



GOVERNMENT CONTRACTOR ETHICS RANKINGS

08





Government Contractor Ethics Ranking



With the amount of government spending on outsourced contractors growing from \$235 billion in 2001 to over \$435 billion in 2007, there is more opportunity than ever to defraud the government and taxpayers alike. So is it any surprise that Congress, in response to high-profile and widely publicized government contractor scandals, has heightened the ethics program criteria for corporations that do business with the federal government? Of course not.

Rather than tar all government contractors with a broad-tagging brush as “wasteful, deceitful and fraud-ridden,” the Ethisphere Institute decided to research the issue. Surely some government contractors care about ethics, and had implemented the controls, culture and programs to communicate such values and prevent unethical behavior.

In November 2007, the Ethisphere Institute’s Government Contractor Ethics Program Methodology Committee, comprised of the best and brightest experts in the ethics, legal and compliance fields, was unveiled. With their insight and input, an objective analysis was applied to over 1,000 federal government contractors. These companies comprise more than 90 percent of the outsourced government budget.

The weighted analysis effectively covers four broad-based categories: Code of Ethics and Business Conduct (20%); Leadership and Tone from the Top (20%); Internal Control Systems (35%); and Ethics Training and Communication Programs (25%). Information provided by the companies was supplemented by Ethisphere’s own research. In addition, Ethisphere conducted a random audit and verification

of a number of responses, and encouraged companies to send in additional materials and “evidence” of their organization’s efforts in ethics and compliance.

Some companies chose to participate in the study, and others didn’t. For those that declined, we had to rely on the information that was available within the public domain. When all was said and done, Ethisphere gave each company a highly objective, numerical score.

The following pages break down the key findings of Ethisphere’s research. First, we list the 100 contractors that do the most business with the U.S. Government. Unfortunately, some of the private and overseas companies on that list who failed to respond, despite multiple efforts by the Ethisphere Institute to reach out to them, do not have a great deal of reliable, publicly available information regarding their ethics programs. As a result, these companies are listed as “NR,” or “not rated.” These companies will, however, be ranked in the future based upon Ethisphere analysts’ research and feedback from competitors, customers and suppliers, should NR companies continue to decline to participate.

We scored the remaining companies on a scale of 1 to 100 and compiled rankings based on these scores. The 35 contractors with the best ethics programs overall are highlighted, as well as the top 10 private company programs and the 5 most outstanding small company programs. These latter groups deserve particular credit and recognition—their efforts at creating and maintaining an ethical environment exceed many of the largest spenders of taxpayers’ money. Also featured are the five top-ranking foreign contractors. Lastly, we decided to call attention to the 10 contractors—big or small—that have the best codes of ethics and business conduct, the best internal controls systems and the best ethics training and communication programs, respectively.

What we found, not surprisingly, is that there is a big disparity between the calibers of ethics programs within these companies. And, although the reports of heavy abuse and scandal can be unforgettable, many contractors actually have very effective ethics and compliance programs in place. Take a look for yourself through the following pages and see which companies made the grade, and which companies fell flat on their face.

Government Contractor Ethics Program Survey and Rating Methodology

The methodology and the resulting survey took into account existing and proposed components of the Federal Acquisition Regulation regarding contractor ethics programs, key “hallmarks” of the Federal Sentencing Guidelines for effective compliance programs and industry best practices. The evaluation criteria were grouped into four broad sections: Code of Ethics and Business Conduct, Leadership and Tone from the Top, Internal Control Systems and Ethics Training and Communication Programs. For the complete methodology and weighting systems, head over to our website at www.ethisphere.com.



Govt Contractor Ethics Program Rating & Ranking

feature



ETHISPHERE 100 LARGEST CONTRACTOR ETHICS PROGRAM RANK

U.S. GOVT. BUSINESS RANK

ETHISPHERE ETHICS PROGRAM TOTAL SCORE

CLASSIFICATION

ORGANIZATION

U.S. GOVT. BUSINESS RANK	ORGANIZATION	ETHISPHERE ETHICS PROGRAM TOTAL SCORE	CLASSIFICATION	ETHISPHERE 100 LARGEST CONTRACTOR ETHICS PROGRAM RANK
001	LOCKHEED MARTIN	89.71	above standard	8
002	BOEING CO.	66.45	meeting standard	24
003	NORTHROP GRUMMAN CORP.	60.22	meeting standard	39
004	GENERAL DYNAMICS CORP.	60.60	meeting standard	37
005	RAYTHEON CO.	76.54	meeting standard	20
006	KBR INC.	61.56	meeting standard	35
007	L-3 COMMUNICATIONS HOLDINGS	61.98	meeting standard	32
008	SAIC	90.00	excellent	7
009	UNITED TECHNOLOGIES CORP.	60.03	meeting standard	40
010	BAE SYSTEMS	48.08	below standard	51
011	MCKESSON CORP.	NR	not rated	NA
012	BECHTEL GROUP INC.	47.36	below standard	53
013	UNIVERSITY OF CALIFORNIA SYSTEM	NR	not rated	NA
014	COMPUTER SCIENCES CORP.	80.00	above standard	16
015	GENERAL ELECTRIC CO.	92.43	excellent	5
016	FLUOR CORP.	93.92	excellent	2
017	HUMANA INC.	52.95	below standard	48
018	BATTELLE MEMORIAL INSTITUTE	NR	not rated	NA
019	EDS	90.95	excellent	6
020	HONEYWELL INC.	87.69	above standard	9
021	HEALTH NET INC.	54.02	below standard	47
022	TRIWEST HEALTHCARE ALLIANCE CO.	NR	not rated	NA
023	CH2M HILL COMPANIES LTD.	NR	not rated	NA
024	BOOZ ALLEN HAMILTON INC.	73.39	meeting standard	21
025	ITT INDUSTRIES	61.26	meeting standard	36
026	PUBLIC WAREHOUSING CO./AGILITY	54.34	below standard	46
027	ALLIANT TECHSYSTEMS INC.	60.25	meeting standard	38
028	CALIFORNIA INSTITUTE OF TECHNOLOGY	72.94	meeting standard	22
029	URS CORP.	57.33	below standard	44
030	TEXTRON INC.	93.10	excellent	4
031	BNFL INC.	NR	not rated	NA
032	SHAW GROUP INC.	77.90	meeting standard	18
033	HARRIS CORP.	64.84	meeting standard	25
034	AMERISOURCEBERGEN CORP.	58.94	below standard	43
035	FEDEX CORP.	61.89	meeting standard	33
036	IBM CORP.	50.02	below standard	50
037	VERITAS CAPITAL INC.	NR	not rated	NA
038	UNITED SPACE ALLIANCE	83.20	above standard	14
039	MCDERMOTT INC.	64.75	meeting standard	26
040	BP PLC	60.02	meeting standard	41
041	DRS TECHNOLOGIES INC.	NR	not rated	NA
042	EXXONMOBIL CORP.	41.03	below standard	57
043	JACOBS ENGINEERING GROUP INC.	41.96	below standard	56
044	KUWAIT NATIONAL PETROLEUM CO.	NR	not rated	NA
045	THE ALLIANCE CONTRACTOR TEAM	NR	not rated	NA

Rating Scale

Excellent (90-100); Above Standard (80-89); Meeting Standard (60-79); Below Standard (40-59); Unsatisfactory (<40); NR= not rated; NA= not available

U.S. GOVT. BUSINESS RANK
ORGANIZATION
**ETHISPHERE
ETHICS PROGRAM
TOTAL SCORE**
CLASSIFICATION
**ETHISPHERE 100 LARGEST CONTRACTOR
ETHICS PROGRAM RANK**

046	CACI INTERNATIONAL INC.	93.14	excellent	3
047	RENCO CORP.	NR	not rated	NA
048	MACANDREWS & FORBES HOLDINGS	NR	not rated	NA
049	OSHKOSH TRUCK CORP.	64.52	meeting standard	27
050	ENVIRONMENTAL CHEMICAL CORP.	NR	not rated	NA
051	JOHNS HOPKINS UNIVERSITY	NR	not rated	NA
052	WASHINGTON GROUP INTERNATIONAL	57.33	below standard	44
053	ROYAL DUTCH SHELL CO.	59.00	below standard	42
054	DELL COMPUTER CORP.	78.86	meeting standard	17
055	UNISYS CORP.	63.66	meeting standard	30
056	STEWART & STEVENSON SERVICES	NR	not rated	NA
057	ARMOR HOLDINGS INC.	48.08	below standard	51
058	GENERAL MOTORS INC.	51.28	below standard	49
059	GRINDEX PUMPS AB SWEDEN	NR	not rated	NA
060	KOREA AGRICULTURAL COOPERATIVE	NR	not rated	NA
061	ACCENTURE	83.34	above standard	13
062	CARDINAL HEALTH INC.	77.65	meeting standard	19
063	MITRE CORP.	NR	not rated	NA
064	GENERAL ATOMICS TECHNOLOGY CORP.	NR	not rated	NA
065	CHUGACH ALASKA CORP.	NR	not rated	NA
066	AEROSPACE CORP.	84.38	above standard	12
067	SRA INTERNATIONAL INC.	43.88	below standard	55
068	ROCKWELL COLLINS	94.32	excellent	1
069	MASSACHUSETTS INSTITUTE OF TECHNOLOGY	NR	not rated	NA
070	VALERO ENERGY CORP.	43.66	below standard	55
071	IAP WORLDWIDE SERVICES INC.	NR	not rated	NA
072	SYRACUSE RESEARCH CORP.	NR	not rated	NA
073	TETRA TECH INC.	70.77	meeting standard	23
074	BEARINGPOINT INC.	86.08	above standard	11
075	BLACKWATER USA	NR	not rated	NA
076	ARINC INC.	63.89	meeting standard	29
077	GOVERNMENT OF CANADA	NR	not rated	NA
078	PHILLIPS AND JORDAN INC.	NR	not rated	NA
079	REFINERY ASSOCIATES INC.	NR	not rated	NA
080	GLAXOSMITHKLINE	64.33	meeting standard	28
081	ROLLS ROYCE PLC	61.69	meeting standard	34
082	UNITED INDUSTRIAL CORP.	NR	not rated	NA
083	PARSONS CORP.	NR	not rated	NA
084	AP MOLLER-MAERSK	NR	not rated	NA
085	UNIVERSITY OF TENNESSEE SYSTEM	NR	not rated	NA
086	AKAL SECURITY INC.	NR	not rated	NA
087	HATAKEYAMA BUSSAN	NR	not rated	NA
088	CHEVRONTEXACO CORP.	63.03	meeting standard	31
089	THALES GROUP	38.68	unsatisfactory	59
090	CHENEGA CORP.	NR	not rated	NA
091	ARCTIC SLOPE REGIONAL CORP.	NR	not rated	NA
092	MANTECH INTERNATIONAL CORP.	80.31	above standard	15
093	G4S PLC	35.15	unsatisfactory	61
094	CANGENE CORP.	37.71	unsatisfactory	60
095	NANA REGIONAL CORP. INC.	NR	not rated	NA
096	ABU DHABI NATIONAL OIL CO.	NR	not rated	NA
097	GTSI	40.87	below standard	58
098	MERCK & CO. INC.	86.49	above standard	10
099	SANOFI AVENTIS	NR	not rated	NA
100	BAHRAIN NATIONAL OIL CO.	NR	not rated	NA



best of



RATING SCALE
Excellent (90-100); Above Standard (80-89); Meeting Standard (60-79); Below Standard (40-59); Unsatisfactory (<40)

U.S. GOVT. BUS. RANK	ORGANIZATION	ETHISPHERE ETHICS PROGRAM TOTAL SCORE	ETHISPHERE PRIVATE CO. ETHICS PROGRAM RANK	CLASSIFICATION
104	VERIZON WIRELESS	97.38	1	excellent
379	AVAYA INC	92.09	2	excellent
139	DATAPATH INC	88.14	3	above standard
237	SENTEL CORPORATION	87.81	4	above standard
065	THE AEROSPACE CORPORATION	84.38	5	above standard
185	BECHTEL JACOBS COMPANY LLC	83.83	6	above standard
347	EOD TECHNOLOGY INC	83.39	7	above standard
016	UNITED SPACE ALLIANCE	83.20	8	above standard
210	VANGENT INCORPORATED	80.91	9	above standard
247	PALMETTO GBA	80.09	10	above standard



U.S. GOVT. BUS. RANK	ORGANIZATION	COUNTRY	ETHISPHERE ETHICS PROGRAM TOTAL SCORE	ETHISPHERE FOREIGN CO. ETHICS PROGRAM RANK	CLASSIFICATION
199	ELBIT SYSTEMS LTD	Israel	74.59	1	meeting standard
552	MEGGITT PLC	United Kingdom	71.31	2	meeting standard
080	GLAXOSMITHKLINE	United Kingdom	64.33	3	meeting standard
081	ROLLS ROYCE PLC	United Kingdom	61.69	4	meeting standard
040	BP PLC	United Kingdom	60.02	5	meeting standard

U.S. GOVT. BUS. RANK	ORGANIZATION	ETHISPHERE ETHICS PROGRAM TOTAL SCORE	ETHISPHERE SMALL CO. ETHICS PROGRAM RANK	CLASSIFICATION
139	DATAPATH INC	88.14	1	above standard
237	SENTEL CORPORATION	87.81	2	above standard
401	HERLEY INDUSTRIES INC	83.55	3	above standard
347	EOD TECHNOLOGY INC	83.39	4	above standard
572	ROBBINS GIOIA INC	76.76	5	meeting standard

Note: A company qualifies as "small" if it has less than 1,000 employees





BEST ETHICS PROGRAMS OVERALL

U.S. GOVT. BUS. RANK

ORGANIZATION

CODE OF ETHICS &
BUSINESS CONDUCTLEADERSHIP AND
TONE FROM THE TOPINTERNAL
CONTROL
SYSTEMSTRAINING AND
COMMUNICATIONETHISPHERE ETHICS
PROGRAM TOTAL SCORE

CLASSIFICATION

ETHISPHERE BEST ETHICS
PROGRAM RANK

104	VERIZON WIRELESS	97.17	92.00	93.36	99.50	97.38	excellent	1
068	ROCKWELL COLLINS	88.20	96.00	91.00	98.50	94.32	excellent	2
016	FLUOR CORPORATION	87.53	94.00	90.13	96.25	93.92	excellent	3
046	CACI INTERNATIONAL INC	71.53	96.00	93.60	99.50	93.14	excellent	4
030	TEXTRON INC	82.87	96.00	91.47	97.25	93.10	excellent	5
015	GENERAL ELECTRIC CO	81.20	95.00	92.69	95.00	92.43	excellent	6
379	AVAYA INC	81.67	90.33	86.60	97.50	92.09	excellent	7
019	EDS	82.00	91.00	85.45	93.75	90.95	excellent	8
129	PROCTER AND GAMBLE	87.50	93.33	88.31	85.75	90.51	excellent	9
008	SCIENCE APPLICATIONS INTL CORP (SAIC)	81.87	92.33	88.13	93.25	90.00	excellent	10
001	LOCKHEED MARTIN CORP	78.20	94.00	91.13	81.50	89.71	above standard	11
678	CA INC	88.83	90.67	84.48	87.50	88.34	above standard	12
139	DATAPATH INC	94.50	90.33	84.77	82.00	88.14	above standard	13
237	SENTEL CORP	68.50	92.00	88.82	94.50	87.81	above standard	14
022	HONEYWELL INC	73.53	83.00	90.20	95.25	87.69	above standard	15
217	PEPSICO	90.67	92.33	85.35	69.00	86.72	above standard	16
097	MERCK	86.87	88.00	89.33	77.00	86.49	above standard	17
244	DELOITTE LLP	85.00	81.00	86.36	83.75	86.36	above standard	18
200	XEROX CORPORATION	72.00	93.33	88.56	80.75	86.25	above standard	19
073	BEARINGPOINT INC	75.67	99.00	85.78	88.50	86.08	above standard	20
211	TYSON FOODS	80.00	95.00	82.56	80.00	85.89	above standard	21
288	THE GOODYEAR TIRE AND RUBBER CO	75.00	85.67	85.11	84.25	84.98	above standard	22
065	THE AEROSPACE CORP	58.00	96.00	82.81	90.38	84.38	above standard	23
424	KELLOGG CO	94.00	81.33	81.07	78.13	83.97	above standard	24
185	BECHTEL JACOBS CO	71.00	90.00	86.61	81.25	83.83	above standard	25
401	HERLEY INDUSTRIES INC	76.33	92.00	82.16	92.50	83.55	above standard	26
347	EOD TECHNOLOGY INC	54.00	94.00	92.24	82.00	83.39	above standard	27
060	ACCENTURE LLP	91.87	88.00	74.80	84.75	83.34	above standard	28
016	UNITED SPACE ALLIANCE	42.67	87.33	91.81	92.25	83.20	above standard	29
601	SPRINT NEXTEL	94.33	83.33	82.20	74.25	82.87	above standard	30
210	VANGENT INC	30.67	94.00	88.51	96.00	80.91	above standard	31
091	MANTECH INTERNATIONAL CORP	68.87	93.33	77.30	83.25	80.31	above standard	32
247	PALMETTO GBA	41.17	94.00	85.69	88.25	80.09	above standard	33
527	GRANITE CONSTRUCTION INC	96.33	90.67	75.72	55.75	80.04	above standard	34
014	COMPUTER SCIENCES CORP	70.20	88.67	85.65	61.00	80.00	above standard	35

Rating Scale Excellent (90-100); Above Standard (80-89); Meeting Standard (60-79); Below Standard (40-59); Unsatisfactory (<40)



ETHISPHERE ETHICS & COMMUNICATIONS PROGRAM RANK

U.S. GOVT. BUS. RANK	ORGANIZATION	SCORE	RANK
046	CACI INTERNATIONAL INC	99.50	1
104	VERIZON WIRELESS	99.50	1
068	ROCKWELL COLLINS	98.50	3
379	AVAYA INC	97.50	4
030	TEXTRON INC	97.25	5
016	FLUOR CORPORATION	96.25	6
210	VANGENT INCORPORATED	96.00	7
022	HONEYWELL INC	95.25	8
015	GENERAL ELECTRIC COMPANY	95.00	9
237	SENTEL CORPORATION	94.50	10



U.S. GOVT. BUS. RANK

PUBLIC AVAILABILITY

READABILITY

COMMITMENT TO STAKEHOLDERS

ORGANIZATION

TONE FROM THE TOP

NON-RETALIATION

U.S. GOVT. BUS. RANK	ORGANIZATION	TONE FROM THE TOP	PUBLIC AVAILABILITY	READABILITY	NON-RETALIATION	COMMITMENT TO STAKEHOLDERS
104	VERIZON WIRELESS	A	A	A	A+	A
527	GRANITE CONSTRUCTION CO.	A-	A+	A	A	A
040	BP PLC	A	A	A	A+	A
139	DATAPATH INC.	A+	A+	A	A	A
601	SPRINT NEXTEL	A-	A-	A	A	A
060	ACCENTURE	A-	A+	A-	B-	A+
217	PEPSICO	A	A+	A+	B+	A
062	CARDINAL HEALTH INC.	A	A+	A	B+	A+
068	ROCKWELL COLLINS	A	A	A-	B	B-
016	FLUOR CORP.	B	A	A	A	B

Ethisphere Project
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RATING SCALE DEFINED

Excellent (90-100)

The Ethisphere "Hall of Fame" that few companies achieve, represents outstanding programs overall with clear commitment to attempting to drive an ethical and disclosure culture well beyond disclosure requirements.

Above Standard (80-89)

Strong programs that exceed all government standards. Institutional commitment to ethics apparent with most measurement criteria met yet selective shortfall may still be present, but easily improved.

Meeting Standard (60-79)

Companies which meet the "letter of the law" but fail to exceed by meeting the "spirit of the law." These are companies that could achieve better scores by putting in action their written commitments.

Below Standard (40-59)

Programs which fail to prove that they have met the minimum FAR ethics program standards.

Unsatisfactory (<40)

Programs that fail to demonstrate sufficient material commitment to institute a culture or program of ethics consistent with FAR per disclosed information.

U.S. GOVT. BUS. RANK

ETHISPHERE INTERNAL CONTROL SYSTEM RANK

ORGANIZATION

INTERNAL CONTROL SYSTEMS

046	CACI INTERNATIONAL INC	93.60	1
104	VERIZON WIRELESS	93.36	2
956	HIGH PERFORMANCE TECH	93.10	3
015	GENERAL ELECTRIC COMPANY	92.69	4
347	EOD TECHNOLOGY INC	92.24	5
016	UNITED SPACE ALLIANCE	91.81	6
030	TEXTRON INC	91.47	7
001	LOCKHEED MARTIN CORP	91.13	8
068	ROCKWELL COLLINS	91.00	9
022	HONEYWELL INC	90.20	10

LEARNING AIDS

OVERALL GRADE

RISK TOPICS

PRESENTATION

ETHISPHERE CODE OF ETHICS RANK

KEY TAKEAWAYS

A+	A+	A+	A+	1	"Can you hear me now? Can you hear me now?" Verizon Wireless employees certainly can hear their company loud and clear.
A+	A	A+	A	2	A rock solid code in its construction and all other aspects. The best part is the CEO appearing with his dog on the third page.
A	A+	A+	A	3	BP must stand for "Best Practices" in code creation considering the exemplary design, contextual learning tools and clear tone from the top. This document truly shines.
A+	B+	A	A	4	This code has all the right data. It not only has substance, it also has a great presentation and use of graphics.
A+	A	A+	A	5	A code that truly sprints ahead of the rest as its message comes through crystal clear.
A	A+	A+	A	6	Like their spokesman Tiger Woods, the Accenture code performs at the highest level. The only question is, who has a better short game?
A	B-	A	A	7	Excellent tone from the top which bubbles throughout and is very readable. Could elevate its grade further through addition of Q&A or other learning aids.
A	A	B-	A	8	When given a check-up, this code's health passes with flying colors. The only thing keeping this from being an A+ code is a little cosmetic surgery.
A	A	A	A-	9	Well done when it comes to the tone from the top, risk topics, learning aids and graphics. A little rocky in its non-retaliation and commitment to stakeholders, but still an excellent code.
A	A-	B	A-	10	How can you argue against a code that contains the statement, "We live by the highest ethical standards?" Very good code overall but the presentation could use some construction.



Summary of the FAR Ethics Program Changes

// BY DORN C. MCGRATH AND SEAN M. CONNOLLY

THE FAR REQUIREMENTS FOR GOVERNMENT CONTRACTORS

For many years, the U.S. policy has been that defense contractors “should” have a written code of ethics. Effective December 24, 2007, the government-wide Federal Acquisition Regulation (FAR) implemented a new requirement. Now, all government contractors “shall” have a written code of ethics. Here is a summary of the steps to take to comply with the new FAR ethics requirements.

01 // Determine whether the new rules apply to you.

- Is the contract value more than \$5 million and the performance period longer than 120 days?
- Is the contract a defense or dual-use acquisition (but not commercial)?
- Will contract performance occur within the United States?
- If you answer “yes” to all questions, proceed to Step 2.

02 // Establish a compliance program.

- Write a Code of Conduct. Don't wait until you've been awarded a contract because your Code must be in place within 30 days of the award. Start now. Trust us, it takes more than 30 days to write a Code and get it approved.
- Give a copy of the Code to all employees who are engaged in performance of the contract (or better yet, all employees).
- Begin to promote compliance with the Code.
- Hang posters in each worksite publicizing a reporting hotline. Check with the government contracting officer to find out what posters to use if your company doesn't have its own reporting program.

03 // Implement an awareness program within 90 days of the contract award.

- Train employees on dos and don'ts for working on and managing government contracts.

- Establish a reporting hotline. You can either set up a company hotline or use the government fraud hotline. Which makes more sense to you?
- Publicize the reporting hotline on company web pages.
- Set up internal controls. Determine processes that will ensure timely discovery of improper conduct with government contracts and define the appropriate corrective measures to take. Decide what you will do if you uncover possible fraud with a government contract. (See below on proposed self-reporting requirement.)
- Schedule periodic reviews of your ethics program.

PROPOSED FAR AMENDMENT: SELF-REPORTING

An additional change to the new FAR ethics program rules proposed in 2007 requires highly controversial self-reporting requirements. Under this proposal, the FAR's new ethics regulations would be further amended to add mandatory self-reporting and cooperation and to subject contractors to suspension and debarment for failing to meet these requirements.

This proposed contract clause would

require contractors to notify contracting officers and agency inspector generals when the contractor has “reasonable grounds” to believe that the company has violated federal criminal law in connection with a government contract. The government would then expect “full cooperation with any government agencies responsible for audit, investigation, or corrective action.” Moreover, the causes for debarment or suspension would be modified to include a contractor's “knowing failure to timely disclose” a violation of federal criminal law in connection with a government contract, or even an overpayment.

Before approval, this proposed rule will be the subject of much discussion in 2008. For instance, the proposal would make all disclosures mandatory, but it does not address the potential conflicts between its requirements and those of current voluntary disclosure programs. In addition, the terms “timely,” “reasonable grounds,” “criminal violations,” “full cooperation” and “overpayment” are not defined, which leaves them open to interpretation. The proposed rule also does not explain how a government contractor would go about policing a mandatory self-reporting requirement with subcontractors. ◀

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 See *Final Rule on Contractor Code of Business Ethics and Conduct*, 72 Fed. Reg. 65873 (Nov. 23, 2007);
Proposed Rule on Contractor Compliance Program and Integrity Reporting, 72 Fed. Reg. 64019 (Nov. 14, 2007).

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Government Contracting Ethics and Compliance Methodology Committee

The methodology and the survey were developed with the assistance and under the supervision of the Government Contracting Ethics and Compliance Methodology Committee. The Ethisphere Institute is very grateful to the invaluable service of the methodology committee, which determined the ranking and rating methodology:

- George W. Ash, Partner, *Foley & Lardner LLP*
- Steven G. Churchwell, Government Affairs Practice Group Partner, *DLA Piper LLP*
- Jeffery D. Clark, Partner, *Willkie Farr & Gallagher LLP*
- Ronald Clark, Partner, *Arent Fox LLP*
- Lisa A. Estrada, Partner, Government Contractor Services and Government Enforcement, *Arent Fox LLP*
- Jenny Kim, Senior Associate, *Miller & Chevalier Chartered*
- David Laufman, Partner, *Kelley Drye Collier Shannon LLP*
- Kathleen M. Hamann, Vice-Chair, Anti-Corruption Initiatives & Compliance Issues Committee, *American Bar Association*
- Timothy Lupfer, Director, Human Capital Organization and Change, *Deloitte Consulting LLP*
- Deneen J. Melander, Partner, *Fried Frank*
- Traci Melvin, Deputy Director, *NIH Ethics Office*
- Paul Melendez, Professor, *Eller College of Management University of Arizona*
- Kevin Mullen, Partner, Government Contracts Practice, *Cooley Godward Kronish LLP*

None of the Committee members had access to any company data or were involved in the rating process.