

OES 2024-03

September 2024

Suspect/Counterfeit Items Best Practices, Lessons Learned, & Recommended Actions

Introduction

This Operating Experience Summary (OES) provides information about suspect/counterfeit item (S/CI) operating experience products from FY 2004 to FY 2024. This OES highlights and summarizes the valuable recommendations, actions, and best practices provided over this time to aid S/CI Programs with potential opportunities for the DOE enterprise to improve program implementation and outcomes.

Background

Between FY 2004 and FY 2024, there were 55 lessons learned, best practice, and operating experience documents (excluding Data Collection Sheets) with recommendations developed to provide the DOE enterprise with information targeted at preventing, detecting, and reporting S/CIs.

Figure 1.

Types of S/CI documents¹ from field organizations

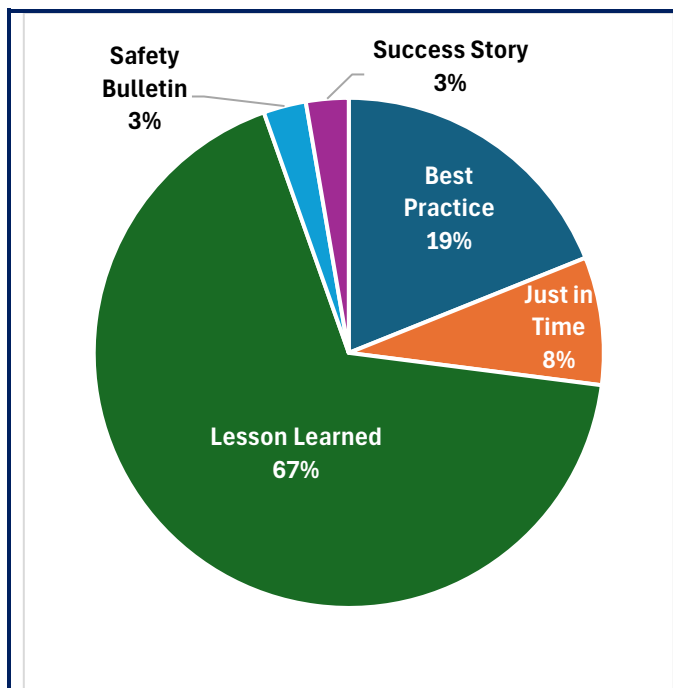
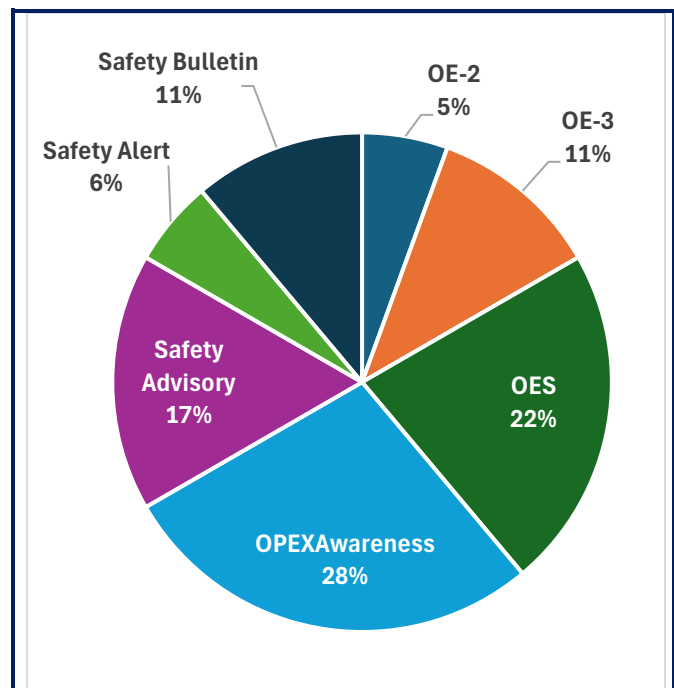


Figure 2.

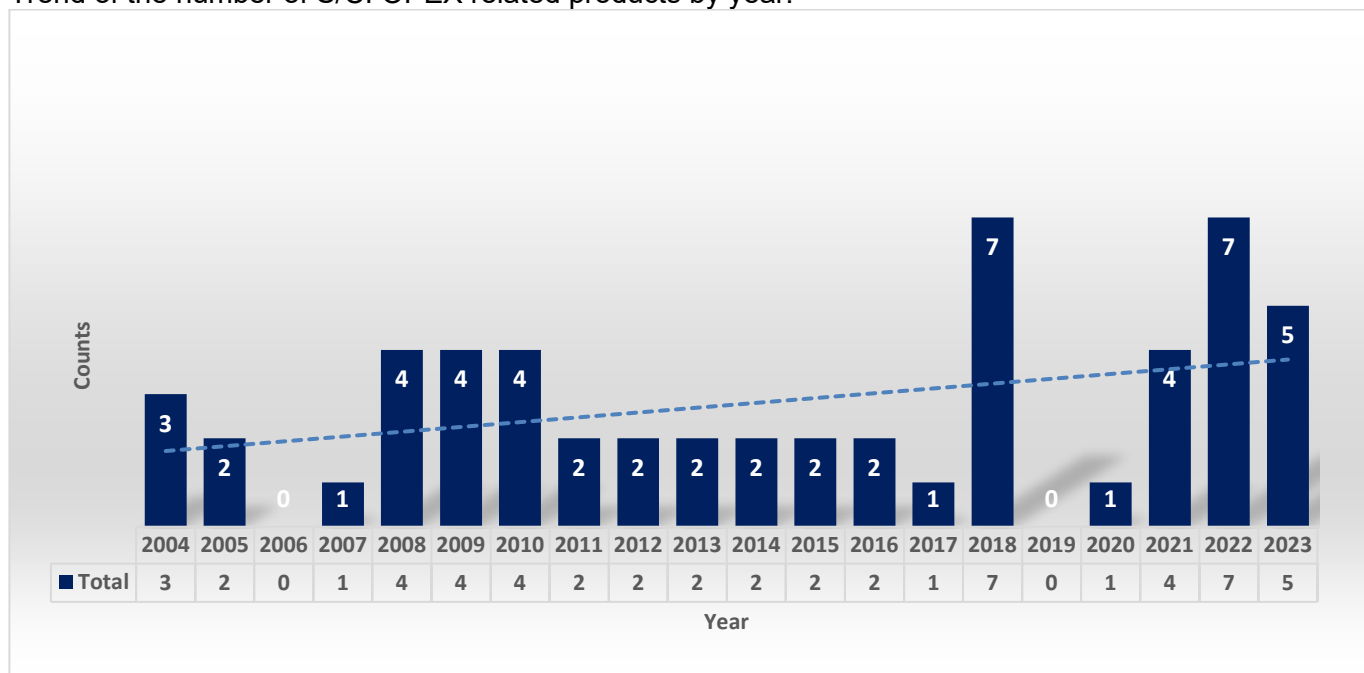
Types of S/CI documents from DOE Headquarters



¹ S/CI products identified for the time period are described in Attachment 1, *Document Types*.

Figure 3.

Trend of the number of S/CI OPEX related products by year.



Discussion: S/CI Program Recommendations and Actions

Between FY 2004 and FY 2024 numerous recommendations and actions have been given in response to S/CIs identified throughout the DOE/NNSA. Below is a list of general recommendations and actions for potential implementation and indoctrination through S/CI program procedures:

Planning:

- Standardize processes such as training, planning, detecting, handling, reporting, and dispositioning

Procurement:

- Use reputable sources
- Evaluate procurements
- Verify price against manufacturer suggested retail price (MSRP)
- Add appropriate S/CI and procurement clauses to contracts
- Review procurement documents to ensure the site has not procured hazardous products as identified in data collection sheets, operating experience documents, or other alerts
- Review recall alerts
- Monitor the DOE Suspect Counterfeit Web Items page
- Look for negative reviews on products
- Avoid websites that lack information
- Be wary of social media purchases
- Don't click on links but type in information to search and go directly to websites
- Insist on secure transactions (i.e., https) and guard personal information

Inspection:

- Inspect labels for uneven fonts, misspellings, inconsistent patterns or language, incorrect manufacturer logos, and conflicting or incorrect information
- Inspect packaging for low quality appearance or not being in manufacturer packaging
- Inspect quality of the product. If it is lower quality than usual, then the item may be suspect
- Verify information on documentation matches information on products

Reporting & Disposition:

- Immediately stop use of S/CIs
- Disposition and report in accordance with DOE O 414.1D
 - Report S/CIs as applicable to the Occurrence Reporting and Processing System (ORPS)
 - Report S/CIs as applicable to the Office of Inspector General (OIG)
 - Disposition S/CIs
 - Submit lessons learned and familiarize individuals with lessons learned and operating experience documents. Individuals should work closely with ES&H

Discussion: Options for Improving the Sharing of S/CI Operating Experience

Future operating experience products that share S/CI information may be improved by incorporating the below recommendations. Additional detailed and comprehensive guidance on S/CIs may also be found in the DOE-HDBK-1221-2024, *Suspect/Counterfeit Items Resource Handbook* [here](#).

Overall, best practices provide a positive example of work processes with the greatest capacity for probable significant operational improvements or cost savings. Although best practices have the greatest potential to make the most impact on S/CI programs throughout the enterprise these documents comprised only 19% of the total S/CI related documents submitted from 2004 to 2024 (reference Figure 1 on page 1). In addition to best practices being submitted less than other types of S/CI related operating experience products, 43% of the best practices that were reviewed did not include details and vital information that could create the most impact and benefit to DOE S/CI programs such as actual examples (e.g., photos, diagrams, excerpts of processes, procedures, clauses, etc.).

Improvements in operating experience products for S/CI could be made in the following areas:

- 1) **Inspection:** Provide examples such as photos of suspect items (even if determined to be nonconforming and not S/CI). This would help inspectors to understand how to better inspect products.
- 2) **Administrative functions:** Provide information and examples on administrative functions and best practices of working with these functions. For example, there could be best practices or standard processes that could be shared for developing procurement clauses and engaging engineering to develop these clauses or when you might engage with your local site legal office on a suspect product.
- 3) **Training:** Provide information on best practices for training, accessing training, and resources for employees to access training at your site and beyond for S/CI.
- 4) **Resources:** Provide additional best practices or resources that are available inside or outside of DOE on S/CIs. This could be shared broadly across the department as a best practice or could be emailed to counterfeit@hq.doe.gov to be included in the Fraudulent, Adulterated, Knockoff, and Erroneous (FAKE's) monthly newsletter.

- 5) **Reporting:** Although there are current projects in progress for S/CI reporting, it is recommended to increase familiarization and use of the Government-Industry Data Exchange Program (GIDEP). This facilitates quick communication between Government agencies and industry partners about potential S/CI and major or critical nonconformance issues that could affect health and safety. Additionally, resources are now available to S/CI Coordinators (these are contacts assigned at each DOE site) to assist in reporting. If you are unsure who your S/CI Coordinator is at your site or if you are an S/CI Coordinator who needs assistance in reporting an S/CI please email counterfeit@hq.doe.gov.

Conclusion

Operating experience products could be greatly improved for S/CI by including more detailed examples for inspections, administrative functions, training, resources, and working collaboratively with other reporting sources as applicable.

References

The Office of Environment, Health, Safety and Security (EHSS), Office of ES&H Reporting and Analysis publishes OESs to promote safety throughout the DOE complex by encouraging the exchange of lessons learned information among DOE facilities.

For further information or assistance related to this OES, please contact Gabrielle Holcomb, S/CI Program Manager, at (240) 255-8299 or by email at gabrielle.holcomb@hq.doe.gov

Attachment 1: Document Types

The following are the various types of operating experience products that were identified for S/CI for the time period of January 2004 to August 2024:

- Best Practice
 - Used by organizations to provide a positive example of work processes with the potential to be the basis for significant operational improvements or cost savings. (DOE O 210.2A, *DOE Corporate Operating Experience Program*)
- Just-In-Time
 - Used to provide brief examples of problems and mistakes encountered in actual cases and points to consider for avoiding pitfalls. (DOE O 210.2- dated 06-12-06)
- Lesson Learned
 - Used by organizations provide examples of good work practices or innovative approaches that are captured and shared to promote repeat application or sharing of adverse work practices or experience that is captured to prevent recurrence. (DOE 210.2A)
- Operating Experience Awareness (OPEX Awareness)
 - Used by DOE HQ to provide timely information that raises awareness of recent events or trends in internal DOE or external operations.
- Operating Experience Level 1 (OE-1)
 - Used by DOE Headquarters (HQ) to inform the DOE complex of most significant events or trends of concern to DOE/NNSA management, including assessments and required actions with close-out verification in a formal response. (DOE 210.2A)
- Operating Experience Level 2 (OE-2)
 - Used by DOE HQ to inform the DOE complex or affected sites of potentially significant safety issues (e.g., conduct of operations, suspect, counterfeit, or defective items, etc.). Must include a statement of actions required (or recommended for NNSA) and formal method of feedback. (DOE 210.2A)
- Operating Experience Level 3 (OE-3)
 - Used by DOE HQ to inform Senior HQ and Field Management when an event(s) or a trend(s) warrants attention by Senior HQ or Field Management but does not warrant an OE-1 or OE-2 report. Highlights important environment, safety, and health issues for senior management's attention and potential action. (DOE 210.2A)
- Operating Experience Summary (OES)
 - Used to inform the DOE complex of DOE or external operating experience from which sites could benefit. Consists of a compilation of informative operating experience-based articles. (DOE 210.2A)
- Safety Alert
 - Safety Alerts were replaced by the OE-1 when DOE O 210.2A was released. No Operating Experience Level 1 (OE-1) documents were identified during this timeframe but Safety Alerts were identified.
- Safety Bulletin
 - This was replaced by the OE-2 in DOE O 210.2A.
- Safety Advisory
 - This was replaced by the OE-3 in DOE O 210.2A.
- Success Story
 - A practice that resulted in a positive outcome. (Reference archived DOE O 210.2)