

## CRITERIA REVIEW AND APPROACH DOCUMENT (CRAD)

### Suspect/Counterfeit Items Program

Date of Issue: 05/26/2026

#### FUNCTIONAL AREA GOALS:

Suspect/Counterfeit Items (S/CI) programs are being effectively implemented and assessed by DOE/NNSA Headquarters, Field organizations, and their contractors.

#### REQUIREMENTS:

- DOE Order 414.1E, *Quality Assurance*
  - Additionally included by reference:
    - DOE Order 221.1B, *Reporting Fraud, Waste, and Abuse to the Office of Inspector General*
    - DOE Order 232.2A, *Occurrence Reporting and Processing of Operations Information*
    - DOE Order 210.2A, *DOE Corporate Operating Experience Program*
- FAR 52.246-26, *Reporting Nonconforming Items*

#### GUIDANCE:

- DOE-HDBK-1221-2024, *Suspect/Counterfeit Items Handbook*
- DOE G 414.1-2B, *Quality Assurance Program Guide*

#### PERFORMANCE OBJECTIVES:

Processes for Suspect/Counterfeit Item Prevention must be identified, established, and implemented within the QAP. Organizations must ensure items meet specified requirements, prevent entry of S/CIs (including software) into the DOE supply chain, and ensure detection, control, reporting, and appropriate disposition of S/CIs.

It is the intent of 414.1E, *Quality Assurance*, Attachment 2, *Quality Assurance Requirements*, Part A, *Quality Assurance Criteria* to address any relevant or general areas related to quality such as Suspect/Counterfeit Items whereas requirements that are more specific to Suspect/Counterfeit Items are further defined in Part B, *Suspect/Counterfeit Items Prevention*.

The **Performance Objectives** are divided into 3 main areas:

- 1) Oversight;
- 2) Controls; and
- 3) Reporting.

The **Approach** section of this document provides document review suggestions, observations, and potential interviews that may be conducted during an S/CI assessment.

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**OBJECTIVES, CRITERIA, AND SUGGESTED LINES OF INQUIRY:**

**PERFORMANCE OBJECTIVE 1: OVERSIGHT**

*Organization has processes for providing oversight of the S/CI program.*

#	REQUIREMENT REFERENCE	CRITERIA	SUGGESTED LINE(S) OF INQUIRY: OVERSIGHT
1	DOE O 414.1E, Att. 2, Part B. para. 1.a.	Conduct S/CI oversight and prevention of S/CI entering the DOE supply chain.	How does the organization conduct S/CI oversight and prevention processes?
2	DOE O 414.1E, Att. 2, Part B. para. 1.b	Identify the position responsible for prevention, detection, control, reporting, and appropriate disposition of S/CI and for serving as a point of contact.	What is the position responsible for S/CI activities and for serving as the point of contact with the Office of Environment Health Safety and Security? How is this documented or conveyed?
3	DOE O 414.1E, Att. 2, Part B. para. 1.e.	Provide training for managers, supervisors, and workers on Suspect/Counterfeit Items (S/CI) processes and controls (including prevention, detection, and disposition) as appropriate.	What training is provided for informing managers, supervisors, and workers about S/CI processes and controls?
4	DOE O 414.1E, Att. 2, Part A. Criterion 3- Management/ Quality Improvement, para. a.	Establish and implement processes to detect and prevent quality problems	How are S/CIs being detected and prevented at the organization?
5	DOE O 414.1E, Att. 2, Part A. Criterion 3- Management/ Quality Improvement, para. b.	Identify, control, and correct items, services, and processes that do not meet established requirements.	When S/CIs are identified, how are they being controlled?
6	DOE O 414.1E, Att. 2, Part A. Criterion 3- Management/ Quality Improvement, para. c.	Identify the causes of problems and include prevention of recurrence as a part of corrective action planning.	What processes exist to determine potential causes of S/CIs and how to prevent recurrence?

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#	REQUIREMENT REFERENCE	CRITERIA	SUGGESTED LINE(S) OF INQUIRY: OVERSIGHT
7	DOE O 414.1E, Att. 2, Part A. Criterion 3- Management/ Quality Improvement, para. d.	Review item characteristics, process implementation, and other quality related information to identify items, services, and processes needing improvement.	What information is reviewed to improve S/CI processes?
8	DOE O 414.1E, Att. 2, Part A. Criterion 3- Management/ Quality Improvement, para. f.	S/CI processes must include provisions for the collection, dissemination and use of the most accurate, up to date S/CI information.	How does your organization collect, maintain, disseminate, and use the most accurate/up to date information on S/CIs and suppliers?
9	FAR 52.246-26, <i>Reporting Nonconforming Items</i>	The organization screens Government Industry Data Exchange Program (GIDEP) reports to avoid the use and delivery of S/CIs.	What processes does your organization have for GIDEP screening?

**PERFORMANCE OBJECTIVE 2: CONTROLS**

*The Organization ensures items meet specified requirements and prevents the entry of S/CIs (including software) into the DOE supply chain.*

#	REQUIREMENT REFERENCE	CRITERIA	SUGGESTED LINE(S) OF INQUIRY: CONTROLS
1	DOE O 414.1E, Att. 2, Part A, Criterion 7- Performance/ Procurement, para. b.	Evaluate and select prospective suppliers on the basis of specified criteria.	Are lines of inquiry related to S/CI included as a part of supplier evaluations or when selecting prospective suppliers? How is this included or where?
2	DOE O 414.1E, Att. 2, Part A, Criterion 7- Performance/ Procurement, para. a.	Procure items and services that meet established requirements and perform as specified.	How does your organization verify that items meet established requirements? How does your organization verify that items will perform as specified and who establishes or reviews these requirements or specifications? What processes or procedures are in place to verify that the organization places technical and QA requirements in procurement specifications?

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#	REQUIREMENT REFERENCE	CRITERIA	SUGGESTED LINE(S) OF INQUIRY: CONTROLS
3	DOE O 414.1E, Att. 2, Part A, Criterion 7- Performance/ Procurement, para. c.	Establish and implement processes to ensure that approved suppliers continue to provide acceptable items and services.	Is S/CI included as a part of the processes that ensure approved suppliers are providing acceptable items and services? How is this included?
4	DOE O 414.1E, Att. 2, Part A, Criterion 8- Performance/ Inspection and Acceptance Testing, para. a.	Inspect and test specified items, services, and processes using established acceptance and performance criteria.	What are your organization's item acceptance processes or procedures?
5	DOE O 414.1E, Att. 2, Part B. para. 1.c.	Inspect inventory and storage areas for S/CIs on a defined recurring basis.	What is the process for inspecting inventory or storage areas? Is there a defined graded approach used? How often are these areas inspected?
6	DOE O 414.1E, Att. 2, Part B. para. 1.d.	Develop processes for inspection, identification, evaluation, and disposition of installed S/CIs that may present potential hazards. During routine evaluations (e.g., maintenance and/or inspections) determine whether S/CIs are installed. Evaluations must consider potential risks to the environment, the public and workers along with a cost/benefit impact, and a schedule for replacement (if appropriate). Clearly mark S/CIs that remain in use.	<p>What is your process for inspecting, identifying, evaluating, and dispositioning installed S/CIs?</p> <p>How do you determine how to mark installed S/CIs to prevent future use?</p> <p>How do you determine if an installed S/CI is acceptable for continued use?</p> <p>How are items dispositioned to prevent future use in these applications?</p> <p>How do you ensure evaluations consider potential risks to the environment, the public and workers along with a cost/benefit impact, and a schedule for replacement (if required)?</p> <p>What are the evaluation processes conducted on S/CIs identified in safety applications and non-safety applications?</p> <p>How do you disposition S/CIs identified during routine maintenance and/or inspections to prevent future use?</p>

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**PERFORMANCE OBJECTIVE 3: REPORTING**

*Organization ensures the appropriate reporting and disposition of S/CIs in accordance with applicable provisions.*

#	REQUIREMENT REFERENCE	CRITERIA	SUGGESTED LINE(S) OF INQUIRY: REPORTING
1	DOE O 414.1E, Att. 2, Part B. para. 1.g.(1)	Include applicable provisions for S/CI reporting: (1) DOE O 210.2A, <i>DOE Corporate Operating Experience Program</i> .	How or what S/CI information communicated to DOE OPEXShare? What processes are used to do this?
2	DOE O 414.1E, Att. 2, Part B. para. 1.g.(2)	Include applicable provisions for S/CI reporting: (2) DOE O 221.1B, <i>Reporting Fraud, Waste and Abuse to the Office of Inspector General</i> .	What is the process to report items to the DOE Office of Inspector General?
3	DOE O 414.1E, Att. 2, Part B. para. 1.g.(3)	Include applicable provisions for S/CI reporting: (3) DOE O 232.2A, <i>Occurrence Reporting and Processing of Operations Information</i> .	What is the process for reporting S/CIs to ORPS?
4	DOE O 414.1E, Att. 2, Part B. para. 1.h.	Coordinate with the DOE Inspector General's Office (IG) before destroying or disposing of S/CIs and corresponding documentation.	How does the organization coordinate with the DOE IG before final dispositioning items? How is this documented?
5	FAR 52.246-26, <i>Reporting Nonconforming Items</i>	The organization submits S/CI reports to the Government Industry Data Exchange Program (GIDEP).	What processes does your organization have for GIDEP reporting?

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### APPROACH:

Document Review suggestions:

- Procedures
- Test documents and plans concerning S/CIs
- Occurrence reports on S/CIs
- Inspector General correspondence
- GIDEP submissions
- Approved training plans
- Training records
- Trending analyses
- Procurement Documentation (contracts, terms & conditions, etc.)
- Inspection Records
- Documentation used to gather information, evaluate, and disposition S/CIs

Observations:

- Selected work processes such as testing, inspection, quality, or training being performed e.g., processes for procurement, receiving, testing, maintenance, nonconformance, engineering involvement, etc.
- Controlled areas for identified S/CIs
- Inventory, warehouse, and/or storage areas

Interviews:

- Site Suspect/Counterfeit Point of Contact
- Management/ Project Managers
- Maintenance/Facilities/Fleet/Logistics
- Trainers/Training Coordinators
- Procurement
- Quality Assurance/Quality Control (Inspection)
- Engineering
- General Technicians/Site Personnel