



## **Chaffee County Department of Human Services Falsification Policy**

### **Purpose:**

- To establish process and expectations around personnel within Chaffee County Department of Human Services knowingly submitting or falsifying documentation used for official purposes. This is to ensure contacts made with clients are documented accurately and with integrity.

### **Policy:**

- The falsification of any documents for the databases used by employees of Chaffee County Department of Human Services (DHS) is a criminal act under C.R.S. § 18-8-114 and is a violation of policy and procedures. . Employees failing to comply with this policy may face disciplinary action, up to and including termination. Law Enforcement, the District Attorney, and the appropriate regulatory agencies will be notified of such criminal activity, which could also result in criminal charges and the loss of certification or licenses.
- Any Chaffee County Department of Human Services employees who become aware of suspected or confirmed falsification of documentation shall immediately report the matter to their direct supervisor.

### **Definitions:**

- The following databases are used within the Chaffee County Department of Human Services and are included in this policy.
  - Trails: Colorado Child Protective Services system
  - CAPS: Colorado Adult Protection Services system
  - CBMS: Colorado Benefits Management System
  - CHATS: Child Care Automated Tracking System
  - ACSES: Automated Child Support Enforcement System
  - Salesforce: customer relationship management software
  - CiviCore: human services software
  - PaperVision: document management system

**Falsification of client records examples can include and are not limited to oral or written statements, in any database or other medium:**

- 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 were 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 any database then renders the information, or part of the information, inaccurate.

Suspicion of falsification of documentation may come to the attention of the Chaffee 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 Department of Human Services, Chaffee County Department of Human Services Director shall initiate a review of the allegation as a personnel matter.

Upon receiving an allegation of suspected falsification of records, Chaffee County Department of Human Services will notify the agency's director (or their designee) and the county Human Resources Director immediately.

Chaffee County Department of Human Services' Director and Chaffee County Human Resources Director 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 records, then Chaffee County Department of Human Services shall request that the designated state department suspend the employee's access to the specific state database the alleged falsification took place in within one (1) working day from the date the employee is placed on said leave.

During the personnel investigation Chaffee County Department of Human Services shall make reasonable efforts to promptly preserve evidence that documentation has been falsified and supervise or restrict the employee's access to records including but not limited to the comprehensive state databases, hard copy case files and other related documents.

The personnel investigation will be conducted by the Department of Human Services' Director and the Human Resources Director or their designee and shall be completed 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 documentation becomes known to the county department.

When the Chaffee County Department of Human Services confirms an incident of falsification of records, the agency will complete the following notifications within the required response times.

Within three (3) working days:

- Notification to the state-level department associated with that employee's casework.

Within ten (10) working days:

- Notification to the appropriate law enforcement agency or the district attorney.
- Notification to the court for any open court cases.

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:

- Notification to the clients directly implicated in the falsification of records.
- Notification to the persons affiliated with the case involved with the falsification of records.
- 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 record provided to the individuals named above shall be documented in the applicable state database.

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

- Identifying who 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 concerns and/or issues that exist for clients?
  - Have any cases been reassigned?
- Confirm all required parties have been notified.
- Following an investigation and verification of a falsified record, program supervisor will submit amended information to the database.
- Determine what additional steps the agency needs to take to address this matter?

Contact:

- Monica Haskell - Director of Chaffee County Department of Human Services - (719) 530-2511