

Organizational Conflict of Interest Checklist

1	General Considerations	Page/Para
1.1	A clear statement of corporate commitment to continuously identify and avoid or mitigate OCI situations for this acquisition signed by senior corporate official (Vice President or above).	
1.2	Corporate commitment to certify annual compliance with OCI Plan.	
1.3	Description of the position of the business unit performing this contract effort within the overall corporate structure.	
1.4	Organizational charts for the parent organization and the performing business unit (e.g., division, sector, subsidiary, affiliate).	
1.5	Letters of commitment to the prime contractor's OCI Plan from all teammates and subcontractors or individual OCI Plans from all teammates and subcontractors attached to prime contractor's OCI Plan.	
2	Definitions	
2.1	Definition of all terms used in the OCI Plan.	
2.2	Definitions of all acronyms used in the OCI Plan.	
3	Management of OCI Plan	
3.1	Identification of individual responsible for oversight and administration of the OCI Plan by position and place in company/business unit organizational structure.	
3.2	Identification of individual responsible for maintaining documentation related to OCI Plan by position and place in company/business unit organizational structure.	
3.3	Location where OCI Plan documentation will be maintained and commitment that the location will be easily accessible by Contracting Officer or Government auditor.	
3.4	Identification of corporate OCI-related policies and procedures (policies and procedures shall be attached to the OCI Plan).	
3.5	Description of processes and procedures implemented to execute the OCI Plan.	
3.6	Commitment to flow OCI Plan requirements down to all teammates and subcontractors. Only those teammates and subcontractors who have committed to the Contractor's OCI Plan in writing or provided an OCI Plan of their own shall be allowed to commence work on this contract.	
3.7	Description of process for advance notification to Contracting Officer of addition, deletion, or changes to subcontractors and teammates. Notification shall include sufficient information for the Contracting Officer to	

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	determine whether or not the OCI situation has changed. Notification shall also include any proposed changes to the OCI Plan.	
3.8	Description of process for timely notification to Contracting Officer of newly identified OCI situations, OCI Plan violations, or appearance of violation. Notification shall include a description of the violation or appearance of violation and the actions taken or proposed to be taken to mitigate or avoid repetition of the violation. After conducting further inquiries and discussions as may be necessary, the Contracting Officer and the contractor shall agree on appropriate corrective action, if any.	
4	OCI Training	
4.1	Plan for OCI training of all personnel working on the program.	
4.2	Identification of persons or classes of persons working on the program not subject to OCI training, including rationale and description of alternate OCI mitigation techniques.	
4.3	Statement of frequency of training (not less than annually).	
4.4	Description of how training completion is documented and where training documentation is maintained.	
4.5	Description of process for determining personal (individual) conflicts of interest.	
4.6	Description of personnel policies to limit employee transfers that might result in the inadvertent flow of sensitive information to other parts of the company where information could be used inappropriately.	
4.7	Statement that requirement is in place for program personnel to execute non-disclosure agreements (NDA) to protect proprietary and other sensitive information.	
4.8	Statement that requirement is in place for debriefing personnel who executed NDAs upon their transfer, reassignment, resignation, or retirement.	
4.9	Statement of the length of time that NDAs require protection of information.	
4.10	Description disciplinary actions for non-compliance with the OCI Plan.	
4.11	Description of how and where disciplinary actions are documented.	
5	OCI Plan Reviews	
5.1	Description of how OCI processes and procedures are overseen and audited by the corporate organization.	
5.2	Statement of the frequency of corporate audits.	
5.3	Commitment to annual certification by a senior corporate official (Vice President or above) of compliance with the terms of the OCI Plan.	
5.4	Description of location where certification documentation is maintained.	

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6	Description of OCI Situation	
6.1	Description of actual and potential OCI situations for prime contractor, subcontractors, or teammates, including classification of OCI situations as biased ground rules, impaired objectivity or unequal access to non-public information. Description identifies applicable contract numbers and customers.	
6.2	Explanation of factors that place the prime contractor, subcontractors, or teammates in an OCI situation.	
7	OCI Mitigation	
7.1	Description of avoidance or mitigation technique(s) proposed for each identified OCI situation in sufficient detail to evaluate efficacy of proposed technique.	
7.2	Identification of individuals (by position and place in company/business unit organizational structure) responsible for executing proposed technique(s).	
7.3	If OCI situation is one of biased ground rules or impaired objectivity, avoidance or mitigation techniques shall involve more than firewalls.	