

# Falsifying Documents Is Never Okay

Business record authenticity is paramount in most organizations. It speaks to the integrity of the entire business, the brand, and the reputation of the organization.

Falsifying a business document means altering the documentation in a way that is untruthful. Examples of falsifying a document include, but are not limited to, forgery (i.e., when one person signs someone else's name on a document) and backdating (i.e., when the date affixed to the document is not the actual date the document was signed). **Let's be blunt.** Employees might think that falsifying a document is somehow protecting the organization. You've likely heard examples of employees who have been caught falsifying official business documents and who have expressed that they did so to help their work group pass an audit; others have said they did so because they didn't want a "black mark" on their performance or their group's performance—they wanted to meet all their goals and measures. It is crucial that employees understand that there is never a good reason for falsify-

ing any organization's documents and the consequences of getting caught are not good either.

Speaking of consequences, there could be many. Individuals who alter documents could face disciplinary action, including termination of employment. Additionally, **falsified documents that are submitted to a government regulatory agency could be considered fraud and put an organization at risk of sanctions, fines, and penalties—at worse.**

The message is clear. It is not acceptable to falsify a document. It's not okay to backdate, sign someone else's name, or submit altered documents to anyone or any agency.

**Here are some key tips to create and maintain a compliant environment:**

Communicate to employees that the damage to a business' good reputation caused by unethical behavior can be severe **and may take years to rebuild.** A reputation takes a long time and hard work to build and a short time and only one big event to erode. As the saying goes, "It only takes

one bad apple." Every employee should feel a responsibility for protecting an organization's reputation.

Ensure that trainings are robust and meaningful. Remember that employees must, at a minimum, receive general compliance training within 90 days of initial hiring, and annual training thereafter. Attendance and participation in compliance and fraud, waste, and abuse training programs is a condition of continued employment and a criterion to be included in employee evaluations.

Ensure business ethics and compliance policies are relevant and that the culture is to "walk the talk." Leadership is essential for this step. Everyone needs to feel that their behavior is respected and makes a difference to the organization. The organization should communicate regularly and by different methods about the importance of not falsifying documents.

Ensure business pressures to meet targets do not inadvertently encourage undesirable behavior by employees. Employees who feel intimidated about retaliation

## Continuation...Falsifying Documents Is Never Okay

for not meeting metrics are more likely to try to cover up a missed target. This may include document falsification.

### Common Employee Justifications For Falsifying Documents:

- *It is okay to sign someone else's name on a document, because I know the information is correct.*

**Wrong.** It's never okay to sign someone else's name—that is considered forgery.

- *Recently my supervisor has been really critical of me and my team. As a manager, I know my team is trying hard and I feel my supervisor does not understand our stressful workload. In the interest of my team, it's okay to take a few liberties on our internal audit because we are being unfairly judge.*

**Wrong.** **Misrepresenting the facts, no matter how few, discredits you and the organization.**

- *My manager was out on a family leave for several weeks. When she recently did my performance review, she backdated the document before she went out. She said that she is required to give performance reviews by a certain date and she was concerned that her manager would see her absence and the subsequent missed deadline as a black mark on her record. I feel really bad that she is going through a family ordeal, so it is okay that I sign my review.*

**Wrong.** Feeling bad for someone else is no excuse for signing a document that's been backdated. You can show your concern in other ways while maintaining your integrity and that of the organization as a whole.

If you suspect compliance, ethics, or integrity violation, or have questions about specific practices, please use the following resources:

- Talk to your Supervisor or Manager
- Call the Care1st HOTLINE at 1-877-837-6057. Anonymous. Available 24/7. Trained Professionals. Toll-Free

- Contact the Compliance Department at ComplianceSIU@care1st.com or ComplianceDepartment@care1st.com
- Call the Corporate Compliance Officer, Brooks Jones, CHC, at extension 6202
- Contact Ellen Smart, AVP of Human Resources at extension 6203