

ATTACHMENT E

Extracorporeal Shock Wave Lithotripsy (ESWL) Services QUALITY ASSURANCE SURVEILLANCE PLAN (QASP)

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QUALITY ASSURANCE SURVEILLANCE PLAN (QASP)

1 INTRODUCTION

For: Medical Services – multi-year contract to provide Extracorporeal Shock Wave Lithotripsy (ESWL) services with necessary vendor deliverables for the C.W. Bill Young VA Medical Center located at 10,000 Bay Pines Blvd, Bay Pines, FL 33744 and the Lee County Healthcare Center located at 2489 Diplomat Parkway E, Cape Coral, FL 33909.

Contractor's name: <Enter your company name.> (hereafter referred to as the contractor).

1.1 Purpose

1.1.1 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/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.

1.1.2 This QASP defines the roles and responsibilities of all members of the integrated project team (IPT), 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.

1.2 Performance Management Approach

1.2.1 The PWS structures the acquisition around "what" service or quality level is required, as opposed to "how" the contractor should perform the work (i.e., results, not compliance). This QASP will define the performance management approach taken by Bay Pines VA Medical Center and Lee County Outpatient Clinic to monitor and manage the contractor's performance to ensure the expected outcomes or 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.

1.2.2 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/or the desired performance levels are being met.

1.3 Performance Management Strategy

1.3.1 The contractor is responsible for the quality of all work performed. The contractor measures that 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 QCP will set forth the staffing and procedures for self-inspecting the quality, timeliness, responsiveness, customer satisfaction, and other performance requirements in the PWS. The contractor will develop and implement a performance management system with processes to assess and report its performance to the designated government representative. The contractor's QCP will set forth the staffing and procedures for self-inspecting the quality, timeliness, responsiveness, customer satisfaction, and other performance requirements in the PWS. This QASP enables the government to take advantage of the contractor's QC program.

1.3.2 The government representative(s) will monitor performance and review performance reports furnished by the contractor to determine how the contractor is performing against communicated performance objectives. The government will make determination regarding incentives based on performance measurement metric data and notify the contractor of those decisions. The contractor will be responsible for making required changes in processes and practices to ensure performance is managed effectively.

2 ROLES AND RESPONSIBILITIES

2.1 The Contracting Officer

The contracting officer (CO) is responsible for monitoring contract compliance, contract administration, and cost control and for resolving any differences between the observations documented by the COR. The CO will designate the COR(s) as the government authority for performance management. 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.

2.2 The Contracting Officer's Representative

The contracting officer's representative (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 is not empowered to make any contractual commitments or to authorize any contractual changes on the government's behalf. Any changes that the contractor deems may affect contract price, terms, or conditions shall be referred to the CO for action. 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.

3 IDENTIFICATION OF REQUIRED PERFORMANCE STANDARDS/QUALITY LEVELS

The required performance standards and/or quality levels are included in Attachment 1 below. If the contractor meets the required service or performance level, it will be paid the monthly amount agreed on in the contract and will receive recommendation for exercising options. Failure to meet the required service or performance level will result in low performance ratings and possible recommendation not to exercise option.

4 METHODOLOGIES TO MONITOR PERFORMANCE

4.1 Surveillance Techniques

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:

- Random inspection and auditing, which shall be performed by the COR/COR designated inspector.
- Collection and tracking of monthly billing statements by the COR

4.2 Customer Feedback

The contractor is expected to establish and maintain professional communication between its employees and customers. The primary objective of this communication is customer satisfaction. Customer satisfaction is the most significant external indicator of the success and effectiveness of all services provided and can be measured through customer complaints.

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 CO and/or COR, as opposed to the contractor.

Customer complaints, to be considered valid, must set forth clearly and in writing the detailed nature of the complaint, must be signed, and must be forwarded to the CO/COR. The CO/COR will accept those customer complaints and investigate and then document by using the Contract Discrepancy Report –CDR (Attachment 3) which is also attached to the COR designation letter.

Customer feedback may also be obtained either from the results of formal customer satisfaction surveys or from random customer complaints.

4.3 Acceptable Quality Levels

The acceptable quality levels (AQLs) included in Attachment 1, Performance Requirements Summary Table, for contractor performance are structured to allow the contractor to manage how the work is performed while providing negative incentives for performance shortfalls. For certain critical activities such as those involving direct patient care, the desired performance level is established at 100 percent. Other levels of performance are keyed to the relative importance of the task to the overall mission performance at these VAMC(s).

5 QUALITY ASSURANCE DOCUMENTATION

5.1 The Performance Management Feedback Loop

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 PWS Section Nine, “Performance Monitoring”, and in attachment 1 below.

5.2 Monitoring Forms

The government’s QA surveillance, accomplished by the COR, will be reported using the monitoring forms in Attachments 2 and 3. The forms, when completed, will document the government’s assessment of the contractor’s performance under the contract to ensure that the required results and acceptable quality levels are being achieved.

5.2.1 The COR will retain a copy of all completed QA surveillance forms and CDR forms.

6 ANALYSIS OF QUALITY ASSURANCE ASSESSMENT

6.1 Determining Performance

6.1.1 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.

6.2 Reporting

6.2.1 At the end of each quarter, the COR will prepare a written report for the CO summarizing the overall results of the quality assurance surveillance of the contractor's performance. This written report, which includes the contractor's submitted quarterly report and the completed quality assurance monitoring forms (Attachment 2), will become part of the QA documentation. It will enable the government to demonstrate whether the contractor is meeting the stated objectives and/or performance standards, including cost/technical/scheduling objectives.

6.3 Reviews and Resolution

6.3.1 The COR may require the contractor's project manager, or a designated alternate, to meet with the COR and/or CO and/or other government personnel as deemed necessary to discuss performance evaluation. The 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 will meet with the CO and/or COR as often as required or per the contractor's request. The agenda of the reviews may include:

- Monthly/Quarterly performance assessment data and trend analysis
- Issues and concerns of both parties
- Projected outlook for upcoming months and progress against expected trends, including a corrective action plan analysis
- Recommendations for improved efficiency and/or effectiveness
- Any other issues arising from the performance monitoring processes

6.3.2 The COR must coordinate and communicate with the contractor to resolve issues and concerns regarding marginal or unacceptable performance.

6.3.3 The COR and contractor should jointly 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 contract modification at the convenience of the CO.

ATTACHMENT 1: PERFORMANCE REQUIREMENTS SUMMARY

Task	Standard	Acceptable Quality Level	Method of Surveillance	Incentive/ Disincentive
Credentialing	All providers must be credentialed in accordance with Department of Veteran Affairs and Local.	100% compliance required	Upon request, random inspection and auditing	Non-payment
Joint Commission Standards	Compliance with all industry Joint Commission Standards	100% compliance expected	Random inspection and auditing	Past Performance Evaluation
Monthly invoices	Monthly invoices of billed services will be forwarded to the Surgery Service Office COR for tracking	No more than one occurrence of non-compliance per 6 months.	The COR shall collect and track monthly billing statements	Past Performance Evaluation
Mandatory VA Education	Information Security and Cyber Security training must be completed on an annual basis (Maintain computer access for the VA network)	100% compliance expected	The COR will collect evidence of this training	Non-payment and impact on CPARS rating
OSHA Requirement	Required to have annually PPD/TB screening; current immunizations and evidence of having been offered the HEP-B vaccine prior to commencement of work	100% compliance required prior to commencement of work.	Upon request, random inspection and auditing	Non-payment and impact on CPARS rating
Service Cancellation Contractor Performance	No Cancellations	100% compliance	The COR will monitor this on a monthly basis	Non-payment and impact on CPARS rating

SERVICE or STANDARD: _____

SURVEILLANCE METHOD (Check):

LEVEL OF SURVEILLANCE (Check):

Observed Service Provider Performance Measurement Rate: _____%

☐ Does Not Meet Standards

Narrative of Performance During Survey Period: _____

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Contract Discrepancy Report (Attachment 3)				
Contract No.		Report No. for this Discrepancy:		
Contractor/Manager's Name:		From: (Name of Project Officer)		
Dates				
Prepared:	Returned by Contractor:		Action Complete:	
Discrepancy or Problem:				
Signature of Contracting Officer:				
To: (Contracting Officer)		From: (Contractor)		
Contractor Response as to Cause, Corrective Action and Actions to Prevent Recurrence (Attach Continuation Sheet if Necessary)				
Signature of Contractor Representative:			Date:	
Government Evaluation:				
Government Actions:				
Close Out				
	Name	Title	Signature	Date
Contractor Notified				
Project Officer				
Contracting Officer				