



Estb. 1887

Washington County Department of Human Services POLICY

<p>POLICY TITLE</p> <p>Falsification, Child Welfare/At Risk Adult Records, Monitoring, Quality Assurance</p>	<p>REFERENCE</p> <p>12 CCR 2509-7, SECTION 7.601.81; IM-CW-2024-0037; 12 CCR 2518-1</p>
<p>POLICY NO.</p> <p>DHS-CW/AP-2024.2</p>	<p>EFFECTIVE DATE</p> <p>September 1, 2024</p>
<p>DIRECTOR APPROVAL</p> <p><i>Serisa Traylor</i></p>	<p>REVISION DATE(S)</p>

BACKGROUND

Washington County Department of Human Services (WCDHS) is responsible for the provision and administration of child welfare services as defined in 12 CCR 2509-1 and the administration of an adult protective services (APS) program as defined in 12 CCR 2518-1. Child welfare services are intended to strengthen the ability of families to protect and care for their own children, prevent involvement or continued involvement in the child welfare system, minimize harm to children and youth, and ensure permanency planning. Adult protective services are intended to be provided to prevent, reduce, or eliminate the current or potential risk of mistreatment or self-neglect to the at-risk adult.

PURPOSE

The purpose of this policy to implement the requirements of 12 CCR 2509-7, Volume 7.601.81 and to ensure that WCDHS maintains and utilizes a written protocol regarding quality assurance and investigatory processes to monitor for falsification of child welfare records in the comprehensive child welfare information system known as Trails as well as at-risk adult records in the Colorado Adult Protective Services system (CAPS).

DEFINITIONS

Trails – the comprehensive child welfare information system

CAPS – the comprehensive information system used for at-risk adult records

Allegation – is a statement asserting an act or suspicion of an act involving falsification of child welfare and/or at-risk adult records.

Confirmed Incident – is an incident where, after an investigation by the county department, the department establishes by a preponderance of the evidence that a person knowingly or intentionally made a false entry or falsely altered information in Trails or CAPS.

POLICY

Falsifying records or documentation of child welfare or at-risk adults in Trails or CAPS is a violation of state law and regulations and this Policy and will not be tolerated. Failure to comply with this policy shall include disciplinary action and/or termination per the Washington County Personnel Policies and Procedures Manual.

Falsification of child welfare and/or at-risk adult records may include but is not limited to the following examples:

- Representing that a contact occurred when it did not.
- Representing specific content was discussed during a contact when it was not.
- 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).
- Representing that information was sent to a client or collateral (e.g., letter, text, etc.) when it was not sent.
- Representing that someone was present during a contact or meeting when that individual was not present.
- Changing information in an area of Trails or CAPS that renders the information, or part of the information, as inaccurate.

Upon receipt of an allegation of the falsification of a child welfare and/or at-risk adult records, WCDHS shall promptly initiate a review of the allegation.

PROCEDURE

Upon receiving an allegation of suspected falsification of child welfare and/or at-risk adult records, the WCDHS Director (or their designee) will notify the County Attorney and County Manager immediately. The WCDHS Director will work with the County Manager

and the County Attorney to determine if the employee in question should be placed on administrative leave.

If it is determined the employee will be placed on administrative leave or temporary suspension to investigate a suspected incident of falsification of child welfare and/or at-risk adult records, then WCDHS shall request that the state department suspend the employee's access to Trails (child welfare system) and/or CAPS (at-risk adult system) within one (1) working day from the date the employee is placed on leave.

During the personnel investigation, WCDHS shall make reasonable efforts to promptly preserve evidence that a child welfare and/or at-risk adult record has been falsified and supervise or restrict the employee's access to records including but not limited to Trails, CAPS, hard copy case files, and any other child welfare and/or at-risk adult case related documents.

The personnel investigation will be conducted by the WCDHS Director, or their designee. The investigatory team may also include other qualified individuals as appropriate as determined by the WCDHS Director. The investigation shall be completed by WCDHS even when the employee subject of the investigation resigns, is terminated, or is no longer employed by WCDHS at the time the suspected falsification of child welfare and/or at-risk adult records becomes known to WCDHS.

When the WCDHS Director confirms an incident of falsification of child welfare and/or at-risk adult records has occurred, they will take the following steps:

- Within three (3) working days:
 - Notify the Division of Child Welfare and/or the Office of Aging and Adult Services
- Within ten (10) working days of making the correction in Trails or CAPS:
 - Notify the appropriate law enforcement agency and or district attorney
 - For falsified records relating to an open dependency and neglect or juvenile delinquency case, notify the court, parties to the case, legal counsel, and the Guardian ad Litem. For falsified at-risk adult records, notify the court, parties to the case, legal counsel, and the Guardian ad Litem.
 - 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.
 - Notify the at-risk adult who was alleged or found to be the victim of abuse or neglect, and the person found or alleged to be responsible for the abuse or neglect.

WCDHS will utilize both the preferred method of contact of the individual and the state-approved notification letter which will be mailed by first class U.S. mail to the last known address of the parties listed above. Any notice of a corrected child welfare record and/or at-risk adult record provided to the individuals named above will be documented in Trails and/or CAPS as appropriate.

WCDHS will consider the following actions in the investigation and report including but not limited to the following:

- Identify who all from the agency were involved.
- Access a comprehensive report of the employee's workload to include current and past cases.
- Initiate quality assurance steps such as calls to clients and/or collateral contacts as well as conducting an interview with the employee in question.
- Determine the nature of the falsification such as:
 - When did the suspected incident(s) occur?
 - How many incidents have been confirmed (breadth and depth)?
 - Did the employee admit to the falsification (if interviewed)?
- Determine if any unresolved safety issues exist for families.
- Identify if assessments and/or cases have been reassigned.
- Confirm all required parties have been properly notified.
- Determine what additional steps, if any, need to be taken to address the matter.
- Identify the outcome of the investigation e.g., confirmed or not; if the outcome is not confirmed, WCDHS will contact the Division of Child Welfare and/or Office of Aging and Adult Services to request restoration of the employee's access to Trails and/or CAPS.

WCDHS will utilize efforts to prevent falsification of records and assist workers with accurately documenting their work in Trails and/or CAPS as follows:

- The WCDHS Supervisor accompanies caseworkers to interviews, court, and/or home visits as a piece of intervention for performance improvement or training opportunities.
- The WCDHS Supervisor pre-audits cases for Foster Care Reviews, Foster and Kin Desk Reviews, In-home and Assessment Reviews, and Adult Protection Reviews through the Administrative Review Division.
- During child welfare team meetings, the WCDHS Supervisor may select one case per month to be utilized in a peer review.
- For CAPS internal case reviews, the WCDHS Supervisor and worker may review two open cases per quarter for accuracy and quality assurance purposes.
- Supervision is provided to each worker weekly. During that time, the WCDHS Supervisor and worker engage in detailed discussions on what the worker observed to inform the safety, permanency, and well-being, of children, youth, and at-risk adults as well as to verify the accuracy and completion of required duties.

Supervision meetings are also used to monitor workers for fatigue, burnout, and missed deadlines, as well as other predictive indicators to prevent falsification.

- The WCDHS Supervisor shall complete outreaches with the families WCDHS staff are working with. This outreach could be a meeting in the field with the worker and the family, a call to the family, and/or attending a court hearing with the worker. The purpose of outreach is to ensure workers are representing themselves and WCDHS in a professional and ethical manner.