DATA REQUIREMENTS DESCRIPTION

1a. DRD Title: Organizational Conflicts of Interest (OCI) Plan **1b. Data Type: 1**	**2. Date of Current Version** January 23, 2015	**3. DRL Line Item No.** 6	**RFP/Contract No.** NND15520845R
4. Use (Define need for, intended use of, and/or anticipated results of data) To ensure that conflicts of interests are mitigated and that each contractor employee acknowledges and agrees to comply with the policy to protect sensitive information.			**5. DRD Category** ___Technical _X_Administrative ___SR&QA
6. References (PWS, Clause, etc.) NFS 1852.237-72, and NFS 1852.237-73		**7. Interrelationships** (e.g., with other DRDs)	

8. PREPARATION INFORMATION:

FIRST SUBMISSION DATE: After Contract Award and Prior to Commencement of Work. Upon NASA approval, this document becomes a contractual requirement. The CO will retain the OCI plan in the contract file.

SUBMISSION FREQUENCY: To be updated as required thereafter.

FORMAT: Contractor format (compatible with Microsoft Office 2007 applications).

APPROVAL: The Contracting Officer's Representative (COR) must approve any changes.

DISTRIBUTION: Contracting Officer
Contracting Officer's Representative

INSTRUCTIONS:

In accordance with NFS 1852.237-72, Access to Sensitive Information, and NFS 1852.237-73, Release of Sensitive Information, the Contractor shall deliver an Organizational Conflicts of Interest Avoidance Plan.

CONTENT: The Organizational Conflict of Interest Plan shall discuss the following:

1. Demonstrate an understanding of (1) OCI principles and (2) the full breadth of OCI issues and the types of harm that can result.
2. Describe the actions the contractor intends to take to mitigate the OCIs identified in the RFP. If using a firewall, explain how these actions will operate to successfully address the conflict without adversely affecting performance of the contract. Additionally, identify any potential OCIs created by the requirements of this RFP which the contractor intended to resolves using methods other than mitigation. Specific mitigation strategies shall be appended to the mitigation plan.
3. Require the reporting of all potential/actual OCIs during performance of the contract. An OCI report shall include (1) a description of the conflict, (2) the plan for resolving the conflict, and (3) the benefits/risks vis-à-vis contract performance associated with plan approval/acceptance.
4. Include a requirement to update this plan as necessary to address specific OCIs. All updates to the plan must be approved by the contracting officer and the updates/changes must be incorporated in the contract to be effective.
5. Define company roles, responsibilities, and procedures for screening (i.e., identifying/recognizing, analyzing/evaluating, resolving, and reporting) existing and new business opportunities for actual/potential

OCIs.
6. Identify any affiliated companies/entities (e.g., a parent company or a wholly-owned subsidiary) and procedures for coordinating OCIs with such affiliated companies/entities.
7. Explain how the contractor will flow down the provisions of this mitigation plan to any subcontractor that may have a conflict with regard to performing the requirements of this contract. Discuss affected subcontractors' OCI program as it relates to this contract and specifically explain how affected subcontractors will identify, resolve, and report OCIs associated with this contract.
8. Establish and require entrance training for new employees, refresher training for existing employees, and exit training for departing employees.
9. Define organizational and employee sanctions for violations of established OCI procedures/requirements/guidelines.
10. Require periodic self-audits to ensure compliance with established OCI procedures/requirements/guidelines.
11. Define records related to the OCI plan (e.g., training and audit records) that will be made available to the Government upon request.