Department of Defense
Defense Contract Management Agency
INSTRUCTION

DCMA-INST 301
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Title: GIDEP and DCMA Forum Regarding Defective/Nonconforming Product and Process Notifications

DCMA Requirements

DCMA shall promptly investigate and notify all potentially affected contract management offices (CMOs), and procurement and program officials of potential or known defective / nonconforming product, processes and services received from any source in which a serious hazard to health, safety, or operational readiness is indicated.

Information from fraud investigations must be treated confidentially and designated For Official Use Only (FOUO) when passed between government activities, and must not be disclosed without the consent of the investigative agent or the cognizant CIC counsel**.** Any product investigation related to information disclosed in an IG Safety Alert must be coordinated with the investigative agent or cognizant CIC counsel.

DCMA activities shall participate in the Government Industry Data Exchange Program (GIDEP) and comply with the terms, conditions and requirements of GIDEP and application for participation. CMO Representatives and Users shall comply with the Participant requirement to report Utilization (PURS) benefits. In accordance with GIDEP Distribution Policies, DCMA shall not provide GIDEP documents to other organizations or to DCMA foreign national employees. Each Division and CMO shall appoint a GIDEP Representative and at least one alternate. Any CMO *DCMA Forum* participant changes shall be reported to the HQ DCMA Forum Administrators.

DCMA CMOs shall issue, review and disseminate appropriate GIDEP Failure Experience Data (FED) about potential or known nonconforming products, process or material not meeting manufacturing specifications, design, composition or other contract requirements. These nonconformances could present a significant health or safety risk, or could negatively impact operational readiness or mission success. (OFPP Policy Letter No. 91-3)

- To facilitate this requirement, the Division/CMO GIDEP Representative shall enroll eligible DCMA personnel as GIDEP Users and administer and monitor their activities.
- To assist with the dissemination of information or allegations on nonconforming products/processes, DCMA shall use the GIDEP-DCMA Forum, referred to simply as the "*DCMA Forum*" within GIDEP to collect/refine information and internally discuss/share knowledge about defective/nonconforming products, processes, services, and quality

escapes between all CMOs, Divisions and Headquarter activities.

CMO specialists who become aware of nonconforming products/processes, even though they may not be completely defined, shall report their findings to the GIDEP Representative to determine if those findings warrant the submittal of an Agency Action Notice with limited government-only distribution (AAN-L) to GIDEP. Further distribution will follow via a Problem Advisory (PA). The *criteria for issuance* of an AAN-L and a PA are:

- Potentially nonconforming products/processes do not meet the requirements of contracts (including purchase orders), catalogue descriptions or referenced specifications, and;
- Continued supply or use of these products/processes could adversely affect other Government agencies (buying activities and/or weapon system programs) or contractors/suppliers, if not reported to GIDEP.

The AAN-L shall be issued by the GIDEP Representative within 5 working days of the above criteria being met**.** Release of GIDEP documents must be coordinated with the DCMA CIC (office locations) or local counsel. The document shall make clear whether the established facts indicate the contractor has/has not caused the reported defect/nonconformance. The AAN-L shall be followed by a GIDEP PA (which requires a contractor 15 day comment period) within 25 working days of the above criteria being established, unless:

- It has been determined that the nonconformance does not impact other Government agencies or contractors/suppliers; or
- Special circumstances do not warrant its release such as DCIS investigation, or the nonconformance was determined to be in error; or
- The Contractor has already issued a PA or Alert within the same 15 day comment timeframe.

All product/process investigations shall be evaluated by the GIDEP Representative and if they meet FED notification criteria, the results of those investigations shall be released to GIDEP using the appropriate FED notification document.

All DCMA personnel whose duties require that they have knowledge of the quality of a supplier's product (Engineers, Quality Assurance Specialists, Industrial Specialists, Program Integrators, Packaging Specialists, etc.), and their Team Leaders, shall participate in the *DCMA Forum*, DCMA's internal information exchange within GIDEP, as Users. Only DCMA personnel shall be given access to the DCMA Forum. Types of information meeting the above criteria to be posted, developed or refined in the *DCMA Forum* are:

- Systemic Deficiency Reports
- Bellringers reporting issues that affect product performance
- Level III & IV Corrective Action Requests (CARs), and systemic Level II CARs, and
- Any other information on contractually nonconforming or defective parts, processes or material.

All *DCMA Forum* Users and DCMA GIDEP Representatives will receive, via "push mail", summary information on both the GIDEP FED and *DCMA Forum* notifications, and shall review

notifications of potential interest or concern to their activity. All documents submitted into the *Forum* will be reviewed by the Forum Administrator (senior engineering and/or quality specialist) prior to their posting in the Forum to ensure technical accuracy and suitability. The Forum Administrators shall receive training in International Traffic in Arms Regulations (ITAR) and Export Administration Regulations (EAR) sufficient to enable them to identify ITAR and EAR restricted information so that it is not released to foreign national DCMA personnel.

- If known ITAR or EAR restricted information is submitted to the DCMA Forum, it should be identified as such in the Forum document; identification of data protected by ITARs and EARs may be found in the contract, weapon systems blueprints, drawings, plans, instructions, computer software and/or other contract documentation.
- Foreign National employees will have limited access to the *DCMA Forum* and will not be enrolled in GIDEP, or provided access to the FED when they apply to become DCMA Forum Users due to ITARs and EARs requirements. Foreign National employees will only receive DCMA Forum documents that have been reviewed and scrubbed by properly trained *Forum* Administrators to remove potential ITARs & EARs material.
- Company proprietary material and trade secrets, classified material, information on nuclear technology or cryptographic equipment/techniques and NOFORN documents shall not be submitted to the *DCMA Forum.*

As much of the information within the *DCMA Forum* may not have been verified / substantiated to the degree necessary for it to become public information, no *DCMA Forum* information shall be released to any activity outside DCMA (for example, customers, contractors or other Government entities) without the permission of the originator of the document and DCMA CIC or local counsel. After the information from the *DCMA Forum* has been verified, it shall be evaluated by the GIDEP Representative to determine if it should be released into the main GIDEP FED Database.

Process - Process Description

1. Purpose

1.1. DCMA receives information regarding defective/nonconforming product, processes and services from various sources and ensures the appropriate and timely dissemination of this information to all potentially affected parties. DCMA uses the government-wide Government-Industry Data Exchange Program (GIDEP) to inform and exchange information among government and industry partners. To accomplish this, DCMA has combined its GIDEP policies with activities of the GIDEP-DCMA Forum (hereafter referred to as the *Forum* a DCMA-only resource) and DCMA's Contract Integrity Center (CIC)**.** These resources are utilized by DCMA GIDEP Representatives and Users to comply with the DCMA Instructions and the intent of Office of Federal Procurement Policy Policy Letter No. 91-3 policies

and procedures for using a Government-wide system for exchanging information among agencies about nonconforming products and materials.

1.1.1 Information should NOT be transmitted to GIDEP that would not benefit multiple or unidentified government or commercial activities or entities, e.g., routine acceptance test anomalies or routine quality deficiency reports.

1.2. The purpose of the *Forum* is to expand upon the use of the existing GIDEP system that already has broad usage by both our customers and the suppliers we oversee on their behalf. DCMA personnel should use the *Forum* to exchange/develop information about nonconforming material and quality escapes (*nonconforming material that has entered the supply chain*) among our internal activities/CMOs. DCMA CMO Team Leaders should be actively involved in their PA personal reporting of nonconforming material and quality escape issues. After DCMA investigations (to include information gleaned using the *Forum),* any suspected nonconforming product or process meeting issuance criteria should be reported promptly - via a GIDEP Failure Experience Data (FED) notice. The information (both in the *Forum* and the GIDEP FED) can be used to help correct deficiencies and/or take other appropriate action to assure the quality of defense material. As such, the *Forum* and the GIDEP FED are integral parts of the knowledge database used to support many of our customers and processes.

1.2.1. Additional information about GIDEP may be found at the DCMA GIDEP Website or at the public GIDEP Website. The *Forum* and GIDEP FED are password-protected member resources.

1.2.2. GIDEP FED notices may NOT be released to any activity outside DCMA (i.e, information cannot be released to customers, contractors or other Government entities). Information in the *Forum* may only be released with the permission of the originator of the document.

2. GIDEP Representatives/IG Safety Alerts Coordinators (GIDEP Representatives).

2.1. Each Division and CMO should appoint a GIDEP Representative / IG Safety Alerts Coordinator (preferably the same person and herein referred to as the "GIDEP Representative") and at least one alternate.

2.2. The GIDEP Representative and Forum Users will receives GIDEP Failure Experience Data (FED) notices via "push mail" and should review potentially applicable notices at least weekly. GIDEP SAFE-ALERTS should be reviewed within 1-2 days of receipt. CMO GIDEP Representatives should forward other pertinent GIDEP documents and information to all technical specialists within the CMO who have cognizance over potentially affected

contracts or subcontracts within 10 days of receipt. CMO GIDEP Representatives should also ensure that appropriate actions are taken by the technical specialists.

2.3. DoD IG Notices of Potentially Non-Conforming Product ("IG Safety Alerts") are received by the Contract Integrity Center (DCMAC-Y) and are disseminated to Division GIDEP Representatives within 1 day of receipt. Division GIDEP Representatives should disseminate IG Safety Alerts to CMO GIDEP Representatives within 1-2 days of receipt. IG Safety Alerts are designated FOR OFFICIAL USE ONLY LAW ENFORCEMENT SENSITIVE (FOUO-LES). Distribution outside the Government is prohibited.

2.4. In some cases, an IG Safety Alert is also issued as a GIDEP Agency Action Notice ("AAN"), either as a Limited-to-Government-personnel basis (L) or an Unlimited distribution basis (U). Division and CMO GIDEP Representatives and technical specialists should treat information contained in a limited distribution GIDEP AAN-L as For Official Use Only (FOUO) and should not disclose the information outside the government except as noted in paragraph 2.5 below.

2.5. Upon receipt, CMO technical specialists should first determine if the GIDEP Notice or IG Safety Alert information potentially affects a contractor or contract for which the CMO has contract management responsibilities. For IG Safety Alerts, technical specialists should first attempt to determine if the information in the IG Safety Alert could possibly affect any contract or contractor under their cognizance through the review of information that is available without contacting any contractor. If such review would necessarily be incomplete (e.g., the named contractor could be a subcontractor or lower tier supplier), the technical specialist should contact the investigative agent identified in the IG Safety Alert or the cognizant CIC counsel and request approval to contact the contractor for information.

2.5.1 If approval is granted, or if the information is derived from an unrestricted GIDEP notice, the technical specialist may request the assistance of the contractor to determine if the information applies to products, processes or services the contractor has delivered or is intended to be delivered to the Government. Technical specialists should report the status of this initial review to the CMO Primary or Alternate GIDEP Representative within 10 days of receipt of the GIDEP notice or IG Safety Alert. Negative responses should be provided.

2.6. If a CMO technical specialist determines that the information might involve products, processes or services provided by a contractor under the technical specialist's cognizance, the technical specialist should identify all contractors and contracts that are affected and perform risk assessments. CMO

technical specialists should consider risk to both open and closed contracts. All information should promptly be provided to the CMO GIDEP Representative. If GIDEP information applies to the CMO's contracts or contractors, the CMO GIDEP Representative is required to complete a utilization report using GIDEPs Participant Utilization Reporting System (PURS). If IG Safety Alert information applies to the CMO's contracts or contractors, the CMO GIDEP Representative should promptly report this information to the cognizant CIC counsel providing the name and location of the technical specialist reporting the findings.

2.7. CMO GIDEP Representatives should submit other credible information received by the CMO involving potentially defective or nonconforming products or services that may affect contracts or contractors managed by other CMOs (such as contractor notifications, customer reports, reports of criminal convictions for fraud) to the Forum. Indicators and allegations of fraud are to be reported to CIC Counsel.

2.8. If credible information indicates a product nonconformance may be applicable to unidentified contractors or customers, an appropriate GIDEP notice should be issued. CMO GIDEP Representatives should team with CMO technical specialists and, if appropriate (e.g., not for information related to IG Safety Alerts), contractor representatives, on the issuance of an appropriate GIDEP notice. GIDEP Problem Advisories (or Agency Action Notices where information is derived from a DoD IG Safety Alert) are the likely GIDEP documents to be used in most cases. Issuance of a GIDEP notice reporting facts or findings related to a fraud investigation should be coordinated with the cognizant CIC Counsel. Where the information is initially received or discovered by a contractor, the CMO technical specialist should encourage the contractor to issue the appropriate GIDEP notice. However, if the contractor does not promptly initiate issuance of a GIDEP notice, the CMO technical specialist should prepare the appropriate GIDEP document in accordance with GIDEP policy and submit it to the CMO GIDEP Representative.

3. Product Investigations and Assessment.

3.1 In many cases a detailed investigation may be appropriate to confirm the reported non-conformance, to identify affected products and contracts, and to design appropriate risk management plans.
Product investigations related to information disclosed in an IG Safety Alert are to be coordinated with the investigative agent or cognizant CIC counsel.

Technical specialists conducting product or process investigations should consider the following actions (not necessarily in order) as needed to protect the customer's interests and the safety of our warriors:

3.1.1 Determine the existence, cause and scope of the reported defect, deficiency or non-conformance, the responsible party or parties, and appropriate corrective and preventive actions. Obtain test results if appropriate.
3.1.2 Determine if the nonconformance or defect has been previously reported or reviewed.

3.1.3 Contact the appropriate QA Commodity Lead Agent for coordination and recommended actions as appropriate.

3.1.4 For a critical or major nonconformance (as defined in FAR 46.101), if it is suspected that similar defective items were provided on other contracts or to other customers, promptly notify customers, end-users and/or storage depots of suspect materiel, and request suspension / screening of depot stocks. Issue the appropriate GIDEP notice in accordance with instructions.

3.1.5 Determine the need for a supporting product investigation from a contractor, other CMO or Contract Management Team, Engineering Support Activity, Contracting Office, Supply Center, etc. Transmittal of an action request should include a copy of the GIDEP report/notice, IG Safety Alert (if approved, then identify as FOUO) or other information source, a statement of the support required, and all pertinent background data which may be helpful in the product investigation. If the response indicates that the product investigation should be conducted by another CMO, contact the CMO GIDEP Representative for transfer. *Note: In accordance with GIDEP Distribution Policies, DCMA may not provide GIDEP documents to other organizations or to DCMA foreign national employees.

3.1.6 Advise the cognizant ACO of contracts involving defective products that should be placed in MOCAS Section 3 (contract under investigation).

4. Follow-up Actions and Dissemination

4.1. If the investigation is not the result of an IG Alert and no indicators of fraud have been uncovered, then the following actions can be considered:

4.1.1 Determine whether the results of the product investigation indicate that a GIDEP document/notice (or follow-up GIDEP document) should be issued.

4.1.2 If the defect or non-conformance is determined to be the contractor's responsibility:

- adjust the current risk rating and risk management plan as appropriate,
- issue a corrective action request to the contractor and

pursue, as appropriate, cost-free repair, replacement or reimbursement for the defective material.

- If the product has not yet been delivered to the Government, take appropriate actions to ensure that all delivered product conforms to contract specifications and requirements.
- If any product has already been delivered to a higher level subcontractor, the prime contractor, or customer, notify the cognizant CMO(s), customer(s) and using activities.
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4.1.3 If the defect or non-conformance is determined to be due to a technical data error, request the appropriate engineering activity to provide a corrective and preventive action response.

4.1.4 If the defect or non-conformance is determined to be due to a procurement deficiency, refer the issue to the attention of the contracting officer for corrective action.

4.1.5 If the defect or non-conformance is determined to be due to maintenance or user error, refer the matter to the maintaining or using activities for corrective and preventive actions.

4.1.6 If appropriate, provide the customer and other known military users with results of the investigation and the corrective action.

5. *Forum* Use in Evaluating Information for GIDEP Notices

5.1. DCMA personnel (Engineers, Quality Assurance Specialists, Industrial Specialists, Program Integrators (for Bellringer issues), Packaging Specialists, etc., (known as GIDEP Users) should consider all known or suspect occurrences of nonconforming material and quality escapes (*nonconforming material that has entered the supply chain*) to determine if these occurrences should be reported to the *Forum*, and should evaluate the information to determine if issuance of a GIDEP notice is required. The evaluation can be completed at the local level and reported to the Forum Administrator or the Users may use the Forum to have others within DCMA help with the evaluation/reviews, locate nonconforming materials, etc.

5.2. Of major interest would be known or suspected nonconformance of parts/components or services that could affect multiple contractors, buying activities, and/or weapon system programs. Typically, these include, but are not limited to: systemic production/dimensional/material problems at suppliers who provide common parts or components to a large number of other sources (e.g., o-rings, fasteners, bearings, adhesives, raw materials such as steel/aluminum/titanium, forgings/castings, electronic components, etc.), or systemic/procedural problems at vendors providing services for many

parts/contractors (e.g., heat treatment, plating/coating, nondestructive testing, etc.). All Level III & IV Corrective Action Requests (CARs) and systemic Level II CARs should be reported in the *Forum*. Systemic Deficiency Reports (DRs) should also be reported to the *Forum*, particularly if there is a high possibility that other activities or contractors may be affected; such as problems reported at a sub-vendor or component manufacturer. The *Forum* should be used like a Community of Practice (CoP) to gather information and collaborate between/among the other CMOs/Divisions to determine the extent of the problem and whether it warrants issuance of a GIDEP notice. In many cases a detailed investigation may be appropriate to confirm the reported non-conformance, to identify affected products and contracts, and to design appropriate risk management plans.

5.3. Information should not be transmitted to the GIDEP database or *Forum* that would not benefit other DCMA CMOs, customers, or other Government agencies. Information that would not be suitable could include, for instance, routine acceptance test anomalies or routine quality deficiency reports. Information regarding major waivers or deviations that affect multiple contracts or products lines may be included in the *Forum*.

6. *Forum* Access - All users are assigned a username and password for the *Forum*, which should not be shared with others. When entering the *Forum*, the links automatically take the user to the *Forum* Homepage, which is where the data is located. The Homepage shows the following information:

Title	Contractor Name	Location	Nonconforming Product	Nonconforming Process
Information Source	**Number**	**Status**	**Distribution**	**Contractor ID Code**

6.1. The users may review documents, may sort on the information by clicking on the blue titles of the columns (for example if they wish to determine how many documents were generated as a result of Level III & IV CARs), or they may use the search feature (it is a limited search feature which works on any information entered into the topic document, but does not open or search in the attachments to the document). Click on the Number to open and review an existing document. If the reviewers wish to add comments or attach additional files to the document, use the yellow box at the bottom of the document and then click on the Submit Attachment button. To return to the Homepage, either use the green Back button at the top or click on the *Forum* Home link at the top in the middle of the page. There is an active Help feature at the top of the screen which assists with the mechanisms of the *Forum*.

6.2. To create a new document, click on the green and gray Create Topic

Button on the mid-right side of the Homepage. Fill out all blocks on the form. All of the blocks have automatic descriptive dropdowns when the cursor is hovered over the block title.

6.2.1. Block 1a is a Dropdown list for NONCONFORMING PROCESSES, click on the process that best describes the problem. If there are multiple Nonconforming Process(es) affecting the items, choose the primary cause of the problem and list the other Process(es) in the Topic Narrative.

6.2.2. Block 1c is a Dropdown list for the SOURCE OF INFORMATION, click the item that best describes the source where the information came from. If you select "Z-OTHER," describe your source in the narrative.

6.2.3. Block 2a is a Dropdown list for NONCONFORMING PRODUCTS, click on the product group that best describes the item. If the affected items fall within multiple Nonconforming Product groups, choose the most specific product group and list other affected Products in the Narrative.

6.2.4. Use the contractor's full name in Block 2b and enter the contractor's location (City, State/Province or Country) in 2c.

6.2.5. List the NSN and the Part Number if known in Blocks 3a & b. If there are multiple part numbers and NSNs, please list them in the Narrative so that they can be located with the search tool.

6.2.6. Block 3c - contractor ID Code requires either the CAGE (Commercial and Government Entity), the DoDAAC (DoD Activity Address Code), or the DUNS (Data Universal Numbering System).

6.2.7. For Block 4, Topic Title - enter a brief description of the non-conformance and the item, list the weapon system (if unknown, state that it is unknown), and note if the nonconformance is on a Critical Safety Item (CSI).

6.2.8. Block 5 is the Narrative. Identify and describe the specific problem, the effect of problem on products/programs, and any action taken in relation to resolving the problem. Please include the class, function, and type of item or component, specification, known systems to be affected by non-conforming process or part, lot or date codes, etc., known customers/prime contractors affected, and technical specifications involved. Identify any information that is restricted by ITAR/EARS, or involves proprietary information. Do not include or attach company proprietary material and trade secrets, classified material, information on nuclear technology or cryptographic equipment/techniques and NOFORN documents are not to be submitted to the

DCMA Forum.
proprietary information.

6.3. Submit any attachments or supporting information into Block 6 (the form needs to be saved before an attachment can be uploaded). These may include forms, Word documents, spreadsheets, parts lists, digital photographs of the nonconformance or markings, sketches, or any other material that describes the issue. If it is known that any of the attachments contains information that falls under the requirements of the International Traffic in Arms Regulations (ITARs) or Export Administration Regulations (EARs), please list those sources in the Narrative.

6.3.1. Block 6 is also used to complete (close-out) the document when all investigations are done. This block may also be used to terminate the current Forum document when an issue or nonconformance proves to be unsupportable.

6.4. After the document is completed, submit for Administrative Review. An initial review should be conducted within two business days. The Forum Administrator is to review the information for clarity and accuracy, and to ensure that the information is appropriate for posting in the Forum. If necessary, the Forum Administrator will contact the submitter for additional information. After the document is reviewed and approved for issuance, it will be posted on the Forum, which then automatically generates an e-mail notice to Forum members.

6.5. Forum Administrators will receive training in ITAR and EAR regulations sufficient to enable them to prevent ITAR and EAR restricted information from being released to foreign national DCMA personnel. DCMA foreign national personnel are not provided access to the general Forum. Foreign Nationals are provided access to a foreign national Forum, which contains information from the general Forum that has been screened to exclude ITAR and EAR restricted information.

7. *Forum* Dissemination - The *Forum* notifies others in DCMA about nonconforming/suspect material via an automatic e-mail when a document is released. The information in the e-mail includes the Topic NUMBER, TITLE, INFORMATION SOURCE, DISTRIBUTION, NONCONFORMING PROCESS, NONCONFORMING PRODUCT, CONTRACTOR NAME, and LOCATION. Recipients should review all documents that potentially affect contracts under their cognizance. If a recipient is aware of, or learns of, information relevant to the issue described, the recipient should submit the information in the remarks section of the notice, and attach any relevant documents. If appropriate, a GIDEP Notice should be issued by either the contractor or by the DCMA GIDEP Representative for inclusion in the GIDEP Failure Experience Data (FED). While GIDEP Users may prepare

documents for submittal, only the DCMA GIDEP Representatives are authorized to sign and submit documents to the GIDEP.