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| POLICY TITLE: | | Falsification of Records | |
|   | | CHILD AND FAMILY SERVICES AGENCY | |
| Approved By: | Date Approved: | Original Effective Date: | Last Revision: |
| Robert L. Matthews - Director | January 27, 2023 | January 27, 2023 | January 26, 2023 |

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| I. AUTHORITY | Federal and District of Columbia law, including D.C. Code §§ 1-616.51 et seq., 1-618.01 et seq., 2-353.01 et seq., 4-1301.01 et seq.; 6-B DCMR Chapters 16, 18; and 27 DCMR Chapter 22. |
| II. APPLICABILITY | This policy applies to all CFSA employees, contractors, volunteers, and interns. |
| III. RATIONALE | <p>The DC Child and Family Services Agency (“CFSA”) is responsible for protecting child victims and those at risk of abuse and neglect and assisting their families. Accurate and reliable information is essential to executing CFSA’s mission of improving safety, well-being, and permanence for children and strengthening families. All CFSA staff and contract providers are accountable for ensuring that children and families receive high quality care and that true and accurate client information is always documented.</p> <p>Information about the children and families served by CFSA and its contracted providers that is inaccurate or falsified undermines CFSA’s core values. Accurate, reliable, and timely information is necessary to ensure that the best decisions are made to support children and families. CFSA is committed to children’s safety, well-being, permanency, and empowering families.</p> |
| IV. POLICY | <p>It is CFSA’s policy that CFSA staff and its contract providers accurately document information about children and families and carry out any reasonable instruction relating to those duties in a timely manner.</p> <p>CFSA and its contract providers are prohibited from purposely documenting or providing false or misleading information in any hard copy or electronic record.</p> <p>Any evidence of falsified or misleading information electronically or in a hard copy record by a CFSA employee will result in an investigation by CFSA’s Human Resource Administration (“HRA”).</p> <p>Where necessary, personnel action, including progressive disciplinary action, will be taken. In the event of a conflict between any of the provisions of this policy or the District’s personnel regulations and any <i>collective bargaining agreement</i> (“CBA”), the provisions of the CBA shall control to the extent that there is a difference.</p> <p>CFSA Contract Monitoring Division (“CMD”) shall regularly monitor electronic entries and hard copy records. If there is any evidence of falsified information electronically or in a hard copy record by a contract provider, CFSA’s CMD will investigate. If misleading or false information is substantiated, the CMD will undertake corrective or remedial action.</p> |

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| <p>V. CONTENTS</p> | <p>A. Hard Copy and Electronic Records B. Definition of False Informaton C. Documentation Responsibilities of CFSA Staff and Contracted Providers D. Disciplinary Action for CFSA Employees</p> |
| <p>VI. SECTIONS</p> | <p>Section A: Hard Copy and Electronic Records</p> <p>A record is any documented information created, received, and maintained in electronic format or hard copy as evidence of work and services provided to children and families by CFSA or any CFSA contracted provider. Examples include progress notes, assessments, treatment plans, final reports, emails confirming an action or decision, or spreadsheets showing decisions, actions or improvements.</p> |
| | <p>Section B: Definition of False Information</p> <p>1. False information shall be defined as, but not limited to:</p> <ul style="list-style-type: none"> a. Deliberately, knowingly, and willfully fabricating or omitting facts b. Knowingly documenting untruthful information as part of an official record and offering such entry as a true representation of facts c. Misrepresentating or concealing facts or records in connection with any official CFSA matter <p>2. Misleading information shall be defined as but not limited to:</p> <ul style="list-style-type: none"> a. Any inforamation that describes or misrepresents an action by deliberate deceit b. Knowingly and willfully reporting information causing someone to believe somethig that is not true |
| | <p>Section C: Documentation Responsibilities of CFSA Staff and Contracted Providers</p> <p>1. CFSA staff and contracted providers shall maintain complete and accurate records of services provided to children and families that are serviced. In order to comply with this requirement, CFSA staff and contracted providers shall document all client contacts, assessments, and delivery of case management services electronically or in hard copy records at or near the time the services were rendered.</p> <p>2. Contracted providers shall adhere to the terms of their contractual obligations with CFSA by maintaining accurate, updated documented information of the activities and services it provides to CFSA's children and families.</p> |

Section D: Disciplinary Action for CFSA Employees

1. CFSA shall utilize personnel action measures as a means by which employees are helped and encouraged to achieve and maintain the required standards of performance and conduct.
2. Supervisors shall ensure any shortfalls in employee performance or conduct are dealt with effectively, and in a reasonable, fair, and consistent manner.
3. Supervisors shall communicate reasonable standards of performance and conduct that each employee should meet such as but not limited to:
 - a. Documenting assessments, and the delivery of case management services.
 - b. Documentation should happen at or near the time the services were rendered.
 - c. Documentation should be clear, concise, organized, and accurate.
4. When a CFSA employee's performance or conduct fails to meet expectations and an informal resolution does not apply, CFSA may use progressive disciplinary actions, if appropriate, to resolve the matter which includes but is not limited to the following steps:
 - a. Verbal counseling (e.g., articulate relevant behavior standards).
 - b. Reprimand (e.g., a written document that identifies a specific behavior by the employee).
 - c. Corrective action (e.g., reprimand, reassignment, or suspensions of fewer than 10 workdays).
 - d. Adverse action (e.g., reduction in grade, suspension of 10 or more workdays, or removal).