



C R I M I N A L E N F O R C E M E N T
ECONOMIC RECOVERY
ANTITRUST DIVISION

Red Flags of Collusion

You can help prevent collusion in procurement and grant awards — or detect collusion after an award has been made — by using this simple four-part MAPS analysis:

M = MARKET

Who is in the market for this award?

Find out how many vendors could compete for the award and which vendors are best positioned to perform the award. The award may be the target of collusion if:

- There are few vendors in the market that offer the good or service.
- A small group of major vendors controls a large share of the market.
- The good or service is standardized, so that the determining factor in the award is price rather than other competitive factors (such as design, quality, or service).

A = APPLICATIONS

Are there similarities between vendor applications or proposals?

Closely examine the proposals or applications submitted by the competing vendors and look for similarities. The award may be the target of collusion if:

- Two or more proposals contain similar handwriting, typos, or mathematical errors.
- Two or more proposals are sent from the same mailing address, e-mail address, fax number, or overnight courier account number.
- Two or more proposals reflect that last-minute changes (such as white-outs and cross-outs) were made to alter price quotes.
- The document properties of two or more electronic proposals show that the proposals were created or edited by one vendor.

P = PATTERNS

Have patterns developed among competing vendors?

Review the outcome of prior awards for the same product or service to identify patterns over time. The award may be the target of collusion if:

- Over a series of awards, competing vendors rotate as the award winner.
- Over a series of awards, routine competing vendors win the same or similar amounts of work.
- Over a series of awards, one vendor always wins, regardless of competition.
- The vendor that wins the award subcontracts work to losing vendors or to vendors that withdrew their proposals or refused to submit proposals.
- As compared with prior awards, a smaller number of vendors submit proposals for the current award.

S = SUSPICIOUS BEHAVIOR

Have vendors demonstrated behavior that suggests that they worked together on the award?

Keep an eye out for suspicious behavior that indicates that vendors worked together rather than competed for the award. The award may be the target of collusion if:

- A vendor submits a proposal for a procurement or grant award, and you know that the vendor lacks the ability to provide the goods or services requested.
- A vendor brings multiple proposals to an in-person procurement or grant process or submits multiple proposals.
- A vendor makes statements on the phone or by e-mail indicating advance knowledge of a competitor's prices or likelihood of winning the award.

If you notice any combination of these red flags, you should report your concerns to the Antitrust Division.

E-mail: antitrust.complaints.recovery@usdoj.gov

Mail: Citizen Complaint Center
Antitrust Division
950 Pennsylvania Avenue, NW
Room 3322
Washington, DC 20530

Phone: 1-888-647-3258 (toll free in the U.S. and Canada) or 202-307-2040