



Grand County
Department of Human Services
POLICY

POLICY TITLE Protocol regarding falsification of Child Welfare Records	DIRECTOR APPROVAL <i>Debra D. Rutterberg</i>
BOARD OF COUNTY COMMISSIONERS APPROVAL <i>Merit Julia</i>	PROGRAM AREA Child Welfare

In accordance with the Code of Colorado Regulations Volume 7.601.81, the Grand County Department of Human Services shall maintain and utilize 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.

Falsification of child welfare records examples can include and are not limited to:

- 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 that renders the information, or part of the information, inaccurate.

Suspicion of falsification of child welfare records may come to the attention of the Grand County Department of Human Services in various ways such as a grievance filed or as part of a supervisor's performance review for quality assurance. Regardless of how an allegation of falsification comes to the attention of the agency, the Grand County Department of Human Services shall initiate a review of the allegation as a personnel matter with the following considerations.

Upon receiving an allegation of suspected falsification of child welfare records the Grand County Department of Human Services will notify the agency's director (or their designee), the County Manager's

office, and the County Attorney within 2 working days.

Grand County Department of Human Services' Director after consultation with the Grand County Manager's Office will 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 for the purpose of investigating a suspected incident of falsification of child welfare records, then Grand County Department of Human Services shall request that the state department suspend the employee's access to the comprehensive child welfare information system known as Trails within one (1) working day from the date the employee is placed on leave in accordance with Volume 7.601.81 (B, 1).

During the personnel investigation the Grand County Department of Human Services shall make reasonable efforts to promptly preserve evidence that a child welfare record has been falsified and supervise or restrict the employee's access to child welfare records including but not limited to the comprehensive child welfare information system known as Trails, hard copy case files, and other child welfare case related documents.

The personnel investigation will be conducted by the Director of the Grand County Department of Human Services in coordination with the Grand County Child Welfare Supervisor (unless falsification concerns involve the Supervisor) and shall be completed by the county department 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. If the suspicions of falsification involve the Child Welfare Supervisor, the Grand County Director will consult externally with a neighboring county or the state to gather Trails information to use in the investigation.

Grand County Department of Human Services considers a confirmed incident of falsification of child welfare records an ethical violation of the agency's code of conduct.

In accordance with Volume 7.601.81 (A) a confirmed incident of falsification of child welfare records is an incident where, after an investigation by the county department, the county department establishes by a preponderance of the evidence that a person knowingly or intentionally made a false entry or falsely altered information in the comprehensive child welfare information system known as Trails.

When the Grand County Department of Human Services confirms an incident of falsification of child welfare records the agency will complete the following notifications within the required response times in accordance with Volume 7.601.81.

Within three (3) working days: The Director of the Grand County Department of Human Services will call and email the DCW liaison to notify the state of the incident of falsification.

- Notification to the Division of Child Welfare.

Within ten (10) working days: The Director of the Grand County Department of Human Services will call the Chief of the law enforcement agency with jurisdiction to notify them of the falsification incident(s). The Director will work with the County Attorney to notify the court if the incident involves an open dependency and neglect or juvenile delinquency case.

- Notification to the appropriate law enforcement agency or the district attorney.
- Notification to the court for any open dependency and neglect or juvenile delinquency case.

Within ten (10) working days and utilizing both the preferred contact method of the individual and the state approved notification letter which shall be mailed by first class U.S. mail to the last known address of each individual: The Child Welfare Supervisor of the Grand County Department of Human Services shall provide:

- Notification to 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.

- Notification to the person found or alleged to be responsible for the abuse or neglect.
- Notification to the child/youth if age ten (10) years old or older.
- Notification to the legal counsel and Guardian ad Litem for the individuals involved in an open dependency and neglect or juvenile delinquency case.

Any notice of a corrected child welfare record provided to the individuals named above shall be documented in the comprehensive child welfare information system known as Trails.

The Grand County Department of Human Service will consider the following actions in the agency's review of this personnel matter (include and not limited to):

- Identifying who all from the agency is involved (names and roles)?
- Pull a comprehensive report of the employee's workload current and past.
- Initiate quality assurance steps:
 - Calls to clients and/or collateral contacts
 - Interview with employee in question
- Determine what is the nature of the falsification:
 - 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 there are any unresolved safety issues that exist for families?
 - Have any assessments and/or cases been reassigned?
- Confirm all required parties have been notified.
- Determine what additional steps the agency needs to take to address this matter?

In order to prevent such actions or to identify concerns early, The Grand County Child Welfare Supervisor shall initiate measures to ensure staff are accurately documenting contact information in the statewide database, which may include the following:

- The Child Welfare Supervisor, "Supervisor" will randomly call families on each caseworker's caseload to get feedback once a month.
- Supervisor will accompany each caseworker to interviews, court, and/or home visits at least twice a year and document completion of such within their supervisory notes.
- Supervisor will randomly call community partners listed as collaterals on each caseworker workload, at least twice a year and document completion of such within their supervisory notes.
- Supervisor 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.
- Supervisor shall assign another caseworker to follow up with a family if a caseworker frequently documents that they are unable to locate children or families.
- Supervisor shall ensure that casework is in compliance with all applicable laws and regulations.
- Supervisor shall review a sample of assessments and cases once a quarter from their team.
- Caseworkers shall utilize the Reasonable Efforts template to guide practice and decisions when unable to locate a child and/or family.
- Ongoing training and communication will be relayed to staff on ethics and professionalism through team meetings, and Department specific trainings.
- Supervisor shall regularly monitor for worker fatigue, burnout, and missed deadlines, as well as other predictive indicators to prevent falsification.

