

# ORGANIZATIONAL CONFLICTS OF INTEREST (OCI)

## AVOIDANCE PLAN

CONTRACT NUMBER XXXX

Award Date:

Effective Date:

I. INTRODUCTION:

A. Describe the company to include address and primary type of business.

Company Name: XXXX University

Address:

XXXX University is a nonprofit, independent, educational, nondenominational institution that performs research and provides undergraduate and graduate instruction in the arts and humanities, social sciences, natural sciences, and engineering.

B. Identify the Contract and/Task Order Number and description of the scope of work requirements.

CONTRACT NUMBER XXXX;

XXXX University, as the prime contractor, shall perform XXXX as defined in the Statement of Work (SOW) Attachment X.

C. Identify who is responsible for this OCI/Aidance Plan. State the name, title, mailing address, email address, phone number and fax number of the individual in your company that will be responsible for OCI reporting ensuring this plan is carried out and updated as needed.

\*As per Regulation 1852.237-72 "Access to Sensitive Information," Sensitive Information refers to information that a contractor has developed at private expense, or that the Government has generated that is not in the public domain, and which may embody trade secrets or commercial or financial information, and may be sensitive or privileged.

B. Specify who this plan applies to (i.e., employees and subcontractors who provided services on contract and/or task order) and any affiliated companies/entities (e.g., a parent company or a wholly-owned subsidiary) and procedures for coordinating OCIs with such affiliated companies/entities.

This OCIAP applies only to the following:

- o XXXX University employees and consultants involved in the XXXX Contract.

The following will be affiliated with the Contract and will supply their own OCIAP.

- o YYYY (direct subcontractor to XXXX);
- o ZZZZ (direct subcontractor to YYYY);

During the subcontracting signing period, all subcontractors will be asked to create their own OCIAP. XXXX University will be responsible for the implementation of this OCIAP for all XXXX University employees and consultants involved in the XXXX Contract. All XXXX University employees and consultants involved in the XXXX Contract and subcontractors will be provided the RIA email address (XXXX@XXX.edu) and phone number (XXX-XXX-XXXX) to report any potential OCI.

C. Describe the procedures for updating this plan as necessary, to address specific, actual OCIs that may arise during contract and/or task order performance

The OCIAP will be updated as needed to address any changes in process or procedure relative to implementing the plan as well as to update any changes to personnel or affiliates associated with the plan. At a minimum, the OCIAP will be reviewed annually by RIA. RIA will update the plan and, prior to implementation of any changes, notify NASA of the proposed changes. RIA will communicate any revised OCIAP to XXXX University employees and consultants involved in the XXXX Contract and subcontractors (if applicable).

D. Define company roles, responsibilities and procedures for screening (i.e., identifying/recognizing, analyzing)



30 days of any such occurrence. Subcontractors will report any such incident or violation to RIA either by email ([foi@XXXX.edu](mailto:foi@XXXX.edu)) or phone XXX-XXX-XXXX.

- F. Describe the procedures for reporting of all potential/actual OCIs during performance of the contract and/or task order. 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.

All XXXX University employees and consultants involved in the XXXX Contract are required to report potential OCI issues/concerns, which they become aware of or observe. Reporting of potential OCI issues/concerns can be made through the person's immediate manager/RIA. The OCI report should include a description of the potential conflict. Once reported, the information will be triaged and, if warranted, investigated by RIA or a subcommittee appointed by the IO. The IO or Conflict of Interest in Research Panel will make the final determination regarding whether a reported OCI is an actual OCI, and approve plans for conflict resolution and management. The management plan will include benefits/risks regarding Contract performance that may be associated with an approved mitigation strategy or management plan.

Additionally, all XXXX University employees and consultants involved in the XXXX Contract will fill out an annual disclosure form to report any potential OCI or other conflict of interest (commitment, resources, financial) that may be related to the Contract. The annual disclosure forms will be reviewed by RIA and, if warranted, investigated as described above if a potential conflict is identified.

- G. Explain how employees who will work on this contract and/or task order are trained specifically on the requirements of this OC Avoidance Plan, how to protect sensitive information and safeguard it from unauthorized use and as

Subcontractors will certify their compliance with NFS 1852.223-72 through the Subrecipient Commitment Form and the certifications section of the Subaward Agreement managed by the XXXX University Subaward Administrator.

If no training program exists for individual companies, XXXX University will work with the subcontractors to provide any necessary training on the OCIAP.

- H. Explain the monitoring process to ensure that employees comply with all reasonable security procedures, report any breaches to the Contract Officer, and implement any necessary corrective actions.

The XXXX University PI will be responsible for directly monitoring all XXXX University employees and consultants involved in the XXXX Contract identified as having access or potential access to sensitive information for compliance with this OCIAP. Any non-compliant OCI issue or sensitive information breaches that the PI becomes aware must be reported.

The types of OCI that can be identified are:

xUnequal Access to Information: Arises in situations when an organization has access to non-public information as part of its performance of a Government

place to evaluate subcontract 0 hrs perform



IV. DISCIPLINE FOR NONCOMPLIANCE:

- A. Define any organizational and employee ~~sans~~ for violations of established OCI procedures/requirements/guidelines.

Depending upon the findings and recommendations of O or Panel, any violations of this Plan may result in appropriate administrative, organizational and/or disciplinary action pursuant to and consistent with

