

# The Procurement Integrity Act: Is the Government Promoting Unethical Business Practices and Unfair Competition?

In its efforts to streamline procurement practices, it appears that the government may have reinstated the “old boy” network, resulting in fewer contracts being awarded under full and open competition.

BY DEBBIE EYCHISON

As a result of a multitude of procurement reforms over the last decade, there have been an increasing number of companies entering the federal marketplace. These reforms, along with the fact that the federal government is the world’s largest customer (spending more than \$200 billion each year), have made the process of selling to the federal government simpler, easier, and more desirable. However, many companies that sell to the government are small businesses that lack the knowledge or the organizational structure to have an effective compliance program in place in order to manage conformity with contract terms and conditions.

In addition, these procurement reforms have resulted in the elimination of thousands of positions within the government acquisition workforce. Also, the majority of the remaining workforce is due to retire in the near future. Private contractors will replace these dwindling government procurement positions.<sup>1</sup> If the government privatizes more of its functions, are rules and regulations truly being enforced or are violations being overlooked? In its efforts to streamline government procurement practices, it appears that the government may have reinstated the “old boy” network that was repealed with the enactment of the Procurement Integrity Act (PIA). The result is fewer contracts being awarded under full and open competition, thus increasing costs and promoting unethical business practices and unfair competition. Although violations to PIA carry fines, imprisonment, and

the potential for suspension and debarment, there continues to be widespread favoritism and conflicts of interest (COIs) within the industry. These violations are due to the high turnover of government procurement personnel, as well as the lack of oversight over both government procurement officials and private contractors.

## Background

Requests for proposals (RFPs), also known as solicitations, are issued every day for products and services ranging from office supplies to military defense machinery. In response to an RFP, proposals are submitted and evaluated and a contract is awarded to one or more contractors. However, the rules that dictate the proposal and contract processes differ between commercial contracting and government contracting. Commercial contracting is governed by the Uniform Commercial Code (UCC). In commercial contracting, it

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does not matter whether the business (contractor) is a small or large company, and only the contract, its formation, and performance are addressed in the rules and regulations of the UCC. The UCC does not address rules with respect to proposals, nor does it address improper business practices, except to say that all transactions are to be handled “in good faith.”

Contracting with the federal government, on the other hand, is governed by the *Federal Acquisition Regulation (FAR)*, the *Defense Federal Acquisition Regulation Supplement (DFARS)*, other agency-specific supplements. The *FAR*, considered to be the primary rule book, addresses the rules and regulations regarding the proposal process, as well as all phases of the post-contract-award process. FAR Part 3, Improper Business Practices and Personal Conflicts of Interest, is devoted entirely to the ethics of government procurements. In part, it states:

Government business shall be conducted in a manner above reproach and, except as authorized by statute or regulation, with complete impartiality and with preferential treatment for none. Transactions relating to the expenditure of public funds require the highest degree of public trust and an impeccable standard of conduct. The general rule is to avoid strictly any conflict of interest or even the appearance of a conflict of interest in government-contractor relationships. While many federal laws and regulations place restrictions on the actions of government personnel, their official conduct must, in addition, be such that they would have no reluctance to make a full public disclosure of their actions.<sup>2</sup>

These guidelines are meant to be the ethical framework for all government procurement personnel through all phases of the contracting process to include these standards of conduct when dealing with private contractors. PIA expands on these standards of conduct and addresses issues such as fair competition and contractor compensation to government personnel.

## The Procurement Integrity Act

Prior to PIA's enactment in 1988, it was common to see government procurements for such things as \$600 hammers and \$200 toilet seats. These practices resulted in a very long and exhaustive investigation by the U.S. Justice Department called Operation Ill Wind, which ended in 1988 with simultaneous raids of both contractor and government offices from coast to coast. According to James Nagle, an attorney and nationally known expert in the subjects of government contracts and construction law,

The scandal exposed two flaws. Government officials improperly steered contracts to preferred contractors (often favored solely because they had hired the right consultant). A second aspect was the free-wheeling way that consultants and industry marketers could acquire classified information regarding what the Pentagon planned to buy, when it planned to buy it, and how much money was available to buy it, well in advance of the data being publicly available. Some of these disclosures included their competitors' bids.<sup>3</sup>

As with any major scandal, Congress became involved and enacted the PIA. The designers of the act sought to “restore the public's confidence in the integrity of the federal procurement system.”<sup>4</sup> In effect, purging the procurement system of its unethical business practices, as well as ridding the system of the “old boy” network, made it possible for contractors of all shapes and sizes to compete for the government's business, regardless of who they knew.

The primary purpose of PIA is to ensure that parties competing for the federal government's business are treated equally and that fair competition is emphasized. It addresses three major topics in particular:

1. Improper disclosure of information prior to contract award,
2. Employment contacts between government officials and contractors, and
3. Acceptance of employment with a contractor by former federal government officials.

The “improper disclosure of information” provision of PIA strictly forbids the disclosure of any information to any contractor prior to contract award, except information that is disclosed to all bidders and released to the public. The restrictions placed on “employment contacts” and “acceptance of employment” between government officials and contractors are directly related to COIs. Essentially, this portion of PIA requires government officials who are personally and substantially participating in a procurement, and who receive an offer of employment from a contractor, to either reject the offer or disqualify themselves from the procurement and report the incident immediately.

In addition, procurement officials who have personally and substantially participated in procurements of \$10 million or more cannot accept compensation from a contractor for one full year following their retirement from government service.<sup>5</sup> However, the enactment of the Clinger-Cohen Act of 1996 broadened this provision to

apply to all federal employees, not just procurement personnel.<sup>6</sup> As a result of this provision, contractors are required to certify that there are no COIs and to submit this certification along with their proposal submission.

Violation of the “disclosure of information” provision of PIA can carry both criminal and civil penalties, provided that the exchange of information “was for anything of value or gave anyone a competitive advantage.”<sup>7</sup> Although a sentence of up to five years in prison and/or substantial fines may not seem very severe to some, a contractor may also be liable for penalties for violations regarding illegal gratuities, theft of government property, violations against the False Claims Act, as well as the potential for infringement of trade secrets.

The civil penalties are essentially the same, with the exception that a person found guilty can be fined up to \$50,000 for each violation, along with twice the amount of compensation received or offered. Moreover, a corporation can be fined up to \$500,000 for each violation, along with twice the amount of compensation the corporation received or offered.<sup>8</sup> For example, if a company is convicted based upon two separate violations, the fine will be a minimum of \$1 million plus twice the amount of compensation that was offered.

## Personal Ethics vs. Business Ethics

In order to be compliant with PIA and other ethics rules and regulations, we must first understand the correlation between personal ethics and business ethics and how they are applied during business transactions. Understanding the meaning of ethics is not only knowing right behavior from wrong behavior (or moral behavior from immoral behavior), but also how these behaviors affect business decisions and social responsibilities.

When a person is hired to work for a company, he or she is expected to be loyal. But what does “being loyal” to a company really mean? “Loyal” is defined as being “faithful to a person, an ideal, a custom, or a duty,” and also as being “worthy of trust or belief; reliable.”<sup>9</sup> Therefore, does being loyal mean that an individual must give up personal ethics to support the decisions of the company regardless of the moral path those decisions may take? It all comes down to trust. If being considered loyal means that someone must trust and believe in the decisions the company makes, then to be loyal also means that an individual may deem those decisions to be reliable.

If that is the case, then how do individual employees know the company is worthy of trust? Trust is a virtue we are born with but learn to be wary of when it has been betrayed. According to business ethics expert George Brenkert, “Trust is not a principle, let alone a moral principle, but an attitude

or disposition to behave and respond in certain ways.”<sup>10</sup> Brenkert believes that in order to build a trusting relationship, there must be a “commonality of values and aims” to include the ability to determine the trustworthiness of the other party, as well as the ability to use discretion in forming such relationships.<sup>11</sup> Therefore, it may be fair to say that business ethics involves trust between individuals that promotes morality.

R. Solomon, on the other hand, takes a contrasting approach to business ethics. He states, “The Aristotelian approach to business ethics rather begins with the idea that it is individual virtue and integrity that counts; good corporate and social policy will follow.”<sup>12</sup> If we accept this approach, then personal ethics would be the foundation for business ethics. Therefore, business ethics should not begin with the economic responsibility of maximizing profits, but should instead begin with the social responsibility of the community of people that make up the company. In other words, business ethics should not be a set of rules or constraints, but an ideal based on the virtues and integrity of the people the company has hired to represent them.

Both Brenkert’s and Solomon’s views support the notion that business ethics is comprised of a value system made up of many diverse individuals; each with his or her own personal ethics and value systems that support the social, economic, and moral systems of the company. The level of trust and integrity of a company’s people determines the level of trust and integrity of the company.

In agreement with these so-called virtue ethics are the concepts of Kantian ethics, in that we should “always treat the humanity in a person as an end and never as means merely.”<sup>13</sup> The idea behind this theory is that people should not be intimidated or misled. Managers should contribute to their employees’ development, not prevent them from succeeding.

Further, business ethics should not be driven by corporate deeds, but by corporate culture led by the virtues and identities of its employees. Cooperation among all members of the company, including the CEO, is essential in order to create this corporate culture. According to J. Pfeffer, “The key to managing people in ways that lead to profits, productivity, innovation, and real organizational learning ultimately lies in how you think about your organization and its people. It lies in mindset and perspective.”<sup>14</sup> In essence, this means that an organization needs to put people before profits. But what does it really mean to put people first? There are a number of actions and messages that convey that an organization’s values truly put their people first, but the most important message comes from the organization’s senior management. Pfeffer answers this by saying that “putting people first entails

ensuring that those in leadership positions have people-oriented values and manage in ways consistent with building high-performance work environments.<sup>15</sup> Consequently, a corporate culture led by senior management and built upon a code of ethics fosters positive ethical behaviors that affect business decisions and social responsibilities.

Critics of these views believe that utilitarianism is the correct approach to business ethics, making statements such as “the right thing to do is do whatever brings the most pleasure to the most people.”<sup>16</sup> Simply stated, this point of view supports actions that produce the greatest good for the greatest number. In effect, utilitarianism is the need to make management decisions based on what would bring the greatest pleasure and the least pain.

### Procurement Integrity vs. Competition

To put all of these ideas in perspective, the procurement reforms of the Clinton administration caused confusion with respect to ethics, thus giving the government procurement community (contractors and government officials) the sense that older rules and regulations no longer applied. Angela Styles, the former head of the Office of Federal Procurement Policy, is reported to have said, “The environment became one that encourages and rewards carelessness. The lines became too easy to cross, and no one was paying attention. I don’t think most people know where the lines are anymore.”<sup>17</sup> This statement supports the argument that the government has lost sight of its goals and objectives, thus losing faith in its corporate culture.

This may explain why Darleen Druyun, a 32-year veteran (nonmilitary) procurement official with the U.S. Air Force, who was in charge of an annual budget of more than \$30 billion, was able to negotiate a multibillion-dollar lease contract for tankers with Boeing, while conducting employment negotiations with them at the same time. It is said that Druyun was feeding competitor bid information to Boeing via e-mail, which she claimed was “playing contractors against one another to get the best deal for the Air Force.”<sup>18</sup> These are clear violations of government ethics policies as defined by FAR Part 3 and PIA. If Boeing had put people before profits, as well as promoted an effective code of ethics and an effective compliance program, red flags would have been raised and actions would have been taken to keep such unethical practices from escalating to a scandal.

Nevertheless, the investigation revealed that in addition to Druyun conducting simultaneous negotiations with Boeing relating to business and employment in 2002, she also favored Boeing in four separate negotiations totaling more than \$25 billion over a three-year period beginning in early 2000.

These findings resulted in a nine-month prison term, a \$5,000 fine, and 150 hours of community service. The federal sentencing guidelines provide for a maximum term of 16 months in prison.<sup>19</sup> Perhaps the only reason Druyun was not given the maximum penalty was the fact that prior to her actions, she maintained strong ethical conduct as a shrewd and tough negotiator that resulted in savings of nearly \$20 billion during her career as a procurement official with the air force.

As a contracting officer (CO) for the government, Druyun held a great deal of authority in procurement decision-making. In fact, according to the *FAR*, “contracting officers are responsible for ensuring performance of all necessary actions for effective contracting, ensuring compliance with the terms of the contract, and safeguarding the interests of the United States in its contractual relationships.”<sup>20</sup> In addition to the ethical duties outlined in FAR Part 3, it is the CO’s duty to protect the public’s interest and to maintain the integrity of the procurement system.

However, this is not always the case. As Ruben Berrios points out:

Quite often the selection weighs heavily on the technical content of the proposal and less so on the actual cost. The procedure tends to favor the larger, more established contractors. They have a distinct advantage over small firms even if those groups have the technical expertise in the field. Small firms don’t have the resources, the visibility, and the connections the large firms command.<sup>21</sup>

That being the case, the practice of favoring one contractor over another is common. As a result of such favoritism, single-source contract awards are also common. Government officials claim that such favoritism over competition is a result of overregulation and a shrinking workforce, leaving government officials little or no time to conduct proper evaluations. The end result is a broken procurement system that promotes unethical business practices and unfair competition.

### Lack of Efficiency and Oversight

The government is not only aware of this, but it also blames the system for being broken. In 2004, Charlie Cray of the *Multinational Monitor* reported that:

In 2001, the [Bush] administration quietly repealed a contractor accountability standard passed by the Clinton administration, which clarified *FAR* standards for “integrity and business ethics” that prospective bidders for federal contracts were required to meet. Government officials admit

that without the rule, specific decisions regarding suspension and debarment are left to individual agencies.<sup>22</sup>

It appears that while the government wants contractors to be accountable for their actions, they are hesitant to punish such contractors by suspending and/or debarring them. Interestingly, this reluctance to punish is primarily geared toward the larger contractors and less toward small contractors. One reason may be that “contracting officers and private contractors often develop long-term relationships governed by their own specific needs.... They have become influential constituents who are familiar with the people and procedures of the government agencies that award contracts.”<sup>23</sup> Although the “old boy” network was repealed by PIA, this network remains in existence and continues to promote unethical business practices and unfair competition.

Others believe that “the current procurement ethics system is the result of rule piled upon rule during an extended period of time as Congress and regulators responded to various scandals.... The complexity of these rules means that few fully comprehend them.”<sup>24</sup> If the government has a difficult time comprehending their own rules, then it is clear why the system is faulty. It is also clear that maintaining a knowledgeable workforce is critical if there is to be a fairer and more user-friendly competitive system in the future.

Some believe that, “More rules are not the answer. The goal is to get the best value for agencies, and that requires sound business judgment, innovation, and good contract management. None of that can be prescribed by regulations.”<sup>25</sup> Critics to this point of view state that “most federal managers are not placing enough priority on workforce issues, specifically in preserving the knowledge and skills of employees nearing retirement.”<sup>26</sup> Essentially, the loss of a knowledgeable workforce is the reason behind the lack of sound business judgment, innovation, and contract management skills needed to help prevent improper use of government contracting rules and to maintain accountability.

Hiring more employees may resolve the manpower issues in the short term, but will that truly help in the long term? As *Federal Computer Week* reports: “Staff shortages produce mistakes. Mistakes produce more negative attention. More negative attention means more box-ticking, checking with superiors, and documenting—and less actual work getting done. All of that makes the system even more cumbersome and ineffective.”<sup>27</sup> Such mistakes add more risks to an already cumbersome and ineffective procurement system. These risks leave government procurement officials to their own devices with little or no oversight, thus making it appear as though they are allowed to become noncompliant with ethics policies and regulations.

In addition, if the government intends to resolve the staff shortage issue by privatizing more of its functions, determining what and how much of these functions can be privatized should be adequately evaluated prior to contracting them out. According to the Defense Acquisition University, there are both advantages and disadvantages to privatizing government functions. The advantages include:

- Positive mission impact,
- Flexibility, and
- High qualifications of contractors.

The disadvantages include:

- Contractors not being trained for the specific task,
- Frustration with staffing problems (hiring and turnover), and
- Concern that the contracting activity may become too reliant on contractor personnel.<sup>28</sup>

Consequently, for those functions that are privatized, more oversight is warranted of contractors, despite complaints by government procurement officials that there is inadequate time to evaluate contractor proposals effectively. Essentially, this lack of efficiency is due to the pattern of favoritism; by continually awarding to these contractors regardless of their level of performance. The lack of oversight is due to inadequate priorities on workforce issues such as loss of knowledge, continuing education, and accountability for violations to rules and regulations.

## Conclusion

It is clear that the government ethics policies defined by FAR Part 3 and PIA are being violated by both government and industry as a result of a fractured government procurement system. The result is fewer contracts being awarded under full and open competition, thus increasing costs and promoting unethical business practices and unfair competition.

From the government’s perspective, this is due to the loss of knowledge leaving with the retiring workforce. From a contractor’s perspective, regardless of business size, this is due in part to a minimal or nonexistent code of ethics and the lack of any effective compliance program—both of which are essential for conducting business with the government.

The government may outnumber contractors in terms of size and power, and also have more funding and other valuable resources available than private contractors may have, but that should not negate the fact that a solid corporate culture, a code of ethics, and an effective compliance program

would reduce, if not eliminate, the number of ethical violations taking place. In addition, from both a government and a private contractor perspective, it is important to remember the critical relationship formed between ethical conduct and the organization. Unethical conduct breaks this relationship, resulting in loss of competitive ability and disruption of the trust and integrity of the organizational culture.

## Recommendations

As a result of the government's decreasing workforce and body of knowledge, how do we ensure that rules and regulations are enforced and that fair competition is upheld among contractors of all sizes? First, the government needs to adequately address the issue of the retiring workforce in order to regain the knowledge and experience it desperately needs. One way to accomplish this would be to create an internal mentor–protégé program that would allow the veteran workforce to train the new and less experienced personnel on the job and to pass down the skills of senior personnel. However, because of the increasing size and complexity of the procurement acquisition workload, burnout can occur for those left to maintain these procurements. Management needs to recognize when employees do a good job, ensure that these employees are not overloading themselves or taking vacations away from the job, and most importantly, ensure that employees have an adequate support system. To help alleviate the burnout issue, it may be necessary to retain retired personnel on a consultant basis until junior-level personnel are sufficiently able to manage on their own.

Another problem is that as a result of the shrinking workforce, more functions are being contracted out to private contractors. These private contractors should be closely monitored to ensure that they are meeting the goals and objectives the government has set out for them to achieve. If contractors are to be held accountable, they need to ensure that they have a corporate culture that fosters ethical conduct, and to establish both a code of ethics and a proper compliance program. For publicly held businesses, this means expanding upon regulations outlined under the Sarbanes-Oxley Act of 2002, and incorporating the rules of PIA and FAR Part 3 into their existing ethics policies and compliance programs. For all other businesses, this means modifying or creating corporate ethics policies and compliance programs to include government contracting rules and ethics policies such as those outlined in PIA and the *FAR*.

Additionally, contractors need to be aware of the fact that there is more to a compliance program than just following the rules. In an effort to describe the purpose of such a program, the director of contract management of the Fluor Government Group states:

It is an understanding of the environment in which contracts are executed and an acceptance of a set of behaviors. These behaviors indicate that each individual involved with the contract has made a personal decision to do the right thing and not tolerate the behaviors of others who do not. Compliance programs that solely point to their audit efforts and rely on the number of findings accumulated are not successful or effective programs.<sup>29</sup>

Essentially, senior managers need to understand that individuals make choices based on their corporate culture. If ethics are not an integral part of that culture, then no compliance program will ever be successful.

Most importantly, government officials need to be held accountable for not enforcing the rules. The government needs to ensure that it has a corporate culture that fosters ethical conduct. If favoritism and COIs continue to be widespread, lack of oversight and efficiency will remain an issue, thus preserving unethical business practices and promoting unfair competition. There needs to be more oversight over government procurement officials to ensure that the rules of FAR Part 3 and PIA are being properly applied.

Additionally, all government officials—especially procurement officials—should be forced to certify on a periodic basis (i.e., monthly, quarterly, or annually) that they have not knowingly violated the rules of the *FAR*, any executive orders, or any other agency supplements. This certification process can be done electronically through an Intranet and can be maintained in the contracting official's personnel file.

This practice has been addressed in new legislation that was passed in early December 2007 with the Accountability in Government Contracting Act. Personally, I do not agree that more rules and regulations are the answer. More rules just make the system more complex and difficult to understand. However, if this new legislation will actually force government procurement officials to be accountable for their actions, and will also ensure full and open competition, then it is my belief the taxpayer dollars have been well spent. *JCM*

## ENDNOTES

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