



LAS ANIMAS COUNTY
DEPARTMENT OF HUMAN SERVICES
MEMBER: AMERICAN PUBLIC HUMAN SERVICES ASSOCIATION



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Effective Date: September 01, 2024

Policy Scope/Program Area: Child Welfare

Protocol Compliance: § 18-8-114(1)(a), C.R.S., § 26-1-118(2), C.R.S., Volume VII, (7.601.81)

Title: Falsification of Documentation

I. PURPOSE

- A. This procedure outlines agency actions and state notification when falsification of child welfare records is suspected or confirmed by child welfare staff.
- B. To maintain the integrity of our work and ensure that all documentation is an accurate reflection of the work performed and a true record of events that occurred.

II. GENERAL PROCEDURE

1. Any suspicion or indication of falsification of child welfare records that is brought to the attention of any Las Animas County DHS worker, will be immediately reported by that employee to a child welfare supervisor, administrator and/or deputy director.
2. The supervisor and/or lead worker of the child welfare employee suspected of falsification of records will immediately perform an interim investigation to determine the validity of the allegations (records check, contact clients, etc.).
3. Once the allegations of falsification of records are determined to be valid, the supervisor and/or lead worker will notify the deputy director and director to determine if the employee will be placed on paid administrative leave.
 - a. A thorough investigation of the falsification allegations will be conducted by compliance officer, human resources and/or child welfare deputy director/administrator/supervisor.
 - i. Evidence of falsification of records will be promptly preserved by a compliance officer.
 - ii. The investigation will continue until a disposition is reached, regardless of if the employee resigns, is terminated or is no longer employed by the county when the falsification is discovered.


- b. If the employee is placed on administrative leave or temporary suspension for the purpose of investigating a suspected incident of falsification of child welfare records, the child welfare supervisor and/or lead worker will request the employee's access to Trails is suspended. The request to suspend access to Trails will be made within one working day of the employee being placed on leave.
 - c. If the employee is placed on administrative leave for the purpose of investigating a suspected incident of falsification of child welfare records, the child welfare supervisor will request the employee's email and phone access be suspended and ensure the employee will not have access to any child welfare files or case related documents.
4. If the falsification is confirmed, by a preponderance of the evidence that the employee knowingly or intentionally made a false entry or falsely altered information in Trails:
- a. The supervisor and/or deputy director will complete the state department approved letter of notice when there is a confirmed incident of falsification of records and send it to the appropriate parties as follows:
 - i. 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 of record 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. 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 supervisor of record shall send 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.
 - ii. 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 supervisor of record 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. 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 supervisor of record shall send 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. The supervisor of record shall create a ROC note in trails with the original date of the falsified record and will note the notice to parties was sent informing them of a falsified record (of the same date). The original documented note with falsified information will not be deleted in Trails, but identified in the new ROC note as confirmed to be falsified. A ROC note will also be entered on the date the notice was sent to all parties, documenting the notice of falsification was sent on the actual sending date.
- c. Any discipline resulting from founded violations of this Policy will be conducted pursuant to the most recently executed collective bargaining agreement executed between AFSCME and Pueblo County
- d. The administrator will refer the confirmed incident of falsification to the appropriate law enforcement or district attorney within 10 working days of the confirmation.
- e. The administrator will notify the Department of Child Welfare (Las Animas County's Intermediary) of the falsification within 3 business days of the confirmation.
- f. The director will notify Human Resources to instruct them to include the notification to law enforcement or DA in the employee's personnel file.

III. PREVENTION PROCEDURES

- 1) In order to prevent falsification of records or to identify concerns early, supervisor and lead workers shall initiate measures to ensure staff are accurately documenting records of contact (ROC notes) in the statewide database, which will include the following:
 - a. When conducting monthly visits with families, caseworkers will be required to have families sign off on a form titled “Monthly Visit Contact Sheet/Placement Visit Acknowledgement”. This form will have the date and location of the visit, family members present and topics of discussion.
 - b. Supervisor and/or lead workers may reach out to parents, providers and other collaterals to get feedback regarding the caseworker and casework practices.
 - c. During assessment caseworkers will have each member of the family sign and acknowledge that they participated in the completion of the Safety Assessment.
 - d. Supervisors shall 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.
 - e. Supervisor shall monitor documentation and casework to ensure that it is in compliance with all applicable laws and regulations.
 - f. Ongoing training and communication will be relayed to staff on ethics and professionalism through team meetings, department specific trainings and staff meetings.
 - g. Supervisors and lead workers shall regularly monitor for worker fatigue, burnout and missed deadlines as well as other predictive indicators to prevent falsification.
 - h. Staff will receive annual training on expectations and consequences for falsification.
 - i. Staff will be provided this policy at hire and review and acknowledge this policy on an annual basis.



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