supervision as means to communicate about assessments/cases and to seek peer guidance and support twice a month.

County leadership regularly monitors worker fatigue and burnout by offering a Child Welfare caseworker support group once per month lead by the Mental Health Specialist. The county also offers EAP services to all staff.

Supervisor review of documentation

The supervisor will review workers' documentation content, including all documents that need approval in Trails/CAPS/CCM and all written reports. Samples of a variety of ROC/log notes will be reviewed. ROC/Log Notes will be reviewed for "place holders," relevance of the discussion and ensuring that notes are not a cut/paste from a prior contact note. The reviews will be documented in supervision notes.

Supervisory oversight

Program Manager will review a sample of documentation in at least two assessments and at least two cases once a month.

County will ensure references are checked prior to hiring all staff using a standardized reference check form.

QA process- Client & stakeholder engagement

County will implement surveys via QR code in the areas of assessment, permanency, family engagement meetings, foster/kinship care, and parenting time.

Client Surveys will be added to child welfare assessment and case closing letters. Closing letters will be prepared and signed by the caseworker and their supervisor after which the supervisor will provide the closing letter and addressed envelope to the Administrative Assistant for mailing.

Supervisor will randomly contact clients/members, parents, and caregivers on the worker's caseload eliciting feedback on their experience with GCDHS at least once a quarter. This should be done by phone call or email and specifically inquire about face-to-face contacts made by the caseworker and the caseworker's overall interactions.

Supervisor will randomly contact community partners listed as collaterals in the assessments or cases for feedback on their experience with GCDHS at least once a quarter.

A quarter is defined as January-March, April-June, July-September, October-December.

Documentation of contact is kept in Supervisor notes and shared with Program Manager

by the end of each quarter.

Supervisor involvement in the field

Supervisors will accompany each employee on their team to a client contact in the field at least once per six months (not to include Family Engagement Meetings or court hearings.) Documentation of contact is kept in Supervisor notes and shared with Program Manager by the end of each quarter.

Additional Information:

Volume 7 7.301.22

Volume 7 7.104.1

Volume 8

Volume 30 30.260