SAE INTERNATIONAL

# AEROSPACE STANDARD

AS6301™ REV. A

Issued 2014-01
Revised 2024-09

Superseding AS6301

# (R) Compliance Verification Criterion Standard for AS6081A Counterfeit Electrical, Electronic, and Electromechanical (EEE) Parts: Avoidance, Detection, Mitigation, and Disposition - Independent Distribution

## RATIONALE

AS6081A was issued in April of 2023. AS6301A contains the criteria for compliance or certification to AS6081A.

## FOREWORD

To assure compliance to AS6081A requirements, a set of standard assessment criteria is utilized to evaluate and establish uniform certification. This document standardizes compliance criteria for AS6081 Revision A requirements. Throughout the body of this document, all references to AS6081 refer to AS6081A.

## TABLE OF CONTENTS

1. SCOPE ..... 2
1.1 Purpose ..... 2
1.2 Application ..... 2

2. REFERENCES ..... 2
2.1 Applicable Documents ..... 2
2.1.1 SAE Publications ..... 2
2.1.2 ANSI Accredited/ESD Association Publications ..... 2
2.1.3 IPC Publications ..... 2
2.2 Related Publications ..... 3
2.2.1 SAE Publications ..... 3
2.2.2 ASME Publications ..... 3
2.2.3 ASQ/ANSI Accredited Publications ..... 3
2.2.4 IDEA Publications ..... 3
2.2.5 ISO Publications ..... 3
2.3 Terms and Definitions ..... 3

3. REQUIREMENTS ..... 4
3.1 Auditor(s) Competency ..... 4

4. NOTES ..... 4
4.1 Revision Indicator ..... 4

APPENDIX A MANDATORY APPENDIX FOR AUDITING AS6081A FOR CERTIFICATION; NONMANDATORY FOR ALL OTHER AUDITS ..... 5



**TO PLACE A DOCUMENT ORDER:** **Tel: 877-606-7323 (inside USA and Canada)**
**Tel: +1 724-776-4970 (outside USA)**
**Fax: 724-776-0790**
**Email: CustomerService@sae.org**
**SAE WEB ADDRESS:** **http://www.sae.org**

**For more information on this standard, visit**
https://www.sae.org/standards/content/AS6301A/

# 1. SCOPE

## 1.1 Purpose

This set of criteria is intended for use by accredited Certification Bodies (CBs) to establish compliance and grant certification to AS6081A. It may also be used by others to assess compliance to AS6081A requirements.

## 1.2 Application

This standard applies to compliance assessments of Open Market Distributors (e.g., Independent Distributors, Brokers, etc.) who have implemented processes conforming to AS6081A requirements.

# 2. REFERENCES

## 2.1 Applicable Documents

The following publications form a part of this document to the extent specified herein. The latest issue of SAE publications shall apply. The applicable issue of other publications shall be the issue in effect on the date of the purchase order. In the event of conflict between the text of this document and references cited herein, the text of this document takes precedence. Nothing in this document, however, supersedes applicable laws and regulations unless a specific exemption has been obtained.

### 2.1.1 SAE Publications

Available from SAE International, 400 Commonwealth Drive, Warrendale, PA 15096-0001, Tel: 877-606-7323 (inside USA and Canada) or +1 724-776-4970 (outside USA), www.sae.org.

AIR6273 Terms, Definitions, and Acronyms Counterfeit Materiel or Electrical, Electronic, and Electromechanical Parts

AS6081A Counterfeit Electrical, Electronic, and Electromechanical (EEE) Parts: Avoidance, Detection, Mitigation, and Disposition - Independent Distribution

AS6171 Test Methods Standard; General Requirements, Suspect/Counterfeit, Electrical, Electronic, and Electromechanical Parts

### 2.1.2 ANSI Accredited/ESD Association Publications

Copies of these documents are available online at https://webstore.ansi.org/.

Available from EOS/ESD Association, Inc., 218 W Court Street, Rome, NY 13440-2069, Tel: 315-339-6937, www.esda.org.

ANSI/ESD S20.20 Protection of Electrical and Electronic Parts, Assemblies and Equipment (Excluding Electrically Initiated Explosive Devices)

### 2.1.3 IPC Publications

Available from IPC, 3000 Lakeside Drive, 105 N, Bannockburn, IL 60015, Tel: 847-615-7100, www.ipc.org.

IPC-J-STD-001 Requirements for Soldered Electrical and Electronic Assemblies

IPC/JEDEC-J-STD-033 Handling, Packing, Shipping and Use of Moisture, Reflow, and Process Sensitive Devices

## 2.2 Related Publications

The following publications are provided for information purposes only and are not a required part of this SAE Technical Report.

### 2.2.1 SAE Publications

Available from SAE International, 400 Commonwealth Drive, Warrendale, PA 15096-0001, Tel: 877-606-7323 (inside USA and Canada) or +1 724-776-4970 (outside USA), www.sae.org.

ARP6178 Counterfeit Electrical, Electronic, and Electromechanical (EEE) Parts: Tools for Risk Assessment of Other than an Authorized Source (e.g., Independent Distributors)

AS5553 Counterfeit Electrical, Electronic, and Electromechanical (EEE) Parts; Avoidance, Detection, Mitigation, and Disposition

AS9003 Inspection and Test Quality Systems, Requirements for Aviation, Space, and Defense Organizations

AS9100 Quality Management Systems - Requirements for Aviation, Space, and Defense Organizations

AS9120 Quality Management Systems - Requirements for Aviation, Space, and Defense Distributors

### 2.2.2 ASME Publications

Available from ASME, P.O. Box 2900, 22 Law Drive, Fairfield, NJ 07007-2900, Tel: 800-843-2763 (U.S./Canada), 001-800-843-2763 (Mexico), 973-882-1170 (outside North America), www.asme.org.

ASME NQA-1 Quality Assurance Requirements for Nuclear Facility Applications

### 2.2.3 ASQ/ANSI Accredited Publications

Available from American Society for Quality, 600 North Plankinton Avenue, Milwaukee, WI 53203, Tel: 800-248-1946 (United States or Canada), 001-800-514-1564 (Mexico), or +1-414-272-8575 (all other locations), www.asq.org.

Copies of these documents are available online at https://webstore.ansi.org/.

ASQ/ANSI E4 Quality management systems for environmental information and technology programs - Requirements with guidance for use

### 2.2.4 IDEA Publications

Available from Independent Distributors of Electronics Association, 2250 Double Creek Drive, #6474, Round Rock, TX 78683-0061, Tel: +1 714-670-0200, https://idofea.org/.

IDEA-QMS-9090 Quality Management Standard for Independent Distributors of Electronics Association Members

### 2.2.5 ISO Publications

Copies of these documents are available online at https://webstore.ansi.org/.

ISO 9001 Quality management systems - Requirements

## 2.3 Terms and Definitions

For the purposes of this document, the terms and definitions are stated in AS6081A or AIR6273.

## 3. REQUIREMENTS

The AS6081 requirements depicted in Appendix A shall be used by the Certification Body to establish compliance to AS6081. In order to ensure the consistency of third-party audits, Appendix A is mandatory for use by the Certification Body but is optional for other users of the appendix.

Appendix A contains the AS6081A requirement clause, recommended methods of evaluation (MOE), record of compliance, and a column for notes.

Each “shall” requirement in the “Requirement” column is assigned a numerical superscript number - e.g., “shall(1),” “shall(2),” “shall(3)” - that correlates to the (1), (2), (3), etc., designations in the “Method of Evaluation (MOE)” column in Appendix A.

The MOE identified in Appendix A is for guidance only in establishing the methodology for conducting the audit; as such, the MOE may be modified, as deemed appropriate by the auditor(s). The MOE is included to structure the audit at the depth necessary to verify compliance to the AS6081, Section 3, mandatory requirements.

The MOE used during the audit shall be recorded as part of the final audit report to provide readers with an understanding of the depth of the audit.

### 3.1 Auditor(s) Competency

Personnel performing audits to verify AS6081 compliance shall have a working knowledge of the requirements of AS6081and should be knowledgeable in performing audits of Quality Management System (QMS) processes.

## 4. NOTES

### 4.1 Revision Indicator

A change bar (l) located in the left margin is for the convenience of the user in locating areas where technical revisions, not editorial changes, have been made to the previous issue of this document. An (R) symbol to the left of the document title indicates a complete revision of the document, including technical revisions. Change bars and (R) are not used in original publications, nor in documents that contain editorial changes only.

PREPARED BY SAE G-19 COUNTERFEIT ELECTRONIC PARTS COMMITTEE

APPENDIX A - MANDATORY APPENDIX FOR AUDITING AS6081A FOR CERTIFICATION; NONMANDATORY FOR ALL OTHER AUDITS

| AS6081A Clause | Requirement | Comply? | | Method of Evaluation (MOE) | Record of Compliance | Notes |
|---|---|---|---|---|---|---|
| 3 | Unless otherwise specified by the customer, all requirements of Section 3 shall apply. | | | Use the MOE in the rows below to verify the requirements of AS6081 Section 3 are being met, unless otherwise specified by the organization's customer. | *Record an overall assessment of the extent of compliance to AS6081.* | |
| 3.1 | **Relationship of the Quality Management System to AS6081 Requirements** | | | | | |
| 3.1 | The organization shall implement and comply with an industry recognized higher-level quality standard or quality management system in conjunction with the requirements specified herein. | | | Review the Quality Manual to determine the industry recognized higher-level quality standard that is being used by the organization. | *Record the higher-level quality standard that is being used by the organization. If certified, record the certification, the date of the last certification, and the expiration date of the certification.* | |
| 3.2 | **Suspect Counterfeit and Counterfeit EEE Parts Mitigation Policy** | | | | | |
| 3.2 | The organization **shall**(1) establish a documented policy to prevent the purchase, acceptance, and distribution of suspect counterfeit or counterfeit EEE parts in conformance with the risk mitigation requirements specified herein. The organization's senior management **shall**(2) ensure that its policy is communicated, understood, implemented, and maintained at all levels of the organization and made accessible to the customer upon request. | | | (1) Verify the company counterfeit parts mitigation policy exists.<br>(2a) Verify the policy is communicated, understood, and implemented.<br>(2b) Verify the policy is accessible to the customer. | *Record the organization's policy and method of personnel and customer access to the counterfeit mitigation policy.* | |
| 3.3 | **Control of Documented Information** | | | | | |
| 3.3 | The organization **shall**(1) establish documented processes to define the controls needed for the identification, storage, protection, retrieval, retention, and disposition of documented information. Documented information **shall**(2) remain legible, readily identifiable, and retrievable. Unless otherwise specified in the contractual requirements, the retention period for all documented information **shall**(3) be a minimum of 10 years. | | | (1) Verify documented controls needed for the identification, storage, protection, retrieval, retention, and disposition of documented information (records).<br>(2) Select a sample of records and verify that records remain legible, readily identifiable, and retrievable.<br>(3) Select a sample of records and verify the retention period is a minimum of 10 years. | *Record the written procedure(s) for the controls. Document the records reviewed during the audit.* | |

| AS6081A Clause | Requirement | Comply? | | Method of Evaluation (MOE) | Record of Compliance | Notes |
|---|---|---|---|---|---|---|
| **3.4** | **Counterfeit EEE Parts Control Plan** | | | | | |
| **3.4** | The organization **shall**(1) develop and implement a counterfeit EEE parts control plan that documents its processes used for risk mitigation, disposition, and reporting of suspect counterfeit or counterfeit EEE parts. The control plan may be provided as a standalone plan against this standard or otherwise may be integrated into the organization's existing quality management system. The control plan **shall**(2) include the requirements of 3.2 through 3.4.14. The control plan **shall**(3) be maintained and updated based upon evolving counterfeiting techniques. | | | (1) Verify that the control plan has been developed and implemented.<br>(2) Verify that the control plan addresses 3.2 through 3.4.14 of AS6081.<br>(3) Verify that the control plan has been updated based upon evolving counterfeiting techniques. | *Record the plan title, number, release date, and revision. Record whether the control plan addresses 3.2 through 3.4.14 of AS6081.* | |
| **3.4.1** | **Request for Quotation Review** | | | | | |
| **3.4.1** | The organization **shall**(1) disclose test or inspection methods that were or will be performed by the organization prior to any customer test or inspection requirements, on each homogeneous lot being offered. If no test or inspections are performed prior to any customer testing or inspection requirements, this disclosure is also required with each homogeneous lot being offered. When requested, the organization **shall**(2) provide detailed test and inspection methodology documentation, including results, sample size criteria, acceptance or rejection criteria, and how the testing was accomplished.<br>The organization **shall**(3) not perform pre-screening (see 3.4.6). | | | (1a) Verify the organization discloses the test or inspections that were or will be performed by the organization prior to any customer test or inspection requirements, on each homogeneous lot being offered.<br>(1b) If no test or inspections are performed prior to any customer testing or inspection requirements, verify this disclosure for each homogeneous lot being offered.<br>(2) Verify that the organization, when requested, provides detailed test and inspection methodology documentation, including results, sample size criteria, acceptance or rejection criteria, and how the testing was accomplished.<br>(3) Verify that the organization does not perform pre-screening. | *Record the RFQ and offers that were reviewed. Query the organization to verify it does not pre-screen.* | |
| **3.4.1a** | The organization's review of the request for quotation addresses the following:<br>a. The organization **shall**(1) determine if the customer requires additional testing and inspection for EEE part conformity and acceptance for each homogeneous lot being offered. The organization **shall**(2) coordinate with the customer to determine if such test and inspection results are needed prior to or subsequent to the delivery of the parts being offered (see 3.4.6). | | | (1) Verify the process for determining the customer requirements for additional testing and inspection for EEE part conformity and acceptance for each homogeneous lot being offered.<br>(2) Verify the process to coordinate with the customer to determine if such test and inspection results are needed prior to or subsequent to the delivery of the parts being offered. | *Record the RFQs and offers that were reviewed.* | |

| AS6081A Clause | Requirement | Comply? | | Method of Evaluation (MOE) | Record of Compliance | Notes |
|---|---|---|---|---|---|---|
| **3.4.1b** | b. The organization shall notify the customer in writing if the customer requirements cannot be satisfied. | | | Verify the organization has a process for when the customer requirements cannot be satisfied. Verify that the organization notified the customer in writing if the customer requirements could not be satisfied. | *Record the RFQs and offers that were reviewed.* | |
| **3.4.2** | **Contract Review, Agreement, and Execution** | | | | | |
| **3.4.2** | The organization shall review the customer requirements: | | | Verify that the organization reviews customer requirements. | *Record the RFQs, POs, and/or contracts that were reviewed.* | |
| **3.4.2a** | a. The organization **shall** notify the customer in writing if customer commitments cannot be satisfied. | | | Verify sample purchase order(s) and determine if the organization took any exceptions to the customer request and confirm written communication was provided to the customer. | *Record purchase order numbers and identify written communication to the customer, if any.* | |
| **3.4.2.b.1** | b. The organization **shall**(1) comply with the following unless otherwise specified by or agreed to by the customer:<br>Provide a product guarantee that:<br>1. the EEE parts are unused and not suspect counterfeit or | | | Sample PO(s) and verify that the organization provided to its customer a statement guaranteeing that the parts are unused and not suspect counterfeit. | *Record the sample PO number(s) and the method used to communicate the guarantee statement.* | |
| **3.4.2.b.2** | Provide a product guarantee that:<br>2. if parts are found to be suspect counterfeit or used, then the organization will replace parts or refund the original cost of the product for a minimum of 1 year post-delivery, for parts related to sales to OEMs or their sub-contractors. | | | Sample PO(s) and verify that the PO includes a product guarantee that if parts are found to be suspect counterfeit or used, then the organization will replace parts or refund the original cost of the product for a minimum of 1 year post-delivery, for parts related to sales to OEMs or their sub-contractors. | *Record the sample PO number(s) and if the PO includes the requirements of AS6081.* | |
| **3.4.2c** | c. The organization **shall** review the customer requirements for inspection and testing for the detection of suspect counterfeit or counterfeit EEE parts. | | | Verify that the organization's customer requirement review process includes review of requirements for inspection and testing for the detection of suspect counterfeit or counterfeit EEE parts. | *Record the sample PO number(s) and if the PO includes the customer requirements for inspection and testing.* | |

| AS6081A Clause | Requirement | Comply? | | Method of Evaluation (MOE) | Record of Compliance | Notes |
|---|---|---|---|---|---|---|
| **3.4.3** | **Supplier Approval and Source Selection** | | | | | |
| **3.4.3a** | The organization **shall**[(1)]:<br>a. Have documented processes to assess potential suppliers to mitigate the risk of receiving suspect counterfeit or counterfeit EEE parts. The organization **shall**[(2)] identify and mitigate any risks found during the assessment. | | | (1) Verify the documented process for assessing potential suppliers.<br>(2) Verify that the risk assessment includes mitigation of any risks identified. | *Record the method the organization uses to determine potential sources of supply.*<br>*Record the method for risk assessment.* | |
| **3.4.3b** | The organization **shall**[(1)]:<br>b. Develop, maintain, and use a register of suppliers that includes approval status. The process for creating the register **shall**[(2)] include the scope and criteria for the approval and removal of suppliers. Distributor-approved suppliers **shall**[(3)] be reviewed prior to procurement, if a year has elapsed since their last transaction, and their status updated if warranted changes have occurred. These reviews **shall**[(4)] also be triggered by risk-based events likely to negatively affect counterfeit risk. Such events could include material business size changes, ownership changes, mergers, and change in Commercial and Government Entity (CAGE) Code. Triggers may also include data from internal and external reporting centers (such as System for Award Management [SAM], ERAI, GIDEP, and UK Anti-Counterfeiting Forum). | | | (1) Verify a register of approved suppliers exists.<br>Select a sample of transactions and verify that the suppliers are on the register of approved suppliers.<br>(2) Verify that the process for creating the register of approved suppliers includes the scope and criteria for approval and removal of suppliers.<br>(3) Verify the process for review of distributor-approved suppliers includes a review within the last year of the transaction of the distributor-approved supplier.<br>(4) Verify that the organization performs risk-based reviews likely to negatively affect counterfeit risk of distributor-approved supplier. | *Register of approved suppliers.*<br>*Record the transactions reviewed.*<br>*Record the evidence that the organization is meeting requirements 2, 3, and 4.* | |
| **3.4.3c** | The organization **shall**:<br>c. Maintain objective evidence when the supplier is an authorized source. | | | Select a sample of transactions to authorized suppliers. Verify the objective evidence that the supplier is an authorized source. | *Record the transaction information.* | |
| **3.4.4** | **Purchase Order Requirements** | | | | | |
| **3.4.4a** | The organization **shall** flow down the following requirements to their suppliers, via an appropriate contractual mechanism.<br>a. Controls for suspect counterfeit or counterfeit EEE part avoidance. | | | Verify the organization flows down requirements to suppliers which include controls to avoid suspect counterfeit or counterfeit EEE parts. | *Record purchase orders or equivalent transactions that were reviewed.* | |
| **3.4.4b** | b. Requirements specified by the organization's customers. | | | Verify customer requirements were flowed down. | *Record purchase orders or equivalent transactions that were reviewed.* | |

| AS6081A Clause | Requirement | Comply? | | Method of Evaluation (MOE) | Record of Compliance | Notes |
|---|---|---|---|---|---|---|
| **3.4.4c** | c. Contractual language prohibiting the pre-screening of homogenous lots to remove non-conforming, defective, suspect counterfeit, or counterfeit EEE parts prior to performing inspection and/or testing. | | | Verify contractual language prohibiting the pre-screening of homogenous lots to remove non-conforming, defective, suspect counterfeit, or counterfeit EEE parts prior to performing inspection and/or testing. | *Record purchase orders or equivalent transactions that were reviewed.* | |
| **3.4.5** | **Supply Chain Traceability** | | | | | |
| **3.4.5a** | The organization shall have documented process that:<br>a. Require retention for 10 years minimum of all available objective evidence and records pertaining to supply chain traceability and testing (e.g., packing lists, invoices, manufacturer's Certificate of Conformance [CoC], Certificate of Conformance and Supply Chain Traceability [CoCT], test results, returned material documentation). | | | Verify that a process exists for the retention of records for 10 years. Verify that records that are up to 10 years old are accessible. | *Record the process and/or procedure. Record the records reviewed.* | |
| **3.4.5b** | b. Ensure objective evidence provides traceability to the authorized source or the mitigated risk documentation. | | | Review a sample of transactions and verify that the organization can provide traceability to the authorized source or to mitigated risk documentation. | *Record the transactions.* | |
| **3.4.6** | **Verification of Purchased Product** | | | | | |
| **3.4.6** | The organization **shall**(1) provide for verification of purchased product in accordance with customer requirements and the organization's quality management system. Prescreening of lots to remove defective parts prior to sample selection and testing **shall**(2) not be permitted. If the verification identifies suspect or confirmed counterfeit EEE parts, the organization **shall**(3) contain the parts in accordance with 3.4.8. The organization **shall**(4) report such parts per 3.4.9. When required by the customer, the organization **shall**(5) provide detailed test and inspection methodology documentation including results, sample size, acceptance/rejection criteria, disposition, and which recognized industry standard test or inspection methods were used. | | | (1) Verify the organization has a process for verification of purchased product. Select sample transactions and verify compliance to 3.4.6.<br>(2) Verify that prescreening was not permitted or performed.<br>(3) If suspect or confirmed counterfeit parts are identified, verify the organization contains the parts per AS6081, 3.4.8.<br>(4) If suspect or confirmed counterfeit parts are identified, verify the organization reports the parts per AS6081, 3.4.9.<br>(5) Verify that test and inspection records are available. | *Record transactions, test, and inspection reports, if applicable.* | |
| **3.4.7** | **Material Control** | | | | | |
| **3.4.7** | The organization **shall**(1) have documented processes for controlling EEE products that include the following: | | | Verify documented process for material control of EEE parts that includes 3.4.7a through 3.4.7f. | *Record document number.* | |

| AS6081A Clause | Requirement | Comply? | | Method of Evaluation (MOE) | Record of Compliance | Notes |
|---|---|---|---|---|---|---|
| **3.4.7a** | a. The organization **shall**(1) not alter, obliterate, or redact the following information from the OCM's labeling: logo, name, lot/date code, and part number (including revision or die info), unless specified by the customer contract. The organization **shall**(2) not instruct another supplier to complete this activity on their behalf, unless specified by the customer contract. Adhesive labels may cover the OCM marking provided that the OCM marking is clearly legible after label removal. Where applicable, retain OCM package labeling and part marking with any repackaged parts. | | | (1) Select sample of transactions to ensure that this information is not altered, obliterated, or redacted without customer contract authorization.<br>(2) Select sample of transactions to ensure that the organization has not instructed another supplier to complete this activity on their behalf, unless specified by the customer contract. | *Record the transactions.* | |
| **3.4.7b** | b. Require product which does not meet the manufacturers' specifications to be dispositioned in accordance with 3.4.8 | | | Select a transaction of product that does not meet the manufacturers' specifications and confirm disposition per AS6081, 3.4.8. | *Record Transaction.* | |
| **3.4.7c** | c. Preserve the product during internal processing and delivery to the intended destination in order to maintain conformity to requirements. | | | Verify the controls to preserve the product during internal processing and delivery. | *Record the transactions that were observed.* | |
| **3.4.7d** | d. Handle ESD-sensitive devices in accordance with a documented ESD control program per ANSI/ESD S20.20, including control of humidity in accordance with J-STD-001. | | | Witness how ESD sensitive parts are being handled and confirm handling in accordance with ANSI/ESD S20.20 and IPC-J-STD-001. | *Record ESD Policy and transactions observed.* | |
| **3.4.7e** | e. Handle moisture sensitive components in accordance with IPC/JEDEC-J-STD-033 or customer requirements. | | | Witness how moisture sensitive components are handled and confirm handling in accordance with IPC/JEDEC-J-STD-033. | *Record MSL policy and transactions observed.* | |
| **3.4.7f** | f. The organization **shall**(1) implement a customer return process which segregates EEE parts until they are verified as new and unused. The customer return process **shall**(2) provide for verification that parts returned by the customer to the organization were purchased directly from the organization. Verification **shall**(3) require validation of the returned parts against the organization's traceability records, including the date/lot code of parts returned, when available. | | | (1) Verify that customer returns are segregated from deliverable product until they are verified as new and unused.<br>(2) Review transactions to confirm the organization verified the parts returned were purchased directly from the organization.<br>(3) Review transactions to verify the returned parts were validated against the organization's traceability records, including the date/lot code of parts returned, when available. | *Record observations and transaction details.* | |
| **3.4.7f** | If there is any evidence that the aforementioned requirements were not met, the parts shall be considered non-conforming pending disposition. | | | Query the organization to determine if any transactions did not meet AS6081, 3.4.7, requirements and verify these transactions were considered non-conforming. | *Record observations and transaction details.* | |

| AS6081A Clause | Requirement | Comply? | | Method of Evaluation (MOE) | Record of Compliance | Notes |
|---|---|---|---|---|---|---|
| 3.4.8 | **Control of Suspect Counterfeit and Counterfeit EEE Parts/Assemblies** | | | | | |
| 3.4.8 | Suspect counterfeit and counterfeit EEE parts/assemblies are considered non-conforming and **shall**(1) be controlled in accordance with the organization's Quality Management System (QMS) requirements and the requirements specified herein. | | | Verify the QMS contains a process for controlling non-conforming material and the process applies to suspect counterfeit and counterfeit EEE parts/assemblies and the requirements specified herein. | *Record the process.* | |
| 3.4.8a | The organization **shall**(1)<br>a. Segregate suspect or confirmed counterfeit parts from all other parts or products until disposition and prevent such parts from re-entry into the supply chain. Quarantine/segregation **shall**(2) consist of physical barriers and controlled access. | | | (1) Select sample of suspect or confirmed counterfeit parts, if available, to ensure that the suspect or confirmed counterfeit parts are segregated from re-entry into the supply chain.<br>(2) Confirm that segregation includes physical barriers and controlled access. | *Record the samples observed, if available, and method of segregation and controlled access.* | |
| 3.4.8b | b. Not disposition suspect counterfeit or counterfeit EEE parts for use-as-is. | | | Review disposition records and query organization to determine if suspect counterfeit or counterfeit EEE parts have been dispositioned for use-as-is. | *Record the sample suspect counterfeit or counterfeit EEE parts and their disposition.* | |
| 3.4.8c | c. Not remove suspect counterfeit or counterfeit EEE parts from quarantine except for independent verification testing in accordance with 3.4.6 or for final disposition. | | | Review records and query organization to verify that suspect or confirmed counterfeit parts are not removed from quarantine except for independent verification testing in accordance with AS6081, 3.4.6, or for final disposition. | *Record the sample suspect counterfeit or counterfeit EEE parts and authorization for removal.* | |
| 3.4.8d | d. Retain suspect counterfeit or counterfeit EEE parts in accordance with customer, statutory, and regulatory requirements. | | | Review records and query organization to verify that the organization's retention complies with customer, statutory, and regulatory requirements. | *Record the sample suspect counterfeit or counterfeit EEE parts and applicable retention requirements.* | |
| 3.4.8e | e. Destroy parts once retention requirements have been met or surrender parts to requesting Authorities Having Jurisdiction. | | | Review records and query organization to verify that once retention requirements have been met, the parts have been destroyed or surrendered to Authorities Having Jurisdiction. | *Record the sample suspect counterfeit or counterfeit EEE parts and applicable retention requirements* | |

| AS6081A Clause | Requirement | Comply? | | Method of Evaluation (MOE) | Record of Compliance | Notes |
|---|---|---|---|---|---|---|
| 3.4.8f | f. Maintain the records pertaining to suspect counterfeit or confirmed counterfeit EEE parts in accordance with 3.3. | | | Sample the records pertaining to suspect counterfeit or confirmed counterfeit EEE parts in accordance with AS6081, 3.3. | *Record how the records are maintained and the sample suspect counterfeit or counterfeit EEE parts records reviewed.* | |
| **3.4.9** | **Reporting** | | | | | |
| 3.4.9 | The organization's documented processes shall include the reporting of any EEE part(s) or any assemblies containing EEE part(s) that have been determined to be suspect counterfeit or counterfeit to the required distribution noted in 3.4.9.1 in accordance with customer, statutory, and regulatory requirements. | | | Verify that the organization has a documented process for reporting of any EEE part(s) or any assemblies containing EEE part(s) that have been determined to be suspect counterfeit or counterfeit to the required distribution noted in AS6081, 3.4.9.1, in accordance with customer, statutory, and regulatory requirements.<br>Verify on a sample that customer, statutory, and regulatory requirements are met. | *Record the document number.*<br>*Record sample transactions.* | |
| 3.4.9.1 | **Reporting Distribution**<br>The organization shall report incidents of suspect counterfeit or counterfeit EEE part(s) to the following distribution listed below as a minimum:<br>a. Internal management.<br>b. Legal counsel (when applicable at the organization).<br>c. All customers that the suspect counterfeit or counterfeit EEE part(s) may have been provided to within the last 10 years, if the parts are the same part number and procured from the same supplier or are the same lot or date code as previously delivered parts.<br>d. Government contracting officer, or their designee, when the contract was placed under terms of the government (e.g., government funding; design agency is the government).<br>e. Data reporting agencies as mandated by government and/or legal contractual requirements.<br>f. If there is no mandated reporting agency, report to an appropriate national body—such as the National Intellectual Property Rights Coordination Center (IPR Center) for the United States—and report to one or more of the following: GIDEP, UK Anti-Counterfeiting Forum, ERAI. | | | Verify a sample of reports to ensure the distribution of suspect counterfeit or counterfeit EEE part(s) to internal management, legal counsel (when applicable at the organization), affected customers, and government contracting officer or their designee (when applicable), data reporting agencies mandated by the government and/or legal contractual requirements. If there is no mandated reporting agency, verify the report(s) were made to an appropriate national body—such as the National Intellectual Property Rights Coordination Center (IPR Center) for the United States—and report to one or more of the following: GIDEP, UK Anti-Counterfeiting Forum, ERAI. | *Record sample transactions.* | |

| AS6081A Clause | Requirement | Comply? | | Method of Evaluation (MOE) | Record of Compliance | Notes |
|---|---|---|---|---|---|---|
| 3.4.9.2 | The organization shall report the following information or ensure that the information has been reported by other entities (e.g., supplier, test lab) when applicable and available:<br>a. Part number(s) (including the national stock number [NSN] or national item identification number [NIIN], where applicable).<br>b. Date code(s), and lot code(s), as marked on the parts or on the part packaging.<br>c. Problem description.<br>d. The date that suspect counterfeit or counterfeit anomalies were found.<br>e. The date that the parts were determined to be suspect counterfeit or counterfeit EEE parts.<br>f. The date the part(s) were acquired and/or shipped to customers, if previously shipped.<br>g. A copy of the inspection and test report that documented the part(s) as being suspect counterfeit or counterfeit EEE parts.<br>h. Actions taken and planned based on the reported incident (e.g., disposition, supplier disqualified, all affected customers notified). | | | Verify a sample of reports to ensure information defined in AS6081, 3.4.9.2, was reported. | *Record sample transactions and report numbers.* | |
| **3.4.10** | **Organization Actions in Response to Data Reporting** | | | | | |
| 3.4.10 | The organization shall have a documented process for the review of alerts or reports concerning suspect counterfeit or counterfeit EEE part(s) or supplier(s) of such parts issued from data reporting centers used by the organization, including any data reporting center mandated for use by government or legal contractual reporting requirements. The purpose of this review is to avoid the purchase or use of suspect counterfeit or counterfeit EEE part(s). | | | Verify that the organization has a process to review alerts or reports concerning suspect counterfeit/ counterfeit EEE part(s) or supplier(s) of such parts issued from data reporting centers. | *Record the alerts or reports observed.* | |
| 3.4.10a | If the organization's screening process identifies that the organization is impacted by the alert or report (e.g., item part number, supplier of the item), the organization shall perform the following:<br>a. Adjudicate the incident(s) using the processes as specified in the organization's Counterfeit EEE Parts Control Plan. | | | If the organization identified suspect counterfeit/counterfeit parts during the review which affected the organization, verify that the organization took action to avoid the purchase or use of the parts. | *Record the alerts or reports observed.* | |
| 3.4.10b | b. Report the incident(s) to the appropriate reporting center as applicable. | | | If the organization identified suspect counterfeit/counterfeit parts during the review which affected the organization, verify that the organization reported the incidents to the appropriate reporting center, as applicable. | *Record the alerts or reports observed.* | |

| AS6081A Clause | Requirement | Comply? | | Method of Evaluation (MOE) | Record of Compliance | Notes |
|---|---|---|---|---|---|---|
| **3.4.11** | **Personnel Training** | | | | | |
| **3.4.11** | The organization shall train relevant personnel in the awareness, avoidance, mitigation, disposition of suspect counterfeit or counterfeit EEE parts, and in the technology used for detection, if relevant to their organizational role and/or function. | | | Verify relevant personnel have been trained in the awareness, avoidance, mitigation, disposition of suspect counterfeit or counterfeit EEE parts, and in the technology used for detection, if relevant to their organizational role and/or function. | *Record the training records reviewed.* | |
| **3.4.12** | **Internal Audit** | | | | | |
| **3.4.12** | The Organization's internal audit or continuous improvement program shall address compliance to:<br>a. AS6081<br>b. The Organization's Counterfeit EEE Parts Control Plan | | | Verify that compliance to AS6081 and the Organization's Counterfeit EEE Parts Control Plan were addressed by the Internal Audit or continuous improvement program. | *Record the internal audit or continuous improvement program.* | |
| **3.4.13** | **Product Impoundment and Financial Responsibility** | | | | | |
| **3.4.13** | The organization's flow-down process shall include provisions to address product impoundment, testing, and/or associated financial responsibilities unless otherwise superseded by customer agreement. | | | Verify that the organization's flow-down process includes provisions to address product impoundment, testing, and/or associated financial responsibilities. | *Record the procurement sampled to address flow-down.* | |
| **3.4.14** | **Internal Awareness** | | | | | |
| **3.4.14** | The organization **shall**(1) establish processes to obtain current counterfeiting information and trends annually at a minimum. This **shall**(2) include the detection, avoidance, and mitigation techniques contained in appropriate industry standards.<br>The organization **shall**(3) use results from current counterfeiting information as opportunities for lessons learned, problem resolutions, and the benchmarking of best practices on counterfeiting to improve internal processes. | | | (1) Verify that the organization has a process to obtain current counterfeit information and trends annually at a minimum.<br>(2) Verify that the current counterfeit information includes the detection, avoidance and mitigation techniques contained in appropriate industry standards (e.g., AS6171).<br>(3) Verify that processes are updated (e.g., procedures and training) as a result of the review of the counterfeiting information. | *Record the process the organization uses at least annually to obtain current counterfeiting information and trends, including the detection, avoidance, and mitigation techniques. Record updated process, if applicable.* | |