



Procedures and Guidelines (PG)

DIRECTIVE NO. 500-PG-4520.2.1
EFFECTIVE DATE: 02/21/2013
EXPIRATION DATE: 02/21/2018

APPROVED BY Signature: Original signed by:
NAME: Dennis Andrucyk
TITLE: Director of AETD

COMPLIANCE IS MANDATORY

Responsible Office: Code 562/Parts, Packaging and Assembly Technologies Office

Title: Electrical, Electronic and Electromechanical (EEE) Counterfeit Parts Avoidance Plan (CPAP)

PREFACE

P.1 PURPOSE

This directive establishes the Goddard Space Flight Center (GSFC) Counterfeit Parts Avoidance Plan (CPAP). The requirements and practices necessary to mitigate the risk of receiving and installing counterfeit Electrical, Electronic and Electromechanical (EEE) parts or assemblies into space flight or ground support hardware are specified herein. These requirements and practices also apply to any EEE parts contained within Commercial Off The Shelf (COTS) and Military Off The Shelf (MOTS) assemblies.

Additionally, this directive standardizes practices to:

- a. Maximize authentic parts availability by purchasing parts from authorized sources;
- b. Delineate process differences between flight and non-flight EEE parts;
- c. Establish Incoming Inspection requirements to verify compliant product and required test data and certifications are received;
- d. Verify pedigree of devices already in flight storage;
- e. Control and handling of parts identified as counterfeit, including reporting to other potential users and Government investigative authorities.

P.2 APPLICABILITY

This directive applies to all purchases made by GSFC, or on behalf of GSFC via on-site contractors, including Purchase Card procurements as defined in the Goddard Credit Card Program Policy/Guidance Document # 210-Purchase Card (PCARD). The requirements of this document shall also be flowed down to all contractors and their subcontractors supplying EEE piece parts, populated circuit boards, assemblies and test equipment used on GSFC missions.

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P.3 AUTHORITY

GPR 4520.2G Receiving, Inspection and Test

NPD 8730.2C NASA Parts Policy

P.4 REFERENCES

ANSI ASQ Z1.4 Sampling Procedures and Tables for Inspection by Attributes

SAE AS5553 Counterfeit Electronic Parts, Avoidance, Detection, Mitigation, and Disposition

SAE AS6081 Fraudulent/Counterfeit Electronic Parts: Avoidance, Detection, Mitigation and Disposition - Distributors

GSFC S-311-M-70 Destructive Physical Analysis for Electronic, Electromagnetic, and Electromechanical Parts

GSFC-WM-001 Workmanship Manual for Electro-Static Discharge (ESD)

NPR 8735.1 Procedures for Exchanging Parts, Materials, and Safety Problem Data Utilizing the Government-Industry Data Exchange Program and NASA Advisories

GPR 5340.1 Preparation and Handling of Alerts, Safe Alerts, and Advisories

270-WI-5340.2.1 Control of Non-Conforming Project Parts

P.5 CANCELLATION

None

P.6 SAFETY

Not Applicable

P.7 TRAINING

Organizations shall identify and train functionally-relevant personnel in the following areas:

- a. Handling of Electrostatic Discharge (ESD) sensitive parts IAW GSFC-WM-001
- b. Special techniques in detecting counterfeit parts during receiving inspection and Destructive Physical Analysis (DPA)

P.8 RECORDS

Record Title	Record Custodian	Retention
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Counterfeit Form (Appendix D)	Code 562 Parts, Packaging and Assembly Office	5 years after end of project*
Procurement Records	Procurement Agency	5 years after end of project*

* *NRRS – NASA Records Retention Schedule* ([NPR 1441.1](#))

P.9 MEASUREMENT/VERIFICATION

Not Applicable

PROCEDURES

In this document, a requirement is identified by “shall,” a good practice by “should,” permission by “may” or “can,” expectation by “will,” and descriptive material by “is.”

Counterfeit Parts Avoidance Plan. This plan shall be implemented to prevent the introduction of counterfeit parts into the flight and non-flight parts inventory. These requirements shall be flowed down to all GSFC equipment suppliers and vendors as a contractual requirement via the GSFC Mission Assurance Requirements (MAR) document. The GSFC Parts Control Plan, as issued for each GSFC flight project, shall also implement and verify conformance with this plan. If – at any point – personnel have reason to suspect that a counterfeit part is in their possession, then the individual shall notify the NASA Office of the Inspector General.

10.1.0 Flight Parts Procurement. See Figure 1 for the EEE parts procurement flow for counterfeit avoidance. Utilization of a manufacturer authorized source of supply is paramount to the prevention of counterfeit parts being received. The use of this trusted supply chain will eliminate the sources of supply that are not approved and managed by the manufacturer’s quality system, and are not authorized to provide the Government with the part warranty and post-procurement parts support. Use of the trusted supply chain will eliminate the majority of sources for counterfeit part introduction. Under this plan, the use of a source of supply for any part, other than a manufacturer authorized source of supply, requires prior written approval by the appropriate GSFC Parts Control Board.

- a. Procurement Clauses. All flight procurement contracts shall include, as a minimum, the following clauses that specifically address the counterfeit parts issue.
 - i. Financial responsibility. The seller shall be liable for all remedial costs associated with the delivery of counterfeit products.
 - ii. Obligation period. The seller shall be held responsible for all counterfeit claims, for a period of time starting from the dock date of parts at GSFC, of not less than ninety (90) calendar days.
 - iii. Return of Product. Parts suspected as counterfeit by the procuring activity will not be returned to the supplier. Parts suspected as counterfeit shall be quarantined, dispositioned and provided to the NASA Office of the Inspector

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General as evidence, to be returned only if verified to be authentic. Destruction or confiscation of parts verified to be counterfeit does not relieve the supplier of the financial responsibility identified in 10.1.0.a.i., above.

- b. Certificate of Conformance. All flight procurements shall require a manufacturer's certificate of conformance as part of the end item data package. This certificate shall comply with all requirements as specified in the general specification governing the part type.
 - i. The certificate of conformance shall contain, as a minimum, the following information.
 1. Manufacturer name and address
 2. Manufacturer and/or buyer's part number and dash number
 3. Batch identification for the item(s) such as date codes, lot codes, serializations, or other batch identifications.
 4. Signature or stamp with title of seller's authorized personnel signing the certificate.
 5. Purchase order or contract number

10.2.0 Non-Flight Procurement - The use of the flight EEE parts procurement method of Section 10.1.0 is strongly recommended for non-flight EEE parts procurement. Needless time and money spent in troubleshooting, failure analysis, re-design, schedule delays, and re-procurement may result from the use of a counterfeit EEE part in a non-flight development system. The decision to deviate from the flight EEE parts procurement flow of Section 10.1.0 shall be documented by the GSFC PPE and approved by the Project manager or his designate.

10.2.1 Commercial or industrial parts. A formal certificate of conformance with traceability to the manufacturer may not be available with many commercial or industrial sources of supply. In such cases, the accompanying documentation is often a packing list. This /packing list shall identify the manufacturer, part number, quantity, and procuring activity purchase order or contract number. Additional information, such as lot date code or statement of compliance, may be provided by the distributor.

10.3.0 Authorized Sources of Supply

10.3.1 Authorized Sources of Supply.

10.3.1.1 Direct procurement from the Original Component Manufacturer (OCM). This method of procurement is preferred, because there are no intermediaries between the OCM and the GSFC or GSFC contractor procuring activity.

10.3.1.2 Procurement from the OCM's authorized distributor. OCM- authorized distributor (s) may be found on the OCM's web site, or by contacting the sales department of the OCM. The procurement activity, when procuring from other than the OCM, shall be responsible for verifying the current status of that distributor, as an authorized distributor. Verification may include, a review of the OCM's authorized distributor list on their web site, or written confirmation by the manufacturer's Sales organization.

10.3.1.3 Military Specification Parts. For EEE parts controlled by military specifications and managed by the Defense Logistics Agency (DLA) Land and Maritime (LAM), authorized OCM's shall be found in the Qualified Products Directory. The Supplemental Information Sheets (QPDSIS) or Qualified Products Listings (QPL) also identify authorized sources of supply. This information may be found at the DLA website (<http://www.dsc.dla.mil/programs/qmlqpl/>). For all EEE parts controlled by military specifications, including DLA LAM managed products, authorized OCMs may also be found in the Qualified Products Directory (QPD), found at the ASSIST website, using the "QuickSearch" tab, at <https://assist.dla.mil/online/start/>.

10.3.2 Non-Authorized Sources of Supply

10.3.2.1 Brokers, Broker Distributors, Independent Distributor, and Stocking Distributor. These terms are several examples of nomenclature often applied to non-OCM authorized sources of supply. Use of these non-OCM authorized suppliers are not authorized under this plan, without prior specific written approval from the appropriate GSFC Parts Control Board.

10.4.0 Monitoring of Supply Chain -

10.4.1 Manufacturers shall be monitored for compliance to the military specifications governing their products, and to their internal documents for controlling and distributing products to their franchised distributors. Military specifications, particularly those used in the procurement of active devices, have detailed traceability requirements.

10.4.2 Manufacturer authorized distributors shall be monitored for compliance to incoming traceability requirements, as defined in SAE AS6081. As a minimum, the purchasing agent should require distributors to submit a counterfeit parts avoidance plan. MIL-PRF-38534, for example, includes the requirements for traceability from the manufacturer to the end distributor, including intermediate locations. Documentation is required by the military specification to be maintained by the distributor. Sample data shall be reviewed for compliance with the traceability requirements. Distributor compliance with internal documentation of processes for parts return and re-distribution shall be part of the supply chain monitoring activity.

10.4.3 Distributor's Counterfeit Avoidance Policy. A periodic review of the distributor/supplier's counterfeit policy shall be performed. In particular, the handling of returned parts shall be evaluated to insure that an otherwise secure supply chain from the manufacturer cannot be corrupted with "returned" counterfeit parts, and destruction of counterfeit parts is controlled.

10.5.0 Incoming Inspection - All EEE parts received into the GSFC inventory, or used for GSFC procured systems shall have undergone a receiving inspection, consisting, at a minimum, of the following steps:

10.5.1 Visual Inspection and Sample Photodocumentation - External visual inspection (4x - 30x typically) to an AQL sample of 0.65, single sample, normal inspection, per ASQC Z1.4, shall be performed. After visually verifying that the received lot of parts appears homogenous, a representative sample shall be selected for photodocumentation; top and bottom or all sides, as applicable, shall be photographed, so that all markings and package features are documented. The detailed visual inspection shall focus on specific external details such as marking inconsistencies, differing package roughness or finishes, differing lead lengths or finishes, and other visual anomalies that indicate a suspect counterfeit lot has been received.

10.5.2 Sample external prohibited materials evaluation, in accordance with GSFC S-311-M-70. X-ray Fluorescence (XRF) tools may be used for this purpose.

10.5.3 Review of traceability documentation supplied with the purchased items, and comparison to the procurement requirements specified in the Purchase Order or contract.

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The incoming inspection criteria may be modified or enhanced by the appropriate GSFC Parts Control Board. Failing incoming lots, where failures indicate possible counterfeit parts receipt, shall be referred to the appropriate GSFC Parts Control Board for possible counterfeit inspection processing (reference Section 10.7.0 herein).

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10.6.0 Existing Inventory - Existing flight inventory, which has been previously procured from an authorized source of supply in compliance with Section 10.3.0 herein, received, inspected, and used successfully in a flight application, shall be treated as a low risk for counterfeit. No further action is necessary prior to use.

10.6.1 If the procurement history cannot be verified as compliant with Section 10.3.0 herein, the component shall be treated as a possible counterfeit device, and submitted for the appropriate GSFC Parts Control Board evaluation.

10.6.1.1 In lieu of GSFC Parts Control Board evaluation, possible counterfeit components may be identified as non-flight only, but shall still be identified as a possible counterfeit risk.

10.6.1.1.1 Inventory parts planned for non-flight use shall still undergo an evaluation to verify that the part is not counterfeit.

10.7.0 Counterfeit Inspection Process - Any EEE part which has not been procured from a manufacturer authorized source of supply, or has failed incoming inspection as specified herein, or is in existing inventory without proper documentation, shall be processed as a suspected counterfeit device, in accordance with SAE AS6081.

10.7.1 Evaluation. Any product which has been identified as a suspect counterfeit component shall be clearly identified as such, and segregated from all other inventory. Material shall be handled in accordance with 270-WI-5340.2.1, Control of Non-conforming Project Parts, or equivalent.

10.7.2 Documentation. A Counterfeit Documentation package shall be developed. GSFC 270-FORM-0068 or equivalent, shall be completed at Receiving Inspection. The Suspect Counterfeit Part Identification Form, found in Appendix D herein, shall be started by the cognizant Project Parts Engineer, and include all pertinent details about the procurement, applicable purchasing documentation (purchase order), any deliverable documentation, incoming inspection report and GSFC 270-FORM-0068, and reasons that counterfeit was suspected.

10.7.3 Counterfeit Verification Inspection. Counterfeit verification inspection shall consist of the following minimum examinations. Additional examinations may be added as needed based on the appropriate GSFC Parts Control Board recommendations and product technology, using SAE AS5553 as a guideline.

10.7.3.1 100% external visual inspection, 3x-40x typically.

10.7.3.2 100% marking or re-surfacing inspection.

10.7.3.3 100% Real Time radiographic inspection to verify internal construction homogeneity.

10.7.3.4 Destructive Physical Analysis (DPA) or construction analysis, in accordance with S-311-M-70.

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- 10.7.4 Notification.** Suspect counterfeit parts shall be segregated from all other GSFC materials, and shall be reported to the appropriate organizations, as specified below. All pertinent details shall be contained in the Appendix D Suspect Counterfeit Part Identification Form.
- 10.7.4.1 NASA GSFC Inspector General Notification.** Devices verified as counterfeit, and documented in the Appendix D report, will be referred to the GSFC Inspector General's office for possible prosecution. NASA IG POC: <http://oig.nasa.gov/cyberhotline.html>
- 10.7.4.2 Project Notification.** The Project or Projects whose funds were expended to procure the parts suspected as counterfeit shall be notified of the receipt of a suspect counterfeit part, so as to assess the impact to their cost and schedule. Project notification shall include the Chief Safety and Mission Assurance Officer (CSO) and Project Manager as a minimum. Upload to the appropriate Project document system shall be handled by the Project Parts Engineer.
- 10.7.4.3 Supplier Notification.** After consultation with the NASA/GSFC IG, the supplier of the counterfeit material, defined as the vendor that is named on the purchase order or contract, shall be notified that they have supplied suspect counterfeit material. Clauses specified in the purchase order or purchase contract, dealing with the counterfeit penalties, shall be implemented.
- 10.7.4.4 Manufacturer Notification.** The Quality Assurance manager for the manufacturer of the suspect counterfeit part shall be notified and supplied with the objective evidence as compiled during the investigation.
- 10.7.4.5 Safety and Mission Assurance Notification.** SMA notification will occur in conjunction with the development of a GIDEP alert as well as Project notification. Counterfeit verified devices may also be candidates for the release of a NASA Advisory
- 10.7.4.6 GIDEP and NASA Advisory Coordinator Notification.** This notification will occur to initiate the generation of a GIDEP Alert or NASA Advisory, as appropriate. Documentation and submission shall be in accordance with GPR 5340.2.
- 10.7.4.7 NASA Office of the General Counsel (OGC), Acquisition Integrity Program (AIP).** Devices verified as counterfeit shall be reported to the NASA Director of the AIP for possible action in accordance with NPR8735.1.
- 10.7.5 Final disposition** shall be made by the GSFC PCB. Parts that have been evaluated and determined to be counterfeit devices will be quarantined and subsequently destroyed, to assure that they cannot return to the supply chain. Counterfeit EEE parts, after documentation and disposition, will be delivered to GSFC Property (Code 270) for destruction.

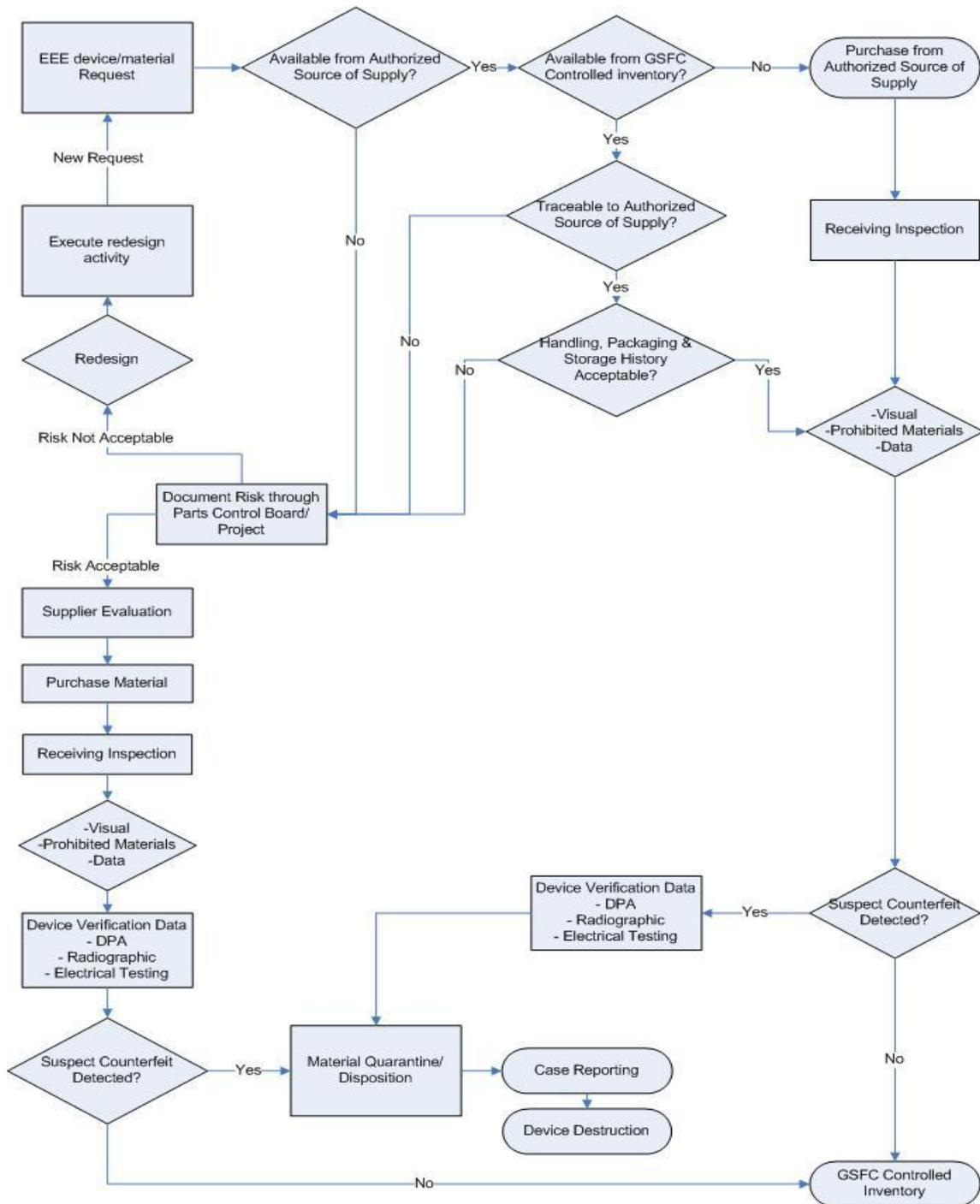


Figure 1. EEE Parts Procurement Flow

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Appendix A – Definitions

- A.1 **Certification of Conformance (C of C, CoC)** – A document provided by a supplier formally declaring that all procuring activity purchase order or contract requirements have been met. The document shall include the following minimum information:
- a. Manufacturer’s name and address
 - b. Distributor’s name and address, if applicable
 - c. Procuring activity name and address
 - d. Purchase Order or Contract number.
 - e. Procurement part number.
 - f. Lot/date identification codes and latest re-inspection date, if applicable.
 - g. Quantity of devices in shipment.
 - h. Assembly plant location or CAGE Code.
 - i. Statement certifying QPL device conformance and traceability, if QPL is applicable.
 - j. Attached copy of manufacturer’s original certification (for distributors)
 - k. Certificate of Conformance and Traceability, if applicable
 - l. Signature of authorized corporate representative and date of transaction.
 - m. ESD classification, when not marked on the device, if applicable.

The authenticity of the above manufacturer documents can be verified with the OPM and supply chain authorized distributor.

- A.2 **Certificate of Conformance Traceability (CoCT)** - A certificate of conformance required by certain military specifications (e.g. MIL-PRF-38534, MIL-PRF-35835) which requires documented traceability from the QPL/QPM manufacturer through delivery to the procuring activity, if the material is not procured directly from the approved manufacturer.
- A.3 **Commercial-Off-The-Shelf (COTS)** — A category of EEE parts or equipment that is ready-made and available for sale. The requirements used in the design, development and manufacture of COTS products are under the control of the OCM, and vary widely by OCM.
- A.4 **Counterfeit Parts** — A counterfeit part is a copy or substitute without legal right or authority to do so; or a part whose material, performance, or characteristics are knowingly misrepresented by a supplier at any level in the supply chain. Examples of counterfeit parts may include, but are not limited to:
- Parts which do not contain the proper internal construction and materials(die, manufacturer, wire bonding, etc.) consistent with the procured part.
- a. Parts which have exhibit appearance they are used, refurbished or reclaimed, but presented as new product.
 - b. Parts which have a different package style or surface plating/finish than the ordered parts.

- c. Parts which have not successfully completed the OEM's full production and test flow, but are represented as completed product.
- d. Parts sold as re-screened parts, to a higher quality level than identified, which have not successfully completed re-screening.
- e. Parts sold with modified part number identification intended to misrepresent the part's form, fit, function, grade or manufacturing date.
- f. Parts sold as compliant to a procurement specification, marked as required by the procurement specification but do not satisfy the parametric or quality requirements of the specification.

A.5 **Defense Logistics Agency Land and Maritime (DLA-LAM)** — Standardization and Qualifying activity for most electrical, electronic, and electromechanical (EEE) components to military specifications and an Inventory control point. Formerly, Defense Supply Center Columbus (DSCC) merged with Defense Electronics Supply Center (DESC).

A.6 **Destructive Physical Analysis.(DPA)** — DPA is a systematic, logical, detailed examination of parts during various stages of physical disassembly, conducted on a sample of completed parts from a given lot, wherein parts are examined for a wide variety of design, workmanship, and processing problems that may not show up during normal screening tests. The purpose of these analyses is to determine those lots of parts, delivered by an OCM or their authorized distributor, which have anomalies or defects such that they could, at some later date, cause degradation or catastrophic failure of a system.

A.7 **Distributor** QPL/QML qualified manufacturers (OCM) may approve authorized distributors to perform additional functions and operations on their products. The QPL/QML manufacturer (OCM) is responsible for validation of these distributors. The controls and requirements shall be such as to assure the product sold by the distributor is of the same quality and performance as parts supplied directly from the manufacturer (OCM). The manufacturer (OCM) is responsible for ensuring that all products sold through these distributors meet the requirements of the applicable product specifications. The manufacturer shall identify each distributor and the functions that they are authorized to perform according to the following categories:

- a. Category A distributor. This category of distributor is authorized to store, pack, handle, and distribute qualified products.
- b. Category B distributor. This category of distributor is authorized to perform additional operations, tests, and inspections in addition to responsibilities of a category A distributor. If the distributor is authorized to mark the parts, a code symbol is to be added to the modified part to identify the distributor (in accordance with agreement with original manufacturer) in addition to the original part marking and lot identification by the manufacturer.
- c. Category C distributor. This category is a value added distributor that has been approved by a qualified manufacturer and the qualifying activity to assemble QPL products in addition to the responsibilities of a Category B distributor including part marking. Approval includes but is not limited to the following:

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- a. Distributor shall be audited by the qualified manufacturer (OCM) to ensure compliance to all applicable specifications.
- b. Assembly procedures and routers shall be equivalent to the manufacturer's documents and all changes shall be approved by the qualified manufacturer.
- c. The qualified manufacturer shall be responsible for any and all problems associated with QPL products assembled at the Category C distributor.

A.8 **Electrical, Electronic and Electromechanical (EEE) Parts** — one or more pieces assembled together which cannot be disassembled without impairing or destroying their functionality.

Any of various part types that include, but are not limited to: capacitors, connectors, crystals, crystal oscillators, diodes, passive fiber optics, filters, fuses, heaters, magnetic, hybrid microcircuits, monolithic microcircuits, plastic encapsulated microcircuits (PEM), opto-electronic devices, electromagnetic relays, resistors, discrete semiconductor devices, sensors and detectors, switches, thermistors, wire and cable.

A.9 **Government Industry Data Exchange Program (GIDEP)** — is a cooperative activity between government and industry participants seeking to reduce or eliminate expenditures of resources by sharing data and information

A.10 **Homogeneous lot** — A group of parts received in a single shipment (whether individually packaged, in a single package, single bulk or multiple bulk packages) that are clearly identified with identical lot, batch, production run exhibiting identification marking (e.g. date codes or lot date codes). Homogeneous lot will have the same design, construction, materials, assembly techniques and processing and are assembled on one OPM production line at one OPM facility during a specified time period. The parts will have the same acceptance testing. These parts are identical in appearance such as part marking, package marking.

A.11 **Independent (Non-Franchised) (Unauthorized) Distributor (henceforth "Broker")** — The supply chain entity who procure and vend products on the open market. There is no contractual relationship between the OPM and this distributor. Typically, a broker is not able to offer warranty and may not be able to furnish the full supply chain traceability of custody of the product they are vending. Brokers may also be referred to as Independent Distributors or Third Party Sources. Brokers are not authorized by the OPM/OEM and require limited approval for procurement processing. The broker may search the industry in order to locate parts that may satisfy the parts salient characteristics and the customer objective price requirements. The independent distributor may have procured the parts with the intent to vend or redistribute them back into the supply chain.

A.12 **Military-Off-The- Shelf (MOTS)** — A category of EEE parts or equipment that is ready-made and available, and developed to meet the requirements of military systems.

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- A.13 **Original Component Manufacturer (OCM)** — An organization that designs and/or engineers a part and is pursuing or has obtained the intellectual property rights to that part.
- A.14 **Qualified Manufacturers List (QML)** — This document lists the processes and materials each manufacturer has demonstrated a capability to manufacture reliably and in compliance with the manufacturer's requirements and the military specifications. Many different qualified products can be produced using the QML listed processes and materials.
- A.15 **Qualified Products Database (QPD)** — A database of products that have met the qualification requirements stated in the applicable specification, including appropriate product identification and test or qualification reference with the name and plant address of the manufacturer.
- A.16 **Qualified Products Database Supplemental Information Sheet (QPDSIS)** — The QPDSIS contains the same data as the QPD, but is available in a more user-friendly Acrobat .pdf format.
- A.17 **Qualified Products List (QPL)** — A list of products that have met the qualification requirements stated in the applicable specification, including appropriate product identification and test or qualification reference with the name and plant address of the manufacturer and distributor, as applicable.
- A.18 **Suspect Counterfeit Part** — is a part in which there is an indication by visual inspection, testing, or other information that it may be misrepresented by the supplier or manufacturer or may not conform to legal, established government or industry-accepted specifications, or national consensus standards; or a part's documentation,
- A.19 **Supply Chain** — The sequence the parts travel from OPM, through authorized distributor(s), third party logistics services and test facilities, OEM, broker, refurbished to aftermarket broker or distributor, or OEM surplus.
- A.20 **Supply Chain Traceability** — Documentation trail depicting evidence of every step in parts history through the supply chain from the OPM to the final OEM. This should include all distributors, brokers, intermediate processors, logistic and aftermarket test facilities, surplus, upscreening, refurbishment and OEM handling.

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Appendix B – Acronyms

AS	Aerospace Standard
CoC	Certificate of Conformance
COTS	Commercial Off The Shelf
CPAP	Counterfeit Parts Avoidance Plan
CSO	Chief Safety and Mission Assurance Officer
DPA	Destructive Physical Analysis
EEE	Electrical, Electronic and Electromechanical
ESD	Electrostatic Discharge
GPR	Goddard Procedural Requirements
GSFC	Goddard Space Flight Center
MOTS	Modified/Modifiable Off The Shelf
NASA	National Aeronautical and Space Administration
OEM	Original Equipment Manufacturer
PCARD	Purchasing Card
SOW	Statement of Work
X-RAY	X Radiation
XRF	X Radiation Fluorescence

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Appendix C - Checklists

Pre-Procurement Checklist		
Action	Date	Initials
Verify procurement part number is correct		
Verify QPDSIS or QPL status		
Identify approved source of supply either OPM or authorized supplier		
C of C and traceability documents requested?		
Terms of procurement and delivery specified?		
If source of supply is not OPM or authorized supplier, is appropriate GSFC Parts Control Board written authorization present?		
Is supply chain entity audit/evaluation valid?		
Re-inspection Period exceeded. For lot date code . verification of all traceability documentation and lot integrity paperwork		

Receiving Inspection Checklist		
Action	Date	Initials
Review and verify packaging is commensurate with ESD ratings and physical protection of parts		
Verify part marking and lot date code (LDC) match part acquisition documents		
Does the lot appear homogenous?		
Review and verify vendor documentation		
Perform external visual examination, optical, in accordance with P10.5		
Perform prohibited materials inspection		
Is part procured from OPM or authorized supplier? If not, continue inspection per appropriate GSFC Parts Control Board directions		
Real time Radiographic inspection		
Electrical test		
Destructive Physical Analysis (DPA)		
Quarantine suspect counterfeit parts.		
Notify requestor of results		

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Appendix D – Counterfeit Documentation Form

SUSPECT COUNTERFEIT PART DOCUMENTATION FORM		
PART DESCRIPTION (Class, Function, Type, etc.)		ORIGINATION DATE (DD-MMM-YY)
SUPPLIER NAME AND ADDRESS	PROCUREMENT PART NUMBER	MANUFACTURER NAME AND ADDRESS
	PROCUREMENT SPECIFICATION	
	SUPPLIER PART NUMBER (IF DIFFERENT)	
	GENERIC PART NUMBER	
SUPPLIER QUALITY POINT OF CONTACT (POC)	PURCHASE ORDER	MANUFACTURER QUALITY POC
SUPPLIER POC TELEPHONE	PROJECT NAME / SUBSYSTEM	MANUFACTURER POC TELEPHONE
SUPPLIER POC EMAIL	PROJECT WBS	MANUFACTURER POC EMAIL
SUPPLIER CAGE CODE	TRAX ITEM NUMBER	MANUFACTURER CAGE CODE
DATE SUPPLIER NOTIFIED	SUPPLIER RESPONSE <input type="checkbox"/> REPLY <input type="checkbox"/> NO REPLY	
ORIGINATOR NAME /AFFILIATION	ORIGINATOR SIGNATURE	DATE
SUPPLIER NOTIFIED BY	DATE	
MANUFACTURER NOTIFIED BY	DATE	
DLA LAND AND MARITIME NOTIFIED BY	DATE	
NASA INSPECTOR GENERAL NOTIFIED BY	DATE	
RESERVED	DATE	
NASA OFFICE OF THE GENERAL COUNSEL ACQUISITION INTEGRITY PROGRAM NOTIFIED BY	DATE	
PROJECT MANAGEMENT NOTIFIED BY	DATE	
SAFETY AND MISSION ASSURANCE NOTIFIED BY	DATE	

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EFFECTIVE DATE: 02/21/2013
EXPIRATION DATE: 02/21/2018

SUSPECT COUNTERFEIT PART DOCUMENTATION FORM

PROBLEM DESCRIPTION/DISCUSSION OF NON CONFORMANCE

RESULTS OF EVALUATION / ACTION PLANNED

DIRECTIVE NO. 500-PG-4520.2.1
EFFECTIVE DATE: 02/21/2013
EXPIRATION DATE: 02/21/2018

CHANGE HISTORY LOG

Revision	Effective Date	Description of Changes
Baseline	02/21/2013	Initial Release

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