



## **Dolores County Department of Social Services**

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### POLICY NAME:

Fraudulent Activity Reporting

### RULE & STATUE INFORMATION:

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### 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). Also to provide procedures for reporting fraudulent activity.

### DEFINITIONS:

CAPS – Colorado Adult Protective Services system

Trails – Colorado Child Protective Services system

### POLICY & PROCEDURE:

Falsifying documentation in Trails or CAPS is a criminal act and this behavior will not be tolerated under any circumstance. Failure to comply with this policy shall include 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 Dolores County Department of Social Services employee 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 covering supervisor, administrator or the Dolores County Human Resources manager.

The Dolores County Social Services Director shall initiate the following actions when an identified concern has been brought to the Department's attention. These steps shall include:

1. Notify the Dolores County Human Resources Manager, County Attorney, and Board of County Commissioners.
2. Consult with the above named individuals to identify appropriate disciplinary action including paid administrative leave during the investigation.
  - a. If a county department places an employee on administrative leave or temporary suspension for the purpose of investigating a suspected incident of falsification of

child welfare records, then the county department 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.

3. The county department 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.
4. The investigation 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.
  - a. The investigation shall include:
    - i. Review the caseworker's entire workload and complete quality assurance on all assessments and cases to include both open and closed assessments/cases.
    - ii. Review all supervision notes.
5. If there is enough evidence found during the course of the investigation the Department will:
  - a. Report findings to law enforcement and the District Attorney.
  - b. Notify CDHS Division of Child Welfare or Division of Adult, Aging and Disability Services and seek assistance as appropriate.
  - c. Utilize the state department approved letter of notice when there is a confirmed incident of falsified child welfare records.

In order to prevent such actions or to identify concerns early, supervisors shall initiate measures to ensure staff are accurately documenting contact information in the statewide database, which will include the following:

1. Supervisors may randomly call families on each caseworker's caseload to get feedback on the caseworker's actions and activities.
2. Supervisors may accompany each caseworker to interviews, court, and/or home visits and document completion of such within their supervisory notes.
3. Supervisors may randomly call community partners listed as collaterals on each caseworker workload and document completion of such within their supervisory notes.
4. Supervisors may 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.
5. Supervisors may assign another caseworker to follow up with a family if a caseworker frequently documents that they are unable to locate children or families.
6. Supervisors may ensure that casework is in compliance with all applicable laws and regulations.

7. Caseworkers shall utilize the Reasonable Efforts template to guide practice and decisions when unable to locate a child and/or family.
8. Ongoing training and communication will be relayed to staff on ethics and professionalism through team meetings, Department specific trainings, and CAPS All Staff meetings.
9. Supervisors and Administrators shall regularly monitor for worker fatigue, burnout, and missed deadlines, as well as other predictive indicators to prevent falsification.
10. Staff will receive annual training on expectations and consequences for falsification.
11. Staff will be provided this policy at hire and review and acknowledge this policy on an annual basis.