

PROCUREMENT GUIDANCE: COUNTERFEIT ELECTRONIC PARTS**APPROVED DFAR SUPPLIER CATEGORIES**

In order to satisfy U.S. Government requirements (DFARS 246.870 and DFARS 252.246-7007) all purchases of electronic components that will be used on DoD sponsored awards must comply with DoD mandatory requirements and minimize risk to DoD operations.

This guidance describes the set of controls designed to eliminate or mitigate the risk of utilizing counterfeit electronic components in VT delivered hardware. DoD contracts that are subject to DFARS 252.246-7007 are required to adhere to this guidance.

Excluded from these requirements are electronic components procured for use in equipment intended for internal purposes (e.g. research, development, problem resolution, testing theories, trying new ideas, etc.), and which are not planned to be provided to sponsors. Also excluded are unmodified commercial off-the-shelf (COTS) assemblies or subsystems, procured from original equipment manufacturers (OEMs), unless otherwise specified in the project plan or mission assurance plan.

Implementation is the responsibility of any individual or organization, internal or external to VT, which is involved in sourcing such parts in support of program hardware provided to sponsors that is not excluded as called out above. It is important that unit procedures (e.g. college, school, or VT laboratory) reflect the requirements outlined in this guidance. VT is not certified to test suspected counterfeit parts; therefore, VT shall follow the following guidelines in order to avoid the receipt of counterfeit parts.

VT will be in compliance with DFARS 252.246 by obtaining electronic parts from one of three categories listed below in sequential order:

Category 1: VT Departments will obtain electronic parts that are in production by the original component manufacturer (OCM) or an authorized aftermarket manufacturer (AAM). If parts are not in production, obtain from currently available stock in the following order:

- a. OCM of the parts;
- b. OCM-authorized suppliers of the parts; or
- c. Suppliers that obtain such parts exclusively from the OCM of the parts or their authorized suppliers.
- d. OCM authorized suppliers shall be verified using one of these methods:
 1. Verification of OCM authorized supplier legitimacy prior to purchase shall be documented. OCM websites include the suppliers that are authorized to distribute their components. A screenshot from the OCM website designating authorized suppliers or an email from an OCM verifying an authorized supplier is acceptable verification.
 2. The Electronic Components Industry Association (ECIA) maintains a database (<https://www.ecianow.org/>) of verified authorized suppliers. The ECIA database is an alternative source for verifying authorized suppliers and shall be archived with purchase documentation.

A supplier's website should never be solely relied on as a source for OCM authorization to distribute.

Category 2: If electronic parts are not available as provided in Category 1, VT will obtain electronic parts that are not in production by the OCM or an AAM from suppliers identified by the CASL. The CASL is derived from the DLA certified vendor list, which is included in the workflow attached to this guidance. The following three conditions apply to this source of electronic parts:

- a. VT will comply with VT Procurement processes to identify and approve CASs who adhere to established counterfeit prevention industry standards as mentioned in Section 10;
- b. CAS assumes responsibility for the authenticity of parts provided to VT; and
- c. CASL is subject to review and audit by the government CO.

Category 3: If VT (i) obtains an electronic part from a source other than those identified in Categories 1 and 2 because of non-availability or from a subcontractor other than the OCM that refuses to accept the flow down of DFARS clause 252.246-7008; or (ii) cannot confirm that an electronic part is new or previously unused and that it has not been comingled in supplier new production or stock with used, refurbished, reclaimed, or returned parts, then the contractor must adhere to the following:

- a. Promptly notify the sponsor CO in writing;
- b. Be responsible for inspection, testing, and authentication by selecting a test resource from the CASL; and
- c. Log documentation of inspection, testing, and authentication to make available to the government upon request.

Term and Condition:

Counterfeit Parts: This purchase shall be governed by and in accordance with DFARS Sections [246.870](#) and [252.246-7007](#). Any electronic parts must have a Certificate of Origin and the total quantity of any individual part must be from a single manufacturing lot or date code.