



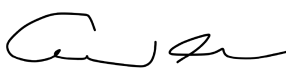
## UNITED STATES DEPARTMENT OF EDUCATION

### OFFICE OF FINANCE AND OPERATIONS

April 3, 2025

#### **MEMORANDUM**

TO: Department of Education Contractors

FROM: Calvin J. Mitchell Jr.   
Deputy Assistant Secretary for the Office of Acquisition Management  
Senior Procurement Executive

SUBJECT: Integrity, Security, and Effectiveness of Department of Education Procurement Activities

As a valued partner in the federal contracting process, we would like to take this opportunity to remind you of your ongoing obligations under federal acquisition regulations and policies, specifically regarding Organizational Conflict of Interest (OCI), Data Security, Records Management, and Ethics.

Your obligations are critical to ensuring the integrity, security, and effectiveness of federal procurement activities, and our national security. As a third party entrusted to manage government information, it is critical that you handle that information in a manner that upholds bedrock American principles and interests.

I am writing to remind you, our contractor partners, of essential responsibilities and ethical commitments included in our binding agreement. Non-compliance could result in termination and/or possible legal penalties. Therefore, I am encouraging you to review your responsibilities and the following clauses which have been included, as applicable, in the Department's contract with you:

- 52.204-2 Security Requirements
- 52.204-21 Basic Safeguarding of Covered Contractor Information Systems
- 3452.204-70 Records Management
- 3452.204-71 Contractor Security Vetting Requirements
- 3452.209-71 Conflict of Interest
- 3452.239-71 Department Information Security and Privacy Requirements
- 52.203-13 Contractor Code of Business Ethics and Conduct
- 52.203-16 Preventing Personal Conflicts of Interest
- 52.224-2 Privacy Act
- 52.203-17 Contractor Employee Whistleblower Rights
- 3452.224-72 Research Activities Involving Human Subjects

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*The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.*

- 3452.227-72 Use and Non-disclosure Agreement
- 3452.227-73 Limitations on the Use or Disclosure of Government-furnished Information Marked with Restrictive Legends
- 3452.224-73 Protection of Student Privacy in Compliance with FERPA

Your adherence to contractual obligations is essential for maintaining a fair, secure, and ethical environment in federal contracting. Please review your internal processes to ensure compliance with OCI, data security, records management, and ethical obligations.

Additionally, please be mindful of your obligations to ensure that government information you handle or maintain is not exposed to any third parties not explicitly authorized *by the Department* to access such information. You are contractually prohibited from sharing government information with any other third party including, for example, consultants, accountants, and law firms, without express approval from the Department.

Should you have any questions or need assistance, please reach out to your contracting officer.