



# National Procurement Fraud Task Force

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## NASA Acquisition Integrity Program (AIP): A Unique Perspective

Fraud Prevention and Detection Improving  
Government Accountability for Government  
Professionals Conference

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# Why was AIP created?

- Recognition by NASA's leadership for:
  - Centralized and coordinated approach to address fraud and corruption throughout the acquisition process
  - Program that helps to foster Agency integrity and public trust
- NASA designated Remedies Coordination Official to coordinate criminal, civil, contractual, and administrative remedies

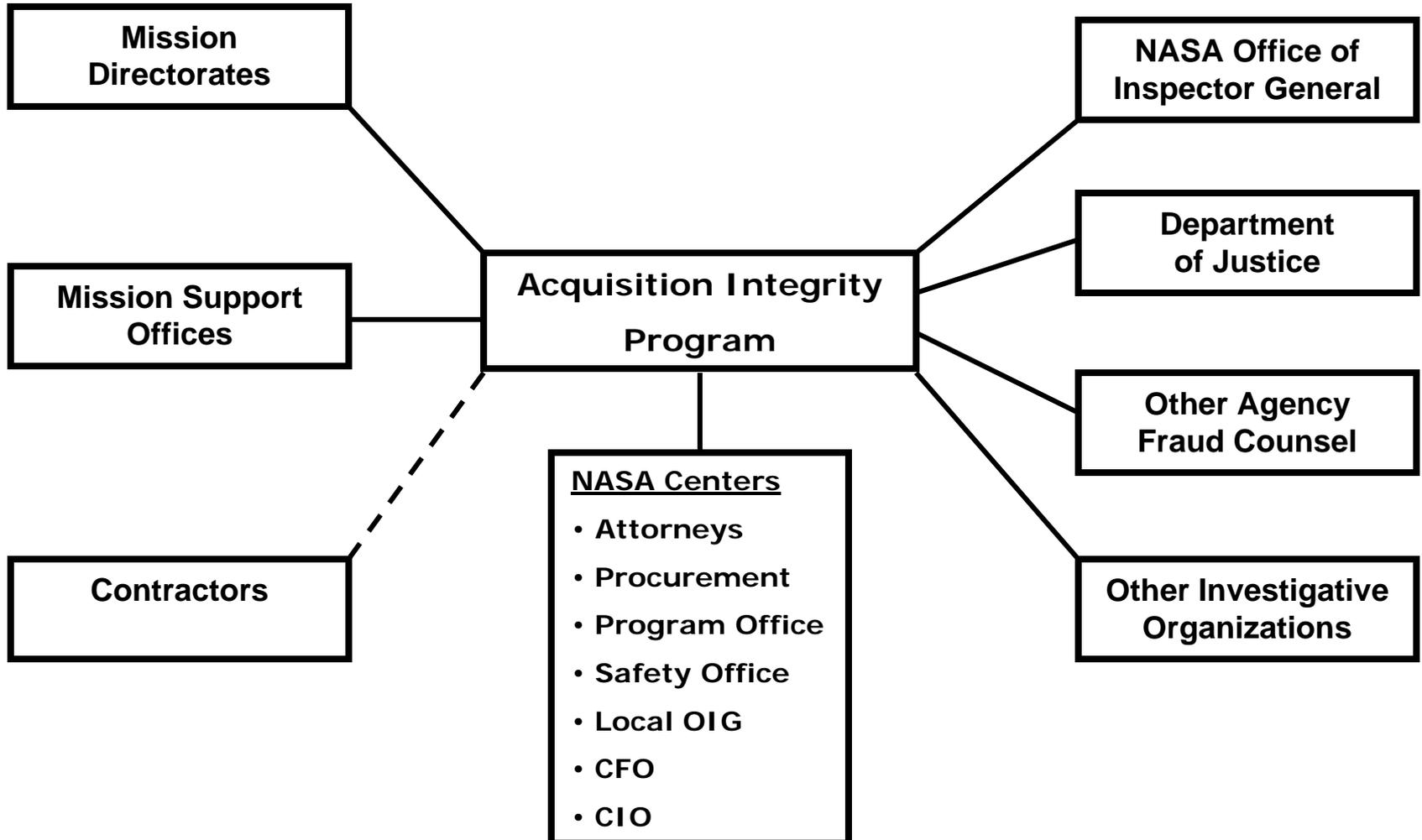


# What is AIP?

- Agency wide fraud remedies program that promotes transparency, accountability, and integrity throughout the acquisition process
- AIP is responsible to NASA for the successful prosecution of procurement fraud cases
- AIP is responsible to NASA for ensuring that an investigation by OIG has the requisite support
- AIP is responsible to NASA for ensuring that its interests are represented in all criminal, civil, contractual, and administrative proceedings



# Who are the AIP Stakeholders and Points of Interface?





# What are the Unique Aspects of AIP?

- Perspective

Fraud is a business risk that has to be managed like other risks to Agency programs

- Collaborative Effort include Liaisons throughout Agency

- Office of the General Counsel
- Office of Inspector General
- Office of Procurement
- Office of the Chief Financial Officer
- Mission Directorates and Mission Support Offices
- NASA Centers



# Why a Four Tier Approach to Fraud Awareness Training?



- Focus and Goal
  - Top Down approach
  - AIP, OIG and Procurement participation
  - Ensure all involved in the acquisition process stay alert to fraud indicators and to those circumstances where fraud can thrive
  - Identify circumstances that raise contractor integrity questions that should be brought to attention of legal and investigative authorities



# How Does AIP Coordinate with OIG?

- OIG and AIP staff are developing strong alliances
- Frequent direct collaboration between OIG investigators and AIP staff
- AIP helps facilitate OIG's access to information
- AIP assists in responsiveness of contracting officers to OIG requests
- AIP facilitates referrals to the OIG
- AIP attorneys serve as resource in developing legal theories because of their procurement fraud expertise and understanding of Agency programs
- Coordination results in expansion of Agency's capabilities for combating fraud, waste, and abuse



# Balancing Differing Interests?

## Differing Interests:

- OIG – what’s best for the taxpayer
- Agency Counsel – what’s best for the agency

## Balanced Approach

- AIP (Fraud Counsel) - “Middle Man” - Unique position of understanding both the interests of OIG agents and Agency Program Office



# How are FAR Disclosures Coordinated?

- FAR 3.1003(b) - If the contracting officer is notified of possible contractor violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations...or a violation of the civil False Claims Act, the contracting officer **SHALL**:
  - **Coordinate with OIG or**
  - **Take action IAW agency procedures – NPD 2086.1**
    - **COs and COTRs shall coordinate any contractor ethics issue or criminal violation with the designated AIP attorney at their Center.**
  - **Successful implementation will require joint efforts of all involved in the contracting process.**



# Joint Efforts = Success

- AIP will work with the OIG, Procurement Office and DOJ to coordinate remedies and recommend actions.
- Successful implementation of FAR Ethics and Disclosure rules require joint efforts of OIG, AIP and all involved in contracting, investigative, legal and prosecutorial process.