

Introduction

Even a cursory look at mission statements of Christian-affiliated colleges and universities makes it clear that, among other things, we share a commitment to educate students for leadership and service to church and society. Of course, there are many ways to understand service. This afternoon, I want to address service from what some might consider a rather narrow perspective: mission integration and organizational ethics. The way in which we attend to the creation of an ethical institutional culture is a form of service in that it provides our colleges and universities a way to integrate more fully the values and vision that inform their mission. In other words, I'm proposing that we consider the manner in which our institutions are run. A few introductory remarks will provide a context for this task.

Our shared commitment to educating students for leadership and service is lived out in many ways. In the classroom we challenge our students to be critical thinkers. We help them to grow in their understanding of the many complex issues facing our world so that they will become socially aware, active participants in society at local, national, and global levels. We encourage faculty and staff to reflect on the relationship between faith and an academic vocation. We design curricula that are integrative and interdisciplinary in order to avoid the false dichotomy of faith and reason. We provide students, staff, and faculty with opportunities for personal development and spiritual growth; we encourage them to reflect on their God-given gifts and talents so they are better able to discern how best to use them. Yet another way in which we live out our educational commitment is through incorporating service into curricular and co-curricular activities on our campuses. As Jeff Bouman has shown us, doing so has long been a part of our educational endeavors.

Hopefully, the design of these service initiatives and programs goes beyond the "doing for" of the "mortality model" to reach the "being with" of the "isolation model" for which Sam Wells has argued so persuasively. He also pointed out that college and university leaders can "further the overcoming of isolation by the way they run their institution[s] and by the way their institution[s] foster] ... healthy relationships among ... members and staff...".¹ This leads to considering how we might answer the questions that Michael Cartwright posed to me: "What does it mean for church-related universities to exercise corporate social responsibility?" I think it's a fair question. After all, many of us in the academy who teach about or do research on Corporate Social Responsibility – or CSR as it's commonly referred to – ask this question of corporations and the men and women who run them but don't often ask this question about our own work. Conceptually, CSR is understood broadly and is concerned with the manner in which corporations meet their economic, legal, ethical, and philanthropic responsibilities in order to serve the common good. Archie Carroll's CSR pyramid provides a way to think about these four responsibilities. The base of the pyramid is economic responsibility. Here the focus is on fiscal responsibility and stewardship of resources. If our institutions are to continue to exist, they must be fiscally sound. The second segment of the pyramid is legal responsibility. The focus here is on compliance with all applicable laws – those that are universal to all institutions and those that are specific to higher education. The third segment is ethical responsibility which is concerned with institutional culture as well as policies, procedures, and activities that are not legally mandated. At the top of the pyramid we find philanthropic responsibility which focuses on contributions to

¹ Sam Wells paper p. 7.

society at local, national, regional, and global levels that are not related to the direct purposes of the organization.² Our main focus this afternoon will be on the third level of Carroll's pyramid – ethical responsibility

Were we to ask colleges and universities across the country about their exercise of CSR, I suspect that their responses will, as those of businesses do, cover a range of positions from "our responsibility is to educate our students" to "our responsibility is not simply to educate our students but to do so in a manner that contributes to the common good". But what about us? I would hope that we would be at the end of the spectrum that believes that colleges and universities have a responsibility to society beyond the responsibility to educate students, but I don't know if that's the case or not. Even if all of us present agreed that our institutions have a responsibility to society beyond educating our students, we'd still have to ask what we mean by that.

Are we talking about social responsibility in an instrumental way? After all, it's good PR; it might be a good marketing tool for attracting students; it might help ease some of the perennial town-gown relationship tensions, and so on. Or do we recognize the complex relational character of CSR at its best and its concern for the common good? I would argue that as church-affiliated institutions we ought to be in the latter category. Here again, however, we need to ask the question of meaning. What do we understand the common good to be? It is most narrowly described in utilitarian terms as the greatest good for the greatest number of people, a description, I suspect, that many of us would reject.

Richer descriptions can be found in Christian social ethics with its communitarian sensibility and "concern for the common good that promotes human flourishing for all."³ It is important to remember that the concept of the common good is not simply descriptive. It's substantive and procedural as well. Bernard Brady demonstrates this by distinguishing among four general categories.

The first category is defined in terms of the basic needs of persons and the goods necessary to fulfill those needs. ... They include basic elements of subsistence. ... The second category contains goods that literally belong to the commons, to people. ... Both are concerned with tangible things persons and societies need to survive and to flourish. The moral elements rest not in the goods themselves, but in the appropriate use, distribution and development of such goods. ... The third type of common goods would include the goods that give identity and definition to the community. ... Finally, there exists the necessary means for the promotion and protection of the first three categories

² Carroll, Archie B. "The Pyramid of Corporate Social Responsibility: Toward the Moral Management of Organizational Stakeholders." *Business Horizons* 34, no. 4 (July 1991): 39-48. *Business Source Premier*, EBSCOhost (accessed September 10, 2012).

³ Regina Wentzel Wolfe and Shirley Roels, "Roman Catholic and Protestant Perspectives on Business as a Calling: Managerial Leadership in the Corporate Square" in *Business as a Calling: Interdisciplinary Essays on the Meaning of Business From the Catholic Social Tradition* ed. by Michael Naughton and Stephanie Rumpza (Minneapolis: St. Thomas University, 2004), 5. Found at <http://www.stthomas.edu/cathstudies/cst/publications/businessasacalling/14WolfeRoels.pdf> Accessed August 8, 2012.

of common goods. This category of common goods highlights the necessary procedural element of the common good. Like the other three categories, the procedural is to be defined in terms of the moral. ... The essence of the procedural element is that it attempts to actualize the common good.⁴

I would argue that this richer understanding of the common good, or one like it, should inform our understanding of corporate social responsibility in general as well as inform the way in which we, as church-affiliated colleges and universities, exercise corporate social responsibility. Doing so challenges us to look at all we do through the lens of promoting human flourishing – a very tall order, indeed. I want to propose that one way to begin to attend to our social responsibility and our commitment to educate for leadership and service is by attending to mission integration and organizational ethics; that is, that we look at ethical responsibility – the third segment of the CSR pyramid. I'd like to do this by focusing on what we might learn from the corporate world, with particular emphasis on best practices in organizational ethics.

Context for compliance and ethics

I doubt anyone here will be surprised by the fact that there has been increased emphasis on organizational ethics in response to the corporate scandals of the last decade. Significant attention has been given to establishing and/or enhancing compliance and ethics activities with particular emphasis on effective, ongoing compliance training programs and effective, ongoing ethics training programs – both of which I'll address in more detail in a few minutes. First, I think a bit of background will be helpful.

In late 2004, as a reaction to the corporate scandals, the U.S. Sentencing Commission introduced amendments to the Federal Sentencing Guidelines for Organizations. The amendments suggest that judges, who are at the sentencing phase of a trial, consider whether or not an organization has in place effective, ongoing compliance and ethics training programs. In addition to the Sentencing Guidelines themselves, the Department of Justice (DOJ) issued what are referred to as "interpretation guides"; these guides indicate how the DOJ interprets the Sentencing Guidelines. There are three things in the DOJ guides that I want to highlight. First, the DOJ guides make a clear distinction between compliance training and ethics training. Second, the DOJ guides favor a proactive rather than a reactive approach. Third, the DOJ guides place great emphasis on institutional culture, which I believe is important. As Dov Seidman notes, "having an ethics 'program' is a misnomer; ethics is not a single act, but a habit"⁵ and institutional culture creates the environment in which habits are formed.

It should be noted that the Sentencing Guidelines are not statutory regulations. However, most publicly traded corporations treat them as if they were regulations and, at least initially, viewed them as an issue of risk management. One other thing that is important to note is that the

⁴ Bernard Brady, *Rights, the Common Good and Roman Catholic Social Thought* (Chicago, IL: University of Chicago Doctoral Dissertation, 1988), 258-60.

⁵ Dov Seidman, "Creating an Effective Ethics & Compliance Organization," *President & CEO Magazine*, January 2005.

Sentencing Guidelines apply to all organizations regardless of size or type. This includes institutions of higher education. Thus, from a very pragmatic perspective, I would argue that colleges and universities need to adopt a proactive position and develop and implement effective, ongoing compliance and ethics training programs.

Ideally, however, this move should not be driven by rules or regulations, but by a recognition that the action has merit and value in its own right – simply put, because it is the right thing to do. In this regard, we can learn something from the corporate world and best practices. Compliance training – which focuses on the legal responsibility segment of Carroll's CSR pyramid – is relatively straight forward. Do employees know about, understand, and comply with relevant laws? Of course some research is required to ensure that all laws and regulations that apply directly to colleges and universities are included in compliance training programs. Once that is done, the challenge will be to develop appropriate, effective, and *ongoing* means of educating all staff, faculty, administration, and student employees and to ensure that materials are continually updated to reflect changes in laws and regulations.

What is of greater interest, both from a research perspective and from a practical approach, is what the business literature refers to as ethics training. Please note, I am not interested in all ethics training – some is simply for show – Enron's award winning code of ethics is a prime example – and some is just ill-conceived and ineffective; but when it is done well, I think ethics training has much to offer those of us who work in higher education. At its best, it is about mission integration and creating and maintaining a culture that embodies the institution's core values and identity. It is *intentional* and by design rejects a minimalist approach. As the saying goes, it gets to the heart of the matter.

While there is no single correct way of designing and implementing ongoing mission based ethics education, there are some identifiable elements that should be included in the process. It is important to note, however, that the outline I propose, which is based on the sentencing and interpretation guidelines, is only a template that requires tailoring to particular institutional circumstances and needs.⁶

At a minimum, the following seven steps should be included in the process:

1. Clearly articulate mission, vision, and values statements – most of our institutions have all three of these, but they should be revisited on an ongoing basis and modified and rearticulated when appropriate. And if we take the challenge of corporate social responsibility seriously our commitment to fostering human flourishing should be evident.
2. Take a step back from the mission, vision, and values statements in order to identify the existing institutional culture – *do* the surveys, the focus groups, and so forth in order to identify what is actually happening on campus and how things are really perceived. Once that is done move on to step three.

⁶ More information on the Federal Sentencing Guidelines for Organizations and related materials can be found on the U.S. Sentencing Commission website at http://www.ussc.gov/Education_and_Training/Guidelines_Educational_Materials/Organizational_Guidelines.cfm; in particular, see "Reasons for the 2004 Amendments to Chapter Eight".

3. Assess the existing culture in light of mission, vision, and values *not only* to identify where the existing culture embodies these, where it is in conflict with them, and where they are not present *but also* to determine the reasons for these successes, failures, and omissions.
4. Design systems, policies, procedures that foster cultivation of the core values – here it is important not to overlook informal patterns of socialization that might clash with or co-opt these more formal aspects of shaping institutional culture. If the assessment work is done well, it can be of great help.
5. Communicate these systems, policies, and procedures in an *ongoing* and effective way. This requires that they be well articulated, widely promulgated, and understood by all constituents. Participation in programs in this area should be considered an ordinary part of professional development of staff, faculty, administration, and student employees.
6. Have clear standards and procedures for enforcing adherence to policies and procedures.
7. Engage in continual evaluation and assessment of *all* aspects of the program in order to sustain and invigorate institutional culture in light of the core values.

This is an ongoing process that, at its best, will be comprehensive and mission driven. In that sense, it is not externally imposed; rather it provides a procedural way in which self-articulated values, mission, vision, and identity are systematized. Such an approach will address the Sentencing Guidelines' emphasis on institutional culture; it is also a proactive rather than reactive approach, which is congruent with best practices in risk management. There are three things I'd like to highlight.

First, because it is mission driven, the work of developing and implementing compliance and ethics education programs is best done by those who have an interest or stake in the institution. For those of us in higher education the most immediate participants in this process are the students, faculty, staff, administration, and board members, who have a fiduciary responsibility for the institution. Alumnae and alumni, parents, community members, and other constituencies are also called upon to assist. These are the people who know the institution and its strengths, its weaknesses, and its challenges.

Second, it is important to recognize that colleges and universities do have institutional cultures and, I would argue, that on the whole these cultures foster positive habits that reflect the underlying core values. The challenge is to understand how this happens and be more intentional about the process so that the systems and structures – which are part of all human institutions – are designed to promote and enhance the university's culture rather than co-opt it. Being intentional about the process not only embodies a best practices approach, it is also a risk management approach.

Finally, in light of a rich understanding of common good, it is important that policies and procedures are implemented in ways that both enhance the educational mission of the institution and take seriously the social responsibility to foster the human flourishing of all members of the community. This must begin at the top; there must be no doubt in anyone's mind that senior administrators and members of the board do not simply talk the talk but that they walk the talk and expect that all members of the community will do likewise. Breadth is also crucial. Universities are complex institutions with a multiplicity of functional or divisional areas each of which must be involved in the process of design and implementation in transparent ways that

attend to structures of vertical and horizontal accountability for the mission of the institution and the institution's broader social responsibilities. From a functional perspective, there might be a person or persons responsible for mission integration and organizational ethics; from a best practices approach *all* members of the institution should understand themselves to be responsible for this.

As I indicated earlier, I believe that adopting a best practices approach is the right thing to do. That said, I have to acknowledge that the risk management aspect cannot be underestimated. There is the obvious risk that a compliance violation or an ethical breach by a member of a university's staff or faculty could lead to significant financial and/or reputational loss. Adopting best practices for compliance and ethics can go a long way toward reducing this risk by creating an institutional culture that is a tangible expression of the core values, mission, and identity of the institution and as such are explicitly and implicitly present in systemic ways in all of the institution's policies and procedures across all functional areas – academic affairs, business affairs, human resources, student affairs, athletics, institutional advancement, admissions, marketing, and so on. What might some of this look like? Let me provide a few examples in the time remaining.

Best practices in compliance and ethics

The obvious starting place for church-related colleges and universities is to be clear about the theological underpinnings of the core values of the institution and their articulation in the mission and vision statements. These go to the heart of institutional identity. I think it's safe to say that the colleges and universities that are members of the Lilly Fellows Program have done this and done it well. And while this is a necessary beginning to building ethical institutional cultures, it is not sufficient. Attending to relationality is central to building a healthy ethical organization. This returns us to Sam Wells' challenge to run our institutions in ways that overcome the isolation so predominant in our society.

What are the institution's community building practices? What types of programs are in place to build and foster mission-centered community? For example, how are new members welcomed? What is the content of their orientation to the community, its values, mission, and vision? Who does the orienting? People who are representative of the broad university community? Those who have direct functional responsibility, such as HR personnel, directors of mission integration, deans of chapel, senior administrative staff? Is the orientation a one-off event or ongoing? If the latter, for how long? Through the first year? Until tenure for members of the faculty? Does the formal orientation program get co-opted?

Let me give you an example. Say a finalist for a new faculty appointment is invited to campus. Members of the search committee and the department are very enthusiastic about this candidate for any number of reasons. The candidate is extremely well qualified – excellent teacher and researcher, impeccable references, and so on. Some members of the department realize that while the candidate is not hostile to the religious affiliation of the university, it is clear that she places no importance on this and might even be a bit dismissive of the Christian character and identity of the institution. In order to make sure that the candidate has the best possible chance of being offered the position, these individuals make sure she knows that she will need to address the way

in which her teaching and scholarship are compatible with the Christian character of the university and will further the university's mission. They provide a bit of coaching so that she's able to answer positively and persuasively, but they also assure her that this is just a hoop she needs to go through in order to be hired. They also assure her that once on board, members of the department will help her negotiate the question of commitment to mission through the tenure process, and make it clear that as a department they believe their responsibility is limited to the part of the mission that focuses on academic and scholarly excellence. The members of this department are co-opting the values and mission of the institution. Other examples in Academic Affairs might focus on faculty governance issues, curricular design, post-tenure review processes, criteria for decisions about suitable research, the proverbial faculty-administration adversarial divide, and so on.

Another functional area to consider is Student Affairs. This is probably the area where the most significant thought has been given to both issues of compliance and issues of ethics, though for the most part, the focus is on student conduct not employee conduct. There are student codes of conduct, criteria for recognizing student organizations, policies and procedures that govern residential life, and so on. That said, it is important to make certain that these are part of a comprehensive, institution-wide effort targeted at mission integration and organizational ethics.

What about processes and procedures for recruitment, orientation, and retention of board members. What are the criteria for recruiting board members? Who is involved in the recruitment process? Is it transparent? How are board members oriented to the institution and its values, mission, vision, and identity? What procedures are in place to ensure that they understand, accept, and will exercise their fiduciary responsibilities and legal obligations? Are there mechanisms in place to remove them if they fail to meet these responsibilities and obligations? Attending to governance issues is crucial to sound organizational ethics.

On the administrative level attention is given to the business affairs of the institution. Functionally, a business affairs or administrative division is usually responsible for design and implementation of compliance policies and procedures as well as compliance and ethics training programs. But there are other issues to consider as well. How are annual reviews conducted? Are they mission centered? Are they fair and just? Are they viewed as a hoop to jump through or do they by design foster true human flourishing among members? On the finance side, the issue of financial aid, which has both compliance and ethics implications, must be considered. Questions about the criteria for making investments and choosing investment partners need to be asked. Another area of concern is the relationship of donors to the institution. Are relationships with them simply transactional – once they've contributed to the capital campaign they're off the radar screen until the next campaign – or are real relationships built with them? Relationships with donors lead to questions about criteria for vetting donors or returning funds or removing a donor's name from a building or program? For a number of institutions this moved from a hypothetical question to a real problem with the conviction of high profile business people whose names were prominently displayed on buildings, athletic fields, auditoriums, and other areas of campus.

What about issues of honesty and integrity closer to home? How are issues of academic integrity handled? Take plagiarism for example. In the context of adopting best practices, a range of questions come to mind. They include the following, which is not an exhaustive list:

How comprehensive are the policies and procedures that deal with plagiarism? Do they reflect the values and mission of the institution? Are they presented in clear and unambiguous language? Are the consequences of engaging in plagiarism made clear? Are the policies known and understood by all members of the university community? What are the means used to disseminate the policies? Do all parties understand their responsibilities vis-à-vis the plagiarism policy? Are the policies applied in a uniform and consistent manner by faculty and administrators, or do some faculty and administrators respond to incidents of plagiarism in ways that undermine or co-opt to policies? Do the policies, themselves, create loopholes?

A quick perusal of university websites shows that while there are some common elements in college and university policies on plagiarism, there can be wide variations. This is true even among member institutions of the Lilly Fellows Program. Many, but certainly not all, have honor systems that explicitly identify academic dishonesty and plagiarism as violations of the honor system and clearly state the penalties for those violations. In some institutions, policies are directly connected to the religious values, charism, and mission of the institution. Other institutions explicitly connect plagiarism with Christian character formation or identify it as an offense against the commandment prohibiting stealing. That said, there is significant variance in the comprehensiveness of policies that I examined. Here I must note that it wasn't an exhaustive study. The search was limited; only four or five keyword searches, such as academic honesty or integrity, plagiarism, and honor code were used, and I didn't go down more than five levels on a website.

Though all the policies included a basic dictionary definition of plagiarism, there were marked differences. Some make explicit reference to both published and unpublished works while others only mention published works. Then there are those that make clear that plagiarism can go beyond words and extend to images, charts, data sets, and so on. Others distinguish between intentional and unintentional plagiarism, while still being clear that from a technical perspective, unintentional plagiarism remains a violation and can result in the same sanction as intentional plagiarism. Some policies address paraphrasing in detail so students are able to distinguish between appropriate paraphrasing and inappropriate paraphrasing. Other areas of difference include explicit mention of cutting and pasting from the internet, copying from other students, submitting the same paper in more than one course without permission of the faculty, submitting a paper written by someone else, and seeking assistance from another for grammar, spelling, punctuation without including an acknowledgment – though here, there was at least one policy that noted this did not apply to seeking help from the writing center unless to do so was explicitly forbidden by the instructor. A number of policies require faculty to be explicit about plagiarism and other forms of academic dishonesty in preparing syllabi and class assignments. For example, they are required to include definitions of authorized and unauthorized collaboration in syllabi. From a best practices perspective, the more clarity there is about what constitutes plagiarism – or other violations of academic integrity for that matter – the better. This is not only for the sake of students, but also for the sake of those who are responsible for enforcing the policy.

Clarity about the consequences of engaging in plagiarism is also essential. This not only includes clear delineation of sanctions but also such things as notations in the student's permanent record and when, if ever, such notations are expunged. While not common, there were a few policies that warned of potential revocation of degrees or the impact on letters of recommendation for employment or further academic work. Adjudication and appeal processes also need to be presented in a clear and thorough manner. Doing so is an issue of justice and fairness for all members of the academic community; it also helps to insure that the overall process is in compliance with FERPA and any other applicable state or federal laws regarding due process and confidentiality.

One area in particular that can lead to confusion and/or the perception of unfairness occurs in the arena of faculty discretion. A few examples might be helpful here. Some policies state that an individual faculty member may establish his or her own policy as long as it is included in the syllabus. If my policies are less strict than another faculty member's policies, I might be perceived by students and colleagues alike as disinterested in academic integrity. If it's the other way around, then I might be considered too rigid and uncompromising. The possibility of pressure being brought to bear on an individual faculty member is also increase in these types of situations. Such pressure might come from students, faculty or administrators. The same thing can be said about policies where sanctions for engaging in plagiarism are left to the discretion of the instructor or the instructor has the discretion to reduce the usual penalty and determine whether or not to report an incident of plagiarism. So, do the policies themselves create loopholes?

For example, some institutions only require professors to report incidences that they believe to be intentional plagiarism, others only require reporting of incidences in which the student received a zero for the assignment; at these institutions, an incident would not be reported if the professor either believed that the plagiarism was unintentional or required the student resubmit the assignment before grading it. Such a policy has the potential of enabling a student to violate the policy repeatedly. The strongest policies avoid such potential loopholes. They are presented in clear and unambiguous language and widely promulgated. They delineate the particular responsibilities that each member of the community – student, faculty, or administrator – has for adhering to and/or enforcing the policy. The institutions also provide all involved with resources needed to enable them to meet those responsibilities. For students, this might be formal classes or informal presentations and tutorials. For faculty, it might be professional development workshops focusing on such things as designing assignments that avoid or limit incidences of plagiarism. Finally, a best practice approach will include on an ongoing basis evaluation, assessment, and if needed, modification of the policy.

If time permitted, we could look at other functional areas, but since I only have a few minutes left, I'd like briefly to consider institutional decisions making processes. Are they comprehensive? Are all necessary voices heard from? Do decision making processes address the reality of the situation? In other words, are the proper questions being asked? Are consequences considered, particularly foreseeable, unintended consequences? Are mental models and biases identified? What about transparency in the decision making process? Are decision making criteria clear, consistent, and in line with institutional values, mission, and vision?

The example here, which unfortunately had tragic consequences, is the 1999 bonfire collapse at Texas A&M University in which 12 students died. In its Final Report, the commission that investigated the causes of the collapse concluded:

The physical failure and causal factors were driven by an organizational failure. This failure, which had its roots in decisions and actions by both students and University officials over many years, created an environment in which a complex and dangerous structure was allowed to be built without adequate physical or engineering controls.

This organizational failure is complex but includes such things as the absence of an appropriate written design or design process, a cultural bias impeding risk identification, and the lack of a proactive risk management approach.⁷

The complexity of organizational failure is detailed in the report, which is forthright in correcting both misperceptions about the causes of the collapse and misplaced blame. What is of import for our purposes is the conclusion of those doing the behavioral analysis. "While no one person is responsible for the collapse, the aggregate effect of actions and decisions by students and University officials over many years created the physical conditions that made the collapse possible."⁸ The Commission found that Texas A&M "does not have a proactive risk management approach for student organizations. ... [It] has a culture that instills bias and tunnel vision in decision making."⁹ An effective, ongoing, mission-centered ethics program will help to militate against such a culture.

While we've considered a wide range of functional areas, our examination has not been all-inclusive. There are many other areas of university life that need to be considered in order to insure that compliance and ethics training programs are comprehensive.

In conclusion, I would like to say that in the context of any educational institution, but particularly our church-related institutions, it is imperative to model what we teach in our classrooms about service to the common good. What convinces me that adopting a best practices approach is appropriate for academic institutions is that such practices insist on attending to mission driven institutional culture. This creates an environment where students, faculty, staff, and other constituencies are not in doubt about expectations, which are quite clear: At this University we walk the talk.

It is impossible to guarantee complete compliance to relevant laws and regulations. It is also impossible to guarantee complete adherence to ethical codes and standards. What is possible is the creation of a mission driven institutional culture with an integrated, proactive risk management approach. Successfully creating and fostering such a culture takes a great deal of time – which, I recognize, means money – and requires a firm commitment by all involved. It also takes leadership – from the bottom as well as the top. It is not the easiest of tasks, but it is a task well worth doing. Thank you for your attention.

⁷ Special Commission on the 1999 Texas A&M Bonfire, "Final Report," May 2, 2000, p.4. Found at <http://209.189.226.235/bonfire/storyarchive/may2000/Final.pdf> Accessed August 8, 2012.

⁸ Ibid., p.35.

⁹ Ibid.