



ELEMENTS OF AN EFFECTIVE ETHICS PROGRAM

MANDATORY DISCLOSURES

WHAT IS THE MANDATORY DISCLOSURE RULE?

FAR 52.203-13 requires companies working on government contracts to “timely disclose, in writing, to the agency Office of the Inspector General (OIG), with a copy to the contracting officer, certain violations of criminal law, violations of the civil False Claims Act.”



WHY DISCLOSE MISCONDUCT?

✓ Meet requirement outlined in FAR Clause 52.203-13

OTHER RESOURCES

Office of the Inspector General of the U.S. Department of Defense Contractor Disclosure Program:
www.dodhotline.dodig.mil/programs/CD/index.html



DETERMINE NEED TO DISCLOSE

Conduct internal investigation to determine whether there is credible evidence that a law or regulation was violated in the performance of a government contract.



START WITH A TEMPLATE

Download sample disclosure, blank form or other guidance from website of Inspector General for agency or department responsible for contract/program in question.



PROVIDE INFORMATION

Draft your disclosure, including but not limited to detailed descriptions of the violation, your investigation (from report of investigation), and any corrective actions taken.



SUBMIT DISCLOSURE

Follow the relevant Inspector General’s directions for submitting your disclosure. Provide any further requested documentation or explanation in a timely manner.