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Exploring Small Business Strategies to Comply With the Foreign Corrupt Practices Act

John Palmer
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Walden University

College of Management and Technology

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John Palmer

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Walden University
2016

Abstract

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by

John Palmer

MBA, Monterey Institute of International Studies, 1998

BA, University of Phoenix, 1996

Doctoral Study Submitted in Partial Fulfillment

of the Requirements for the Degree of

Doctor of Business Administration

Walden University

December 2016

Abstract

U.S. aerospace companies are estimated to lose more than \$25 billion in international contracts per year due to bribery. These losses create Foreign Corrupt Practices Act (FCPA) compliance strategy challenges for U.S. aerospace companies' management. The purpose of this single case study was to explore strategies that U.S. aerospace small business leaders use to comply with the FCPA. The conceptual framework for this study was the regulatory compliance conceptual model, which suggests that small business leaders must gain deeper insight into how corporate compliance policies address the FCPA requirements. The target population for this study was leaders of a small U.S. aerospace company in California. Data collection included semistructured, face-to-face interviews with 7 business managers and an archival exploration of internal company documents related to FCPA compliance. The data analysis process used thematic analysis, including methodological triangulation, to identify 4 themes: continuous FCPA compliance training, interactive management, compliance with cultural norms, and qualifying opportunities for FCPA compliance. These themes highlighted practical strategies for compliance with the FCPA, which are essential in achieving international business contracts. Small U.S. aerospace businesses must consider these 4 themes when developing corporate compliance directives with the FCPA. Better international business ethics through compliance with the FCPA will facilitate positive social change by reducing corporate operational costs and creating jobs, which improve the quality of life and well-being of people in the local communities.

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Section 1: Foundation of the Study

Compliance with the Foreign Corrupt Practices Act (FCPA) is a significant business issue in the United States (Cleveland, Favo, Frecka, & Owens, 2010). The U.S. Congress enacted the FCPA in 1977 to criminalize corruption and to enhance the corporate image of U.S. corporations in global markets (Feld, 2013). The intent of the FCPA is to eliminate illegal foreign business transactions, but the leaders of small U.S. companies conducting business with a foreign government continue to have questions related to obtaining or retaining business with a foreign government (Yockey, 2013). Leaders at U.S. companies encounter vague areas in the FCPA provisions; this vagueness results in misinterpretations of FCPA rules, FCPA violations, and significant penalties (Alemu, 2013; Jennings, 2013; Yockey, 2013). Without proper oversight by the U.S. government, business transactions between U.S. companies and international governments can also lead to noncompliance with FCPA provisions (Nadipuram, 2013; Wedeman, 2013).

Background of the Problem

In 2007, U.S. industries increased global product transactions by more than \$1.4 trillion (Das, 2010). Global product sales expose U.S. companies to business activities with people from various cultures and with different values, norms, and regulations (Baughn, Bodie, Buchanan, & Bixby, 2010). Fierce competition to provide global products has led the leaders of multinational corporations to bribery on a large scale, with global business bribery estimated at \$1 trillion a year in 2002 (Eigen, 2013; Graycar & Sidebottom, 2012; Hess, 2009). Based on the most recent U.S. international contracts

loses information available, from 1994 to 2001, U.S. companies lost an estimated \$200 billion in international business contracts to foreign competitors that allegedly paid bribes to win contracts (Darrough, 2010).

Bribery and corruption have significant consequences: Global business bribery negatively affects the economic growth of businesses, and corruption leads to an anticompetitive environment (Smith, Gruben, Johnson, & Smith, 2013). World Bank analysts estimated the cost of corruption at \$2.6 trillion annually, which is more than 5% of global gross domestic product (GDP; Cleveland et al., 2010). The objective of international antibribery laws and organizations such as the FCPA, the United Nations Convention Against Corruption (UNCAC), and the Organization for Economic Cooperation and Development (OECD) is to eliminate global corruption (Cleveland et al., 2010). U.S. Congress enacted the FCPA in 1977 in response to the U.S. companies including Lockheed and General Electric allegedly bribing foreign government officials, politicians, and political parties to gain government contracts (Cascini, DeFavero, & Mililli, 2012). Since the FCPA entered into effect, U.S. companies must comply with the FCPA requirements and not use bribery to obtain international business contracts (Cascini et al., 2012). However, noncompliance issues remain; for example, a recent FCPA violation resulted in a \$1.6 billion penalty to Siemens (Fox, 2010). Some U.S. small business organizations have indicated that they lack strategies to ensure FCPA compliance (Yockey, 2013).

Problem Statement

Estimates of international bribery are \$1 trillion per year, and estimates of the costs of global corruption range as high as 20% of the value of world business transactions (Nadipuram, 2013). In 2009, U.S. companies lost more than \$25 billion in international contracts due to foreign competitors using bribery and corrupt practices (Nickerson, 2011). The general business problem is that U.S. aerospace companies must operate competitively in the global market and comply with the FCPA, but enforcement of the FCPA by the U.S. Department of Justice does not occur in international settings for non-U.S. companies. The specific business problem is that some U.S. aerospace small business leaders lack strategies to comply with the FCPA.

Purpose Statement

The purpose of the qualitative single case study was to identify the strategies U.S. aerospace small business leaders use to comply with the FCPA. The study population consisted of leaders of a small U.S. aerospace company in California operating in the international market that had an absence of penalties, a good international business record of accomplishment, and successful compliance with the FCPA at the time of the study. The selected population was appropriate because these leaders were part of California's aerospace industry, which represents 47% of the aerospace industry engineering and product development in the United States (U.S. Department of Labor, 2012). The findings of this study showed successful small business strategies for FCPA compliance. Reducing crime in business transactions results in an improvement in the safety of people and organizations, reduces the cost of conducting business, and improves the quality of

life for individuals and communities (Lestrangle & Tolstikov-Mast, 2013; Lord, 2013). This suggests that applying these findings will lead to reductions in the cost of conducting global business and may lead to an increase in the number of U.S. aerospace jobs while also demonstrating social integrity.

Nature of the Study

I used a qualitative case study design for this study. Qualitative research was suitable for the study because the goal of the study was to identify strategies participants used to comply with the FCPA. A qualitative researcher studies a phenomenon in the related context of an experience (Sharma & Aniket, 2014; Yap & Webber, 2015). A quantitative methodology was not suitable for the study because this research did not involve comparing or analyzing variables. A quantitative methodology is suitable for analyzing a relationship between variables (Gelei & Dobos, 2014; Macur, 2013). A mixed methods methodology was not suitable for the study because the quantitative aspect was not designed to address participants' experiences with FCPA compliance strategies, and did not require hypothesis testing.

Three qualitative research design options were evaluated: phenomenology, ethnography, and case study design. For this study, I decided that the case study design was the appropriate choice because the research consisted of studying individuals' FCPA compliance strategies through semistructured interviews. Researchers use a case study design to explore a program, event, or person in depth for a particular amount of time to determine real-life experiences regarding a specific phenomenon (Leedy & Ormrod, 2013). The ethnography design was not suitable for the study because this research did

not include lengthy observations of participants. The ethnography design encompasses extended fieldwork involving observation and cultural interactions within members of a group (Wagar, 2012). The phenomenological design was not suitable because participants' perspective and views of the FCPA were not part of this research.

Researchers use the phenomenological model to understand participants' perspective and opinions of a phenomenon (Leedy & Ormrod, 2013).

Research Question

The research question for the study was as follows: What strategies do U.S. aerospace small business leaders use to comply with the FCPA?

Interview Questions

The qualitative single case study included the following open-ended interview questions to collect data:

1. What strategies do you use to comply with the FCPA?
2. What recent changes have you made in your company policies to improve compliance with the FCPA?
3. What does leadership consider essential for FCPA compliance?
4. What action plan considerations would ensure continued success with FCPA compliance?
5. What other pertinent information do you see that we have not covered in this interview?

Conceptual Framework

The conceptual framework for this study was based on the regulatory compliance theoretical model (Sutinen & Kuperan, 1999) and the corruption conceptual model (Becker & Stigler, 1974). The regulatory compliance and the corruption conceptual models served as a conceptual reference and lens to identify the FCPA adherence strategies needed by U.S. aerospace small business leaders. The regulatory compliance conceptual model served as a theoretical lens for understanding strategies used by executives to comply with the FCPA. The corruption conceptual model provided a theoretical underpinning to gain deeper insight into how indicated strategies address the FCPA requirements.

The key tenets of the regulatory compliance conceptual model are: (a) costs and the revenues from illegal behavior, (b) the moral obligation of behavior, and (c) social influence associated with criminal behavior (Sutinen & Kuperan, 1999). The key constructs underlying the corruption model are (a) government structure influence, (b) cultural influence, (c) corporate profits, (d) government officials' self-interests, and (e) strategies for FCPA compliance (Becker & Stigler, 1974). As applied to this study, the propositions advanced by the regulatory compliance conceptual model and corruption model established the framework needed for me as the research to use it as the theoretical foundation for interpretation and analysis of participants' experiences with strategies for FCPA compliance.

Operational Definitions

Foreign Corrupt Practices Act (FCPA): A U.S. antibribery law passed by U.S. Congress in 1977, prohibiting U.S. citizens and organizations from providing payments to foreign government officials to obtain or retain business contracts (Cascini et al., 2012; Feld, 2013).

Foreign Corrupt Practices Act (FCPA) compliance: Abstaining from bribing government officials in foreign countries to gain business opportunities, in compliance with the FCPA (Virginia & Maurer, 2013). *FCPA strategies*: Corporate, organization, or small business plans created by executives and leaders to comply with the FCPA (Lestrangle & Tolstikov-Mast, 2013; Yockey, 2013).

Small aerospace company: In the context of this study, a U.S. aerospace company with 500 employees or less (U.S. Small Business Administration, 2014).

Assumptions, Limitations, and Delimitations

Assumptions

The assumptions of a study usually relate to the research techniques employed in the research and are the sentiments of what the researcher believes to be true for the study, but are not verified (Leedy & Ormrod, 2013). The first assumption was that the qualitative single case study is a useful design to explore the FCPA strategies used in U.S. aerospace small businesses. The second assumption was that data saturation would occur during interviews with the management of one small aerospace company in California. The third assumption was that executives participating in the interview process would accurately convey their strategies for FCPA compliance. The fourth

assumption was that the interview participants would represent an appropriate cross-section of the U.S. small-business aerospace industry population.

Limitations

The limitations of a study include the research approaches used in the study (Leedy & Ormrod, 2013). Limitations are potential research weaknesses over which a researcher has no control (Bouzon, Augusto, & Manuel, 2014; Marshall & Rossman, 2011). The potential bias namely due to the desire to protect confidential company information of participants during the interview, as well as the possible lack of recollection of experiences with the FCPA, may have been a limitation of the study. The mitigation of this limitation consisted of asking follow-up questions to clarify and to help participants' recollection of FCPA compliance experiences.

Participants' potential concerns about a connection between personal identity and the information disclosed during the interview might have represented a limitation of the study. To mitigate this limitation, participants received a signed consent form before the interview that listed the steps being taken to ensure participant anonymity (see Appendix A).

Another limitation was been the small sample from a small aerospace company. To mitigate this limitation, the corporation selected for gathering data was a successful aerospace company in the United States operating in international markets.

Delimitations

Delimitations refer to the boundaries established by a researcher (Leedy & Ormrod, 2013). Marshall and Rossman (2011) described study delimitations as the design

parameters that researchers control, such as the location and scope of a study. The first delimitation of the study was geographical: Due to the limited time and financial resources available, only U.S. aerospace companies located in California comprised the population for this study. The second study delimitation was the research scope: The number of participants in the interviews consisted of five to seven executives in a small aerospace business experienced with FCPA compliance. The third delimitation of the study was the restriction of the study to the U.S. aerospace industry: The FCPA compliance strategies used in other industries were not part of the study. The fourth delimitation of the study was the curtailing of the research to a small company size: The study included an examination of only one small U.S. aerospace company with international trade experience and has 500 or fewer employees.

Significance of the Study

This study was designed to generate information of interest to small business leaders wanting to obtain and maintain international business contracts. The FCPA compliance strategies identified, if followed, are expected to lead to a reduction of FCPA violations during the pursuit and fulfillment of international contracts. The analysis of gathered data included identified strategies for FCPA compliance that may result in the reduction of law ambiguities. Reducing ambiguities in FCPA compliance may influence the legality and positive social presence of small business operations in the global markets.

Contribution to Business Practice

Compliance with the FCPA helps to reduce costs of operation, improve profits, equalize competition, and enhance the competitive nature of conducting international business (Lestrange & Tolstikov-Mast, 2013; Lord, 2013). Adapting strategies for FCPA compliance is expected to increase profits and decrease costs for U.S. aerospace corporations. Violations of the FCPA, however, cost corporations and shareholders more than the benefits gained from bribery, including decreased profits, increased costs of doing business, and wasted business opportunities (Choudhary, 2013). The findings from this study are expected to contribute to knowledge on avoiding bribery and corruption in international markets. The identified strategies from this study, if implemented, are expected to decrease the business challenges faced in adhering to the FCPA. Using the strategies discovered during this study is supposed to reduce the cost of conducting international trade.

Contribution to Social Change

The results from this study are expected to lead to improvements in corporate ethical standards in international trade practices by reducing contract corruption and increasing compliance with the FCPA. Decreasing contract corruption is expected to result in reduced corporate operational costs. Reduced operational costs are expected to lead to additional jobs in the industry, which possibly improve the local economy. Complying with FCPA mandates reduces business corruption. A decrease in corruption frees small business funds. The freed additional funds and a corporate culture that emphasizes compliance with laws are expected to positively affect small businesses and

affect quality of life in the local business community. Lestrangle and Tolstikov-Mast (2013) and Lord (2013) indicated reducing business transactional crime through FCPA compliance creates a safe environment for conducting business, reduces costs, and creates jobs, which results in a positive social change.

Review of the Professional and Academic Literature

Writing a comprehensive review of a research topic by examining related literature involves developing a plan, obtaining the proper business orientation, and emphasizing relatedness to the research (Leedy & Ormrod, 2013). Literature reviews start with an exhaustive review of published papers on the research topic to provide new perspectives on the themes of the study (Ergazakis, Metaxiotis, & Askounis, 2013; Wolfswinkel, Furtmueller, & Wilderom, 2013). The literature review in this study involved a comprehensive evaluation of the Walden Library databases to find articles and seminal works related to FCPA compliance topics and subtopics. Of the 313 references used, 307 were peer-reviewed articles (i.e., 98% of the cited references are peer-reviewed articles) and 272 had a publication date of 2012 or later. Therefore, 87% of the cited references were peer-reviewed articles published within 5 years old of the anticipated graduation date, meeting university standards for recent research.

The literature review consisted of two parts. The first part of the literature review discussion includes the databases and indexes searched using FCPA compliance, bribery, and corruption terms. The first part also includes a resources table of the exhaustive literature search and a figure of the main topics and subtopics of the literature review.

The second part of the literature review includes the synthesized analysis of peer-reviewed articles and seminal work related to identified topics and subtopics in the figure.

Literature Search Strategy

The literature search strategy used in this study started with keyword searches and then subject term searches. The keyword and subject term searches included (a) foreign, (b) foreign corruption, (c) Foreign Corrupt Practices Act, (d) corruption, (e) international business, (f) FCPA compliance strategies, (g) bribery, (h) fraud, (i) anticorruption laws, (j) fraudulent, (k) U.S. aerospace industry, and (l) California aerospace industry.

Keyword and subject term searches using the Walden Library online databases helped in obtaining peer-reviewed articles and scholarly materials relevant to the concepts of the study. The Walden Library databases searched included ProQuest, Academic Search Complete, ABI/INFORM Global, PsycINFO, Education Research Complete, ERIC, ScienceDirect, Emerald Management Journals, SAGE Premier, and Business Source Complete.

The first searches of the databases using keywords generated 5,105 articles, dissertations, books, and other materials related to the topic area and research process. Narrowing the search to only peer-reviewed articles focused on the FCPA and articles focused on aerospace industry compliance with FCPA issues reduced the number of relevant articles to 304 items. Consequently, the second subject term searches yielded 98% of the peer-reviewed article, with 86% of the peer-reviewed articles published in 2012 or later. Table 1 includes the number of resources reviewed, including peer-

reviewed journal articles, dissertations, books, reports, newspapers, websites, and corporate information related to strategies for complying with the FCPA.

Table 1

Details of Literature Reviewed by Year of Publication

Literature Type	1961-2011	2012	2013	2014-2016
Peer-reviewed journal articles	139	169	201	287
Dissertations	60	50	68	100
Websites	30	50	110	175
Books and reports	25	68	80	113
Newspapers and editorials	80	105	130	280

The purpose of this study was to explore the strategies used by U.S. aerospace small business leaders to comply with the FCPA. The following section includes a description of the literature related to the regulatory compliance theoretical model and the corruption model. The following section also includes the literature review structure and synthesis of reviewed articles related to the research question.

Regulatory Compliance Theoretical Model

Sutinen and Kuperan (1999) first developed the model of regulatory compliance to account for the costs and the revenues from illegal behavior, as well as the moral obligation and social influence associated with criminal behavior. Malik's (2014) regulatory compliance model showed that selective forgiveness of noncompliance is optimal when the firm exerts a high level of compliance efforts. Yockey (2013) noted the FCPA is vague and often confusing about what qualifies as legal and illegal international business transactions under the FCPA.

Hamilton (2012) maintained the regulatory compliance model functions because people comply with the regulations and do the right thing. Hamilton indicated regulatory compliance systems rely on the auditor's review priorities and the appropriate penalties imposed for noncompliance. Méndez (2014) maintained that individual desires for unjust enrichment are the main factors that undermine regulatory compliance.

Joseph, Ngoboka, Mutebi, and Sitenda (2012) based regulatory compliance successes on social values such as individual judgment, decision-making, and moral calculus. The socioeconomic context of a country affects regulatory compliance (Blackman, 2012). Governments of developing countries encourage industrial growth over compliance; the intent is to remedy noncompliance with global industry regulations (Blackman, 2012). Regulatory oversight influences regulatory compliance through the rigorous government monitoring, enforcement, and prosecution of violators of government compliance standards (Mande, Ishak, & Idris, 2014).

Corruption Model

Becker (1968) first discussed the corruption model in an essay on the economy of crime and punishment and used economic analysis to develop governmental policies for law enforcement officers to combat illegal behavior. Becker and Stigler (1974) presented the concept of the corruption model by showing that corruption occurs due to poor law enforcement. Becker and Stigler also indicated the violation of a law is a partial failure of the law. Bowles and Garoupa (1997) complimented Becker and Stigler's idea by illustrating how the effectiveness of the government enforcement system diminishes when the amount paid in bribes for a crime is less than the punishment for the offense.

Bowles and Garoupa extended the economic model of crime to include the process of bribing a police officer for not disclosing the identity of a criminal.

Tullock (1996) based the corruption model on the premise that paying bribe fees is usually less than paying required tax charges. Additionally, Tullock indicated the complexity and ambiguity of the antibribery laws invite noncompliance with anticorruption rules. The majority of people object to bribery on moral grounds without considering that practical efforts such as corporate rent seeking, and complex governmental laws could lead to corporate bribery to bypass local antibribery statutes (Tullock, 1996). Furthermore, Tullock noted corporate funds received by a government official as compensation for performing a task for the corporation are appropriate fees; however, there is no differentiation between rent-seeking payments and bribes. Pillay and Kluvers (2014) implied a country's economic perspective, regulative structures, government efficiencies, culture, and organization structures influence the levels of corruption in that country.

Pillay and Kluvers (2014) used the institutional model to describe the influence of organizational structure on corrupt actions. Eigen (2013) and Waldman (1974) defined corruption as officials' public misuse of the position to violate existing legal norms in the country for personal gain. Waldman also indicated that business leaders participating in corruption in a foreign country fall into four social categories: immoral, antagonist, revisionist, or pragmatic.

The main topics of the literature review are FCPA compliance strategies, a synopsis of the literature, culture and corruption, self-regulation and corruption, and

anticorruption laws and local governments. The literature review includes other subtopics, such as corporate FCPA internal compliance processes and self-regulation. The subtopics of corruption history and significant topics related to the FCPA study explain the development of strategic compliance with the FCPA. Other topics presented are the crime and culture subtopics, including a country's culture and corruption, company culture and corruption, and the relationship between wealth and corruption.

Methodologies

To identify the suitable research methodology, an evaluation of the quantitative, mixed, and qualitative methods was necessary. Based on the problem statement and the literature reviews of similar studies, the qualitative methodology was the appropriate method for this study. Yeoh (2012) applied the qualitative research methodology to analyze the bribery act implications and compliance expectation from regulated firms in the United Kingdom and the U.K. Bribery law expansion on FCPA expectations. Karhunen and Kosonen (2013) applied a qualitative methodology approach in a study of the strategic responses of foreign subsidiaries to host-country compliance with anticorruption laws. Dhaher (2013) used the qualitative research methodology to study the Palestinian Authority telecommunications regulation compliance with international anticorruption laws. Dhaher, Karhunen and Kosonen, and Yeoh implemented the qualitative research methodology in similar studies, which supported the selection of the research approach for this study.

Literature Review Structure

The literature review structure for this study consisted of topics and subtopics related to FCPA compliance strategies. Critical analysis and synthesis of peer-reviewed articles related to the FCPA compliance strategies presented in the following paragraphs.

Figure 1 indicates the structure of the literature review.

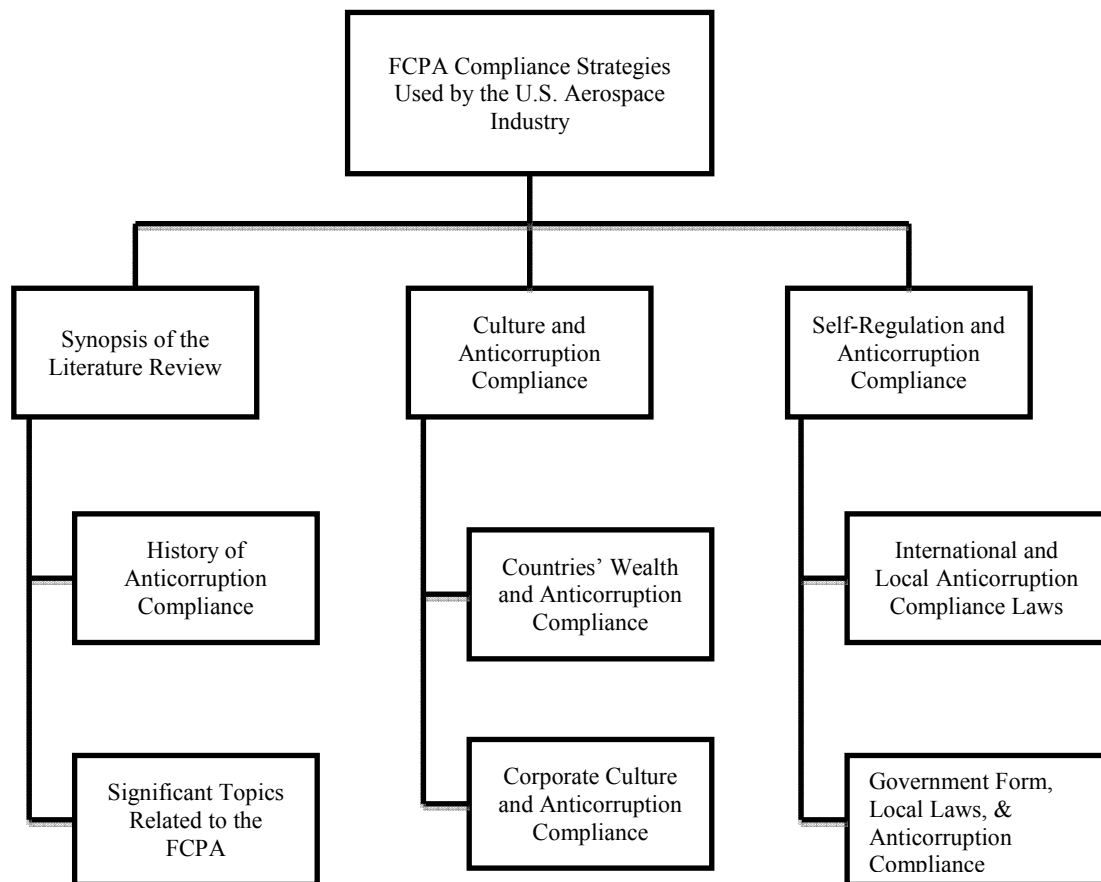


Figure 1. A flowchart showing the structure of the literature review.

FCPA Compliance Strategies Used in the U.S. Aerospace Industry

The present FCPA and related amendments include general ambiguities, and international governments do not adequately enforce the FCPA laws (Barker, Pacini, & Sinason, 2012; Darrough, 2010). U.S. aerospace industry exports comprise 6% of total

U.S. exports (U.S. Census Bureau, 2012). The FCPA regulations significantly affect U.S. exports, which amounted to \$2.20 trillion in exports in 2012 (U.S. Department of Commerce, 2013). Recent penalties imposed on the U.S. aerospace companies for violating the FCPA prompted a need to examine the complexity of compliance instructions for the FCPA (Cascini et al., 2012; Fox, 2010). U.S. industry leaders have debated the need to make changes to the FCPA (Barker et al., 2012; Fraser, 2012; Yockey, 2013). The following synopsis of the literature review includes a list of key areas examined to ensure a clear understanding of the factors that influence global business bribery and identify strategies used to comply with the FCPA.

Synopsis of the literature review. After a thorough review of more than 220 peer-reviewed articles related to the problem statement at the Walden University Library, the following researchers emerged as establishing the literature underpinnings of this study. Cascini et al. (2012), Klinkhammer (2013), Sanyal and Samanta (2011), and Vanasco (1999) discussed the origination of the FCPA and the penalties related to violations. Lord (2013) and Nell (2009) identified the relationship between governments' types and fighting noncompliance with anticorruption laws. Weismann, Buscaglia, and Peterson (2014) established that corporate leaders using the self-regulatory model of corporate governance failed to comply with FCPA and to eliminate corruption in related organizations.

Huang and Rice (2012) and Wedeman (2013) discussed the difficulties of identifying international business bribery committed by multinational companies and the lack of clear guidelines for management on how to deal with noncompliance with FCPA.

The literature review in this study encompassed an analysis of the lack of effectiveness of the FCPA in reducing or eliminating international business corruption, using severe penalties imposed on U.S. companies for FCPA violations. The literature review also included a review of articles related to global governments' involvement in fighting crime, corporate self-regulations of corruption, and difficulties identifying international noncompliance with the FCPA.

To ensure the completeness of the literature review, an extensive review of related studies and relevant literature to the research topic is necessary (Moustakas, 1994). The literature review included an extensive research of the Walden University Library databases, including ProQuest, Academic Search Complete, ABI/INFORM Global, and PsycINFO. Furthermore, the literature review included an exhaustive study of Walden University Education Research Complete, ERIC, ScienceDirect, Emerald Management Journals, SAGE Premier, and Business Source Complete databases. Other databases searched included Google Scholar and local library databases on international business corruption. A literature review involves examining books, websites, and peer-reviewed studies related to the research question (Leedy & Ormrod, 2013). The literature review included major topics related to complying with the FCPA and international business corruption and includes support an annotated bibliography of related peer-reviewed reference articles.

This study involved reviewing interpretations of FCPA compliance factors applied in the U.S. aerospace industry and more specifically in the small-business aerospace industry in California. This research involved identifying a set of

interpretations of the FCPA factors directly related to the small-business aerospace industry for fair international market share. Akbar and Vujic (2014), Bierstaker (2009), and Eisenbeib and Brodbeck (2014) explored the relationship between cultures, corruption, and different attitudes toward compliance with antibribery laws. Results of such studies showed corruption and noncompliance with the FCPA are more culturally acceptable in Eastern countries than in Western countries, and Asian company executives are likely to engage in bribes when managers encounter significant market competition.

The U.S. aerospace companies compete with Asian companies within Asian markets. U.S. Companies are required to comply with the FCPA law when pursuing international business. However, the FCPA law has limited reach to foreign companies that are not listed on the U.S. Stock Exchange. The FCPA and related amendments bound U.S. companies, but not Asian based companies that are not registered on the U.S. Stock Exchange (Feld, 2013). Other areas of consideration are good government and the effects of local laws on the enforcement of global anticorruption laws in corresponding countries (Koike, 2013; Nathanson, 2013). International countries' local laws lack the power needed to enforce global anticorruption laws (Cuervo-Cazurra, 2008; Gao, 2011; Koike, 2013; Sanyal & Samanta, 2011). The form of government significantly affects the enforcement of local antibribery laws (Bryane & Mendes, 2012; Ntayi, Ngoboka, & Kakooza, 2013; Weismann et al., 2014).

Multiple studies have shown positive correlation relationships between a country's wealth, compliance with anticorruption laws, and corruption (Abdulai, 2009; Mujtaba, Williamson, Cavico, & McClelland, 2013; Schofield, 2009). For example,

bribes are higher in developing countries than in developed countries (Abdulai, 2009). Bierstaker (2009), Hess (2009), and D. Watson and Watson (2013) established a relationship between corporate culture and corruption, where corporate behavior in developing countries is a major factor that influences corporate crimes. Abdulai (2009), Akbar and Vujic (2014), and Hess (2009) illustrated the relationship between organizational culture, local laws, country wealth, and country culture. Koike (2013), Schofield (2009), and Varottil (2013) discussed culture influence on the interpretation and compliance with FCPA and the acceptance or elimination of corruption in a country.

The established relationships between corporate culture, local laws, country wealth, and country culture influence the construct of the type of FCPA changes. The FCPA changes are necessary to ensure the success of the California aerospace industry in international markets. The literature review process involves focusing on the review and evaluation of research conducted by others on the topic under study (Leedy & Ormrod, 2013). The focus of the literature review in this study was the examination of articles related to the research question on the FCPA modifications needed by U.S. aerospace companies in California.

History of anticorruption compliance. Corruptions, noncompliance with anticorruption laws, and misuse of position power have occurred throughout history (Singh & Singh, 2012). Corruption has existed since the development of a structured, institutionalized society with leader–follower relationships (Singh & Singh, 2012). Corruption also existed in the Egyptian Paranoiac era in 3000 B.C. and came through the people’s offerings to the rulers (Warner & Scott, 2011). Greek philosophers such as Aristotle and Plato referred to corruption in the Greek Classical era (Singh & Singh, 2012).

Corruption was documented in 30 B.C. in the Roman Empire, which occurred through increased taxation on peasant farmers, by the ruling class (DeLorme, Isom, & Kamerschen, 2005). The Roman governments changed from a democratic form of government to increased misconduct through the rent-seeking behavior of the emperor with virtually no compliance to anticorruption laws (Warner & Scott, 2011). The corruption of the ruling class in the Roman Empire and the lack of a strategy to create and comply with anticorruption laws were some of the factors that attributed to Roman Empire’s failure in 476 A.D. (Warner & Scott, 2011). The Byzantine Empire also had significant corruption and virtually no compliance with anticorruption laws, which resulted in the loss of purpose and direction during the period between 1042 through 1050 when Zoe and Constantine IX ruled Constantinople (Haldon, 2011).

Anticorruption laws and anticorruption strategies continued to be lacking in the Byzantine Empire until period they lost power to the Ottoman Empire in 1453 (Haldon, 2011). In the late part of the 15th century and in the 16th century, corruption and

noncompliance with anticorruption laws continued in the Ottoman Empire with documented evidence in court cases and imperial orders (Demirci, 2003). Evidence of 17th-century corruption and the lack of strategies to comply with anticorruption laws appear in documented corrupt business practices during the relationship between the English monarchy and the East India Company (Parkinson & Chew, 2013).

In the 18th century, corruption occurred in the Dutch tax-collecting process, which prompted public discontent and resulted in tax riots (Kerkhoff, 2011). The tax riots forced a radical alteration of the Dutch tax-collecting process, such as ending farm tax collection by private tax collectors and starting institutional public tax collection in 1748 (Kerkhoff, 2011). In the 19th century, corruption existed in the United States, and corruption continued to be visible in the building and operation of the U.S. transcontinental railroads (Bogart, 2013). Railroad corruption occurred through bribes given by railroad builders to government officials to ensure the continuous flow of government funds to the projects (Bogart, 2013).

In the 20th century, the lack of compliance with anticorruption laws was present and visible during the prohibition of the manufacture, sale, and transportation of alcohol in the United States (Gaytan, 2014). In the 20th century, alcohol supplies came to the United States from Mexico and Canada, which earned the smugglers millions of dollars (Gaytan, 2014). The high demand for alcohol during the prohibition period by Mexicans and the working class in the United States attributed to corruption in this market sector (Gaytan, 2014).

Early in the 20th century, U.S. workers established labor unions to combat corruption (Green & Isaacson, 2012). However, late in the 20th century, labor unions in the United States experienced corruption, and leaders failed to comply with anticorruption laws (Jacobs, 2013). The labor unions in this period controlled significant financial resources, which allowed union leaders to bribe government officials and avoid complying with anticorruption laws (Krinsky, 2013).

Buchheit and Reisner (1998) reported that Justice Holms in 1909 predicted that the U.S. Department of Justice judges would struggle in how to extend U.S. laws overseas, which may cause friction with other countries. U.S. Congress passed a law known as the Helms-Burton Act in 1996 that extend the reach of U.S. laws outside of U.S. territory (Buchheit & Reisner, 1998). The Helms-Burton Act was a federal law created on behalf of U.S. citizens when the Cuban government confiscated U.S.-owned property in Cuba (Buchheit & Reisner, 1998). The passage of the Helm-Burton Act led to protests from other countries; however, an earlier proposed FCPA by Justice Helms-Burton gained acceptance by the same countries that dissented against the Helms-Burton Act (Buchheit & Reisner, 1998).

During the U.S. Watergate scandal in the early 1970s, researchers in the U.S. Department of Justice uncovered questionable payments by global companies to international government officials (Harris, 2011). The U.S. public was outraged at the controversial payments, and the need to improve the international image of the U.S. government led to the creation and introduction of the FCPA (Harris, 2011). As expected with legislation, some people in Congress agreed with the FCPA and others disagreed

(Harris, 2011). Those who agreed believed that it was immoral and unethical for U.S. companies to pay government officials in other countries (Harris, 2011). Those who disagreed indicated compliance with the FCPA would hinder the competitiveness of U.S. businesses overseas (Harris, 2011).

The FCPA passed in 1977 because of President Nixon and the Watergate scandal (Feld, 2013). President Carter signed the FCPA into law in late 1977 (Cascini et al., 2012; Feld, 2013). In the Watergate period, U.S. government officials discovered U.S. aerospace and oil corporations allegedly bribed officials in other governments to gain contracts (Cascini et al., 2012). The Trade and Competitive Act of 1988, as well as the FCPA and related amendments, raised awareness of the need for additional internal company anticorruption controls and strategies to comply with the FCPA (Vanasco, 1999). Company corruption allegedly occurred when foreign government officials received bribes to gain contracts (Vanasco, 1999).

In the 21st century, lack of compliance with the FCPA is still present, and employees of U.S. aerospace companies allegedly bribe international government officials to gain contracts (Darrough, 2010). The FCPA, which is one of the significant business corruption deterrents, applies to U.S. companies, U.S. company personnel, and foreign firms trading on the U.S. Stock Exchange in U.S. territories (Feld, 2013). The implementation of adequate controls to increase compliance with the FCPA in the 21st century is helping to curb corruption (Sanyal & Samanta, 2011).

Researchers at the U.S. Department of Justice and the U.S. Securities and Exchange Commission recorded only 72 cases of noncompliance with the FCPA by U.S.

industry in 2010 (Feld, 2013). Other countries such as Great Britain reduced corruption by adopting the United Kingdom Bribery Act, in which 103 United Kingdom contractors faced fines of 180.7 million pounds for corruption practices (Donohoe, 2011).

Developing countries created local anticorruption agencies to fight corruption (Doig & Norris, 2012). The U.S. Department of Justice imposed a \$2 billion penalty on Siemens for an FCPA violation shows the vigorous enforcement of anticorruption laws in the United States (Sanyal & Samanta, 2011). The Sarbanes-Oxley Act, passed by members of U.S. Congress in 2002, holds executives personally liable for fraudulent acts committed by corresponding corporations (Cascini et al., 2012).

Recent increases in FCPA enforcement in the United States led to debates regarding the need for reforms to the act (Yockey, 2013). The ambiguity of the FCPA and uncertainty among U.S. corporations and international business communities in how to comply with the law led to the recent amendments to the FCPA (Vanasco, 1999). The extensive literature review resulted in identifying international business compliance with the FCPA and business corruption studies cited in this section. The annotated studies include significant topics related to compliance with the FCPA that address the factors influencing corruption in global business. The focus of this study was to identify the FCPA compliance strategies used by U.S. aerospace small business leaders in California.

Significant topics related to the FCPA. Significant topics emerged from an exhaustive literature review related to the research question. One of the topics that emerged was the effect of countries' culture on the development of corporate strategies for compliance with FCPA (Baughn et al., 2010). Another topic was the influence of a country's wealth on compliance with anticorruption laws (Abdulai, 2009). Another topic was the influence of corporate culture on the development of strategies to comply with anticorruption laws (Bierstaker, 2009). Other topics included the failure of corporate self-regulation to influence compliance with the FCPA (Yockey, 2013), as well as the relationship between international and local anticorruption laws (Gao, 2011).

The relationships between a country's culture, wealth, and compliance with FCPA are significant for U.S. aerospace industry competitiveness in international markets because such relationships clarify the contract governmental fees and influence pricing strategies. The following subsections include discussions on the relationship between culture and compliance with antibribery laws, self-regulation and corruption, and enforcement of international and local antibribery laws. Also included in the following subsections are discussions on the effect of the form of government, corporate culture, local antibribery laws, and countries' wealth on corporate compliance strategies for the FCPA.

Culture and anticorruption compliance. National culture significantly influences a country's levels of corruption, where people in countries with high masculinity and high levels of uncertainty avoidance are less compliant with anticorruption laws than in countries with low masculinity and low levels of uncertainty avoidance (Akbar & Vujic, 2014). Executives of multinational corporations need to assist countries corruption and establish strategies on how to comply with the FCPA while conducting business in such countries (Cleveland et al., 2010). Askari, Rehman, and Arfaa (2012) indicated corruption occurs when public officials use of the public office for unlawful private gains. Pacini (2012) defined bribery as the act of giving an item of value to a public official in the hope of obtaining influence or benefits from the official during the execution of official duties. National cultures shape the cultures of corruption at different organizations and ultimately affect the strategies for complying with anticorruption laws in organizations (Zaloznaya, 2012).

Different cultures use different interpretations of corruption and tolerate different levels of corruption. Kumar (2013) discussed Indian corporate culture tolerance toward corruption and the need for reforms to maintain the flow of international investments in India. Gong and Wang (2013) explained the low tolerance levels of people in Hong Kong toward corruption. In contrast, Bardhan (2014) showed the high tolerance levels of Indian and Chinese populations toward corruption. Therefore, international business managers need to understand the cultural tolerance and interpretations of corruption in their assigned countries.

Some of the driving factors creating the cultural differences toward the interpretation of corruption include level of power distance, level of uncertainty avoidance, and the masculinity (Baughn et al., 2010). Power distance refers to the relationship between executives and subordinates, and in high-power-distance cultures, managers adapt paternalistic relationships toward subordinates, whereas in low-power-distance cultures, subordinates frequently question management decisions (Winkler, Busch, Clasen, & Vowinkel, 2014). Researchers typically associate masculinity with the level of aggression and assertiveness in a society, and corporations from high masculinity societies tend to commit bribery to achieve corporate objectives (Baughn et al., 2010; Schlaegel, He, & Engle, 2013). Uncertainty avoidance refers to society's attitude toward the future and the population's ability to deal with the inherent complexities and ambiguities (Schlaegel et al., 2013). Corporations from low-uncertainty-avoidance societies have the tendency to commit bribery to achieve corporate objectives (Baughn et al., 2010). Understanding cultural differences, helps predict the severity of domestic corruption and noncompliance with FCPA (Baughn et al., 2010). Cultural and religious environments where firms conduct business influence behavior toward corruption (Lee, 2012; Mensah, 2014; Pena Lopez & Sánchez Santos, 2014).

Quah (2013) and Smith et al. (2013) examined countries' Corruption Perceptions Index (CPI) scores and the numbers relationship to the levels of foreign investment in such countries. Countries with low CPI scores had high corruption levels and were less desirable for outside investors to invest in such countries' projects. The FCPA laws forbid employees of U.S. companies from bribing officials of foreign governments to

obtain or maintain business. The basis of complying with the FCPA is the theory of a self-regulation process where leaders of a firm ensure compliance with the FCPA (Virginia & Maurer, 2013; Weismann et al., 2014). However, in numerous cases, self-regulation was not sufficient, and corporate governance failed to comply with the FCPA (Weismann et al., 2014).

United Nations anticorruption laws failed to achieve intended goals because of the lack of global enforcement power of such laws (Anechiarico, 2010). In the absence of an international anticorruption-enforcing body, countries must rely on local anticorruption agencies with little enforcement powers (Anechiarico, 2010). Anechiarico (2010) contended that even though countries enacted local anticorruption laws, such local laws often fail to enforce international anticorruption laws, including the FCPA. Strategies to comply with FCPA by U.S. corporations need to include the FCPA international enforcement limitations for countries where local laws have limited enforcement powers (Virginia & Maurer, 2013).

Ethical issues, legal factors, and business growth challenges faced by international firms when conducting business in the People's Republic of China have deep roots in the Eastern culture (Wen, 2013). O'Neill (2014) and Wen (2013) showed the effect of foreign direct investment (FDI) into China on Chinese business strategies for compliance with international anticorruption laws. Wen (2013) described the problems leaders of foreign firms faced when conducting business in China, including low levels of accountability, lack of transparency to the rule of law, and economic inefficiencies. High-power-distance cultures where managers adapt paternalistic relationships toward

subordinates harbor corruption more than low-power-distance cultures where subordinates question management decisions and offer personal opinions (Yeganeh, 2014). O'Neill (2014) and Wen (2013) showed how noncompliance with anticorruption laws affects competitiveness and profitability, cultural and ethical values, human rights, civil liberties, protection of workers, and the destruction of the natural environment related to sustainable development.

Wedeman (2013) and Zheng et al. (2013) indicated business bribery could be difficult to identify in different cultures, and a company employee can hide bribes under entertainment and travel expenses. In contrast, Mujtaba, Williamson, Cavico, and McClelland (2013) contended the corruption levels in target countries determine a country's success in international business. Mujtaba et al. examined 10 Asian members of the OECD that have similar laws regarding foreign corrupt practices.

Huang and Rice (2012) blamed corruption on the lack of corporate directives written for global business leaders to follow in bribery situations and the lack of corporate strategies to comply with international antibribery laws, including FCPA. Akbar and Vujic (2014) and Grimes (2013) attributed business corruption to the different interpretations of corruption in rules-based Western cultures versus relationship-based Eastern cultures. Galang (2012) showed an organization's characteristics and operating environment significantly influence the levels of corruption, including the government's structure. Zhou, Han, and Wang (2013) noted Asian business leaders are more likely to use bribery when facing market competition, corrupt local court systems, inefficient local government, and high local taxes. Huang and Rice showed the significance of expatriate

executives in the corruption process and related cultural dilemmas when confronting corruption in a host country. Expatriate managers encounter cultural difficulties with corruption when differences exist between the host country's culture and a corporate culture's interpretation of corruption (Huang & Rice, 2012).

Fighting corruption and compliance with FCPA across cultures is difficult due to the different cultural perspectives and attitudes toward crime (Bierstaker, 2009). The differences in attitudes by executives and employees toward FCPA compliance result in varying interpretations of the corruption legislation (Bierstaker, 2009). Howson (2012) and Sung (2012) examined the influence of gender on corruption in different cultures and showed major differences toward crime between men and women, where they found that women commit less business fraud than men do.

Akbar and Vujic (2014) and Bierstaker (2009) analyzed the differences between cultures and corresponding tolerances to FCPA noncompliance. Corruption could be a regular part of conducting business in a particular culture and an unacceptable act in another culture; which makes compliance with FCPA more complicated (Akbar & Vujic, 2014; Bierstaker, 2009). Leaders of multinational corporations can reduce corruption through global corporate directives sensitive to cultures that when their international managers follow this instruction can achieve a reduction in business crimes and comply with FCPA (Bierstaker, 2009; Huang & Rice, 2012).

Baughn et al. (2010), Anechiarico (2010), Akbar and Vujic (2014), and Eisenbeib and Brodbeck (2014) used bribery, nepotism, and malpractice as examples of corruption and related effect on the development of corporate strategies to comply with FCPA in

such countries. Huang and Rice (2012) analyzed the effects of consumer resource availability in importing countries, the physical distance between importing and exporting countries, and the cultural differences between importing and exporting countries. O'Neill (2014) and Wen (2013) analyzed relationship influences versus information-oriented influences on bribery and the effects of corruption on corporate success. The identified cultural aspects are major elements to consider when addressing needed FCPA modifications related to the U.S. aerospace industry in California.

Countries' wealth and anticorruption compliance. The wealth of a country plays a significant role in a nation's approach to corruption. Wealthy countries in particular instances contribute to the exportation of corruption. Studies of bribery showed one third of the employees in European companies believe leaders would use bribery to gain new business (Valentine, Godkin, & Vitton, 2012). At the 2009 OECD Forum on Fighting Corruption, Schofield (2009) reported the magnitude of global bribery is reaching trillions of dollars yearly.

In 2009, members of the OECD met to emphasize the need for additional controls to reduce global business corruption (Schofield, 2009). G. Wilson and Wilson (2014) maintained the world financial crisis occurred due to the failure of governments and the laws used to predict and punish companies for employees' financial misconduct. Graeff and Svendsen (2013) showed a strong relationship between wealth and corruption in 25 European countries. Abdulai (2009) related poverty to the level of corruption and supported the argument using GDP per capita, where lower GDP correlates with higher corruption. However, Abdulai's small sample size was not conclusive.

Abdulai (2009) and Graeff and Svendsen (2013) noted wealthy countries foster less corruption than developing countries. However, Schofield (2009) and G. Wilson and Wilson (2014) indicated the political will to fight corruption in developing countries influences the levels of corruption. The desire to maintain an industrial base in wealthy countries requires wealthy country policy makers to engage in protectionism (G. Wilson & Wilson, 2014). The aspiration of organizational leaders in rich countries to gain global market share creates a condition that invites noncompliance with anticorruption laws (G. Wilson & Wilson, 2014).

According to Mujtaba et al. (2013), there is a significant linear relationship between the wealth generation of a country and the country's level of noncompliance with FCPA through corruption. Understanding a country's wealth effect on corruption is essential for identifying possible FCPA compliance strategies related to the aerospace industry in California. Understanding the relationship between state wealth and corruption could help corporations in the formulation of FCPA compliance policies. Knowledge of a country's wealth relationship to crime influences the development of the FCPA compliance strategies used by the aerospace industry in California.

Corporate culture and anticorruption compliance. Corporate culture significantly affects the development and execution of FCPA compliance strategies (Bierstaker, 2009). Clear guidelines regarding proper ethical behavior when conducting business in the international markets affect corporate culture (Bierstaker, 2009). Global corporate citizenship requires compliance with antibribery laws by small, medium, and large enterprises (Galpin, 2013; Inyang, 2013). Small and medium enterprises account for

90% of worldwide business (Galpin, 2013; Inyang, 2013), and small and medium enterprise leaders need to establish an anticorruption policy and create an FCPA compliance program to ensure international business leaders avoid bribery situations (Jorge & Basch, 2013).

Adeyeye (2014) maintained that corruption consists of a demand and a supply side, as in every economic situation. Adeyeye also showed that leaders of corporations needed to address the two sides of the crime simultaneously to effectively curb corruption and achieve FCPA compliance. Leaders of organizations play a significant role in eliminating corruption in international business by complying with FCPA (Adeyeye, 2014; Bierstaker, 2009). Furthermore, Adeyeye and Bierstaker indicated a favorable investment climate does not necessarily reduce crime. In contrast, Alexeev and Habodaszova (2012) and Dechenaux, Lowen, and Samuel (2014) revealed time pressure, urgency to increase revenues, and the size of bribes are situational factors influencing leaders' decisions regarding corruption.

Chinese business leaders' personal philosophies and ethical views play a significant role in the interpretation and participation in unethical business activities (Feldman, 2014; Lu, Ling, Wu, & Liu, 2012). Hess (2009) indicated a lack of corporate commitment to combating corruption and the expansion of the definition of crime in criminal law have a significant role in curbing corruption and FCPA compliance. National culture influences corporate culture regarding how corporate leaders view bribery and the potential of employees to engage in bribery when conducting business overseas (Choudhary, 2013; Klinkhammer, 2013).

Ethical and unethical forms of networking facilitate corruption (Bhatt & Bhatt, 2013). Companies and individuals can benefit from belonging to a social network system because of mutual understanding (Bhatt & Bhatt, 2013). Knowledge networking, which includes utilitarian networking, emotional networking, and virtuous networking, is a human activity with an ethical dimension (Huang & Rice, 2012). Acting within the moral dimension of a network contributes to the creation of trust and harmony within the network (Bhatt & Bhatt, 2013). Corruption occurs when an undeserving candidate receives government benefits because an intermediary agent bribed government officials. The result is noncompliance with anticorruption laws (Sabie, 2012; White, 2013).

Numerous factors can influence the corporate anticorruption culture, and anticorruption organizations can be successful in adverse environmental conditions (Vaccaro, 2012). A close inspection of the relationship between a culture of noncompliance with anticorruption laws and developing culture is necessary (Akbar & Vujic, 2014; Pena López & Sánchez Santos, 2014). Corruption and noncompliance with anticorruption laws are acceptable in numerous cultures including Chinese, Vietnamese, and Burmese cultures, where using an intermediary to facilitate corporate transactions through bribes between government officials and the corporation is the norm (Feldman, 2014).

Compliance with local government anticorruption laws influences corporate culture, corporate liquidity, and control of corporate corruption (Bryane & Mendes, 2012). Company leaders need to be proactive to ensure compliance with the FCPA. Company leaders should also maintain procedures in place to ensure corporate

compliance with the FCPA (Fox, 2010). Companies should have global standards and an ongoing auditing program to ensure proper governance and accountability (Badamasiuy & Bello, 2013; Wanyama, Burton, & Helliard, 2013). Corruption negatively affects the development of developing countries, and governments must demand strict compliance with anticorruption laws (Abdulai, 2009). Abdulai (2009) concluded fighting corruption in a sustainable manner requires a genuine and strong commitment from the top political elite within a country.

Corrupt organization leaders create organizational cultures and establish work structures where employees facilitate corruption on a daily basis without being aware that something illegal is occurring (Campbell & Goritz, 2014). Corporate culture, including management behavior toward corruption as well as corporate procedures, affects employees' behaviors toward bribery (Braje & Galetic, 2014; Tilley, Fredricks, & Hornett, 2012). An analysis of the relationship between corruption and gender in corporate cultures revealed no relationship exists between gender and corruption (Howson, 2012; Sung, 2012).

The relationship between networking and openness in companies increases the tendency toward greater bribery, noncompliance with anticorruption laws, and corruption (Huang & Rice, 2012). Cascini et al. (2012) analyzed the inclusion of FCPA compliance in the corporate code of ethics and employee training and the ways compliance with the FCPA can lead to an antibribery corporate culture. One of the limitations of Cascini et al.'s study was the author's focus on big business' compliance with FCPA. Current trends in FCPA enforcement are ineffective, and the integration of the FCPA into corporate

culture through value-based management strategies could improve FCPA compliance at both small and large companies (Lestrange & Tolstikov-Mast, 2013).

Self-regulation and anticorruption compliance. Based on Weismann et al. (2014), the self-regulation approach in U.S. industries has been unreliable and has failed to enforce compliance with FCPA due to the concentration of power at U.S. major institutions. Self-regulation has also been ineffective because corporate stakeholders have failed to control the ethical business behavior of organization members. In contrast, Yockey (2013) and Sethi and Schepers (2014) attributed self-regulation failure to a lack of governmental regulatory resources, which forced authorities to rely on voluntary corporate self-disclosure. Adebite (2012) noted the corporate governance failures of self-regulation in Nigeria increased corruption, and good corporate governance is necessary to curb corruption in the country. Weismann et al. identified U.S. corporate leaders as the primary reason for self-regulatory failure in enforcing FCPA compliance due to leaders' engagement in questionable financial schemes and the way leaders continually shifted risks to innocent parties.

The failure of the corporate FCPA self-regulatory model to control corruption has deep roots in the theory of self-regulation (Virginia & Maurer, 2013; Weismann et al., 2014). Burger (2012) noted neither self-regulation nor government oversight leads to a dramatic reduction in FCPA compliance, although the combined efforts of the two systems could result in a needed reduction in corruption. In contrast, Blackburn (2012) attributed corruption to the misuse of government-delegated power, as seen in the relationship between the differing powers given by the government through the

delegation of authority to bureaucrats. Blackburn further showed the delegation of government authority to bureaucrats gives government officials the administrative discretion to collect bribes from the public and invites noncompliance with anticorruption laws. Blackburn indicated there is evidence of the negative effect of bribes on economic growth because corruption diverts money from a country's economic growth activities into power-seeking activities.

Ionescu (2013) contended technological improvements introduced through e-government databases significantly affected the reduction in corruption. Weismann et al. (2014) revealed self-regulation is not sufficient to reduce bribery or increase FCPA compliance, and it is essential to maintain oversight and good governance to promote and maintain economic growth. Blackburn (2012) indicated the delegation of government powers to public officials can create opportunities for corruption, and monitoring systems are necessary to ensure corruption is not present.

Technology such as e-government would be effective in increasing compliance with antibribery laws, lowering the levels of corruption, and potentially increasing specific types of bribery in the public sector (Ionescu, 2013; Ojha & Palvia, 2012). Blackburn (2012), Weismann et al. (2014), and Yockey (2013) indicated self-regulation is not sufficient in fighting corruption and increasing FCPA compliance. Government oversight is necessary to ensure compliance with anticorruption laws. Ionescu (2013) and Weismann et al. (2014) discussed the role of technology in monitoring compliance with antibribery laws and limiting corruption. Effective corporate self-regulations and

government oversight of FCPA compliance using technology-monitoring processes reduces FCPA violations by U.S. corporations (Weismann et al., 2014; Yockey, 2013).

International and local anticorruption compliance laws. International antibribery laws remain unenforced and conflict with local country laws (Cuervo-Cazurra, 2008; Darrough, 2010). The Chinese government's intervention in the cause of bribery on behalf of the bribing company influences the company's bribing behavior (Gao, 2011). In contrast, Nell (2009) contended the government should intervene and treat contracts as valid to avoid additional costs and legal complexity. China antibribery laws possess severe penalties; however, enforcing the laws is difficult. In contrast, the enforcement of Canada's Corruption of Foreign Public Officials Act was successful and reached the \$10 million range in enforcement penalties (Keith, 2014). Good governance in Singapore reduced corruption, increased compliance with anticorruption laws, and led to Singapore's success in attracting international business (Jon, 2013).

Adeyeye (2014) discussed the effect of creating a governmental mechanism for combating bribery in Singapore, such as the Prevention of Corruption Act and related limited successes in fighting corruption. Cuervo-Cazurra (2008) showed noncompliance with anticorruption laws had no effect on the flow of FDI funds to corrupt countries. Antibribery international laws need global coordination to ensure effective compliance and a level playing field for participants (Cuervo-Cazurra, 2008). Saleh (2014) showed a lack of focus on internal compliance audits of antibribery laws, government oversight, and appropriate justice procedures are factors in the corruption problems in Iraq.

Gao (2011) revealed government leniency toward bribing firms might send the wrong message to such firms that reduce compliance with antibribery laws. In comparison, Nell (2009) asserted that governments occasionally might need to intervene and accept contracts obtained through bribery as valid contracts to avoid costly legal fees and legal complexity. Sanyal and Samanta (2011) indicated the enactment of national antibribery laws, coupled with vigorous transnational enforcement of compliance with international antibribery laws, influenced the levels of bribery with no effect on FDI funds. In contrast, Quazi, Vemuri, and Soliman (2014) maintained corruption and noncompliance with antibribery laws in the short term positively affect FDI, but ultimately negatively affects a country's economic growth. Moreover, Quazi et al. indicated market size, government effectiveness, infrastructure, and economic freedom affect FDI significantly.

Gao (2011), Nell (2009), and Cuervo-Cazurra (2008) discussed government enforcement of compliance with international and local anticorruption policies and the need for transnational enforcement of international antibribery laws. Adeyeye (2014) and Darrough (2010) discussed the lack of compliance with current international antibribery laws due to conflicts with local laws intended to enforce the international laws. However, Jura, Aninat, and Mefford (2014) indicated an increase in transnational lawsuits by U.S. courts related to compliance with FCPA, even when the originating country is not a signatory of international anticorruption laws.

Government from, local laws, and anticorruption compliance. This section includes an examination of the immoral and unethical aspects of bribery discussed in the principal provisions of the antibribery compliance legislation, including the FCPA, OECD, United Nations Convention Against Corruption, and laws of participant countries. The World Bank analysts estimated international bribery at \$1 trillion per year and corruption at \$2.5 trillion per year, which amounts to 5% of global GDP (Cleveland et al., 2010). Cleveland et al. (2010) showed the effects of the FCPA and the FCPA's antibribery compliance provisions, the OECD organization, and local antibribery laws and policies as evidence of progress in fighting international bribery.

The large fines paid in 2010, including the Siemens company payment of \$1.6 billion for FCPA violations, showed active observation and compliance with the antibribery law (Fox, 2010; Turk, 2013). However, legal complications deeply rooted in antibribery noncompliance cases are concerns in countries such as the United Kingdom because of the law's effectiveness (Virginia & Maurer, 2013). Schmidt and Gualmini (2013) illustrated how the form of government and government leadership in Italy influenced corruption in Italy, which reduced the domestic wealth of the country. Henning (2009) focused on financial crimes in Roman-Dutch law and showed how Roman laws had a greater effect than the current fraud laws, which would be more efficient in combating financial corruption in the 21st century. Lash and Batavia (2013) indicated property rights are the biggest sources of corruption, and reforms of antibribery laws are necessary for diverse legal systems. Mitchell, Merrington, and Bell (2014)

showed 117 studied countries had local anticorruption laws in place, but 50% of the countries had low CPI scores, which indicated the need for more oversight.

Cleveland et al. (2010) suggested conducting additional studies to monitor and examine progress in fighting the battle against noncompliance with anticorruption laws and transnational bribery, including human rights and environmental protection dimensions. In contrast, Bryane and Mendes (2012) contended the form of government and local laws significantly affect noncompliance with antibribery laws and corruption in a country where bureaucrats demanded bribes as a condition for project approval. Two of the weaknesses of Bryane and Mendes's study were the geographical and theoretical limitations in the scope of the study.

Ntayi et al. (2013) indicated economic changes and the form of government used in the procurement of public infrastructure projects are critical factors that contribute to corruption in Ghana. In comparison, Goel and Nelson (2011) contended in the United States, the levels of FCPA noncompliance and corruption related inversely to the wealth and level of education of state populations. Goel and Nelson derived conclusions from empirical models of individual state convictions of corrupt public officials measured over a 5-year period. Goel and Nelson also derived conclusions over a longer period of crime across states.

Religion in the United States has shown no effect on FCPA compliance or corruption levels; however, an association exists between greater prosperity and lower corruption (Goel & Nelson, 2011). Gjinovci (2013) showed the informal economy in transition countries fosters corruption due to the lack of public understanding and

willingness to participate in the enforcement of anticorruption laws. Feldman (2014) revealed other methods used in business corruption monitoring such as using intermediation between corrupt government officials and recipient candidates for government services. Noncompliance with antibribery laws and corruption occurs when an undeserving candidate receives government benefits by using an intermediation agent bribing of government officials (Feldman, 2014). Corrupt officials can offer services to individuals not entitled to government services for a price (Sabie, 2012; White, 2013). One area not investigated was the effect of potential collusion between officials and intermediaries.

Lawyers at the U.S. Department of Justice frequently used criminal and civil actions as an instrument to reduce corruption and increase FCPA compliance in global markets (Jennings, 2013; Virginia & Maurer, 2013). The increase in civil actions is not necessarily due to a failing criminal system, but is a result of suitable recovery alternatives. Civil actions against corruption occur when company leaders need to take decisive and immediate action for rehabilitation and compensation. Tas (2012) showed local laws in Iraq need amendments to allow Iraq's legislation to address money laundering and financial institutions' noncompliance with anticorruption laws. Another form of noncompliance with antibribery laws is corporate tax evasion, where the practice of bribing government officials results in corporate tax avoidance (Alexeev & Habodaszova, 2012; Fakile & Adegbe, 2012).

This section included a review of Cleveland et al. (2010), Fox (2010), and Virginia and Maurer's (2013) research on governments' role in enforcing FCPA

compliance. The section included a discussion of government influences controlling corruption and the enforcement of compliance with local and international anticorruption laws. Bryane and Mendes (2012) and Goel and Nelson (2011) indicated key public contracts are more vulnerable to corruption as well as tax evasion because of government officials' roles in fostering corruption. Because of government-related corruption, an examination of local and international anticorruption law enforcement is necessary for the context of FCPA compliance strategies needed in the California aerospace industry.

In summary, the reviewed literature showed the effects of cultural, wealth, corporate self-regulation, and forms of government in fighting business corruption and the need for effective corporate compliance strategies to comply with antibribery laws. Bryane and Mendes (2012), Cleveland et al. (2010), Fox (2010), Goel and Nelson (2011), Ntayi et al. (2013), and Virginia and Maurer (2013) indicated compliance with FCPA in global business depends on (a) the form of government, (b) corporate self-regulation, (c) local enforcement of international anticorruption laws, (d) a country's wealth, and (e) organizational culture. The literature review provided the context for explaining and understanding the elements of the improved business practice of the study on exploring aerospace business changes in the FCPA.

Transition and Summary

This section included a discussion of global corruption in business, bribery's historical background, and corruption growth in the international market. This section also included organizational bribery, FCPA compliance, and other international antibribery laws. The section encompassed the history of FCPA compliance strategy

problems, the problem statement, the nature of the study, the objective, the research question, and the significations of the study to the aerospace industry. Furthermore, this section included a description of the theoretical framework, the transformational leadership theory, the corruption model, and the regulatory compliance model, including the models' suitability for this case study. This section included the assumptions, limitations, delimitations, and anticipated social change, as well as a review and synthesis of the academic literature related to culture and compliance with antibribery laws, self-regulation of bribery, enforcement of international laws, and enforcement of local antibribery statutes.

Additionally, this section included a discussion of a country's wealth and a country's effect on bribery, FCPA compliance, and corporate culture and related effect on corruption. Section 2 includes the role of the researcher, participants, sampling, data collection, data analysis, research method and design, data validity, and data reliability. Section 3 includes a discussion on the application of the findings to professional practice and recommendations for further research. Furthermore, Section 3 includes an overview of the study, a presentation of the data, the findings, applications of the results to global management professional practice, and social change implications.

Section 2: The Project

Aerospace companies in California are losing international business due to bribes by foreign competitors. From 1994 to 2001, U.S. companies, including the aerospace industry, lost \$200 billion of foreign trade contracts to competitors allegedly bribing government officials to win new contracts (Darrough, 2010). Corruption in the aerospace industry is an international business problem in which government officials around the world use position and power for illegal financial gains through bribes (Blackburn, 2010).

To combat international corruption, U.S. Congress approved the FCPA in 1977 to preclude a particular class of persons and entities namely U.S. companies, U.S. individuals, and foreign companies listed on the U.S. Stock Exchange from bribing government officials to obtain or retain business (Vanasco, 1999). Dissenters against the FCPA in the U.S. Congress contended that compliance with FCPA would negatively affect U.S. business (Harris, 2011). The U.S. Fortune 500 companies' annual international business losses to competitors due to competitors' noncompliance with the FCPA are over \$36 billion of potential new business (Thompson & Medina, 2012). The primary focus of this research study was to identify the FCPA compliance successful strategies used by leaders in a small California aerospace company.

Purpose Statement

The purpose of the qualitative single case study was to identify the strategies U.S. aerospace small business leaders use to comply with the FCPA. The study population consisted of business leaders at a small U.S. aerospace company in California that was

operating in the international market, had not received any FCPA penalties, had a good international business record of accomplishment, and was successfully complying with the FCPA. The selected population was appropriate because the population is part of California's aerospace industry, which represents 47% of the aerospace industry's engineering and product development in the United States (U.S. Department of Labor, 2012). The findings of this study showed successful small business strategies for FCPA compliance are expected to reduce the cost of conducting global business and lead to an increase in the number of U.S. aerospace jobs while demonstrating social integrity. This is important because Lestrangle and Tolstikov-Mast (2013) and Lord (2013) indicated that reducing crime in business transactions results in positive social changes such as improving the safety of people and organizations, reducing the cost of conducting business, and improving the quality of life for individuals and communities.

Role of the Researcher

I was the primary data collection instrument in this qualitative single case study. The role of the researcher is to ensure the data collected are valid and reliable (Leedy & Ormrod, 2013). Networking, collaborating, managing the analysis, performing the research, and collecting data are part of the researcher role (Kyvik, 2013). Researchers must ensure safety and confidentiality while paying close attention to researcher behavior during the interviews to avoid harming the participants (Gibson, Benson, & Brand, 2013).

My work as a researcher was informed by my having held a senior executive position in the aerospace industry for over 28 years, including significant exposure to international business development and contract negotiations. This aerospace experience

was helpful in contacting participants and asking members to participate in the study. The basic ethical principles applied throughout the research process involved informing the participants of the right to have a safe environment for the interview, receiving an informed consent form (see Appendix A), and explaining a participant's right to terminate the interview without giving a reason for ending the interview.

Participants signed consent forms collection process occurred before the interviews begin. I took steps to maintain the highest level of ethics and to comply with the *Belmont Report* protocol by focusing on the well-being of the research participants. The authors of the *Belmont Report* principles primarily focused on the well-being of study subjects, including specifying steps to protect participants' anonymity, safety, vulnerability, and right to terminate the interview without giving an explanation, as well as the data protection process (Bromley, Mikesell, Jones, & Khodyakov, 2015). Rogers and Lange (2013) indicated the *Belmont Report* protocol protects vulnerable research populations from potential exploitation. Strause (2013) described the three principles of the *Belmont Report* protocol as autonomy, beneficence, and justice for study participants.

Researchers should ensure no harm comes to participants due to participation in a study (DuBois et al., 2012; McKee, Schlehofer, & Thew, 2013). Further safeguards during the data collection process must prevent risks to participants because of joint involvement in the study (Durham, Brolan, & Mukandi, 2014; McInnes et al., 2012). Researchers should ensure the data collection is nonintrusive, and participants can stop the interview without giving a reason for the decision (Hassali, Siang, Saleem, & Aljadhey, 2013; Yuan, Bartgis, & Demers, 2014).

Biases can occur due to preexisting knowledge and experience with the topic under study; I therefore took steps to use a nonpersonal lens to view the collected data to help mitigate potential biases. A plan existed to ensure personal biases do not affect the performance of this study through careful note taking, performing data triangulation, category coding, and using open-ended questions during the interviews. Additionally, I focused solely on the answers to the interview questions as presented by participants, a review of company policies, and personal reflective journal. Kache and Seuring (2014) and Lituchy, Ford, and Punnett (2013) indicated open-ended questions, content analysis supplemented by contingency analysis, and individual category coding reduce researcher bias in a study. Researchers can minimize personal biases, but eliminating individual biases is often difficult (Kache & Seuring, 2014; Ülle, 2014). I therefore also practiced triangulation after collecting the data to reduce researcher bias, as recommended by Kauppinen-Räsänen et al. (2014) and Lin, Wu, and Hua-Ling (2013).

The semistructured interview protocol (see Appendix B) used in this study to gain insight on participants' strategies for FCPA compliance served to encourage members to discuss personal experiences with FCPA compliance and provided an opportunity for follow-up questions. Using a semistructured interview protocol creates an open, nonthreatening environment for the participants (Burgess & Wake, 2013; Rodrigue, Riopelle, Bernat, & Racine, 2013). Researchers use semistructured interview protocols to encourage participants to discuss individual experiences with a phenomenon (Hohl, Gonzalez, Carosso, Ibarra, & Thompson, 2014). Using the semistructured interview

protocol provided insights into the strategies corporate leaders use for FCPA compliance and an opportunity to ask follow-up questions (Burgess & Wake, 2013; Fox, 2010).

Participants

The participant eligibility criteria for this study were that participants must be executives at a small U.S. aerospace company in California and have at least 1 year of experience addressing FCPA compliance. Experiences with the research phenomenon forms the basis of a study's participant selection criteria (Minis et al., 2014; Moustakas, 1994). My selection of participant criteria aligned with DeFeo (2013) and Shaw, Robinson, Starks, Burke, and Dillard's (2013) reports that researchers choose participants based on members ability to meet described research objectives. Bhakta Bhandari (2014) and Dennett, Cameron, Bamford, and Jenkins (2014) also indicated that researchers select participants based on individual knowledge and experience with the studied phenomenon.

The strategy for gaining access to the study participants involved advanced coordination with one small aerospace organization at which the participants presently work. The goal was to gain access to the participants through the recommendations of the public relations executive at the small aerospace company. The intent was to contact identified members to describe the value of the study and to request participation in the study. After IRB approval, I contacted candidates via email and sent them the consent information (see Appendix A). I followed-up with the candidates via email and by phone and checked on their decision to participate in the study, coordinated their availability, and collected the signed consent forms from the candidates that were willing to take part in the study. The step that followed receipt of the participants' agreement and the consent

forms consisted of coordinating members' availability for a semistructured interview. Arendt et al. (2012) and Leedy and Ormrod (2013) explained researchers must go through a gatekeeper at an organization to gain access to participants. Chikweche and Fletcher (2012) and Pollack (2015) illustrated that gaining access to corporate gatekeepers is challenging due to a general mistrust of an outsider and the unwillingness to discuss sensitive and proprietary data with a stranger. Frich, Røthing, and Berge (2014) and Nightingale, Sinha, and Swallow (2014) indicated researchers gain access to participants by ensuring participants' clear understanding of the purpose of the study and securing participants' approval to participate in the study.

Establishing a working relationship with the participants, started by sending the consent form (see Appendix A) to the participants with detailed information on the interview process, the objective of the study, and member potential role as a study participant for approval. A follow up with participants after receiving approval to participate by signing the consent form took place. After gaining participants' consent (see Appendix A) to take part in this study, the objective was to establish a working relationship with members by reviewing candidates public profiles through professional networking databases, including LinkedIn and Google search engines. Knowing a participant's public profile assisted in identifying common areas of interest, which helped in the development of working relationships with participants. Researchers conducting qualitative research must establish a relationship with participants to conduct a successful study (Turpin, McWilliam, & Ward-Griffin, 2012). Interdependency between partners must exist for a relationship to exist between such partners (Fournier, 1998; Hughes,

Allen, Doheny, Petsoulas, & Vincent-Jones, 2013). Trust plays a critical role in the development of a relationship when people experience difficulty assessing the others' potential for goodwill or harm toward the group (Aamir & Buckley, 2013; Miltgen & Peyrat-Guillard, 2014).

To accomplish the alignment of the participants with the overarching research question, participants must meet the eligibility criteria. Participants' ability to answer the research questions plays a primary role in candidates selection process (Yin, 2014). Researchers use the participant selection process to evaluate individuals' capacity to understand the phenomenon under investigation (Leedy & Ormrod, 2013). Participant must be qualified in the field related to the research question and be able to provide needed information to answer the research question (Maxwell, 2013).

Research Method and Design

Researchers use a methodology in research to understand participants' experiences with a particular phenomenon (Leedy & Ormrod, 2013; Moustakas, 1994). Research methodology and design are techniques used to define the research question and methodology for gathering relevant data to answer a research question (Bowyer & Davis, 2012; Marais, 2012; Yin, 2014). The research methodology and design included techniques to establish a process for collecting and analyzing data (Cao & Nymeyer, 2013; Leedy & Ormrod, 2013).

Research Method

The qualitative research method was the research method used in the study because the goal was to understand participant's perceptions, experiences, perspectives,

and understandings of a particular situation. Stacke (2010) explained researchers use the qualitative methodology to understand individuals' perception, personal experience, perspective, and understanding of a particular situation. Leedy and Ormrod (2013) indicated researchers use the qualitative methodology when focusing on a phenomenon in a natural setting. Heffernan, E. Heffernan, and Pan (2014) and Montero-Marín et al. (2013) noted a researcher uses a qualitative research methodology to understand participants' perceptions and experiences with a phenomenon through data and theory. Researchers use the qualitative method to tell the story of participants' experience through careful preparation and execution of a research plan (Bansal & Corley, 2012; Rowley, 2012).

Doig (2010) conducted a qualitative study to analyze business corruption in Turkey and considerations for admitting Turkey into the European Union. In the study, Doig noted the slow reform in revising corruption laws and the continuing presence of governmental corruption in Turkey. Luiz and Stewart (2014) performed a qualitative study of African public responses to public service corruption when policymakers adopted a public service anticorruption strategy in South Africa in 2002. Agbiboa (2012) conducted a qualitative study to investigate the relationship between corruption and a country's development. Zuofa and Ochieng (2014) used the qualitative methodology to study project failure and concluded that a direct link exists between project failures and corruption in Nigeria. Doig (2010), Luiz and Stewart (2014), and Agbiboa (2012) employed a qualitative methodology to analyze participants' perception of the meaning of a situation or an event. The qualitative studies performed by Doig, by Luiz and Stewart

(2014), and by Agbiboa (2012) had the same context as the study. Therefore, the qualitative research method was deemed suitable for this study.

The quantitative methodology was not appropriate for this study because the approach would not address the lived experience of the FCPA participants, nor the examination of relationship between variables required in this study. Researchers use quantitative research to measure the relationship between variables numerically (Leedy & Ormrod, 2013). Researchers use the quantitative methodology when seeking to analyze a hypothesis or to examine one or more variables of interest (Gelei & Dobos, 2014; Macur, 2013). Caruth (2013) indicated qualitative researchers often claimed that quantitative researchers use simple descriptions and immaterial hypotheses. Allwood (2012) reported the distinction between quantitative and qualitative methods is problematic when attempting to separate methods by using the data collection process, studied phenomena, and the philosophy of the research.

The mixed methods methodology was not suitable because the goal was to understand the participants' perceptions of FCPA compliance. Researchers conduct mixed methods research when a combination of elements from a qualitative and a quantitative approach is necessary to provide a picture of a particular phenomenon (Leedy & Ormrod, 2013). Caruth (2013) explained the mixed methods methodology evolved to address the limitations of the individual qualitative and quantitative methods. Venkatesh, Brown, and Bala (2013) indicated researchers use mixed method design to complete, expand, confirm, and obtain opposing views of the same experience. Through

the interviews conducted during this study, the goal was to gain sufficient information to determine the participants' FCPA compliance strategies and experiences.

Research Design

Given the selection of a qualitative methodology, using a single case study design for this research was appropriate because the objective of this study was to identify the FCPA compliance strategies used by executives at one small U.S. aerospace company in California. Researchers use a research design and methodology to establish the techniques for collecting and analyzing data (Leedy & Ormrod, 2013). Case studies consist of in-depth data gathering about programs, companies, events, or individuals to learn about poorly described or poorly understood phenomena (Leedy & Ormrod, 2013). Chambers et al. (2013) noted researchers use a case study when the goal is to get beneath the surface of policy implementation, challenge current thinking, and reconstruct understanding. Jones (2012) indicated researchers use a single case study when the primary research data consist of concepts used by study participants in the field where the researcher wants to know the participants' level of understanding. The identification of FCPA compliance strategies involved collecting data using in-depth interviews with employees of one California aerospace company. For this study, ethnography, phenomenology, and case study design options received consideration.

The ethnography design was not suitable because the plan for this study was to identify strategies and not observe participant interactions. Ethnography involves lengthy planning, early engagements, fieldwork trips for group observations, exploring the settings, and multiple cultural interactions (Simpson, Slutskaya, Hughes, & Simpson,

2014). Marshall and Rossman (2016) indicated ethnography researchers study groups in a natural environment for long periods, although due to advancements in technology, Internet ethnography and multimodal inquiries are possible. Ethnography is a style of research used to understand the activities of people in a given setting, and ethnography enables fuller social experiences (Simpson et al., 2014).

The phenomenological design was not suitable for this study because the focus of the design was not to understand aerospace executives' perceptions of the meaning of a particular phenomenon, but documenting aerospace executives' understanding of FCPA compliance. Phenomenological design involves lengthy interviews and a focus on understanding participants' perception and perspective and the meaning of a particular event (Leedy & Ormrod, 2013). Researchers use a phenomenological research method when studying the essence of participants' experience (Moustakas, 1994). Tomkins and Eatough (2013) defined the phenomenological design as the process a researcher uses to understand participants' experiences with a particular phenomenon.

Data saturation in this study took place through the interviews with leaders across an organization and by asking participants follow-up questions during the interview to ensure the gathering of sufficient data on the research topic. Coenen, Stamm, Stucki, and Cieza (2012) defined data saturation as the point during data gathering that indicates two similar ideas from two consecutive individual interviews, but reveals no additional new information from previous interviews. Goffin, Raja, Claes, Szwejczewski, and Martinez (2012) indicated researchers reach saturation when no new categories or groupings are surfacing during participant interviews. Keyvanara, Karimi, Khorasani, and Jazi (2014)

and Guzys, Dickson-Swift, Kenny, and Threlkeld (2015) asserted researchers reach data saturation when no new categories, new coding, or new information occurs, and if a study replication takes place, the results will be the same.

Population and Sampling

The study population consisted of leaders of small U.S. aerospace company in California operating in the international market. The population was representative of the aerospace industry in California, which handled over one third of the \$95.5 billion aerospace exports from the United States in 2012 (Aerospace Industry Association, 2012; Kyser Center for Economic Research, 2012). Manerikar and S. Manerikar (2013) defined population as the total group of people, things, or events a researcher desires to investigate.

The purposeful sampling method was the procedure used for the study. The plan was to select five to seven executives purposefully from one company for members' aerospace experience, international business experience, industry knowledge, and real-world experience with FCPA compliance. Researchers use purposeful sampling to understand an experience from the participants' point of view (Leedy & Ormrod, 2013). Purposeful sampling involved selecting a sample to access research participants using the criteria guided by the research purpose and conducting an in-depth exploration of rich sources of information (O. Asst & Asst, 2014; Zeldenryk, Gray, Gordon, Speare, & Hossain, 2014). Hanson, Stephens, Pangaro, and Gimbel (2012) indicated researchers use the purposeful sampling method to maximize diversity in a study.

Participants in the study were seven executives responsible for FCPA compliance in one small aerospace company in California. The research problem, research purpose, and eligibility criteria for such participants strongly influence researchers' selection of the participants (Leedy & Ormrod, 2013). Petit (2011) had one participant in a case study of police corruption in New York. Kramer's (2009) case study of eliminating fraud consisted of one participant. Choudrie and Culkin (2013) conducted eight face-to-face interviews in a qualitative case study of innovation diffusion. Zuofa and Ochieng's (2014) analysis of the failure of Nigerian infrastructure projects had eight participants. Aloysius (2013) used five international students to study the perception of empowerment among international students at Putra University in Malaysia. The average number of participants identified in the five studies was five. Based on the five examples having the same context as the study, five to seven small business executives with FCPA responsibilities at an aerospace company in California were suitable for the study.

I achieved saturation in the study by gathering sufficient data from participants using open-ended questions and follow-up questions. A sample size in qualitative studies can be much smaller than in a quantitative study and still achieve saturation (Marshall et al., 2013). Data saturation occurs at the point at which the gathered data and analysis from two consecutive individual interviews reveal no additional information to the same question (Coenen et al., 2012). In qualitative research data, saturation occurs when no new information or categories emerge in the responses to interview questions (Horter et al., 2014). Data saturation occurs when participants provide similar answers to the same interview questions (Goffin et al., 2012).

The basis for the selection criteria for the seven study participants was the participants must be executives at a U.S. aerospace company in California and must have established a successful compliance strategy for the FCPA. The seven interviews took place in a conference room setting to ensure the comfort, safety, and privacy of participants. The selection standard was appropriate because participants' direct involvement with the FCPA provides members the ability to answer the research question and give insights on members' strategies to comply with the FCPA. Researchers select interview locations to provide a quiet area with minimal distraction that is comfortable, safe, and a relaxed environment (Kitchen, 2013). Hanssen (2012) reported a link in qualitative studies between the interview setting and question limitations concerning the need for data comparison, interview findings, and the reluctance of expressing contrary opinions to strangers. Nwagwu and Igwe (2015) indicated researchers select interview locations based on ease of access to participants, the safety of participants, and availability of resources needed for the interview.

Ethical Research

The informed consent process consisted of sending participants the consent form (see Appendix A) for review and signature before interviews began. Getz (2014) emphasized the consent form must be simple, be easily understandable, and address the demographics of participants. The consent form should include (a) the reason for the study, (b) the involvement of participants, (c) how long the participant will be in the study, (d) the risks of the research, (e) the benefits of taking part, (f) other options, (g) confidentiality, (h) the costs involved, and (i) the rights of the participant (Wright, 2012).

Participants should receive the informed consent form after accepting an invitation to a study and sign the form before beginning the interview (Leedy & Ormrod, 2013). The process of collecting the signed consent form occurred before the interview begins.

Participants can withdraw from the study or interview without reason through email, phone, mail, or other communication methods (Tam et al., 2015). Researchers should inform participants of the option to withdraw from the research (Rasmussen & Berntsen, 2014). Participants can withdraw from a study without penalty or the need to give a reason for withdrawal (Abdelhamid et al., 2012). The participants did not receive an incentive or payment for participating.

Measures to provide adequate ethical protection for the participants throughout the study include (a) obtaining from participants a signed informed consent to participate, (b) ensuring data do not include personal information, and (c) not modifying participants' responses to give better results. The intent was to ensure no harm comes to participants because of candidate participation in the research. Durham et al. (2014) and Rothstein (2013) indicated the protection from harm for study participants includes respect for participants, autonomy, and protection of defenseless populations, beneficence, and justice. Researchers must ensure no physical or psychological harm comes to participants because of members' participation in a study (Leedy & Ormrod, 2013). Boutin-Foster et al. (2013) indicated researchers extend ethical considerations to participants, including safety, respect for autonomy, facility space, and sufficient time for conducting the research.

One of the objectives for the consent form was to protect the anonymity of the source of the information obtained during the interviews before the interview begins (see Appendix A). The purpose of the consent form was to ensure no harm would reach participants because of members' involvement in the study. Individuals receiving the consent form understood the study risks and expectations before deciding whether to take part in the study, and the structure included background information on the FCPA and compliance. The consent form included information on the procedures, invitation to participate, the voluntary nature of the study, payments, privacy, contact information, and the statement of consent.

Agreement documents included an invitation for cooperation (see Appendix C). The letter of cooperation consisted of an overview of the study and the permission process from the approving executive at one U.S. aerospace company to use employees from the company for the study. After the approving manager at the U.S. aerospace company gave permission to use the company for this study by signing the permission letter (see Appendix D), the process of scheduling the interviews with the participants took place. The participant consent form (see Appendix A) contained the background information on the study, an invitation to participate, interview procedures, risks, benefits, and consent to participate in the study.

Collected data will remain in a secured file cabinet at the home office for 5 years to protect participants' confidentiality. Full control over the collected data included maintaining the gathered data in a locked cabinet at the home office. The plan was to safeguard the names of the participants and the organization participating in the study by

the assigned seven different letters to the seven members and a numeric code for the company.

Data Collection Instruments

In the study, I was the primary research instrument and collected data by conducting semistructured interviews with seven aerospace participants at a single aerospace company in California. Data included participants' data collected through interviews, the company's FCPA compliance strategy directives, and personal journaling data. Thompson et al. (2013) claimed that Internet technology reduced data collection costs, but also reduced the reliability of responses, so I did not use Internet-based data collection. Using simplicity, flexibility, data quality, timeliness, and acceptability might help researchers to improve a study's data collection process (Heidebrecht et al., 2014). Researchers can improve the data collection process by clearly communicating the purpose of the data collection to the participants (Iqbal et al., 2012); therefore, the informed consent form included a description of the study purpose and data collection process.

Semistructured interviews using open-ended questions (see Appendix E) were the primary data collection technique. As the researcher, I was the instrument in this qualitative study, and the bulk of the data collection was dependent on my level of involvement, as noted by Leedy and Ormrod (2013). Data collection involves informal interactive discussions with open-ended questions and comments (Moustakas, 1994). Data collection included interviews of participants, which is a method frequently employed to collect data for qualitative studies (Anyan, 2013). Carcone, Tokarz, and

Ruocco (2015) and Knudsen et al. (2012) indicated researchers use semistructured interviews to improve the validity and reliability of the research results. The data collection process in qualitative research consists of collecting data from a limited number of participants that provide information on the phenomenon under study (Leedy & Ormrod, 2013).

I reviewed company directives related to the FCPA compliance process, maintained a paper journal to document the research activities, and took related notes during the study. The journal included the notes taken during the interviews. During the interviews, the process of capturing data included the planned use of two audio tape recorders and handwritten notes. A planned expert review of the set of open-ended semistructured questions served to validate the interview questions. The collected data consisted of responses to the interview questions (see Appendix E) developed to answer the research question.

I enhanced the reliability and validity of collected data by conducting an expert review of the interview questions, member checking, and triangulation of data. Researchers often use triangulation to enhance the reliability of gathered data and improve the validity of the study (Houghton, Casey, Shaw, & Murphy, 2013; Mysen, 2012). Using a qualitative case study enhances validity by controlling study factors, including scenario settings that are difficult to control in other research approaches (Hodge, Oppewal, & Terawatanavong, 2013). Data collection reliability refers to the consistency of the results when the measured entity remains the same (Leedy & Ormrod, 2013).

The study included an expert's review of the interview questions to enhance the reliability and validity of the data collection instrument. Reliability includes the validation of the study conclusion and the trustworthiness, relevance, conformability, and credibility of study results (Otieno-Odawa, 2014). Researchers perform reliable and valid research when investigators conduct expert's reviews (Moustakas, 1994). The validity of research refers to the accuracy, meaningfulness, and credibility of the results (Leedy & Ormrod, 2013). Aust, Diedenhofen, Ullrich, and Musch (2013) showed that a significant number of participants increase validity in a study, and increasing rigorous checks improve validity. Martirosyan, Markhorst, Denig, Haaijer-Ruskamp, and Braspenning (2012) reported an expert's review identifies quality indicators used to develop questions for a larger group of participants. Frolic et al. (2013) used an expert's review to identify trends, themes, and organizational challenges and to assist in an efficient rollout of the survey to more participants. The expert review began after the study received Institutional Review Board (IRB) approval, after which I adjusted the interview questions.

Conducting member checking enhances the reliability and validity of the data collection process. After reviewing the interview data, I sent the individual interpretations of the interviews to the participants to ensure the accuracy of the descriptions, as suggested by Awad (2014) and in alignment with Li et al. (2013) and Goldman et al. (2014).

The interview protocol (see Appendix B) describes the steps taken with the individual participants during the face-to-face interviews. The use of an interview

protocol aligned with instructions by Briggs and Murphy (2011), Brown et al. (2013), and De Ceunynck et al. (2013). Briggs and Murphy (2011) maintained that an interview protocol should include a collaboration process to discover and evaluate research goals. De Ceunynck et al. (2013) indicated the interview protocol structure includes a consideration of respondents' decision-making processes when answering interview questions and includes measures for risk and bias of interviewer interpretations of the responses given by participants. Brown et al. (2013) reported interview protocols emphasize the elicitation of as much information as possible during the interview to establish rapport with participants and provide clear guidelines for the interview.

Data Collection Technique

The research question for this study was as follows: What are the strategies that U.S. aerospace small business leaders use to comply with the FCPA? The primary data collection technique selected to answer the research question was semistructured interviews, which was combined with research on the company's FCPA compliance strategy directives and personal journaling data. Using semistructured interviews does not bias participants' responses to open or closed-ended questions (Covell, Sidani, & Ritchie, 2012). Semistructured interviews provide reliable data, and researchers using semistructured interviews acquire a deep understanding of participants' experiences (Marshall & Rossman, 2011). Irvine, Drew, and Sainsbury (2013) suggested using semistructured interviews to encourage interviewees to elaborate on what members said.

I interviewed seven participants that handle international business in one small aerospace company in California. During the meetings, the plan was to ask participants

the open-ended interview questions and potential follow-up questions during the semistructured interviews. Irvine et al. (2013) showed interviewees in semistructured interviews could ask answers during the interviews. At the end of the interviews, the data collected included recorded data, corporate documents, informed consent documents, and personal journal notes. Alfonso, Nickelson, and Cohen (2012) used brief interview questions in a case study on farmers' markets in rural communities. Researchers frequently conduct case studies in social science research to answer how and why questions regarding situations over which researchers have limited control over the outcomes (Ranjbarfard, Aghdasi, Albadvi, & Hassanzadeh, 2013). Colombini, Mayhew, Ali, Shuib, and Watts (2013) and Sylvain and Lamothe (2012) noted researchers using a case study method should employ interview questions and follow-up questions to explore constructs, patterns, and interrelationships of the collected data.

Phone and email were the communication methods used to confirm the executive's intent to participate in the study and to coordinate the executive's availability. Participants received my contact information, including a phone number and email address, at the beginning of the study. Communications with participants via email and phone calls continued until the completion of the study.

I reserved the meeting room by coordinating with the sponsoring executive one week before the interview date. Some participants elected to have the meeting take place at the candidate's office, and no room reservation was required. The process of securing a hotel near the interview location took place after confirming the interview date.

I arrived in California one day ahead of the interview date and check into a hotel near the interviews location. The next day, one hour before the first scheduled meeting, the preparation of the conference room started by locating the power outlets and setting up the two tape recorders and the laptop computer. Conference room table clearing occurred except the consent forms that still needed signatures.

Greeted the participant upon arriving at the interview location and initiated a general conversation that helped to make the participant comfortable. After greeting the participant, I provided members with an overview of the interview process and collected the signed consent forms. At this point, I turned on the two tape recorders and the interview began by asking the first question. After the participant answered the first question, additional clarification questions took place.

After the participant provided an answer to the first question and related follow-up questions, the second interview question occurred. The process continued until the participant responded to the interview questions. At this point, I informed the participant that the interview was over. A repeat of the interview process took place with the seven participants. Gathering the tape recorders, laptop computer, and notes taken during the interviews completes the seven interviews. Documents collected during the data collection process include interview audio tapes, company's FCPA compliance strategy directives, and personal journaling data. The review process included the three collected documents data during the study. The advantage of the onsite interview technique included costs borne by the researcher, timesavings with little interruption of participant work schedules, elimination of travel time for participants, and opportunities to ask

follow-up questions. The disadvantages of the onsite interview technique included a limit on the number of participants and the possible increase of participant stress levels. Participants' limited recollection of FCPA experiences meant participants needed to prepare for the interview beforehand. Researchers can tape record onsite interviews, which results in more accurate accounts of the phenomenon under study (Fullerton, McGettigan, & Stephens, 2010; Kotlarsky, Scarbrough, & Oshri, 2014). Transcribing interviews enabled the removal of superfluous information such as repetitions (Kotlarsky et al., 2014). Researchers conducting face-to-face interviews have the opportunity to record the interviews, observe participants' physical expressions, and take field notes, but this process may increase participants' tensions (Schäffler et al., 2014). Researchers conducting onsite interviews control the shift of power and record and transcribe interview data; however, onsite interviews limited the number of participants (Laukner, Paterson, & Krupa, 2012).

The advantage of obtaining and reviewing the company directive related to FCPA compliance served as a comparison tool to validate the answers to the interview questions and the credibility of the responses. The disadvantages may be discrepancies between the participant's responses and the corporate directive that would require additional interviews and therefore lengthen the time needed for the research. Company regulations include the company's anticorruption FCPA compliance process that executives must follow when conducting international business (Jorge & Basch, 2013). Leaders of corporations develop self-regulation and anticorruption strategic directives to ensure compliance with the FCPA and to use as a defense against any major bribery legislations

(Lord, 2013). Corporate FCPA compliance guidelines provided a coherent description for employees that served as the code of conduct staffers needed to follow within the country in which organization members operated (Klinkhammer, 2013).

The advantage of using a personal journaling technique includes improving the recollection of events, filling the gaps in the literature, reducing discrepancies, reducing the author's potential misinterpretations of the responses gathered during the interview, and achieving data triangulation. The disadvantages of writing a personal journal included possible distractions during the meetings and the additional time needed to write the personal journal. A researcher uses personal notes, including personal experience, to fill the gaps in the literature and to clarify ideas of different elements in the research process (Lamb, 2013). Researchers use personal diaries and reflexive journals to disclose personal experiences, including seeing, understanding, and interpreting events (Aguilar Delgado & Barin Cruz, 2014). Researchers use a personal journal to stimulate the reflection and awareness of personal experiences during the research process (Starr-Glass, 2014).

I enhanced the reliability and validity of the data collection process by conducting an expert review after receiving IRB approval. The outcomes of the expert review assisted in improving the validity, reliability, and level of understanding of the interview questions. The expert review helped to ensure the answers to the open-ended questions provided valid and reliable data (Leedy & Ormrod, 2013). Researchers conducting expert review can tailor interview questions to improve the efficient use of interview time and validate interview questions (Frolic et al., 2013). Clyne et al. (2013) conducted expert

review of eight participants to validate the process of prescribing medication to older patients.

The expert review involved surveying four aerospace participants experienced in international markets. The four participants had 20 or more years of experience as aerospace contractors leading international business activities. Identified participants had a postgraduate credential and had experience in interpersonal communications. The expert review consisted of the following steps: (a) obtained IRB approval, (b) contacted four aerospace participants via email and telephone to explain the expert review process and expectations, (c) sent the expert review questions to the four aerospace participants, (d) followed up via email or phone and answer questions the expert review participants present, (e) collected executive's suggested changes and comments for improving the interview questions, and (f) updated the interview questions based on the expert review results.

Member checking occurred after completing the seven semistructured interviews. Member checking is a quality control process researchers use to verify the accuracy of collected data during or after the interview (Harper & Cole, 2012). Member checking was the process of checking researchers' interpretations of interviews with participants for accuracy (Harper & Cole, 2012). Awad (2014) and Andrasik et al. (2014) described member checking as the process used by researchers to confirm with participants the researchers' interpretation of the data provided during interviews.

Davidson et al. (2012) concluded member checking involves coordinating a researcher's interpretations of interview results with participants to validate the

researcher's interpretations. Li, Westbrook, Callen, and Georgiou (2012) noted member checking is the process of clarifying interview interpretations with participants. Reilly (2013) illustrated member checks help to ensure credibility by providing participants the opportunities to challenge data interpretation and to correct errors. Kim, Kim, Han, and Chin (2015) reported researchers use the member-checking process to ensure the quality and interpretations of collected data are in agreement with understandings of the participants.

Data Organization Technique

Data organization involved using an electronic data filing system to organize study data for ease of retrieval and data analysis. The data support documents filed electronically included (a) consent form, (b) invitation for cooperation, (c) permission letter, (d) interview protocol, (e) interview questions, (f) interviews transcripts and analysis, (g) corporate directives related to FCPA compliance, (h) copy of all cited articles, and (i) reflective journal. A removable data storage device with password protection ensures data security. The data remains in a locked file cabinet located in the home office for 5 years after the completion of the study. After the 5th year, I will remove the collected data from the storage device and delete the data permanently to protect participants' confidentiality.

Basurto and Speer (2012) explained researchers' efficient organization and analysis of collected data helps to answer research questions. Vernon-Dotson (2013) asserted that during a qualitative case study, researchers perform numerous data organization and analysis techniques to improve the quality of the research. Lawrence

and Tar (2013) illustrated researchers use the coding method in data organization to group similar concept into categories and subcategories to facilitate answering the research question.

Data Analysis

Data analysis in a qualitative study starts with organizing the collected information, followed by data perusal, classification, and synthesis (Leedy & Ormrod, 2013). Mugarura, Slobogean, and Bouchard (2014) indicated the data analysis process involves the emergence of overarching themes from participants' interview transcripts and other collected data from the study. Haanstra et al. (2013) indicated data analysis includes category development and coding recurring themes. Analyzing qualitative data involves organizing, perusing, and identifying general themes and integrating and summarizing the data to the reader (Leedy & Ormrod, 2013). The data analysis process used thematic analysis, including methodological triangulation, to identify key themes was used to examine data in the study.

Using thematic analysis including methodological triangulation of key concepts from three data sources contributed to the quality of conclusions by verifying the findings through the concurrence of data collected from three resources. Through triangulation, I identified categories and themes using multiple resources. This process aided in interpreting the research evidence and supported the study conclusions. Torrance (2012) indicated the four essential forms of triangulation are data triangulation, investigator triangulation, theoretical triangulation, and methodological triangulation. Triangulation is a data analysis technique used in qualitative case studies to compare data from different

sources to ensure the accuracy of research results while supporting data validity and reliability (Othman & Rahman, 2014; Street & Ward, 2012). Triangulation was the process of using multiple data sources and applying multiple perspectives to the phenomenon under study (Homburg, Klarmann, Reimann, & Schilke, 2012; Lin et al., 2013).

Two audio recordings captured the interview data and recorded information transcriptions in Microsoft Word documents after the seven interviews were completed. Study data included coded transcripts, detailed notes, the journal, and corporate documents. The member checking process commenced after data collection using the interpretation of the interview data. After member checking was complete, the thematic analysis including methodological triangulation of key concepts from three data sources began, which involved triangulating the interview data, corporate directives, and the journal themes. Additionally, I identified and documented the common strategies used in small aerospace companies to comply with the FCPA.

This study included the analysis of compiled data from seven participants' interviews using NVivo software tools to organize the research data and establish a data traceability matrix. General coding, theme identification, data relationships, annotations, and linked data sets of the study's evidence accomplished by using the NVivo software thematic analysis including methodological triangulation. Basurto and Speer (2012) maintained coding would help data reliability because the researcher can organize coded data in an efficient and useful manner. After sorting and categorizing the data, I used

NVivo to identify common themes, analyze the themes, and establish the strategies to answer the research question.

Coding and classifying qualitative data increases validity and facilitates the analysis of collected data (Habib, Etesam, Ghoddusifar, & Mohajeri, 2012). Lawrence and Tar (2013) indicated coding is the process of naming and categorizing phenomena through a close examination of collected data. Sánchez-Algarra and Anguera (2013) emphasized coding provides coherence to the flow of events or phenomenon behavior. Line-by-line coding of the answers obtained from study participants' responses to the interview questions served to establish categories and themes (Klassen et al., 2012). Habib et al. (2012) noted using NVivo software in qualitative data analysis increases the reliability and validity of study results. One of the tasks was to triangulate the themes generated by the NVivo software.

Using the themes identified through NVivo data analysis, triangulation of the data, and additional literature search data enhanced the focus on the central topics and the conceptual framework of the study. I concentrated on the main categories and compared identified groups with the literature review, journal notes, and corporate documents before sending the interview analysis results to the participants. The study included changes received from the participants that resulted from the member checking process. Andrasik et al. (2014) asserted researchers conduct member checking to improve the accuracy of collected data, resolve misinterpretations of gathered information, resolve disagreements in codes, and identify new themes. Goldblatt, Karnieli-Miller, and Neumann (2011) referred to member checking as the process of participants verifying the

research findings to improve the data accuracy and credibility of the study results. Li et al. (2013) reported member checking involves analyzing the transcribed responses to the interview questions and coordinating the researcher's interpretations of the results with participants to ensure data accuracy.

Reliability and Validity

Reliability relates to the ability of a measuring instrument to yield consistent results when the measured entity stays the same, and validity refers to the accuracy of the research findings (Leedy & Ormrod, 2013). Reliability refers to the extent of the consistency of the measurements by an instrument (T. J. Hess, McNab, & Basoglu, 2014). Validity consists of the internal validity of the outcome and the external validity of the results of an experiment (Jackson, 2012).

Reliability

Reliability is the consistency with which researchers measure the results of an instrument when the entity measured is constant and with additional changes (Leedy & Ormrod, 2013). Triangulation improves the reliability of collected data through a comparison of interpretations and facts from different sources converging on the same event (Street & Ward, 2012). The reliability of the collected data obtained by asking precise open-ended questions increases the integrity of the investigation and the applicability of the findings (Cook, 2012; Leedy & Ormrod, 2013; Street & Ward, 2012).

I addressed dependability in the study through member checking, triangulation, and an expert review. To ensure the data collection process, instrument, and study were dependable and reliable, the procedures followed involved (a) ensuring the focus of

interview questions and follow-up clarification questions answered the research question; (b) ensuring interview questions were accurate, simple, and clear; (c) using an expert reviewer to validate clarity, understanding, and desired outcomes; (d) comparing the interview data to the interview questions; (e) conducting multiple reviews of data including cross checking journal notes and interview data; and (f) using NVivo software for data analysis. Researchers achieve dependability of collected data by using NVivo software to provide clarity on repeated themes of researcher inquiries (Lancaster et al., 2013). Using NVivo query tools to audit findings guards against rare discoveries that happen to suit a researcher's potential preferred argument, and maintaining a reflective diary enhances study dependability (Houghton et al., 2013). Elo et al. (2014) referred to dependability as the stability of collected data over time and under different situations. Söderholm and Norrbin (2014) described dependability as the ability to perform the task as needed and when needed.

Validity

Validity refers to the accuracy, credibility, and meaningfulness of a research study (Leedy & Ormrod, 2013). Achieving validity involves establishing sufficient controls to ensure collected data will support the study conclusions and the study results generalized beyond the research context (Leedy & Ormrod, 2013; Morgan-Thomas, 2012). Validity entails the internal validity and external validity (Jackson, 2012; Yin, 2013).

Researchers ensure the credibility of collected data by reaching saturation, demonstrated through evidence of recurring themes throughout the developmental process (Ashworth, 2012). Nordhagen et al. (2014) illustrated three forms of credibility:

professional credibility, public credibility, and personal credibility. Henry (2012) indicated the credibility of a case study increases by triangulating data from multiple sources. In this study, I focused on professional credibility, which included academic and nonacademic research credibility.

To improve the credibility of the study, I triangulated the data collected from participants' interviews, against the company's directives, and the personal journal developed during the study. Triangulation involves comparing data from different sources to ensure the accuracy of research results and contributes to the reliability, credibility, and validity of collected data (Othman & Rahman, 2014). Triangulation is the process of using multiple data sources and multiple perspectives for a phenomenon under study to arrive at conclusions to a research question (Leedy & Ormrod, 2013; Lin et al., 2013). Kapoulas and Mitic (2012) indicated researchers use data triangulation to increase the credibility, validity, and quality of the research.

To attain transferability, the FCPA compliance strategies identified must apply to other companies. As the FCPA affects all U.S. individuals and corporations, part of the identified FCPA compliance strategies could be transferable to other organizations or industries. Järvensivu and Törnroos (2010) defined transferability as the process of transferring the study results to other situations. Järvensivu and Törnroos also indicated transferability can be partial and requires testing the resulting framework application in another context to explore the potential for transferability. Due to time limitations, I did not anticipate the need for transferability testing in the study. Detailed results of interview transcripts and a literature search enhance the transferability of study results (Houghton et

al., 2013). The integrative review of literature related to a topic and that draws similar conclusions from different studies improves the transferability of research results (Leon, Lewin, & Mathews, 2013; Moustakas, 1994). Knies et al. (2012), Perrier et al. (2014), and Malterud (2001) described transferability as the extent of study findings' applications beyond the scope of the study. In this study, the transferability of identifying FCPA strategies used by aerospace executives to all U.S. industries left to the reader and future researcher to determine.

Establishing confirmability in the study involved tape recording the interviews, taking notes during the meetings, and obtaining participants' feedback regarding the accuracy of the interpretation of the collected data. Researchers can ensure confirmability throughout a study by taping the conversation, taking notes, and asking participants to examine the accuracy of collected data transcripts (T. R. Wilson, Birks, & Alexander, 2013). The confirmability of a study refers to the accuracy of collected data and neutrality of the researcher during the collection and analysis of collected data (Houghton et al., 2013). The confirmability process secured the neutrality of the researcher and the accuracy of the data (Marshall & Rossman, 2011; T. R. Wilson et al., 2013).

I ensured that saturation occurs before concluding the participant interviews by looking for the point at which no new themes or new data are surfacing in participants' answers to interview questions. Data saturation occurs at the point in which data collected from two consecutive interviews reveal no additional information on the same issue (Coenen et al., 2012). Anyan (2013) explained that during data collection, power between the interviewers and interviewees shifts; however, interviewers must learn how to control

this power shift to reach data saturation during the interview. Guzys et al. (2015) and Ruijs et al. (2012) asserted data saturation occurs when no new categories, new coding, or new information emerges. Data saturation occurred during data collection when all the participants' answers to the same question are comparable (Coenen et al., 2012).

Marshall and Rossman (2011) indicated that to reach saturation, researchers must conduct additional interviews with participants. Researchers achieve data saturation when new data reveal less than 5% new categories (Mueller, Schuster, Strobl, & Grill, 2012). In qualitative research, saturation occurs when no new information or a limited number of categories emerge from case study interview responses (Goffin et al., 2012).

Transition and Summary

Section 1 included the study purpose, my role regarding designing the research interview process, interview questions, and participant selection. This section included information about obtaining permission from a company executive to perform the study, obtaining consent from participants for the interview, setting up interviews, and informing participants of the participant's rights. Section 1 also included a discussion of the critical issue of preventing harm from coming to participants due to participating in the study and validating research data.

Section 2 included a description of the research design and the research method selection, as well as the rationale for selecting the method. The section also included a description of the research population and participant selection criteria. Other topics included data collection techniques, data organization, data security, data analysis

methods, dependability, credibility, transferability, confirmability, data saturation, validity, and the final presentation format.

Section 3 included the application of study results to professional practice and implications for social change. Section 3 includes an overview of the study, the presentation of data, findings, applications of the results of global management professional practice, and social change implications. Finally, Section 3 includes a recommendation for action, recommendation for further study, reflections on personal experiences during the study, a summary, and research conclusions.

Section 3: Application to Professional Practice and Implications for Change

Introduction

This section presents the findings of the study. The problem that I addressed in this study is that U.S. aerospace companies must operate competitively in the global market and comply with the FCPA, but enforcement of the FCPA by the U.S. Department of Justice does not occur in international settings for non-U.S. companies. The specific business problem is that some U.S. aerospace small business leaders lack strategies to comply with the FCPA.

This section includes the results of the data collected from seven small aerospace executives experienced with the FCPA compliance in California. The section also includes the themes that surfaced from semistructured interviews conducted with the seven participants described, and I illustrate how these ideas apply to the aerospace industry professional practice and the implications for social change. In addition, I suggest recommendations for future studies that would complement these research findings. Finally, I reflect on my experience as a researcher, indicate how this process influences my way of thinking, and describe potential bias that may have influenced the study.

The purpose of this qualitative, single case study was to explore the strategies that U.S. aerospace small business leaders use to comply with the FCPA. The population of this study was seven executives at a small aerospace company in California. The overarching question guiding this study was: What strategies do U.S. aerospace small

business leaders use to comply with the FCPA? By interviewing the seven company executives from the small aerospace company, I was able to identify and gain in-depth understanding of successful strategies that small aerospace companies use to comply with the FCPA.

The research data were primarily captured during semistructured interviews that I conducted with seven executives at a small U.S. aerospace company based in California. These interviews showed that the participants were experienced in international business and with the FCPA compliance. The seven executives responded to both open-ended questions (see Appendix E) and follow-up clarification questions. I used two tape recorders to capture the executives' answers and took additional notes during these meetings.

I used thematic analysis including methodological triangulation of key concepts from all collected data, including interview data, interview notes, a personal journal, and corporate directives. Four themes emerged from the research: (a) the importance of continuous FCPA compliance training; (b) interactive management; (c) compliance with cultural norms, policy, and FCPA; and (d) qualifying for FCPA compliance. Through this study, I offer insights on how to establish effective FCPA compliance strategies that account for the cultural norms and maintain compliance with local laws. These findings are intended to positively influence social change by reducing the costs of doing international business, potentially creating new jobs and improving the quality of life for individuals and communities.

Presentation of the Preliminary Findings

In this section, I present the data collected related to the semistructured interviews with participants presented, interview questions tested through expert reviews that resulted in no recommended changes, and semistructured interviews conducted and open-ended questions asked during the semistructured interviews. I coded the obtained data from all resources using NVivo software. The following paragraphs include the findings of the data analysis.

The data collection processed included collecting answers to the open-ended questions that I asked in the seven interviews, personal notes I took during the meetings and samples of corporate directives collected during the interview. The data collection also included member-checking inputs and my personal journal data collected throughout the study. The study involved extensive research on literature related to compliance with the FCPA, identification of Candidate Company for analysis, conducting interviews with participants, and analyzing all collected data to explain successful strategies used by a small aerospace company to comply with the FCPA.

I used findings from semistructured interviews to identify successful strategies a small aerospace company uses, which provide the basis for compliance with the FCPA. After semistructured interviews, data collected during these interviews was electronically transcribed using TranscribeMe through NVivo. Uploaded transcribed interview data into NVivo led to developing nodes or themes. I input these topics into NVivo by reviewing transcribed interview data, assigning a theme for each appropriate answer or sentence related to the research question. The result was a complete list of all themes created by

the NVivo software, as well as consolidation of similar ideas into four main general themes.

I uploaded other collected into NVivo including company policy for FCPA compliance and data from my personal journal. Data triangulation of gathered data from the seven interviews, company policy for FCPA, and my personal journal validated the four main themes. NVivo software facilitated the organization of collected data and themes, and it allowed me to explore and analyze collected data.

The interview questions developed for this research were suitable for exploring and eliciting data consistent with the FCPA compliance strategies used by small aerospace companies to achieve satisfactory compliance with the FCPA. Each interview lasted approximately 25 to 35 minutes. Participants responded to each of the seven interview questions and any additional follow-up questions. The analysis of participants' responses to each question follows.

Interview Question 1

Interview Question 1 was: What strategies do you use to comply with the FCPA? The objective of this question was to determine participants' familiarity with the overall FCPA compliance process and what strategies the leadership uses to ensure employees, customers, and representative comply with the FCPA. As shown in Table 2, all participants (100%) were fully knowledgeable of the full range of FCPA compliance strategy initiatives occurring in the organization.

Table 2

Strategies Used to Comply with FCPA

Code	<i>n</i>	%
Continuous FCPA training	7	100
Interactive management	5	71
Internet search for periodic updates to the FCPA	5	71

RM06 stated that continuous training on FCPA compliance process including timely email notifications of any changes of the FCPA as they occur are an essential part of the company strategy for FCPA compliance process. Participants' responses to this question indicate that the organization leaders are promoting sustainable FCPA compliance training initiatives throughout the organization. The results in Table 2 show that seven study participants (100%) were aware of the full range of sustainable FCPA compliance training initiatives. The general business problem is that U.S. aerospace companies must operate competitively in the global market and comply with the FCPA, but enforcement of the FCPA by the U.S. Department of Justice does not occur in international settings for non-U.S. companies. These results partially supported the study's general business problem.

Interview Question 2

Interview Question 2 was: What recent changes have you made in your company policies to improve compliance with the FCPA? The objective of this question was to determine participants' familiarity with the company policy for FCPA compliance and

the process that corporate leadership uses to ensure employees, customers, and representative are aware of policy changes. Participants' responses to the interview questions provided varying results, as shown in Table 3.

Table 3

Company Policy Changes: Aware or Unaware of Policy Changes

Code	<i>n</i>	%
Quarterly reviews and yearly FCPA re-certification	7	100
Use of CRM tools for FCPA updates	2	28

The results in Tables 3 show that seven participants (100%) indicated that they were aware of the policy change that mandates a quarterly FCPA compliance review including a yearly certification of compliance with the FCPA for all employees and customers. LT08 stated that improving compliance with the FCPA throughout the organization, and within the international customer's organization quarterly was the goal for making these changes. RM08 indicated that maintaining currency on the FCPA changes requires timely updates to all employees and clients through a corporate automatic alerts system, providing all stakeholders with the latest FCPA changes.

The results of Table 3 also show that two participants (29%) were not aware of the recent changes made to the corporate policy that required using customer relationship management (CRM) tools to provide timely information regarding the FCPA changes to all stakeholders. EW08 and SM08, who were among the more senior organizational leaders participating in the study, indicated that some of the changes to the FCPA

compliance policy were designed to meet the organization's FCPA goals. LT08 and RM08 added that senior leadership made these changes to ensure that all employees pursuing international business and their customers are fully compliant with the latest FCPA requirements.

Interview Question 3

Interview Question 3 was: What does leadership consider essential for FCPA compliance? The objective of this question was to determine key strategic items considered critical for a small aerospace company to comply with the FCPA. Participants' responses to Interview Question 3 varied significantly. This variation of the responses prompted me to capture their responses in Table 4 and Table 5.

Table 4

Compliance with Cultural Norms and Corporate Policy

Code	<i>n</i>	%
Comply with cultural norms governed by the FCPA	6	86
Follow corporate FCPA compliance policies	7	100
Initial FCPA training and certification	6	86

Table 5

License Fees and Informing Customer of Conflict with the FCPA

Code	<i>n</i>	%
Explain to customers potential conflicts with the FCPA	7	100
Pay fees that are compliant with the FCPA	6	86

As the results in Table 4 show, six study participants (86%) indicated that management considers initial training and certification essential for FCPA compliance. RM12 noted that new employee's initial training and certification are essential for ensuring that employees are aware of the FCPA compliance requirements and that there are severe penalties imposed by the government on employees and management for any violations of the FCPA law. RM14 and EW12 indicated that they complied with cultural norms as long as they were compliant with the FCPA and, in some cases, had to decline gifts from customers to maintain compliance with the FCPA.

Table 5 shows the additional information study participants provided in response to Interview Question 3. Seven study participants (100%) indicated that they explained to the customers any potential conflicts with the FCPA during the initial business pursuit process. SM18 explained that each culture has its own business rules and that management complies with cultural rules as long as they do not violate the FCPA law. KL26 and RM16 stated that some customers required a significant fee and even these payments are compliant with the FCPA. Paying or not paying these charges becomes part of a strategic business decision because these costs increase the overall value of the contract.

Interview Question 4

Interview Question 4 was: What action plan considerations would ensure continued success with FCPA compliance? The objective of this question was to determine participants' familiarity with the company action plan for FCPA compliance and the effect of the cultural situation on being compliant with the FCPA. The results in

Table 6 show that seven interview participants (100%) were aware of the corporate action plan that ensures continued success with the FCPA compliance.

Table 6

Compliance Action Plan with FCPA

Code	<i>n</i>	%
Aware of FCPA compliance action plan	7	100
Cultural effect on FCPA compliance action plan	6	85

KL30 and RM20 stated that FCPA compliance action plans include responding to any updates to the FCPA. Both employees and customers have access to these plans before any contract engagements. SM15 and LT22 indicated that FCPA compliance action plans are customer specific and include regular certification, field visits, and mutually agreed upon rules of business engagements.

Interview Question 5

Interview Question 5 was: What other pertinent information do you see that we have not covered in this interview? The objective of this question was to determine participants' familiarity with FCPA compliance and the process that company leadership uses to address encountered cultural conflicts with the FCPA. As Table 7 shows, four study participants (57%) provided additional information regarding FCPA compliance.

Table 7

Recommendations for FCPA Currency and Addressing Noncompliances

Code	<i>n</i>	%
Noncompliance with the FCPA	4	57
Maintaining up-to-date FCPA compliance database	4	57

KL34's remarks provided useful insight into the company's commitment to maintaining full compliance with the FCPA. These actions included maintaining the up-to-date database of FCPA requirements, regularly revising the corporate FCPA directive, and using CRM tools to provide email notifications of FCPA to all employees. RM24 stated that company management must examine each opportunity for FCPA compliance and try to avoid the engagements with business situations that may violate the FCPA at any point during the execution of the project.

Triangulation of the interviews data, FCPA compliance corporate policy, and my personal notes improved the validity of the collected data. I compared the interpretation of the data gathered from the open-ended question during the semistructured interviews, corporate policy for FCPA compliance, and my personal notes. I used NVivo as part of the audit process: the triangulation results validated my interpretations of the collected data.

Overarching Research Question

The overarching research question for the study was "What strategies do U.S. aerospace small business leaders use to comply with the FCPA?" I answered this

question through posing five open-ended interview questions to participants (see Appendix E). Multiple themes have emerged from the study: I used NVivo to tabulate and consolidated the developed nodes into four main themes:

- Continuous FCPA compliance training,
- Interactive management,
- Compliance with cultural norms and corporate policy, and
- Qualifying for FCPA compliance.

Through this study, I identified insights on how to establish effective FCPA compliance strategies that take into account the cultural norms and maintain compliance with local laws. These findings are intended to positively influence social change by reducing the costs of doing international business, which creates jobs, and improves the quality of life for individuals and communities.

Findings in Relation to the Themes

The problem concentrated in this study was that small U.S. aerospace company business leaders lack strategies to comply with the FCPA, which they need to do to compete effectively in international markets. I specifically investigated these using semistructured interviews with business leaders who had at least one year of experience addressing FCPA compliance at a small U.S. aerospace company in California.

There are several different perspectives on the importance, application, and implications of adopting a corporate FCPA compliance strategy due to the complexities associated with the U.S. aerospace industry. I categorized, organized, coded, and uploaded participant answers to NVivo for qualitative data analysis. The main themes

that emerged from this research as listed in Table 8 along with significant relevant statements from interview participants.

Table 8

Themes Supported by Significant Statements From Interview Participants

Themes	Participants' Statements
Continuous FCPA compliance training	<p>RM04: We do online training to the greatest extent possible. We look on the FCPA website for periodic updates, and we join in industry associations who sometimes alert us to what's going on internationally. Therefore, we have a variety of sources of which we try to keep as current as possible on the latest FCPA requirements.</p> <p>EW10: We all need ongoing training and timely updated on any FCPA changes. If there are any changes that I may have missed that the boss knows about, he makes sure that I am aware of it. Then we flow all these FCPA changes down to the subcontractors.</p>
Active management	<p>RM06: From an employee standpoint wherever they are - we have people in multiple locations - and we try to ensure on a regular basis - once a quarter - that they are up to date on the FCPA requirements. We send out website alerts; we send out email alerts, we connect employees and customers up to the latest government site.</p> <p>LT22: Just keep all your employees up-to-date and make sure that you always have a feedback loop so that management in the U.S. are always aware of what is going on in the field with your employees.</p>
Compliance with cultural norms and corporate policy	<p>RM22: Sometimes you have to be very careful in reminding our people that we are doing business with international corporation that have to meet U.S. government regulations. Some of the countries that we do business with, sometimes they have no rules whatsoever. We have to remind them that we are representatives of the US government and must comply with the U.S. laws. Therefore, we are diligent about reminding our potential suppliers with the FCPA compliance.</p>

Qualifying for FCPA compliance

EW12: We follow the normal cultural practices. If it is a European customer, they may have different rules than we do. We try to follow the laws of the other country without violating the FCPA.

KL02: About the FCPA, most of our customers we vet for compliance with the FCPA. We do not work for people who are noncompliant with the FCPA. We do vet our customers in that we do not work for people that we would mistrust, noncompliant with the FCPA or find as a demanding customer.

EW18: We try to understand the customers' cultural issues, address these issues and considerations while maintaining compliance with the FCPA and local laws

Findings Related to Body of Literature

Prior literature on FCPA compliance strategies has focused on identifying corruption, courts' role in controlling bribery, the dangerousness of business crimes, and how much money companies need to spend to effectively comply with the FCPA (Virginia & Maurer, 2013). Case studies regarding strategies for compliance with the FCPA have linked reducing business transactional crimes to reducing business costs, and creating jobs, creating positive social change (Lestrange & Tolstikov-Mast, 2013, and Lord, 2013). Operational literature on this topic has documented the relationships between culture, corporate policies, local laws, the wealth of the country, penalties for corruption, and FCPA compliance strategies. Theoretical writings have examined corruption from a cultural, ethical, moral, ambiguity of governmental laws or corporate structures point of view (Lestrange & Tolstikov-Mast, 2013, and Lord, 2013). These theoretical articles examined corruption from cultural, ethical, moral, ambiguity of governmental laws, and corporate structures point of view (Kluvers, 2014; Rullock, 1996). Liu (2015) noted that current literature on FCPA compliance provides different

and contradictory views.

In this section, I relate the research findings to the existing body of literature on FCPA compliance strategies. These study findings are based upon extensive knowledge on the topics discussed in the literature review including new studies that were published since I wrote the proposal for this study.

Theme 1: Continuous FCPA Compliance Training

The research findings showed a direct links to the larger body of literature related to the FCPA compliance. Elements from the literature on FCPA compliance strategies were used to code, organize, and categorize the information collected from each of the interviews. Continuous FCPA compliance training emerged as a significant finding. Jorge and Basch (2013) contributed significantly to the literature on continuing education as an element of FCPA compliance strategies. Jorge and Basch considered continuous corporate training as essential for achieving the ultimate goal of FCPA compliance program where employees internalize the FCPA compliance code of conduct into their daily routines. Cascini et al. (2012) recommended the inclusion of FCPA compliance in the corporate code of ethics and implanting strong and transparent anticorruption employee training programs.

The findings from this study supported Jorge and Basch's (2013) assertion that continuous FCPA compliance training is essential for employee's internalization of compliance with the FCPA in their daily business dealings. In particular, study participants referenced using CRM tools to notify employees via email of any FCPA updates by the DOE or the SEC. The timely notification process of the FCPA changes

ensures that employees have current knowledge of FCPA changes and protects companies from potentially significant penalties due to violations of the FCPA.

Theme 2: Active Management

Active management was a significant study finding. As an element of strategic compliance with anticorruption laws, management uses initial orientation, and a regular training process that serves for screening employees that already have ethical values concurrent with those of the corporation and involve employees in commitment to follow moral norms (Braje & Galetic, 2014). Company leaders should also maintain procedures in place to ensure corporate compliance with the FCPA (Fox, 2010). Executives of multinational corporations need to assess countries' corruption and establish strategies on how to comply with the FCPA while conducting business in these countries (Cleveland et al., 2010). Huang and Rice (2012) blamed corruption on the lack of corporate management directives written for global business leaders to follow in bribery situations and the lack of corporate strategies to comply with international antibribery laws, including FCPA. Active corporate management must include having a clear FCPA compliance directive, interactive monitoring of FCPA compliance, and monitoring of travel expenses and gift giving to a foreign official to ensure compliance with the FCPA safeguard corporations against major DOJ and SEC penalties (Jordan, 2016).

The findings from this study support Jordan's (2016) assertion that active management through monitoring of business entertainment of government official and travel expenses helps in improving corporate compliance with the FCPA. For example, R30's reference to monitoring the entertainment and gift giving to government officials

to avoid the perception of corruption in the business dealings supported Jordan's assertion. Fox (2010) asserted that active management in maintaining corporate anticorruption policy current ensures compliance with the FCPA, an assertion that was supported by SM06's reference to corporate policy updates to stay compliant with the FCPA supported Fox's assertion.

Theme 3: Compliance with Cultural Norms and Corporate Policy

The theme of compliance with cultural norms and corporate policy while addressing the FCPA compliance was a significant finding from analyzing the research data. FCPA compliance improved in companies that have a clear corporate policy that addresses both FCPA compliance and how to navigate through cultural expectations. National culture significantly influences countries' level of corruption, especially in countries with high masculinity and elevated levels of uncertainty avoidance, which tend to be less compliant with anticorruption laws than in countries with low masculinity and low levels of risk avoidance (Akbar & Vujic, 2014).

National cultures shape the cultures of corruption at different organizations and ultimately affect the strategies for complying with anticorruption laws in organizations (Zaloznaya, 2012). Executives of multinational corporations need to assess countries corruption and establish strategies on how to comply with the FCPA and the cultural norms while conducting business in such countries (Cleveland et al., 2010). This was supported by RM22's reference to complying with cultural expectation when they are compliant with corporate FCPA compliance policy, and diplomatically rejecting any actions to comply with cultural expectations that violate the FCPA.

Theme 4: Qualifying for FCPA Compliance

Another emergent theme was the importance of screening business opportunities, customers, and employees for FCPA compliance. Jorge and Basch (2013) stated that enterprise leaders need to establish an anticorruption policy and create an FCPA compliance program that is easily audited and verified, so as to ensure employees, intermediaries, consultants, distributors, and subcontractors are compliant with the FCPA. This aligned with EW04's recommendation of FCPA compliance programs with online training and yearly certifications.

Cascini et al. (2012) analyzed the inclusion of FCPA compliance in the corporate code of ethics and employee training and the ways compliance with the FCPA can lead to an antibribery corporate culture. Tadajewski's (2015) statement that international managers must screen customers for honesty and trust during their business transactions to comply with antibribery laws. Tadajewski's statement was supported by KL02's reference to vetting customers for FCPA compliance and declining business from people that are suspicious of potential corruption.

Findings Related to the Conceptual Framework

The conceptual framework for this study was based on Sutinen and Kuperan's (1999) regulatory compliance model and Becker and Stigler's (1974) conceptual model of corruption. These models described multifaceted processes that are continuously evolving. Sutinen and Kuperan (1999) developed the model of regulatory compliance to account for the costs and the revenues from illegal behavior popularized the regulatory compliance theory. Becker and Stigler (1974) published the concept of the corruption

model, which popularized corruption theoretical model. I specifically employed these models as a conceptual reference and lens to identify the FCPA adherence strategies needed by U.S. aerospace small business leaders, following Méndez's (2014) statement that regulatory compliance is always less present in a corrupt environment.

Continuous FCPA Compliance Training

Training on the FCPA compliance is an essential part of the corporate strategy that ensures compliance with the FCPA. Cascini et al. (2012) asserted that the inclusion of FCPA compliance in the business code of ethics and employee training could lead to an antibribery corporate culture. Similarly, AR11 described companies' concept of continuous training to ensure compliance with the FCPA by both employees and international customers, in alignment with Sutinen and Kuperan (1999).

Active Management

The importance of active management emerged was also a significant finding. Jordan (2016) asserted that leaders of companies that have international operations need to be actively managing FCPA compliance, create proper compliance policies, and develop robust internal controls to combat corruption. RM12's comments indicated that management is active in the creation of the FCPA policy and the enforcement of this policy, in alignment with Jordan (2016).

Compliance with Cultural Norms and Corporate Policy

Compliance with cultural norms and corporate policy addressing the FCPA compliance emerged as a significant finding. Conceptually, designing corporate policies that reduce corporate liability, compliant with cultural norms without improper benefits

being realized by foreign government officials, serves to achieve compliance with the FCPA (Jorge & Basch, 2013). The study findings included a variation on this concept. MR16's comments indicate that the target company's leadership focus on the creation of a corporate policy that provides instructions to employees on how to address cultural norms deviates from Jarge and Basch's (2013) conceptual framework that provides for a more holistic approach to the compliance with cultural norms, policy, and the FCPA.

Qualifying for FCPA Compliance

Qualifying for FCPA compliance emerged as a significant finding. Jordan (2016) posited that integrity, honesty, good record keeping and full disclosure of business transaction financials are emerging as integral elements of a business successful strategy for compliance with the FCPA. KL02 commented that integrity is essential in all business dealings and company management qualifies clients for integrity through their compliance with the FCPA. The study findings concurred with Jordan's conceptualization that honesty and compliance with the FCPA are elements of long-term business success.

Tie Findings or Disputes Findings to Existing Literature on Effective Business Practice

In the 21st century, lack of compliance with the FCPA is still present, and employees of U.S. aerospace companies allegedly bribe international government officials to gain contracts (Darrouh, 2010). The FCPA, which is one of the significant business corruption deterrents, applies to U.S. companies, U.S. company personnel, and foreign firms trading on the U.S. Stock Exchange in U.S. territories (Feld, 2013). The

implementation of adequate controls to increase compliance with the FCPA in the 21st century is helping to curb corruption (Sanyal & Samanta, 2011). In this section, I addressed the research findings as they relate to strategies for compliance with the FCPA. In addition, I identified the successful business plan for compliance with the FCPA that improves corporate competitiveness, reduces costs for doing business, and leads to economic profits.

Continuous FCPA Compliance Training

Continuous employee training on the FCPA compliance methods can lead to an antibribery corporate culture (Cascini et al., 2012). Given the continued risks of noncompliance with FCPA, companies must have adequate compliance policies, internal controls, and plans to detect and prevent bribery including an ongoing training program for corporate employees engaged in international business pursuits (Jordan, 2016). Ethical training does not necessarily provide a stronger ethical culture. However, data suggest that an ethical training program in an organization can prevent and deter criminal conduct (Stucke, 2014).

Development and training of multinational companies' management on corporate FCPA compliance guidelines and how to management addresses noncompliance situations, identify and avoid international business corruption is important (Weeman, 2013). The findings from the research confirmed Weeman's observation that effective training on corporate FCPA directives assists in identifying and preventing fraud. In addition, LT10's comments regarding yearly training and timely updates to corporate

employees of FCPA amendments as they occur concurred with the assertions of Jordan (2016).

Active Management

High-power-distance cultures where managers adapt paternalistic relationships toward subordinates harbor corruption more than low-power-distance cultures where subordinates question management decisions and offer personal opinions (Yeganeh, 2014). Current trends in FCPA enforcement are ineffective, and the integration of the FCPA into corporate culture through value-based management strategies could improve FCPA compliance at both small and large companies (Lestrangle & Tolstikov-Mast, 2013). Leaders of organizations play a significant role in eliminating corruption in international business by actively participating in the compliance process with FCPA (Adeyeye, 2014; Bierstaker, 2009).

Stucke (2014) noted that to reduce the potential of corruption in international business, management must actively promote ethical behaviors at all levels of the organization and monitor compliance with FCPA. The findings from the research confirmed Stucke observation that active management reduces corruption within the organization. RM06 commented that web-based notifications sent to all employees notifying them of any FCPA changes to keep employees informed of the FCPA requirements concurred with Stucke with Stucke (2014). In addition, AR24's comment regarding periodic reviews of the FCPA requirements implementation and actively reaching to employees and customers with updates as they occur concurred with Adeyeye (2014) and Bierstaker (2009).

Compliance with Cultural Norms and Corporate Policy

Small and medium enterprise leaders need to establish an anticorruption policy and create an FCPA compliance program to ensure international business leaders avoid bribery situations (Jorge & Basch, 2013). A close inspection of the relationship between a culture of noncompliance with anticorruption laws and developing culture is necessary (Akbar & Vujic, 2014; Pena López & Sánchez Santos, 2014). Vietnamese and Burmese cultures, where using an intermediary to facilitate corporate transactions through bribes between government officials and the corporation is the norm (Feldman, 2014).

In the literature, Choudhary (2013) and Klinkhammer (2013) provided that national culture influences corporate culture regarding how corporate leaders view bribery and the potential of employees to engage in corruption when conducting business overseas. The finding from the study provided a variation on the existing literature presented by Choudhary and Klinkhammer. In addition, MR02's comment relating to providing employees with the latest changes in FCPA through clear corporate directives concurred with Jorge and Basch (2013).

Qualifying for FCPA Compliance

Corrupt organization leaders create organizational cultures and establish work structures where employees facilitate corruption on a daily basis without being aware that something illegal is occurring (Campbell & Goritz, 2014). In the literature, Sanyal and Samanta (2011) noted that companies implementation of adequate controls to increase compliance with the FCPA in the 21st century is helping to curb corruption. Executives of multinational corporations need to assist countries with corruption and establish

strategies on how to comply with the FCPA while conducting business in such countries (Cleveland et al., 2010).

Cascini et al. (2012) asserted that the inclusion of FCPA compliance in the corporate code of ethics and employee training and the ways compliance with the FCPA could lead to an antibribery corporate culture. RM12 concurred with Cascini et al.'s assertion. Furthermore, LT06's comment relating to verifying customers compliance standards with the FCPA concurred with Sanyal and Samanta (2011).

Applications to Professional Practice

This research applies to the professional practice of pursuing international business. The purpose of the study was to explore the strategies used by U.S. aerospace small business leaders to comply with the FCPA. I expect this research to benefit primarily U.S. small aerospace and defense businesses in complying with the FCPA while pursuing international trade. Second, I expect this research to help those designing corporate compliance strategy and developing FCPA corporate compliance directives.

Continuous FCPA Compliance Training

This research may benefit U.S. small aerospace business executives who are seeking international trade. The findings covered within this theme may help U.S. small aerospace business executives in designing and maintaining FCPA compliance training programs that may save money by avoiding potential FCPA violation penalties and improve profits. Cascini et al. (2012) showed that employees training on the FCPA compliance process leads to an antibribery corporate culture. Huang and Rice (2012)

indicated the need for developing clear corporate guidelines for a manager on how to deal with noncompliance with the FCPA.

The findings of this theme may help U.S. small aerospace business executives to establish a robust FCPA compliance program that reduces international trade risks. The analysis of the participants' responses revealed U.S. small aerospace companies should develop an FCPA program that has

- Initial FCPA compliance certification,
- Continuous training,
- Timely online notification of changes, and
- Periodic auditing.

These findings are relevant to U.S. small aerospace business that are not only trying to comply with the FCPA but also are focusing on the creation of an ethical corporate culture.

Active Management

The findings in this study may help management to be proactive in the creation of FCPA compliance policies and monitor compliance with these policies. These results apply to a U.S. small aerospace business that is seeking international trade. Throughout this case study, I showed the importance of active management in the compliance with FCPA. With these findings, I indicate that U.S. small aerospace business executives should be involved and take ownership of the FCPA compliance program to protect the corporation, employees, and management from potential FCPA violations.

Compliance with Cultural Norms and Corporate Policy

The study findings are intended to help U.S. small business executives develop FCPA compliance policies that address cultural norms and remain compliant with FCPA. Baughn et al. (2010) asserted that countries' culture has a significant effect on the compliance with anticorruption laws and countries' cultural environment need consideration during the development of corporate strategies for compliance with FCPA. Baughn et al. (2010) concluded that understanding cultural differences helps predict the severity of domestic corruption and noncompliance with FCPA. Mensah (2014) asserted that cultural and religious environments influence business behavior toward corruption. The finding encompassed within this theme concurred with Mensah's assertion and may help the U.S. small aerospace business manager in the establishment of corporate strategies that address cultural norms while complying with the FCPA. In addition, the findings revealed that company executives must ensure that all international contracts have an FCPA clause that requires the participant to comply fully with the FCPA.

Qualifying for FCPA Compliance

This research may benefit U.S. small aerospace businesses with limited resources that are expanding in the international markets with qualifying opportunities. The analysis of the participants' responses revealed U.S. small aerospace company executives should vet international opportunities for (a) integrity of the customers, and (b) customers compliance with the FCPA. Findings also revealed that management, in some cases, declines to participate in international opportunities that appear noncompliant with the FCPA.

Implications for Social Change

The results presented in this study may have positive implications for social change. The results from this study are expected to improvements in corporate ethical standards in international trade practices by reducing contract corruption and increasing compliance with the FCPA. Decreasing contract corruption may result in reduced corporate operational costs. Reduced operational costs are expected to lead to additional jobs in the industry, which improve the local economy leading to a positive social change.

Lestrangle and Tolstikov-Mast (2013) and Lord (2013) asserted that reducing transactional business crime through FCPA compliance creates a safe environment for conducting business, reduces costs, and creates jobs, which results in a positive social change. Global business bribery negatively affects corporations' economic and corruption leads to an anticompetitive environment (Smith, Gruben, Johnson, & Smith, 2013). The findings in this study may have positive implications in increasing the competitive markets where products and services evaluation usually based on their value and merit resulting in economic efficiency within the country, which is a positive social change.

Recommendations for Action

By examining participant responses, company policy, my personal journal, collected data triangulation, and material on FCPA compliance strategies, I identified multiple themes that address how U.S. small aerospace business might use FCPA compliance to improve their international business. These themes included that the design and implementation of FCPA compliance strategy requires cultural knowledge, economic

knowledge, global markets knowledge, understanding of local laws, and FCPA requirements knowledge. Based on the study findings, a successful FCPA compliance policy should include full compliance with the FCPA and comprehensive compliance monitoring program.

The first recommendation is that U.S. aerospace business leaders should establish a comprehensive FCPA compliance program that includes

- Ongoing training,
- Active management,
- Cultural norms compliance guidelines, and
- Qualifying business opportunities for compliance with the FCPA.

The established FCPA compliance program must provide employees with clear instructions on how to comply with the FCPA. In addition, FCPA ongoing training should include an electronic notification of any updates and amendments to the FCPA to the employees and customers.

The second recommendation in those U.S. small aerospace business leaders should actively participate in the FCPA compliance process. Leaders' participation can come in a form of regular audits, periodic interactive seminars, or periodic requests of FCPA compliance feedback from their managers involved in international business pursuits. In addition, leaders should set an example for all employees, be transparent, and not tolerate any violations of the FCPA by any member of the corporation. Leaders also should not penalize employees for rejecting business opportunities that prove noncompliant with the FCPA.

I plan to disseminate the study findings through a variety of channels. This topic is relevant to current international business transactions issues. These include the significant penalties levied on corporation due to violations of the FCPA, the sheer volume of world transactions conducted on a daily basis, and the need to protect corporate, management, and employees for personal liability due to violations of the FCPA. Initially, I expect to share these findings with the leaders of U.S. small aerospace companies that they are in the process of expanding their business in the international markets. I hope that organizations presently developing FCPA compliance strategies will find this information helpful to create guidelines that they follow during their policy formulations stage.

Recommendations for Further Research

The observations and findings in this study show the need for additional research in several different areas. In this study, I explored the strategies used by U.S. aerospace small business leaders to comply with the FCPA. The participants in this study gave their view on how their aerospace companies were successful in complying with the FCPA. This study was limited geographically to California and addresses only small aerospace businesses in that region. I recommend further research on the FCPA compliance strategies used by all U.S. aerospace companies engaged in international trade pursuits. Other recommended study can be a study focused on the transferability of the research findings to other U.S. industries that are involved in international business. Another recommended area for study is the close inspection of existing FCPA and amendments to

identify areas that may require a change to improve the competitive edge of U.S. companies in the international arena.

Reflections

This study gave me a deeper understanding of the value of the case study in a qualitative research and its contribution to the academic body of knowledge. Through this process, I believe that I have transformed from being a practitioner to a scholar-practitioner, capable of contributing to our understanding of global business issues. When I began this journey, I naively thought that it would be solving all business corruption problems and helping the U.S. industry gain international trade by evening the competitive field. I have quickly realized that these efforts may need many studies and a significant amount of time to perform these studies. Some of the faculty members helped me narrow this study to exploring small aerospace companies' strategies to comply with the FCPA.

This research was enhanced by my prior knowledge and experience. My experience in the aerospace and defense industry helped me in identifying the population for this study and in conducting the interviews with the participants. Having experience with international pursuits, international contracts, and international business development for the aerospace and defense also gave me first-hand knowledge of the compliance with the FCPA. I have tried to ensure that my personal biases did not influence the study results; I believe that I was successful in achieving this goal.

I found the process of performing the literature search, conducting the interviews, member checking, coding, and triangulation of data to be invigorating. Synthesizing the

themes to answer the research question helped me in formulating the questions for the interviews and in the conduct of these meetings. This process has increased my confidence as a researcher, and I am looking forward to completing more research in the international business field.

Conclusion

Compliance with the FCPA is critical to the success of U.S. small aerospace companies pursuing international business. I conducted this study to identify successful strategies used by U.S. small aerospace companies to comply with the FCPA. Based on the findings in this study, there are four themes that successful U.S. small aerospace companies are engaged in that make these companies successful in the compliance with the FCPA. Managers seeking international business need to consider these themes during the formulation of a corporate strategy for FCPA compliance. The four themes that emerged from this study were

- Continuous FCPA compliance training,
- Active management,
- Compliance with cultural norms and corporate policy, and
- Qualifying business opportunities for FCPA compliance.

These findings are intended to be used by small aerospace company leaders may use the findings of this study to create successful corporate strategies for complying with the FCPA while also pursuing international business opportunities, reducing the cost of making the international trade, avoiding significant penalties, and establishing a good corporate global image.

This research promotes positive social change by facilitating adherence to strategic FCPA compliance policy developed by company leaders, including improvements in corporate international trade practices by reducing corruption. Reducing business crime reduces overall corporate operational costs, which expected to lead to hiring more people. Hiring more people improves local economies leading to a positive social change.

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Appendix A: Consent Form

Dear

You are invited to participate in my study of Exploring Small Business Strategies to comply with the Foreign Corrupt Practices Act. I am now pursuing a Doctorate of Business Administration Degree with a specialization in International Business studies from Walden University, and this study is the final step in my pursuit of this degree. I am conducting this research to try to identify successful strategies used by U.S. small aerospace business to comply with the FCPA during their searches of international trade. Company managing director has approved me John Palmer to conduct research at Sigma Consulting Group LLC. I am inviting you to participate because your views on the impacts of the Foreign Corrupt Practices Act (FCPA) and your experience in pursuing international business would positively influence the identification of the successful strategies used by U.S. aerospace small business leaders to comply with the FCPA. The results of this study will be important to Sigma Consulting Group LLC's international business. I am inviting senior-level aerospace business members employed by a small aerospace business in California, with an established FCPA compliance policy. The candidate executives for the interviews would made decisions within the past ten years that had international business implications related to FCPA compliances. This form is part of a process called informed consent to allow you to understand this study before deciding whether to take part.

John Palmer, a doctoral student at Walden University, is conducting this study. Possibly, you are a colleague, professional associate, or friend, but this study is separate from that role.

Background Information:

The purpose of the proposed qualitative single case study is to explore the strategies used by U.S. aerospace small business leaders to comply with the FCPA. The study population will consist of leaders of small U.S. aerospace company in California operating in the international market. A company in the population has an absence of bribery penalties, a good international business record of accomplishment, and successfully complies with the FCPA.

Procedures:

If you agree to be in this study, you are consenting to a 30-minute interview. This interview conducted in your company's conference room or private office. Privacy and confidentiality maintained throughout the interview process. This interview recorded to ensure the accuracy of the information extracted from the interview and to aid the researcher in the process of documenting the answers to interview questions. After the interview, I will send my interpretations of your answers to you for validation and data accuracy. My research findings will be published in the academic journal ProQuest, and you will have access to the final report should you wish.

Voluntary Nature of the Study:

This study is voluntary. Everyone will respect your decision about whether you choose to be in the study. No one at any organization or the researcher will treat you differently if

you decide not to be in the study. If you decide to join the study now, you can still change your mind later. You can stop at any time without providing any reason for your action.

Risks and Benefits of Being in the Study:

Participating in this study does not involve any risk of discomfort other than that associated with the discussion of a challenging and thought-provoking topic. However, participants will be contributing to the body of knowledge used to help bring potential improvements through identified compliance strategies with the U.S. FCPA. The potential FCPA proven acceptance programs, which potentially affect U.S. aerospace position in global markets, and could, reduce business corruption, which has both commercial and social benefits.

Payment:

There is no payment associated with your participation.

Privacy:

Any information you provide kept confidential. Personal information used only for this research project. Your name, company name, or anything else that could identify you or your organization will not be in the study reports. Data kept secure in a locked file cabinet in my home office, and no one can access this data except me. Data kept for at least 5 years as required by the university. After the 5-year period, all stored data, including tape files and written notes discarded.

Contacts and Questions:

You are encouraged to ask any questions now. Alternatively, you can contact the researcher via cell phone at (310)426-0452 or email at john.palmer@waldenu.edu with

any additional questions. If you want to talk privately about your rights as a participant, you can call the Walden University representative Dr. Leilani Endicott. The phone number of Dr. Leilani Endicott is 1-800-925-3368, extension 312-1210. Walden University's approval number is **06-15-16-0231012** and it expires on **June 14, 2016**.

I will give you a copy of this informed consent form to keep.

Statement of Consent:

I have read the above information, and I feel I understand the study well enough to make a decision about my involvement. By signing below or replying to this email with the words "I consent," I understand that I agree to the terms described above.

Printed Name of Participant

Participant Signature

Date of consent

Researcher's Signature

Appendix B: Interview Protocol

The following is the protocol utilized during the interviews with participants of the study.

- (a) Introduction and setting up the stage for the interview.
- (b) Ask the interview questions (Appendix E).
- (c) Ask follow-up questions as needed.
- (d) Record and document given answers.
- (e) Schedule follow-up member checking date.
- (f) Complete the interview by thanking the participant.

Appendix C: Invitation for Cooperation

Sample Letter of Cooperation from a Community Research Partner

Community Research Partner Name

Contact Information

Date

Dear Executive,

I am a doctoral candidate in the international business studies program at Walden University, and the research focused on identifying the strategies used by U.S. aerospace small business leaders to comply with the Foreign Corrupt Practices Act (FCPA). Part of the objectives of the study includes the identification of an FCPA compliance strategies that brings social change and improves the international market share of the aerospace industry in California. The study is a qualitative single case research method, and I need to interview seven people in the organization meeting the following criteria:

1. An employee at a U.S. aerospace corporation in California responsible for pursuing international business.
2. An employee responsible for or managed \$1 million or more in the international aerospace and defense business.

3. An employee responsible for or managed three or more members of an international program or business pursuit in the global aerospace and defense business.

These interviews are expected to occur in a private setting at corporate facilities, and individual interview should take approximately 30 minutes. The company name and participants' names will remain confidential and will be not disclosed to other entities. Based on the Walden University IRB's policy, the data will be stored under lock and key by the researcher for 5 years, and then the researcher will destroy the data. The researcher will provide the a signed confidentiality agreement. Prticipants will receive a consent form to read and sign prior to the interview.

Background Information:

The purpose of the study is to identify the FCPA strategies needed by U.S. aerospace organizations in California, which could improve related international business market share in the commercial and governmental sectors.

Procedures:

By agreeing to be in the study, you are consenting to a 30-minute interview. The interview conducted at the company facilities in a private setting. Privacy and confidentiality maintained throughout the interview process. This interview recorded to ensure the accuracy of the information extracted from the interview and will aid the researcher in the process of documenting the answers to interview questions.

Voluntary Nature of the Study:

This study is voluntary. Everyone will respect your decision about whether you choose to be in the study. No one at any organization or the researcher will treat you differently if

you decide not to be in the study. If you decide to join the study now, you can still change your mind later. As a participant, you can stop at any time without providing any reason for the stoppage.

Risks and Benefits of Being in the Study:

Participating in the study does not involve any risk of discomfort other than that associated with the discussion of a challenging and thought-provoking topic. However, participants will be contributing to the body of knowledge used to help bring potential improvements through strategies to comply with the U.S. FCPA. The potential strategic guidelines to compliance with the FCPA could improve the U.S. aerospace position in global markets and could reduce business corruption, which affects both commercial and social benefits.

Payment:

There is no payment associated with your participation.

Privacy:

Any information you provide kept confidential. Personal information used only for the research project. Your name, company name, or anything else that could identify you or your organization will not be in the study reports. Data kept secure in a locked file cabinet in my home office, and no one can access the data except me. Data kept for at least five years as required by the university. After the 5-year period, all stored data, including tape files and written notes discarded.

Contacts and Questions:

You are encouraged to ask any questions now. Alternatively, you can contact the researcher via cell phone at (310)426-0452 or email at john.palmer@waldenu.edu with any additional questions. If you want to talk privately about your rights as a participant, you can call the Walden University representative Dr. Leilani Endicott, who can discuss this with you. The phone number of Dr. Leilani Endicott is 1-800-925-3368, extension 1210. Walden University's approval number is **xx-xx-xx-xxxxxxx** and it expires on **xx-xx-2016**.

If you agree to give the permission to perform the study interviews for your company, please copy the following letter of permission form and put on company letterhead, complete, sign, and mail to my address:

John Palmer

1313 Old Howard Mill Rd.

Duluth, MN 55804

Alternatively, scan the signed letter and email it to my school email:

john.palmer@waldenu.edu.

Thank you in advance for your support of the study.

Respectfully yours,

John Palmer

Walden University Doctoral Candidate

Appendix D: Permission Letter

[Redacted]

Letter of Permission from a Community Research Partner

[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

Date: March 10, 2016

Dear John Palmer,

Based on my review of your research proposal, I give permission for you to conduct a study entitled *Exploring Small Business Strategies to Comply with the Foreign Corruption Practices* within the [Redacted]. As part of this study, I authorize you to interview 5 participants from our company meeting your selection criteria at our Southern California facilities. The authorization includes the process of contacting members, collecting interview data, and disseminating results. Individuals' participation will be voluntary and at members discretion.

[Redacted]
[Redacted]

[REDACTED]

I understand our organization's responsibilities include providing you with access to five participants who meet your selection criteria to conduct the interviews. a location to conduct interviews privately, and temporary access to our facilities. I reserve the right to withdraw from an organization as a whole, or any individual participant has the right to withdraw from the study at any time if circumstances change.

I am approving the research in this setting.

I understand that all collected data, including company name and participants' names, will remain confidential, and no one will have access to data with names other than the researcher. The researcher will protect from harm all study participants by ensuring members confidentiality and will ensure no harm comes to the group due to this process.

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

Appendix E: Interview Questions

The following are the questions presented during the aerospace executive's interview meetings. Follow-up questions added as needed to gain sufficient information and achieve data saturation.

1. What strategies do you use to comply with the FCPA?
2. What recent changes have you made in your company policies to improve compliance with the FCPA?
3. What does leadership consider essential for FCPA compliance?
4. What action plan considerations would ensure continued success with FCPA compliance?
5. What other pertinent information do you see that we have not covered in this interview?