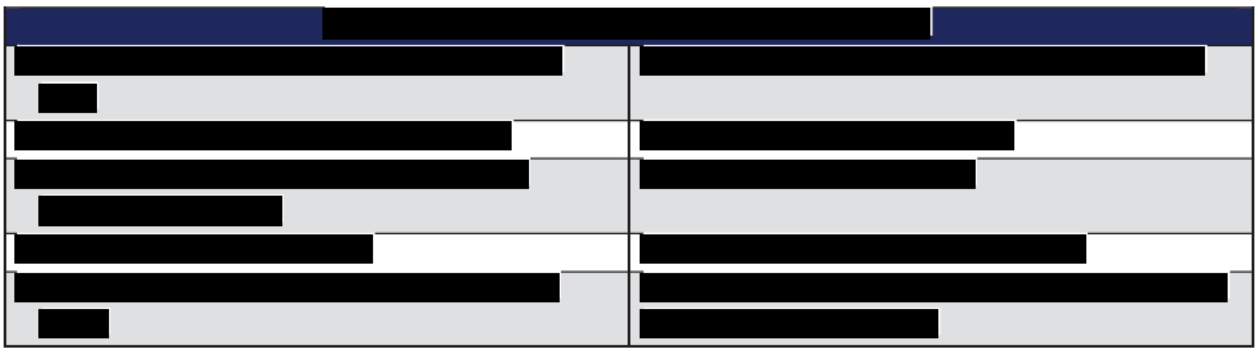
3.0 SUPPLY CHAIN RISK MANAGEMENT PLAN [L.30.2.2, M.2.2, F.2.1 (77), G.6.3]

Level 3 is pleased to include the EIS Supply Chain Risk Management (SCRM) Plan for [redacted].

3.1 Purpose [L.30.2.2, G.6.3]

Level 3 will implement a supply chain risk management methodology, described in this section, which is designed to meet the Government's requirements for the EIS [redacted] Plan policies and procedures will be based on supply chain risk management best practices using National Institute for Science and Technology (NIST) Special Publications 800-161 and 800-53 Revision 4 (including SA-12). In addition, to using the Government's NIST SCRM publications as a guide for the foundation to our [redacted], Level 3 will utilize NIST's 10 Supply Chain Risk Management Practices, shown in **Figure 3.1-1.**

Figure 3.1-1. NIST's Ten (10) Supply Chain Risk Management Practices



Level 3 is dedicated in supporting GSA's objective to ensure that an adversary will not sabotage, maliciously introduce unwanted function, or otherwise subvert the design, integrity, manufacturing, production, distribution, installation, operation or maintenance of a national security system (as that term is defined at 44 U.S.C. 3542(b)) so as to surveil, deny, disrupt, or otherwise degrade the function, use, or operation of such system. In addition, Level 3 is committed to addressing GSA's intent to mitigate the threat of counterfeit and illegally modified products, and the enforcement of strict quality control across the supply chain environment. Level 3 will update the SCRM Plan to include any future changes to NIST SP 800-161 or other NIST Supply Chain Risk

Management guideline(s). Any modification to the [redacted] Plan will be made at no cost to the government.

3.2 Organizational Support

This document outlines Level 3's policies, processes and controls and will be focused on meeting GSA's SCRM requirements for Section C, as outlined in the EIS RFP (Sections: G, H, L). Level 3 understands the importance of implementing risk management processes that address counterfeit and illegally modified products. Our risk management policies and processes will provide the framework for Level 3 personnel to mandate, support and enforce appropriate measures in the mitigation of supply chain vulnerabilities. The five supply chain phases include: [redacted] are key areas of focus included in the risk management plan set forth in the [redacted] Plan. As NIST guidelines, recommendations and standards evolve, Level 3 will continue to update the [redacted] Plan annually and when significant changes occur.

3.2.1 Organizational Framework and Participation

Level 3's executive team is committed to ensuring that potential supply chain threats are closely monitored to minimize any negative impact to GSA's daily EIS mission and both short- and long-term EIS objectives. Our plan is to begin with a management strategy that is a three-step process built on a strong executive commitment to securing the Level 3 infrastructure as shown in **Figure 3.2.1-1**.

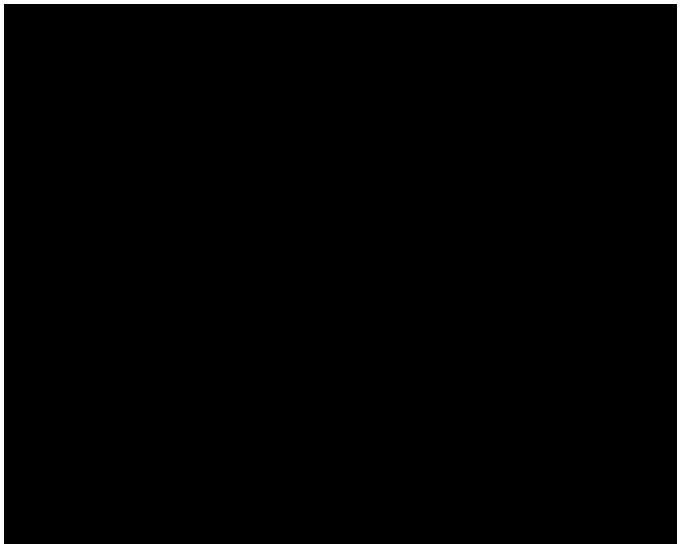


Figure 3.2.1-1. Risk Management Organizational Participation.

- ***The Executive Team*** establishes the appropriate structure and strategy for managing supply chain risk. The executive team has a keen understanding of the inherent risks involved in supplying EIS services. It is of critical importance to be vigilant as a service provider in identifying, managing, and mitigating supply chain risks to GSA for the EIS. The enforcement of strict quality control by Level 3 of the applicable EIS OEM suppliers, resellers, and system integrators is the basis of the mission and vision statement, the executive team is focused on protecting the Level 3 EIS infrastructure and customer information from physical and logical threats by stating:

Executive Team Mission

"Our mission is to ensure the security integrity of Level 3's EIS services from adversaries who look to sabotage Level 3 EIS service infrastructure and/or customer information through surveillance, denial or disruption of service either physically or logically."

Executive Vision

"To protect the physical and logical security of the Level 3 EIS Services."

- ***The Business Processes*** consist of the following tasks to be carried out by key functional areas within the Level 3 organization for the [redacted] the development, implementation and execution of a risk management strategy, the assessment of risks and areas of vulnerabilities across the supply chain, the management and mitigation of risks across the five supply chain phases, the enforcement of quality control across suppliers via flow-down measures to ensure that [redacted], products and components, the development and implementation of a training and awareness program across the Level 3 organization to ensure an organization-wide understanding of the importance of and compliance with procedures set in place in the [redacted], to ensure the risk management strategy is adhered to.
- ***The Information Technology*** involves the Level 3 [redacted] service infrastructure, and equipment and software contained within the [redacted] boundary. Numerous functional areas within Level 3 may be included in the review of supply chain management risk but are not limited to: [redacted].

3.2.2 Organizational Support Model [L.30.2.2 (1), G.6.3 (1)]

To ensure that supply chain risks are effectively assessed, managed, documented, tracked, and controlled, Level 3 recognizes that key stakeholders from various functional areas within the organization may be involved in overseeing supply chain risk management. This group of stakeholders will make up the Level 3 [redacted] The [redacted], at least the SMEs shown in **Figure 3.2.2-1.** Level 3 recognizes the need for key functional areas to be engaged in ensuring risk levels are minimized and the integrity in the supply chain remains intact.

Figure 3.2.2-1. Level 3's SCRM Organizational Support Model.

3.2.2.1 Roles and Responsibilities

Procurement, Vendor Management, Corporate Security, Security Architecture Engineering Legal, Program Management Office (PMO), Network Operations, and Training. Other internal groups may also be involved during various milestones within the supply chain lifecycle.

Level 3 has created a [redacted] It is the expectation that additional controls and tasks will be added as risks are assessed and examined.

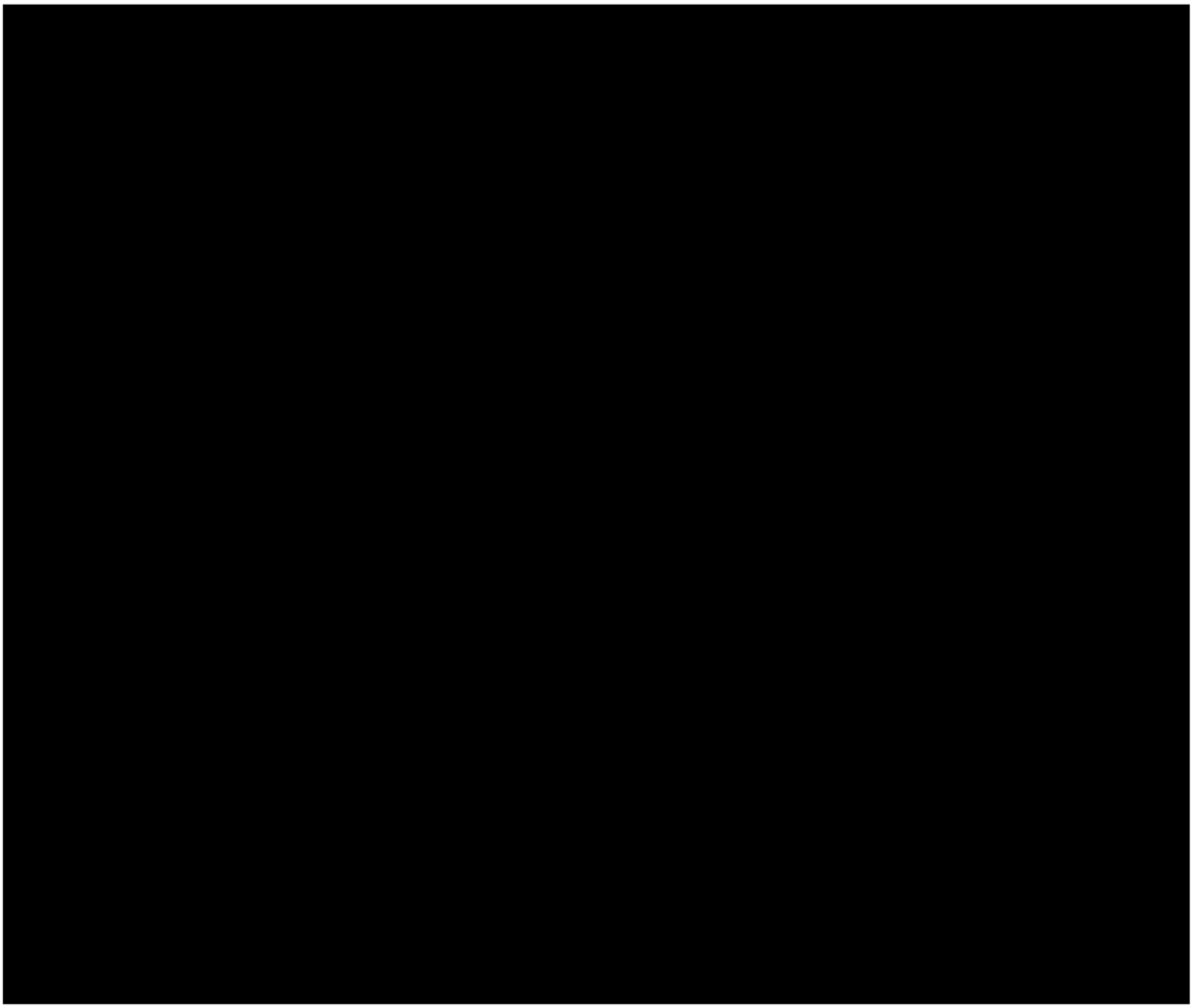


Figure 3.2.2.1-1.

The RASCI will serve as a sample blueprint for an organizational-wide support structure for the

Level 3 recognizes that both the controls and areas of responsibility may vary on a task-order to task-order basis. Therefore, Level 3

acknowledges that there will need to be a rigorous, yet flexible approach to the implementation of the [redacted] over the life of the IDIQ contract.

3.2.2.2 Supply Chain Risk Management Approach

Level 3's strategy for supply chain risk management will be proactive in identifying risks that could impact the integrity of the applicable services. The [redacted] will outline the required mitigation steps necessary to proactively mitigate or control risks. Level 3's goal is to mitigate the possibility of disruptions or degradations to the applicable EIS services. **Figure 3.2.2.2-1** shows the [redacted] process for managing risks and threats to the applicable services.

[redacted]

Figure 3.2.2.2-1. Level 3's [redacted].

Supply chain risk information will be reviewed periodically. Each identified risk will be documented and assessed to determine the physical and/or logical threat, and a decision about the appropriate action to take is established. For a critical risk(s) that may have a negative impact to the applicable services, emergency meetings will be held to address the immediate risk and rapid risk mitigation steps will be executed immediately to contain risk and safeguard areas of vulnerability.

3.2.2.3 Supply Chain Risk Management Processes

Supply chain risk management is an organized methodology for continuously identifying and measuring the issues that may impact applicable services. The process involves developing mitigation steps; selecting, planning, and implementing appropriate risk mitigation strategies or solutions; tracking and documenting risk to ensure

successful risk reduction/mitigation acceptance. Effective supply chain risk management depends on planning early identification and analyses of risks associated with software, hardware and professional services. In addition early implementation of corrective actions; continuous monitoring and reassessment; and communication, documentation, training, coordination and organizational collaboration are keys to a successful SCRM Plan implementation.

Before approving a supplier who may be providing professional services, software or hardware related to the [redacted] will use a five-step risk management process (**Figure 3.2.2.3-1).** Suppliers are monitored for risks during the lifecycle of their contract and/or warranty period to mitigate any potential risks.

Figure 3.2.2.3-1. Level 3's Five-Step Risk Management Process.

3.2.2.4 Supply Chain Risk Notification and Analysis

Level 3's supply chain risk identification and risk analysis is the responsibility of various technology and operational groups within Level 3. These groups work in teams and have the responsibility for gathering transport statistics and data to help facilitate supply chain risk analysis. Once the analytical work is carried out and areas of vulnerabilities are identified, specialized organizational teams will administer mitigating

controls to the [redacted] utilizing the assignment of user accounts and passwords and other security controls.

Figure 3.2.2.4-1 shows the process for communicating risks to internal teams within the Level 3 organization. If a risk is identified as a 'critical' risk, our internal teams will schedule an emergency meeting to address and mitigate the risk.

[redacted]

Figure 3.2.2-4-1. [redacted].

3.2.2.5 Policy Directives and Guidelines Followed

Supply chain risk management and analysis activities for the [redacted] use the following guidelines as a reference as deemed appropriate:

- NIST 800-161, June 2014, **Supply Chain Risk Management Practices for Federal Information Systems and Organizations**
- NIST SP 800-30, September 2012 - Risk Management Guide for Information Technology Systems
- NIST SP 800-53 Revision 4, April 2013 and Latest Publication - Security and Privacy Controls for Federal Information Systems and Organizations (i.e., SA-12 controls)
- Federal Information Processing Standards (FIPS) Publication 199/200, February 2004 and March 2006
- DoD Instruction 5200.39, July 2008 - Critical Program Information (CPI) Protection within the Department of Defense
- DoD Instruction 5200.44, November 2012 - Protection of Mission Critical Functions to Achieve Trusted Systems and Networks (TSN)

- National Institute of Standards and Technology Internal Reports (NISTIR) 7622, October 2012 - Notional Supply Chain Risk Management Practices for Federal Information Systems

3.2.2.6 Supply Chain Risk Management Plan Change Control

Level 3 has defined a process for updating the [redacted] The internal functional teams will work collectively to identify new or modified controls and authorize updates to the master [redacted] to meet GSA's task order requirements. In some cases, a standalone task order-based MTIPS SCRM Plans will be created, as needed.

[redacted]

Figure 3.8.2.2.6-1. Task Order Based SCRM.

The Level 3 team will also identify any new training and awareness communications to ensure Level 3 personnel supporting the task order are aware of the new requirements and will be compliant with updated methods and procedures. This agile approach to task order-based SCRM plans and dedicated oversight by the various functional teams will aid in minimalizing risks and adhering to the applicable guidelines.

3.3 Supplier Management and Quality Control

Level 3's [redacted] contains stringent procedures for the selection of suppliers as shown in **Figure 3.3-1**, Level 3 has a defined process for selecting software, hardware or services in which multiple Level 3 organizational groups may be engaged in researching, vetting and approving new technology and/or suppliers. Level 3's EIS [redacted] plan will invoke quality control measures and flows these down to OEMs, systems integrators and resellers to ensure Genuine Information Technology Tools (ITT) requirements are enforced. Level 3 believes that this ensures we are well-positioned across the supply chain to execute supply chain integrity and oversight. As shown in **Figure 3.3-1**, various internal organizations may help to support the [redacted]

[redacted]

Figure 3.3-1. Supplier Selection and Approval Process.

Level 3 understands the challenges involved with acquiring new or replacement parts, components and software. It is of utmost importance to Level 3 that the [redacted]. Level 3 requires that [redacted], [redacted] and that all suppliers adhere to policies and laws ensuring that [redacted] have been furnished to Level 3 and/ or our customers.

3.3.1 Baseline Requirements for the EIS-MTIPS SCRM Plan

The following items will be addressed at minimum within the Level 3 [redacted] for [redacted] requiring initial control baselines per NIST Special Publication 800 – 53 Revision 4 or the latest publication. Level 3's quality control measures are carried out in each of the five supply chain phases. Each phase of the

supply chain requires a focus on supply chain risk assessment and mitigation efforts. Level 3'scontract vehicle that will be used to acquire products and services for the [redacted]

3.3.2 System Security Engineering

Level 3 will implement as part of the [redacted], system security engineering processes and procedures that address new and existing software, hardware and infrastructure components. The system security engineering processes that will be established will help to ensure the integrity of system design, deployment and maintenance. [redacted]. Level 3 will ensure key functional support areas work in tandem to manage risks by documenting potential threats, implementing risk mitigation steps, and holding suppliers accountable to their SCRM Plans. The key functional areas will collaborate in documenting risk assessments that may affect GSA and develop recommendations for mitigation, remediation, and plans of action.

3.3.3 Security Control Implementation [L.30.2.2 (3), G.6.3 (3)]

The [redacted] will address the security controls for SA-12 (at least) as described in the NIST Special Publication 800-53 Revision 4 (**Figure 3.3.3-1**). The manner in which these controls are administered will be tailored in scope to the effort and specific information available at the time. Level 3 understands that individual task orders may vary from contract level requirements and may present unique circumstances and provisions that may require Level 3 to modify the implementation of such controls for GSA.

Figure 3.3.3-1. [redacted].

[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]		
[redacted]	[redacted]		
[redacted]	[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]	
[redacted]	[redacted]		
[redacted]	[redacted]	[redacted]	
[redacted]	[redacted]		
[redacted]	[redacted]		
[redacted]	[redacted]		
[redacted]	[redacted]		
[redacted]	[redacted]		
[redacted]	[redacted]		
[redacted]	[redacted]		
[redacted]	[redacted]		
[redacted]	[redacted]		

3.3.4 Criticality Analysis (CA) [L.30.2.2 (4), G.6.3 (4)]

Level 3's key functional organizations and [redacted] will lead a Criticality Analysis (CA) effort, per NIST Special Publication 800-53 Revision 4 (or the latest published revision), that will develop processes and procedures to identify

Mission Critical Functions supporting the contract level and individual task orders as part of the [redacted]. Mission Critical Functions will include, at a minimum, [redacted].

The CA team provides oversight for Level 3's key suppliers for hardware and software components supporting the [redacted]. A close examination of each supplier's procedures will be conducted to determine quality control and safety of such material.

Level 3's CA efforts will be in place to minimize risk and to ensure GSA that the objectives outlined by GSA will not be impaired due to vulnerabilities in system design. The risk of sabotage or subversion of a system's mission critical functions or critical components will be rigorously protected and attacks will be thwarted.

3.3.5 Criticality Analysis (CA)Product and Component Quality Control [L.30.2.2 (5), G.6.3 (5)]

The Level 3 Team will ensure that products and components are not repaired and shipped as new products and components provided to the government. [redacted] Level 3 will limit product acquisition activities to those OEMs and resellers that can ensure compliance with stated guidelines and agree

to audits and assessments made by Level 3, the Government, or designated third parties, if deemed appropriate.

3.3.6 Criticality Analysis (CA)Supply Channel Monitoring [L.30.2.2 (6), G.6.3 (6)]

Level 3 will ensure that all suppliers will be contractually obligated to furnish Level 3 with documentation that ensures the authenticity and traceability of products which define the origination of such products and proof that they have not been subject to malicious intent during maintenance or repair. Quality control measures must be adhered to by suppliers of Level 3 and suppliers will be contractually obligated to agree to audits and assessments made by Level 3, the Government or a designated third party at any time, if deemed appropriate. Level 3 will validate components and products that are supplied as genuine – and will examine such components to ensure they have not been altered. [redacted] will be reviewed and subject to inspection by Level 3 to ensure the flow of genuine products.

3.3.7 Logical and Physical Delivery [L.30.2.2 (7), G.6.3 (7)]

Documented methods, procedures and guidelines for purchase orders and for the receiving department are critical to ensure the smooth flow of goods from suppliers to Level 3. Processes will be set in place to assist in the successful and safe receipt of vendor equipment to the Level 3 stocking warehouses. Strict shipment and packing standards, receiving processes, vendor return procedures, vendor audit processes, missing/incorrect paperwork, inconsistent packaging, software review and cycle count for spare inventory will be key elements included in the Level 3 receiving procedures; which will be included as part of the [redacted]. Physical access to warehouses and staging areas will be closely guarded and monitored. Electronic delivery of software will also be protected and will fall under the access control list methods and procedures for adequate supply chain protection.

Level 3 will also evaluate the applicable suppliers' logistical methods and procedures to ensure that supply chain risk is avoided and well managed. For example, [redacted]

[redacted]

Specific processes will be put in place that include step-by-step instructions to ensure strict quality control and access on a per purchase order basis. Protection mechanisms will look for evidence of:

- [redacted]

All packages arriving in any Level 3 stocking warehouse will be inspected for the following:

- [redacted]

- [redacted]
- [redacted]
- [redacted]

Processes will be set in place to ensure protection against the [redacted]. [redacted] The reporting and documentation of supply chain issues that arise follow the following guidelines:

1. [redacted]

3.3.8 Operational Process [L.30.2.2 (8), G.6.3 (8)]

Level 3 recognizes that it is of critical importance to ensure processes are in place to protect products and components during maintenance, patching, element replacement and other sustainment activities. Only authorized and documented personnel will have the ability to access elements of the [redacted] and Level 3-provided GSA equipment to repair and make changes to such gear, material and components. Guidelines and standards for repair, patching and maintenance will be followed by assigned personnel to ensure tasks are carried out in a manner consistent with protecting the Level 3 supply chain and GSA. [redacted]. Disposal activities will follow a strict guideline to minimize unauthorized access to

hardware, software and components. Careful labeling, tagging, tracking of goods that arrive and are disposed of by Level 3 will be documented closely to ensure the protection of the supply chain for all items that arrive and leave Level 3. Disposal procedures must be followed carefully to maintain the integrity of the network. Personnel will be trained on proper disposal methods and procedures, the consideration of permanent disposal of elements will be reviewed and authorized disposers as needed will be properly vetted to ensure the safeguarding of elements and data during the disposal effort.

3.3.9 Supplier Relationship [L.30.2.2 (9), G.6.3 (9)]

A Level 3 [redacted] All suppliers will be required to comply with the security standard set forth by Level 3 and will be required to agree to be subject to audits and assessments by Level 3 personnel. Clearly defined roles of each supplier will be identified. Procurements will follow the established [redacted] Internal and external audits are expected to be conducted on a regular basis. Supplier reviews will be conducted to ensure:

- [redacted]

- [redacted]

3.3.10 Software Warranty [L.30.2.2 (10), G.6.3 (10)]

Level 3 will represent and warrant that (i) Level 3 will not knowingly introduce [redacted].

3.3.11 Verification and Validation [L.30.2.2 (11), G.6.3 (11)]

Level 3 will reserve the right to perform [redacted]. In addition to assessments and verification activities, validation of such security requirements will be well documented.

3.3.12 Sub-Contractor Clause [L.30.2.2]

Level 3 will incorporate the substance of EIS RFP Section G.6.3 in subcontracts at all tiers where an EIS subcontractor provides personnel, components, or processes identified as [redacted].

3.3.13 Training and Awareness

Level 3's Training Organization will support the development and delivery of [redacted]. The training organization will develop and distribute a toolkit in an effort to introduce Level 3 employees to the basic terms and concepts of the technology supply chain and associated threats. [redacted], etc., and advise associated suppliers of the associated risks that could be involved in the supply chain lifecycle. Employees and associated suppliers will be required on an as-needed basis to participate in supply chain training programs and assessments run by their own organizations; respectively.

3.4 Plan Submittal and Review [G.6.3.1]

Level 3 understands that the [redacted]. [redacted], and used solely for the purposes of mission essential risk management. It is understood that all reviews will be completed within a [redacted]

3.5 Definitions and Acknowledgements

3.5.1 Definitions

a) Level 3 understands that "Information Technology" (see 40 U.S.C. 11101(6)) means, in lieu of the definition at FAR 2.1, any equipment, or interconnected system(s) or subsystem(s) of equipment, that is used in the automatic acquisition, storage, analysis, evaluation, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information by the agency.

1. For the purpose of this definition, Level 3 understands that equipment is used by an agency if the equipment is used by the agency directly or is used by a contractor under a contract with the agency that requires:
   a. Its use or;

b. To a significant extent, its use in the performance of a service or furnishing of a product.

2. Level 3 understands that the term “information technology’ includes computers, ancillary equipment (including imaging, peripherals , input, output and storage devices necessary for security and surveillance), peripheral equipment designed to be controlled by the central processing unit of a computer, software, firmware and similar procedures, services (including support services) and related resources.
3. Level 3 understands the term “information technology” does not include any equipment acquired by a contractor incidental to a contract.

Level 3 understands that “Supply Chain Risk,” means that an adversary may sabotage, maliciously introduce unwanted function, or otherwise subvert the design, integrity, manufacturing, production, distribution, installation, operation or maintenance of a national security system (as that term is defined at 44 U.S.C. 3542(b)) so as to surveil, deny, disrupt, or otherwise degrade the function, use, or operation of such system.

a. Level 3 will maintain controls in the provision of applicable supplies and services to the Government to minimize supply chain risk.
b. Level 3 recognizes that in order to manage supply chain risk, the Government may use the authorities provided in section 806 of Pub L. 111-383. Level 3 understands that the Government may consider information, public and non-public, including all –source intelligence, relating to a contractor’s supply chain.
c. Level 3 acknowledges that if the Government exercises the authority provided in section 806 Pub. L. 111.383 to limit disclosure of information, that no action undertaken by the Government under such authority shall be subject to review in a bid protest before the Government Accountability Office or in any Federal court.
d. Level 3 includes the substance of this clause, including this paragraph (e) in all subcontracts involving the development or delivery of any information technology, whether acquired as a service or as a supply.