

<b>MCDSS SERVICES PROCEDURE</b>	
<b>TITLE: Documentation Falsification</b>	
<b>DEPARTMENT/S: Child Welfare/ Adult Protection</b>	<b>EFFECTIVE Date: 9/1/2024</b>
	<b>REVISION Date: N/A</b>
<b>REGULATIONS: 7.601.81/ 12 CCR 2509-7</b>	
<b>AGENCY LETTERS: N/A</b>	
<b>APPROVED BY: Kelli Hargraves, MCDSS Director</b>	

**PURPOSE:** To monitor casework practice to ensure contacts with children, at-risk adults and families are documented accurately and with integrity, into statewide databases (TRAILS & CAPS).

**DEFINITIONS:**

TRAILS – Colorado Child Protective Services Database  
 CAPS- Colorado Adult Protective Services System  
 APS- Adult Protection Services

**POLICY:**

Falsifying documentation in TRAILS or CAPS is a criminal act and this will not be tolerated under any circumstance. Failure to comply with this policy will result in disciplinary action to include termination and it will be reported to law enforcement and/or the District Attorney for the filing and prosecution of criminal charges.

Any Montezuma County Department of Social Services employees who become aware of suspected or confirmed falsification of casework, shall report the matter to their direct supervisor immediately. If their supervisor is unavailable for any reason, they shall notify the Director.

Supervisors shall initiate the following actions when an identified concern of falsifying documentation has been brought to the Department’s attention. These steps shall include:

1. Notify Director immediately, who will involve the County Attorney.
2. Consult with the Director to identify appropriate disciplinary action including paid administrative leave during the course of the investigation.
  - a. MCDSS will request CDHS Division of Child Welfare suspend the employee’s access to TRAILS within one (1) working day from the date the employee is placed on administrative leave.
  - b. MCDSS will request to the Division of Adult, Aging and Disability Services suspend the employee’s access to CAPS within one (1) working day from the date the employee is placed on administrative leave.
  - c. The Supervisor will promptly preserve evidence that a record has been falsified to include: hard copy files, PaperVision files, access to documents stored on their MCDSS issued computer, notebook, and/or cell phone, and any other child welfare/ APS related case documents.
3. The direct supervisor will review the caseworker’s entire workload and complete quality assurance on all assessment and cases to include both open and closed assessments/cases,

even if the employee subject of the investigation resigns, is terminated or is no longer employed by MCDSS.

4. Provide all supervision notes to Director for review/consultation.
5. If the allegation is confirmed, the Director and County Attorney will involve Law Enforcement and the District Attorney's Office within ten (10) working days of the confirmation.
6. MCDSS will utilize the state approved letter of notice when there is a confirmed incident of falsification of a child welfare record.
7. The Director shall notify CDHS Division of Child Welfare or Division of Adult, Aging and Disability Services within three (3) working days of the confirmation and seek assistance as necessary.
8. CAPS Management shall enforce disciplinary action as directed.
9. MCDSS will correct the record in TRAILS and shall make notice of the correction as follows for child welfare cases:
  - a. 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 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 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 the comprehensive child welfare information system known as Trails. 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.
  - b. If the 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 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 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 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 the comprehensive child welfare information system known as Trails. 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.

- c. To the extent permitted by C.R.S. § 19-1-307 and any other applicable state or federal privacy requirements, the county department 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 record for Child Welfare or APS issued pursuant to this rule shall be documented in TRAILS/CAPS.

In order to prevent such actions, identify concerns early and conduct regular quality assurance, supervisors shall initiate measures to ensure staff are accurately documenting contact information in TRAILS/CAPS which will include the following:

- Supervisors will accompany each caseworker to interviews, court and/or home visits at least bi-monthly and document completion of such within their supervisory notes.
- Supervisors shall engage each caseworker in detailed discussion on what the caseworker observed to inform safety, permanency, vulnerability, and well-being and to verify completion of required duties.
- Supervisors shall assign another caseworker to follow up with a family/client if a caseworker frequently documents that they are unable to locate the children, adult, or family.
- Supervisors shall review a sample of assessments and cases once a quarter from their team and provide feedback- (pre ARD reviews meet this criteria for ongoing and fostercare if they are frequent enough to meet the quarterly standard).
- Ongoing training and communication will be relayed to staff on ethics and professionalism through team meetings, Department wide trainings, and state issued trainings/memos.
- Supervisors shall regularly monitor for worker fatigue, burnout, and missed deadlines, as well as other predictive indicators to prevent falsification.
- A referral to the Employee Assistance Program will be made if/when appropriate.
- CAPS staff will receive annual training on expectations and consequences for falsification.
- APS/Child Welfare staff will be provided this policy at hire and review and acknowledge this policy annually.