DATA ITEM DESCRIPTION

TITLE: COUNTERFEIT PREVENTION PLAN

Number: DI-MISC-81832 **Approval Date: 20110121**
AMSC Number: 9181 **Limitation:**
DTIC Applicable: No **GIDEP Applicable: No**
Office of Primary Responsibility: NRO
Applicable Forms: N/A

Use/Relationship: The Counterfeit Prevention Plan will be used by the procurement activity to determine and evaluate the effectiveness of the contractor's counterfeit protection plan and award fee.

a. This Data Item Description contains the format and content preparation instructions for the data product generated by the specific and discrete task requirements delineated in the statement of work.

b. This DID is related to Parts, Materials and Processes Selection List (PMPSL).

c. This DID is related to "As Designed" and "As Built" Parts List.

d. The Counterfeit Prevention Plan will be updated as counterfeiting methods evolve to include any new indicators, as well as new prevention processes needed (either discovered directly or provided by the Government).

Requirements:

1. The Counterfeit Prevention Plan shall be in contractor format and shall include the following, as a minimum:

    a. Procurement practices and procedures to include procurement of all parts and materials from original qualified parts/materials equipment manufacturer (OEM) or it franchised/authorized distributor.

    b. Procurement practices and internal processes used for exceptions to buying from OEM or OEM franchised distributors in cases where items are no longer available including a process to qualify/certify non-OEM parts & materials.

    c. Monitoring procedures to include the delivery of test results from random sampling and supply chains surveillance that does not assume any source is safe to identify possible penetration of OEM supply chain.

    d. Training/certification program for receiving inspectors.

    e. Process to verify counterfeit.

f. Processes to identify, store, and report counterfeit parts.

g. Process to ensure subcontracts contain the following requirements (As a minimum):

(1) Requirements to procure only from Original Equipment Manufacturer (OEM) or OEM franchised distributors
(2) Procurement practices and internal processes used for exceptions to buying from OEM or OEM franchised distributors including a process to qualify/certify non-OEM parts & materials obtained
(3) Requirements to monitor supply (including delivery of test results from random sampling and supply chain surveillance that does not assume any source is safe) to identify possible penetration of OEM supply chain
(4) Training/certification program for receiving inspectors
(5) Process to verify counterfeit
(6) Processes to identify, store, and report counterfeit parts.
(7) Notification procedure (tailored to specific sub-contractor based on following Notification Procedure)

h. Self-audit of internal processes.

i. Monitor processes at all subcontractor levels processes and verify compliance through on-site audits.

j. Notification Procedure:

(1) Step 1: The contractor shall quarantine all suspect products pending further direction. The contractor shall provide a statement, with problem description, justifying why this is considered suspect and how it was detected. The contractor shall NOT notify the supplier that the items are suspected as being counterfeit items. However, consultation with the OEM is authorized. Make certain the parts and all members of the lot procured for use on this contract are stored in correct environmental controls. These parts need to be protected as evidence.

(2) Step 2: Contractors that identify suspect items shall immediately notify their customer that is the next link toward the prime contractor. Notification shall be passed up the customer chain until reaching the prime contractor. The prime contractor shall immediately notify the cognizant Contracting Officer (CO) and Contracting Office Technical Representative (COTR) of all suspect items identified.

(3) Step 3: The contractor shall make certain that the original documentation is secured as evidence and maintain any and all documentation associated with the part to include:

a. Part information such as part identifying number, lot date code, manufacturer information and originator/point of contact information

b. Any information reflecting part procurement/acquisition traceability which should include a copy of the purchase order, any and all correspondence between the buyer and the supplier to include: e-mails, records of phone conversations and paper letters of correspondence

c. Part documentation from the purported original manufacturer, distributors and suppliers (certificate of compliance and certificate of conformance)

d. All visual examination and physical analysis/testing results and the technical data package showing that the parts passed the required screening and qualification tests

e. List of company products affected

(4) Step 4: Determine that the part is or is not counterfeit (Usually accomplished as part of root cause analysis of non-conforming parts and/or materials)

(5) Step 5: If the parts are found to be counterfeit, they shall be isolated and controlled pending direction from law enforcement.

(6) Step 6: The contractor shall provide any additional required information to the government's investigation team

END OF DI-MISC-81832