**Policy**

Documentation is an ongoing process during an abuse, neglect, and exploitation report and consists of preserving detailed events, written or verbal communications, facts gathered, and pertinent documents or evidence obtained.

The purpose of documentation in the Adult Protective Services (APS) record is to:

* Provide support for conclusions drawn concerning reported allegations or findings;
* Establish a baseline of the eligible adult’s particular circumstances;
* Assist in building a reliable case history for future actions and interventions;
* Hold the employee accountable for actions taken; and
* Ensure consistency across case records.

The APS case management system will contain the eligible adult’s official electronic case record, which includes documentation of all activities completed during an investigation, such as efforts to address safety and risk issues and/or (dis)prove allegations, a summary of community resource interventions offered/provided, referrals to outside agencies, identification of supports through collateral contacts, and the eligible adult’s involvement in services proposed or service planning.

All information gathered, pertinent documents obtained, and activities performed shall be documented or uploaded to the APS case management system no later than **fifteen (15) calendar** **days** after receipt. APS staff are encouraged to complete documentation as soon as possible to preserve the accuracy of relevant, meaningful, and specific details.

**Procedure**

**Demographic Information**

APS staff shall collect the following information for all involved persons and document it in the eligible adult’s electronic case record.Involved persons include individuals who provide significant information supporting the allegation finding or are heavily involved with the eligible adult. Typically, this will consist of the eligible adult and individuals involved in the eligible adult’s care, such as a spouse, an adult child, or a guardian. If involved persons refuse to provide demographic information, the refusal shall be documented in case notes.

* First Name
* Middle Name
* Last Name
* Suffix (Jr., Sr., II, etc.)
* Date of Birth
* Gender
* Social Security Number
* Department Client Number (DCN)
* Race
* Ethnicity
* Marital Status
* Primary Language
* Physical Address
* Primary Phone Number

**Note:** Demographic information collected may differ depending on the individual’s role. Professional contacts such as doctors, attorneys, and service providers only require an office mailing address and phone number(s). However, the eligible adult and alleged perpetrator require more extensive demographic information.

**Case Notes**

Case notes are a chronological narrative of all relevant contacts made during an investigation, such as attempted or completed phone contacts, documents sent or received, mail/email sent or received, attempted or completed face-to-face visits, and other interviews. All case notes shall be entered into the eligible adult’s electronic case record as soon as possible, not to exceed **fifteen (15) calendar days** from the date of contact or receipt of information, to capture the most accurate detail. Case notes should contain the date of contact, type of contact (phone, personal visit, mail, etc.), the full name of any individuals spoken to, return contact information, and the contact content. When the case note documents the receipt or transmission of information, it shall contain a summary of the information sent or received, to whom it is being sent, from whom it has been obtained, and why.

The Division of Senior and Disability Services (DSDS), Section of APS, requires all case notes to follow the **SWIPE** method to ensure thorough and adequate information is included. This method helps to keep case notes organized, consistent, and uniform. Emphasis is placed on being purposeful, specific, factual, and focused.

**Situation**- The who, what, when, why, where, and how the information is gathered. This section is where you document the main body of information and answer the following questions:

* What is the situation;
* Who are your involved persons, and what are their roles;
* What is the nature of the abuse, neglect, or exploitation that we are addressing;
* When did it occur;
* Why did the eligible adult or other parties take the actions they did;
* Where did incidents occur, and where are involved parties located; and
* How did you gather the evidence or information you gathered?

**Why**- Document the reason for our agency’s involvement or contact. Why are you making this particular home visit or phone call?

**Issues-** Document the specific concerns and unmet needs identified during the contact.

**Plan-** Document and describe the steps for which APS staff, the eligible adult, or other parties are responsible or accountable.

**Edit**- Review your documentation to ensure you have included all pertinent information and used proper spelling, grammar, and punctuation.

**Note:** All five categories of the SWIPE method of documentation should be considered when completing case notes, but not every contact will contain information from all types.

The following principles shall guide all case note entries:

**Accurate**-Documentation of the information received effectively communicates what occurred during each contact. Accurate case notes are an accountability measure of the APS staff member’s response to the eligible adult’s risks, safety issues, and need for intervention.

**Clear and concise**-Clarity can be achieved by using plain language. Brief, simple words and sentences are preferable. Clear and concise case notes are easier to read and improve documentation quality. Care should be taken to avoid using acronyms/abbreviations and vague terms like sometimes, often, or occasionally. If acronyms/abbreviations are utilized, they should be spelled out the first time they are used.

**Factual**-DSDS staff members shall document who, what, when, where, why, and how as it relates to the eligible adult. In forming and recording professional judgment about the eligible adult’s needs, the facts should support the judgment, not vice versa. Cite any professional conclusions or comments regarding the eligible adult with background and context. Avoid the use of “feel” and “think”; instead, use “believe” and “conclude.”

**Pertinent-** Documentation should be relevant and relate directly to the allegations investigated, concerns addressed, or interventions offered.

**Structured-** Thoroughly proofread all documentation before saving to ensure proper spelling, sentence structure, punctuation, and grammar are used.

* Write in the first person from the ‘I’ point of view using language like ‘I witnessed/observed’ rather than ‘this worker witnessed/observed.’
* Utilize active voice when documenting, like ‘I gave this resource to the eligible adult’ rather than ‘the resource was given to the eligible adult by me.’
* Use action verbs and descriptive phrases which are specific instead of general.
* Avoid vague pronoun usage to prevent confusing statements. If the APS Specialist is documenting an interview involving multiple persons, ensure the reader can understand what each individual is stating, especially if they are of the same gender. Use first and last name rather than ‘she stated.’
* Avoid using EA or AP instead of the eligible adult’s or alleged perpetrator’s name; use the person’s full name.

**Case Initiation**

APS Specialists shall document all contacts with the reporter or collateral contacts as needed. They shall also review prior history and document the results of those system searches as applicable in case notes. The date the report was initiated shall be documented in the eligible adult’s electronic case record.

**Reporter Contact**

APS staff shall not document any information in the case notes that identifies a specific person as the reporter, even if the eligible adult is such. The “contact name” in the case note should be “Reporter.” The following is an example of how initial phone contact with the reporter should be documented:

“Reporter verified the information.”

Any additional contact with the reporter *or* information obtained that isn’t on the original report should be a separate entry and entered like any other contact with a person involved in the investigation. There should not be any reference to the person being the reporter in the subsequent case notes.

**Note:** The reporter contact case note shall still be entered separately when the eligible adult is the reporter.

**Eligible Adult**

APS staff shall document any statements or observations made during face-to-face or phone contacts with the eligible adult that (dis)prove allegation findings or show a relevant pattern of behavior. Observations may include the eligible adult’s environment, physical or emotional demeanor, sounds or repeated gestures, or their ability to respond to questions appropriately or articulate their decision-making processes. For example, the eligible adult’s chosen lifestyle contradicts the reporter’s opinion of what a lifestyle should be. The length of time an eligible adult has chosen the particular living situation should be documented. Quotation marks should be used when documenting the eligible adult’s direct statements.

Upon completion of the initial face-to-face visit, the date of the initial visit shall be documented in the electronic case record. The initial face-to-face visit is the first successful visit after the division received the report.

The eligible adult’s decisional capacity and ability to advocate for themselves must be well documented. When administering the St. Louis University Mental Status (SLUMS) exam or the Financial Decision Tracker (FDT, if the eligible adult refuses or cannot participate due to capacity issues, the refusal or inability to participate shall be documented in case notes. Administration of the SLUMS or FDT shall be documented in case notes.

If APS staff make any additional hotline reports on the eligible adult, internally or to another state agency, those reports shall be identified in case notes. Additionally, any service referrals or interventions offered or provided shall be documented along with the eligible adult’s refusal, when applicable. When the eligible adult refuses protective services, the refusal shall be documented.

**Reported Adult Eligibility**

APS Specialists shall thoroughly document the reasons for eligibility determination in a separate case note using the ‘Eligibility Case Note’ type in the APS case management system. Documentation should detail why the reported adult is (in)eligible, e.g., age, can or cannot adequately protect their interests, or can or cannot obtain services necessary to meet their essential human needs. When the APS Specialist determines a person is ineligible, they shall consult with their APS supervisor.

**No Identifiable ANE**

When APS staff, in consultation with their APS Unit Supervisor, determine that a report does not contain any allegations of abuse, neglect, or financial exploitation, they shall thoroughly document in case notes and in the Investigative Summary why there was no abuse, neglect, or financial exploitation allegation.

**Safety Plan and Risk Assessment**

Part of the investigative process involves identifying and assessing the eligible adult’s current safety needs and level of risk and risk for future harm. APS Specialists shall document the eligible adult’s strengths, including their stable or reliable support systems and any need for assistance, as well as others who assist with the safety planning process. The (in)ability of the eligible adult to seek safety or to advocate for themselves shall also be documented. If the APS Specialist cannot complete the Risk Assessment or the Safety Plan, they shall document the reason in case notes. If the eligible adult cannot participate in safety planning or the Safety Plan was completed with another person on behalf of the eligible adult, that information shall also be documented in case notes. Once completed, the Safety Plan shall be uploaded to the eligible adult’s electronic case record in the APS case management system.

**Note:** If the eligible adult has a guardian and conservator, this person shall be contacted to complete the Safety Plan/Risk Assessment.

**HIPAA**

The Health Insurance Portability and Accountability Act (HIPAA) shall be discussed with eligible adults and their guardians in all reports. APS staff shall have the eligible adult, guardian/conservator, or DPOA sign the Privacy Policies Acknowledgment form and upload it to the electronic case record. APS Specialists shall document the HIPAA conversation in case notes. When subsequent reports are received, APS Specialists shall confirm that a signed form is in the previous report and document the previous report number in the current report’s notes.

**Note:** If the eligible adult refused to sign the form during a previous report, the APS Specialist shall attempt to get the form signed in subsequent reports. If the EA refuses to sign the form, the blank form with the refusal noted shall be uploaded to the electronic case record.

**Collateral Contacts**

APS staff shall document all contacts with pertinent persons, ensuring a thorough investigation is conducted.

**Supervisor Consultations**

APS staff shall document all supervisory consults and pertinent discussions with their supervisor. These consultations can be in the form of a phone call, email, or face-to-face visit. Documentation shall include the details of any supervisory directives or tasks pertinent to the report that need to be completed before closing or approved for report closure.

**Interventions**

APS staff shall document interventions and services offered or discussed with the eligible adult, including those the eligible adult refuses. APS staff shall also document interventions/services the eligible adult received before DSDS’s involvement.

**Exceptions**

APS staff shall document the reason for any policy exception requests in case notes even though the exception request is entered into the electronic case record in another location.

**Case Transfer**

When reports are transferred between APS staff members, the receiving employee should document when they received the report.

**Office of General Counsel (OGC) Consultations**

When an investigation requires the consultation of OGC, the “contact name” in the case note shall be “OGC,” and the body of the case note shall reflect the outcome of the contact. Documentation of discussions with OGC **shall not** include the attorney’s name or the options discussed, as this waives the right to attorney/client privilege. The following is an example of how contact with OGC should be documented:

“OGC will file guardianship.”

**Worker Safety Concerns**

If there are events or issues involving worker safety, case notes shall document them in detail. The documentation shall be detailed enough to describe the entire event accurately. This would include inappropriate/non-professional phone calls or texts received on a personal or state-issued mobile device. If any profanity is used in statements, the exact wording should be in quotes.

**Mobile Devices**

State of Missouri Administrative Policy SP-3, titled “[Wireless Telephone Equipment and Services Usage](https://oa.mo.gov/sites/default/files/wireless_usage.pdf),” states in part, “the state of Missouri discourages the use of personal wireless telephone service for business use on a regular basis.” If APS staff members have a state-issued cell phone, that phone should be used before a personal device. However, DSDS recognizes that personal devices may be necessary when conducting department business. If a personal device is utilized, APS staff should be aware that the device could be subpoenaed as part of court proceedings. Any relevant text(s) from an individual involved with the report to a personal or state-issued device shall be identified as a text message and summarized in case notes. Personal Identifying Information such as names, addresses, dates of birth, or social security numbers shall not be included in texts sent. Any photographs taken on a mobile device shall be uploaded to the eligible adult’s electronic case record as outlined in the attachments section.

**Mail or Email Communication**

APS staff shall document pertinent email or mail contacts, either internal or external, with involved individuals. Email or mail shall be uploaded into the eligible adult’s electronic case record. Multiple emails can be uploaded as one attachment.

**Note**: If resource brochures or resource information is emailed, the brochure or information does not have to be uploaded in the electronic record.

**Social Media**

When APS staff receive information from an involved person who has pertinent information from Facebook, Twitter, or other social media sites, they shall immediately consult their supervisor to discuss the best method of capturing the evidence so the information can be documented. After consulting with the supervisor, the appropriate document(s) shall be uploaded to the electronic case record.

**Audio Recordings**

If audio recordings are obtained, they shall be uploaded to the electronic case record. When audio recordings or voicemails are too large to upload to the electronic case record, they shall be downloaded onto a CD, flash drive, or another device, and APS staff shall document the location of the audio recording. If the APS staff members receive a pertinent voice message, they shall summarize it in the case notes. If a voice message needs to be retained due to the content of the message (such as a disclosure or admission), APS staff should consult with their supervisor. If the voice message is retained, it shall be uploaded to the electronic case record and referenced in case notes.

**Photographs**

If photographs pertinent to the report are taken or obtained, they shall be uploaded to the electronic case record. The source of the photo, date and time taken or received, location where the photos were taken, and subject matter should be indicated in case notes. Before taking photos, APS staff shall use the Consent to Photograph form to obtain permission. This consent shall be uploaded to the eligible adult’s electronic case record.

**Handwritten Notes**

Any handwritten notes taken by APS staff shall be transferred to case notes within 15 days. After being transferred, the handwritten document shall be destroyed before closing the report. When APS Staff receives handwritten documents from the eligible adult or other involved persons, a copy shall be uploaded to the electronic case record. If the original documents need to be retained as evidence, APS staff shall create a paper file and document the location in the electronic case record.

**Attachments**

All documents completed or received as part of a report, including internal forms, shall be uploaded to the electronic case record and documented in case notes. Documents shall be labeled with the division or department name or the type of records received; for example, ‘Authorization for Disclosure of Consumer Medical Health Information’ or ‘Medical Records from X Hospital.’ Some documents may need to be designated as exhibits when they (dis)prove allegations or if the documents are to be used for a guardianship case. If an original version must be retained, it shall be labeled, filed in a paper record, and the location referenced in the electronic case file.

**Report Conclusions**

Conclusions should be drawn from all documentation or evidence gathered and observations made during the investigation. Before closing a report, APS staff shall review the documentation to ensure that report conclusions are fully supported and that no further investigation or follow-up is needed.

**Allegations**

The facts of the investigation determine an allegation’s status. Documentation shall support the allegation findings.

**Note:** If new allegations are uncovered during the investigation, APS staff shall add them to the electronic case record and document the information related to these allegations. When appropriate, allegations should be linked to an alleged perpetrator.

**Allegation Findings**

All information must be considered when making the allegation finding. APS staff shall document whether an allegation is substantiated, suspected, suspected and referred to OSI, or unsubstantiated. New evidence should not be introduced in this section.

**Investigation Summary Case Note**

For each allegation, the APS Specialist shall identify the defining elements met from the CIF Matrix and summarize the following:

* The reported concern;
* Evidence and facts collected that support the defining elements and allegation statuses;
* Interventions offered to address the allegations; and
* Unmet needs or insufficient support(s) requiring protective services.

The APS Specialist shall document the need for continued protective services and the eligible adult’s (un)willingness to accept it. The investigative summary should not introduce new information.

Information contained in the investigation summary should be documented in case notes, the Safety Plan, or the Risk Assessment. No new information should be introduced in the summary. The documentation must indicate that the APS Specialist did all of the following:

* Considered all relevant evidence that both supports and refutes each allegation;
* Considered whether the alleged perpetrator’s actions fit the relevant definition of abuse, neglect, or financial exploitation;
* Considered whether the alleged perpetrator fits the definition of caregiver for neglect allegations;
* Made sound judgments about credibility when there was conflicting evidence;
* Demonstrated the reasoning behind the finding for each allegation;
* Avoided errors of logic, fact, and grammar;
* Used objective and professional statements to support the allegation findings; and
* Documented the conclusion justification in a clear, thorough, accurate, and persuasive summary.

**Investigation Extensions**

When APS staff cannot close a report within sixty (60) calendar days, they shall document the reason for the delay in closing and request an extension from their supervisor.

Extension Codes include:

* Guardianship Being Pursued
* Law Enforcement Involved
* Management Approved