

Outline of a OCI Avoidance Plan as required by NASA 1852.237-72, Access to Sensitive Information

I.) INTRODUCTION

- A.) Description of company to include address and primary type of business
 B.) **Description of the Requirement under Task Order __ and the OCI Situation**
 {fill in proposed SOW under task order}

II.) OCI Mitigation Plan and procedures

- A.) **Purpose** {State the purpose of this plan, i.e. The purpose of this plan is to establish policies and procedures for [insert name of company] employees to ensure avoidance and/or mitigation of OCI Scenarios during the performance of contract _____ or Task Order ____.
- B.) **Scope** {Who is the plan applicable to? All employees and subcontractors who provide services on task order ____}
- C.) **Responsibility for this OCI Plan**
 {State the name of the individual in your company that will be responsible for ensuring this plan is carried out, i.e. the [insert name of company] contract administrator will be responsible for ensuring that the policies and procedures set forth in this plan are carried out.}

Organizational Separation (Establishes a firewall for engineering or consulting type work that may result in specifications for a later procurement.)

As a proactive measure, in dealing with sensitive information, [insert name of company] has developed a firewall in which employees working behind this firewall will not communicate any information associated with task order ____ with any non-cleared employees of [insert name of company] or other Team member companies . The [insert division name of company] that provides the services for the _____ contract only provides services for Goddard Space Flight Center, and does not collaborate with any other divisions within the company, so a natural firewall exists already All employees that support this firewalled tasks are listed below and each has signed a nondisclosure agreement for this task or contract (see Attachment A).

Or

[insert name of company] will not compete for any NASA contracts that may result from [insert name of company] work under this contract

D.) **Training**

Prior to beginning work, all employees who will work the task are trained specifically on the requirements of this OCI Plan, how they are required to protect the data, who they can and can not communicate with, how the data is to be safeguarded, and what to do if a breach of this plan were to happen.

E.) **Security of Sensitive Information**

All data that is considered sensitive will be kept in a locked location at the _____. When the data is not being used, reviewed, or manipulated, it will be placed a locked cabinet. Only employees that have been cleared to work the task will be given access to the key. The ____ will be the guardian of the key. As the task is completed, all data that is generated during this task will be retained in a locked cabinet for the amount of time that is required by the task. **[insert name of company] [fill in name or position of individual to perform this duty]** shall continuously monitor data retention to ensure that this process is carried out.

ENCLOSURE E: PROGRAM ANALYSIS AND CONTROL (PAAC IV)

F.) Identification and Monitoring of this OCI Plan

If a COI is identified during the performance of this contract or a specific task, **[insert name of company]** immediately take corrective action and inform the NASA C.O. of the breach and the corrective action taken.

G.) Please address whether **[insert name of company]** will agree not to assist in drafting specification for future procurements in which it may bid.

H.) Discipline for Noncompliance

The failure of any **[insert name of company]** employee assigned to the Program to comply with the requirements and procedures stated herein shall result in disciplinary action up to and including termination.

Cleared Authorized Employees for contract _____ or task order _____ List

The following **[insert name of company]** employees have signed specific non-disclosure agreements and are authorized to have access to sensitive information to perform their duties under this contract/task order.

NONDISCLOSURE AGREEMENT

This Nondisclosure Agreement (AGREEMENT) is entered into between the [*insert name of Company*] located at [*insert address*] (hereinafter referred to as “____”) and [*insert name of company employee*] residing at [*insert address of employee*]

Under contract _____, NASA has provided to [*insert name of company*] access to sensitive information as defined in NASA FAR 1852.237-72. I acknowledge that I have received training on the [*insert company name*]'s OCI Avoidance Plan and I agree to abide by the terms of the OCI Avoidance Plan. Further, I agree to maintain this sensitive information in accordance with the [*insert company's name*] OCI Avoidance Plan. I will only grant access to sensitive information to authorized employees of [*insert company name*]. I have been provided with a list of authorized employees that may receive this sensitive information. I understand that failure to comply with the company's plan may result in disciplinary action up to and including termination from the company

By: _____

Printed Name

Title

Date

