

QUALITY ASSURANCE SURVEILLANCE PLAN (QASP)

Medical Transcription Services

VA Central Iowa Health Care System
VA Nebraska-Western Iowa Health Care System
Sioux Falls VA Health Care System

QUALITY ASSURANCE SURVEILLANCE PLAN (QASP)

1. Contract Description

- a. The contractor shall provide off-site, remote, medical transcription services for the VA Health Care System per the Performance Work Statement (PWS) and the associated contract documents. Medical transcription services shall be provided by the contractor twenty-four hours a day, seven days a week, including all holidays.

2. Introduction to Quality Assurance Surveillance Plan (QASP)

- a. This quality assurance surveillance plan (QASP) is pursuant to the requirements listed in the performance work statement (PWS) titled "Medical Transcription Services." This plan sets forth the procedures and guidelines the VA Health Care System will use to ensure the required performance standards and service levels are achieved by the contractor.

3. Purpose

- a. The purpose of the QASP is to describe the systematic methods used to monitor performance and to identify the required documentation and the resources to be employed. The QASP provides a means for evaluating whether the contractor is meeting the performance standards and quality levels identified in the PWS and the contractor's quality control plan (QCP), and to ensure that the Government pays only for the level of services received.
- b. This QASP defines the roles and responsibilities of all parties to the contract, identifies the performance objectives, defines the methodologies used to monitor and evaluate the contractor's performance, describes quality assurance documentation requirements, and describes the analysis of quality assurance monitoring results.

4. Performance Management Approach

- a. The PWS structures the acquisition around the service and quality level that is required, as opposed to how the contractor should perform the work. This QASP will define the performance management approach taken by VA Health Care System to monitor and manage the contractor's performance to ensure the expected outcomes and performance objectives communicated in the PWS are achieved. Performance management rests on developing a capability to review and analyze information generated through performance assessment. The ability to make decisions based on the analysis of performance data is the cornerstone of performance management; this analysis yields information that indicates whether expected outcomes for the project are being achieved by the contractor.
- b. Performance management represents a significant shift from the more traditional quality assurance (QA) concepts in several ways. Performance management focuses on assessing whether outcomes are being achieved and to what extent. This approach migrates away from scrutiny of compliance with the processes and practices used to achieve the outcome. A performance-based approach enables the contractor to play a

large role in how the work is performed, as long as the proposed processes are within the stated constraints. The only exceptions to process reviews are those required by law (federal, state, and local) and compelling business situations, such as safety and health. A results focus provides the contractor flexibility to continuously improve and innovate over the course of the contract as long as the critical outcomes expected are being achieved and the desired performance levels are being met.

5. Performance Management Strategy

- a. The VA COR shall monitor performance and review performance reports furnished by the contractor to determine how the contractor is performing against communicated performance objectives. The COR will make determinations regarding the performance measurement data and notify the contractor of such. The contractor shall be responsible for making required changes in processes and practices to ensure performance is managed effectively.

6. Roles and Responsibilities

- a. The Contracting Officer (CO)
 - i. The VA Contracting Officer (CO) is responsible for monitoring contract compliance, contract administration, and for resolving any differences between the observations documented by the COR and the contractor. The number of additional representatives serving as technical inspectors depends on the complexity of the services measured, as well as the contractor's performance, and must be identified and designated by the CO.
- b. The Contracting Officer's Representative (COR)
 - i. The VA COR is designated in writing by the CO to act as his or her authorized representative to assist in administering a contract. COR limitations are contained in the written appointment letter. The COR is responsible for technical administration of the project and ensures proper government surveillance of the contractor's performance. The COR will have the responsibility for completing QA monitoring forms used to document the inspection and evaluation of the contractor's work performance. Government surveillance may occur under the inspection of services clause for any service relating to the contract.
 - ii. The COR is not empowered to make any contractual commitments or to authorize any contractual changes on the government's behalf. Any changes that may affect contract price, terms, or conditions shall be referred to the CO for action.
- c. The Contractor
 - i. The contractor is responsible for the quality of all work performed. The contractor measures quality through the contractor's own quality control (QC) program. QC is work output, not workers, and therefore includes all work performed under this contract regardless of whether the work is performed by contractor employees or by subcontractors. The contractor's QC plan shall set forth the staffing and procedures for self-inspecting the quality, timeliness, responsiveness, customer satisfaction, and other performance requirements in

the PWS. The contractor shall develop and implement a performance management system with processes to assess and report its performance to the VA Contracting Officer's Representative (COR).

7. Identification of Required Performance Standards and Quality Levels

- a. The required performance standards and quality levels are included in this QASP and in Table 1.0 – Performance Requirements Summary Table. If the contractor meets the required service or performance level, the incentives may be awarded by VA to the contractor.

8. Methodologies to Monitor and Survey Performance

a. Surveillance Techniques

- i. In an effort to minimize the performance management burden, simplified surveillance methods shall be used by the Government to evaluate contractor performance when appropriate. The primary methods of surveillance are:
 - 1. Random Monitoring
 - a. Random monitoring shall be performed by the CO, COR, or designee. Using this technique, any task may be surveyed at random.
 - 2. 100% Inspection
 - a. The CO or COR shall review all documentation/services associated with this survey technique.
 - 3. Periodic Inspection
 - a. COR typically performs the periodic inspection as deemed needed.
 - 4. Customer Feedback
 - a. The contractor is expected to establish and maintain professional communication between its employees and customers. A primary objective of this communication is customer satisfaction. Customer satisfaction is a significant indicator of the success and effectiveness of all services provided and can be measured through customer complaints.
 - b. Performance management drives the contractor to be customer focused through initially and internally addressing customer complaints and investigating the issues and/or problems but the customer always has the option to communicate complaints to the COR, as opposed to the contractor.
 - c. Customer complaints, to be considered valid by the COR, must set forth clearly and in writing the detailed nature of the complaint, must be signed, and must be forwarded to the COR.
 - d. Customer feedback may also be obtained either from the results of formal customer satisfaction surveys or from random customer complaints.

b. Acceptable Quality Levels

- i. The acceptable quality levels (AQLs) included in Table 1.0 – Performance Requirements Summary are structured to allow the contractor to manage how the work is performed while providing positive incentives for performance measurement achievements.

9. Quality Assurance Documentation

- a. The Performance Management Feedback Loop
 - i. The performance management feedback loop begins with the communication of expected outcomes. Performance standards are expressed in the PWS and are assessed using the performance monitoring techniques shown in the Table 1.0 – Performance Requirements Summary.
- b. Monitoring Forms
 - i. The Government's QA surveillance, accomplished by the COR, will be reported using the Form 1.0 – Quality Assurance Monitoring Form. The form, when completed, will document the Government's assessment of the contractor's performance under the contract to ensure that the required results are being achieved.
- c. The COR will retain a copy and provide the CO with a copy of all completed QA surveillance forms.

10. Incentives

- a. Incentives shall be based on exceeding, meeting, or not meeting performance standards which have been identified as the key performance standards.
- b. The Government may award an option period as an incentive. An award of an option period is at the sole discretion of the Government. As such, an award of an option period is not a guaranteed incentive.
- c. The Government may provide a past performance rating as an incentive for performance.

11. Analysis of Quality Assurance Assessment

- a. Determining Performance
 - i. The Government shall use the monitoring methods cited to determine whether the performance standards/service levels/AQLs have been met. If the contractor has not met the minimum requirements, it may be asked to develop a corrective action plan to show how and by what date it intends to bring performance up to the required levels.
- b. Reporting
 - i. At the end of each quarter, the COR will prepare a written report for the CO and contractor summarizing the overall results of the quality assurance surveillance of the contractor's performance. This written report, which includes the

contractor's submitted monthly report and the completed quality assurance monitoring forms, will become part of the QA documentation. It will enable the government to demonstrate whether the contractor is meeting the stated objectives and performance standards, including cost, technical, and scheduling objectives.

c. Reviews and Resolution

- i. The CO and the COR may require the contractor to meet with the CO and the COR and other Government personnel as deemed necessary to discuss performance evaluation. The CO and COR will define a frequency of in-depth reviews with the contractor, including appropriate self-assessments by the contractor; however, if the need arises, the contractor shall meet with the CO and COR as often as required or per the contractor's request. The agenda of the reviews may include:
 1. Performance assessment data and trend analysis
 2. Issues and concerns of both parties
 3. Projected outlook for upcoming months and progress against expected trends, including a corrective action plan analysis as needed
 4. Recommendations for improved efficiency and effectiveness
- ii. The COR must coordinate and communicate with the contractor to resolve issues and concerns regarding marginal or unacceptable performance.
- iii. As needed, Form 2.0 – Contract Discrepancy Report will be completed for corrective action.
- iv. The CO, COR, and contractor shall together formulate tactical and long-term courses of action. Decisions regarding changes to metrics, thresholds, or service levels should be clearly documented. Changes to service levels, procedures, and metrics will be incorporated as a written contract modification.

12. Signatures

Contracting Officer: _____

Contracting Officer's Representative: _____

Contractor: _____

Table 1.0 – PERFORMANCE REQUIREMENTS SUMMARY TABLE

Task	Indicator	Standard	Acceptable Quality Level	Method of Surveillance	Incentive
Turnaround Times (TAT)	All dictation shall be transcribed and uploaded into VISTA	See Table 2.0 – Turnaround Times Table	98%	Periodic Inspection or Random Monitoring	Exercise of option year and/or assessment of past performance
Contractor Availability	The contractor shall be available to perform all transcription services to include electronic transmission of transcription to VA	The contractor shall perform timely completion and transmittal of transcriptions on a daily basis twenty-four hours per day, seven days per week including weekends and holidays. Contractor availability also includes having a point of contact available via phone at all times.	98%	Periodic Inspection or Random Monitoring	Exercise of option year and/or assessment of past performance
Report Accuracy	Transcribed reports shall be without errors	Contractor shall maintain an overall 98% accuracy rate	98%	Period Inspection or Random Monitoring	Exercise of option year and/or assessment of past performance
Report Correction	Any reports returned to the contractor for correction(s), or reports that are otherwise unacceptable to VA will be returned to the contractor	Reports shall be corrected within four hours for routine reports and within one hour for STAT reports	98%	100% inspection	Exercise of option year and/or assessment of past performance
Invoicing	The contractor shall submit a monthly invoice in arrears through the OB10 eInvoicing System	Monthly invoices submitted in arrears and with an accurate reflection of services rendered by the contractor	95%	100% Inspection	Exercise of option year and/or assessment of past performance
Customer Satisfaction	The contractor shall provide quality services which result in customer satisfaction	There shall be no more than five customer complaints received per quarter during the period of performance of the contract.		Customer Feedback	Exercise of option year and/or assessment of past performance

Table 2.0 – Turnaround Times (TAT) Table

Turnaround Times (TAT) Table	
Discharge Summary	24 hours
Operation Report	4 hours
Compensation and Pension Report, Agent Orange, Desert Storm	24 hours
Consultation	24 hours
Progress Note	24 hours
History and Physical Exam	4 hours
STAT Reports – all work types	4 hours
Miscellaneous Reports	24 hours
Autopsy Reports	24 hours
Gross Pathology Reports	12 hours
Pathology Reports	12 hours
Returned Unacceptable Report	Reports shall be corrected within 4 hours for routine reports and within 1 hour for STAT reports. Refer to Paragraph 2.5 of the PWS for additional information.
Cassette Tapes	24 hours

Form 1.0 – Quality Assurance Monitoring Form

QUALITY ASSURANCE MONITORING FORM

CONTRACT TITLE AND NUMBER: _____

SERVICE/STANDARD to SURVEY: _____

SURVEY PERIOD: _____

SURVEILLANCE METHOD (Check):

☐ Random Monitoring ☐ 100% Inspection ☐ Periodic Inspection ☐ Customer Feedback

LEVEL OF SURVEILLANCE (Check):

☐ Monthly ☐ Quarterly ☐ As needed

PERCENTAGE OF ITEMS SAMPLED DURING SURVEY PERIOD: _____ %

ANALYSIS OF RESULTS:

Observed Service Provider Performance Measurement Rate: _____ %

Service Provider's Performance (Check):

☐ Meets Standards

☐ Does Not Meet Standards

Narrative of Performance during Survey Period: _____

PREPARED BY: _____ DATE: _____

SIGNATURE OF PREPARER: _____

Form 2.0 – Contract Discrepancy Report

Contract Discrepancy Report	
Contract Number:	Title of Contract:
Contractor Point of Contact (printed name):	Phone Number and Email Address:
VA Contracting Officer (printed name):	Phone Number and Email Address:
VA Contracting Officer Representative(printed name):	Phone Number and Email Address:
Date Report Prepared:	
Dates of Discrepancy:	
Discrepancy or Problem:	
Contractor Response for Corrective Action and Actions to Prevent Recurrence: (Attach Continuation Sheet if Necessary)	
Signature of Contractor:	Date:
Page 1 of 2	

Government Evaluation:	
Government Actions:	
Close Out of Discrepancy Report	
Signatures	
Contractor Point of Contact :	Date:
VA Contracting Officer:	Date:
VA Contracting Officer Representative:	Date:
Page 2 of 2	