



MEMORANDUM

Date: November 18, 2008
To: All Purchase Card Holders and Approving Officials
From: Ruth McDunn, Suspect/Counterfeit Program Coordinator, Office of Assurance
RE: Suspect/Counterfeit Items and Purchase Cards

All SLAC employees must be watchful for suspect¹/counterfeit² items (S/CI) in the workplace. As a purchase card holder or approving official, you have increased responsibility since p-card orders bypass SLAC's formal purchase and receiving process. The ultimate goal of the S/CI program³ at SLAC and within the DOE complex is to eliminate S/CI from our operations.

The use of S/CIs in non-office work areas, especially in safety systems and at critical load points, can lead to unexpected failures and undue risk of mission or environmental impacts, personal injury, contamination, or death. For these reasons, SLAC has instituted measures to prevent S/CI procurement, detect their use on site and properly isolate and dispose of discovered items.

Although counterfeit high-strength fasteners (bolts) are the most well known S/CI, it is estimated that about 7% of all products world-wide are counterfeit, and that number is growing. Counterfeit ratchet straps and other hoisting and rigging materials have been discovered at DOE facilities. Materials sold as new, but are used or refurbished, are also considered to be S/CI. These items often include electrical components, circuit breakers, transformers, fuses, resistors, switch gear, metal struts, pipe components (fittings, flanges or valves) and other similar hardware.

To prevent accidental purchase of S/CI, p-card holders are not allowed to purchase items that are known in the past to be S/CI. Unauthorized p-card purchases (outlined in the *Procedures for use of the Purchase Card*⁴), **include:**

- Tools and industrial supplies as required from Grainger.com
- Fabrication or machining to SLAC specifications (BOA's)
- Hoisting and rigging equipment and accessories (see interim policy 3.1⁵ for exceptions)
- Items readily available in Stores

If you would like to learn more, please visit the S/CI webpage⁶. In addition, I offer an awareness training class (90 minutes). If you are interested in the training for you or your group, please contact me and I will schedule sessions as needed.

¹ A **suspect item** is one where there is an indication by visual inspection, testing, or other information that it may not conform to established government or industry-accepted specifications or national consensus standards.

² A **counterfeit item** is a suspect item that is a copy or substitute without legal right or authority to do so, or one whose material, performance, or characteristics are knowingly misrepresented by the vendor, supplier, distributor, or manufacturer.

³ <https://www-internal.slac.stanford.edu/oa/documents/assurance.pdf>, pages 19 - 21

⁴ <https://www-internal.slac.stanford.edu/bsd/pur/forms/creditcardprocedure.pdf>, pages 11 - 13

⁵ <https://www-internal.slac.stanford.edu/bsd/pur/forms/Hoisting%20%20Rigging%20Equip%20%20Accessories.pdf>

⁶ <http://www-group.slac.stanford.edu/oa/suspectcounterfeit.htm>