Recognizing Fraud

Fraud is a false representation about a material fact. It is any intentional deception designed to unlawfully deprive the United States, the EPA or the CSB of something of value or to secure for an individual a benefit, privilege, allowance or consideration to which he or she is not entitled.

Examples of Fraud Indicators

- Unexplained entries of altered records
- Unusually large amounts of payments in cash
- Inadequate or missing documentation
- Delays in producing requested documentation
- Non-serial number transactions
- Unauthorized transactions
- Unusual patterns and trends in contracting and procurement
- Unrealistic contract prices
- Increase in claims for reimbursement
- Offers of gifts, money, or other gratuities from contractors, grantees, or other individuals dealing with the government
- Photocopies of documents where it is difficult to detect alteration
- False or misleading information
- Missing approval signatures
- Lack of separation of duties
- Discrepancies in handwriting

- Lack of or out-of-date written policies and procedures, including those safeguarding assets
- Lack of communication and/or support for ethical standards by management
- Uncharacteristic behavior, including a person living beyond his/her means
- Unaccountable funds
- Uncharacteristic willingness to settle claims
- Fictitious vendors
- Unauthorized personnel with access
- Overly complex organizational structure
- High turnover rate
- Reassignment of personnel
- Termination of key personnel
- "Missing" files, reports, data, and invoices (both electronic and paper)
- Missing, weak, or inadequate internal controls
- Management override of key internal controls
- Inadequate monitoring by management
- A history of impropriety