

# **QUALITY ASSURANCE SURVEILLANCE PLAN (QASP)**

**for**

***HOME OXYGEN  
in***

***NCO-16***

**RFP: VA256-17-R-0994**

**The following members have approved implementation of this Plan on behalf of the entire acquisition team:**

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**AJ Raiber  
Contracting Officer**

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**Melanie Wood  
VISN 16 Acting VISN Prosthetics Rep**

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**Contractor Signature**

## CHANGE CONTROL SUMMARY

**Change.** A change that is administrative in nature does not require the plan to be re-staffed. Changes that remove or add items periodically assessed or affect items assessed in frequency of assessment or thresholds must be re-staffed for signatures. Changes that affect roles of AT members must also be re-staffed. Consolidate changes when possible, and identify as Change 1, Change 2, etc. Include a summary of the changes incorporated in the change table. Ensure change bars have been inserted.

**Revision.** A revision should be used to conform all changes into a new basic document with a new basic date. It should be used to clean up the document when it begins to become ambiguous with too many changes. It is the AT decision when to revise the plan. Number the revision and include a summary of the revisions in the change table. Remove all change bars when the document is revised since the revised document takes all previous changes into account. Do not remove changes from the change table when the plan is revised since they may lend important historical value to the plan.

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## **1. OVERVIEW**

**1.1.** The Quality Assurance Surveillance Plan (QASP) provides the Contracting Officer's Representative (COR) an effective and systematic surveillance method.

**1.2. Contracted Services.** Contractor shall provide non-personal Home Oxygen services to include delivery, set-up, education, pick-up, cleaning, preventative maintenance, and storage of equipment for Healthcare Systems and Medical Centers within VISN 16 region of service.

## **2. ROLES AND RESPONSIBILITIES**

**2.1. Acquisition Team (AT).** The goal of the AT is to give all members the ability to maintain representative services for our mission partners and our Veterans and propose/initiate improvements throughout the life of the contract. Under this concept continual contract assessment will be focused on ensuring the contract continues to meet the needs of the Veterans.

**2.1.1.** The AT should strive to achieve efficiencies in the contract performance and improved customer support. The primary responsibility of the AT is effective contract management. Secondly, the AT is charged with seeking constant process improvement throughout the life of the contract.

**2.1.2.** Core AT members for this contract are the Program Manager (PM), Contracting Officer (CO), and Contracting Officer Representatives (COR). The extended AT consists of Core AT members, the contractor, stakeholders, and Subject Matter Experts (SMEs) from various functional areas covering all program service requirements. It may also include Legal, Small Business, management and leadership of various organizations or any other functional experts. Member participation is contingent upon contract issues requiring a particular AT member's participation.

### **2.2 Program Manager (PM)**

**2.2.1.** Manages the program ensuring performance management focuses on risk management and meets cost, schedule and performance baselines. Develops and implements a risk management plan.

**2.2.2.** Oversees overall contract performance and ensures all CORs complete required audits in accordance with this QASP. When conflicts arise that cannot be handled at the local level, the PM serves as a Subject Matter Expert (SME) in the discussion with the contractor, Contracting Officer, and the station.

### **2.3. Contracting Officer (CO)**

**2.3.1.** Ensures requirements of the Federal Acquisition Regulations (FAR) and its

supplements are met. Ensures compliance with the terms of the contract and safeguards the interests of the government to include cost and property control. Ensures contractors receive impartial, fair and equitable treatment.

**2.3.2.** The CO is the only person with authority to direct the contractor, make interpretations of and changes to the contract and resolve disputes or conflicts with the contractor.

**2.3.3.** Designates' authority for inspection and/or acceptance of service to the CORs, in writing. Issues delegation of authority to CORs.

**2.3.4.** Informs the contractor of the names, duties, and limitations of authority for all personnel assigned to the contract.

**2.3.5.** Participates in the preparation and submission of annual reporting.

## **2.4. Contracting Officer Representative (COR)**

**2.4.1.** The COR has the responsibility to monitor and document contractor performance in accordance with the PWS requirements, and the QASP.

**2.4.2.** Provide information necessary to assess actual or potential conflicts of interests and immediately notify the CO if subsequent situations arise.

**2.4.3.** Establish and maintain a COR file in accordance with VA Procurement Manual. Upon termination of COR designation, all files shall be turned over to subsequent assigned personnel or the CO. All documentation is part of the official contract file.

**2.4.4.** Remain abreast of changes in terms and conditions of the contract resulting from contract modifications.

**2.4.5.** Perform those duties/responsibilities designated by the CO in the CO's Designation Letter.

**2.4.6.** Notify the Contracting Officer, in a timely manner, when performance deficiencies are identified.

**2.4.7.** Prepare Performance Assessment Reports to accurately reflect and document contractor performance.

## **3. PERFORMANCE ASSESSMENT**

**3.1. Strategy.** Quality control is the responsibility of the Contractor. The Government will use this plan to provide predictable quality assurance. CORs will assess the contractor's performance to sufficiently validate delivery of services and gain confidence in the contractor's performance.

**3.2. Assessment Methods.** Several assessment methods exist that can be used and the selection of the assessment method is dependent on the characteristics of the item to be assessed. In very limited cases, 100 percent inspections may be used, but in most cases sampling a service on a periodic basis is sufficient.

**3.2.1. Collecting Patient Feedback.** Feedback is often used as a method of performance assessment on service contracts. CORs should establish feedback processes to allow Veterans to provide positive as well as negative feedback on the services being provided. Positive and negative feedback should be reported with substantiated performance excluding any personnel recognition.

#### **3.2.1.1. Negative Customer Feedback**

**3.2.1.1.1.** CORs must first validate negative customer feedback against PWS requirements.

**3.2.1.1.2.** If negative feedback is discovered to be invalid, the COR will inform the complainant of the reason(s) why it is not valid.

**3.2.1.1.3.** For valid negative comments received, the COR will notify the contractor's representative to allow opportunity for investigation. If warranted, the COR prepares a Contract Discrepancy Report and forwards it to the CO for processing. The COR should provide feedback to the complainant on the status of validated negative feedback.

**3.2.1.2. Positive Customer Feedback.** Positive customer feedback should be validated by CORs to ensure the feedback received is not simply a normal contract requirement. Once validated, positive feedback should be sent by the COR to the contractor's representative and included in further reporting such as CPARS.

**3.2.2. Use of Metrics.** Data should be used to the maximum extent to document and report contractor success or failure in meeting contract requirements. If contractor generated metrics are used, the COR must sufficiently validate the accuracy of the metrics to establish confidence in their accuracy.

**3.2.3. Analyzing Trends.** The CORs should analyze performance assessment data for performance trends. The trending data should be used in subsequent reporting of contract performance.

**3.3. Performance Standards.** Performance standards define desired services. The Government performs surveillance to determine if the contractor exceeds, meets or does not meet these standards.

The Government shall use these standards to determine contractor performance and shall compare contractor performance to the Acceptable Quality Level (AQL).

**Table 1 Performance Standards:**

Task	PWS Reference	Performance Standard	AQL	Method of Surveillance
Initial Setups and Education	Para 22	The Contractor shall perform initial home oxygen setups on the same day for requests received prior to 3:00 pm and within 24 hours if the request is received after 3:00 pm	98% of actions are on time	<b>Periodic Inspection/ Random Sampling.</b> <u>Analysis of contractor reports:</u> The contractor shall provide a weekly report as required by paragraph 11 of the PWS. The COR will conduct random audits for compliance.
Preventive Maintenance and RT home Visits	Para 21(c)(10), 22(g) and 22(i)	Contractor shall perform quarterly routine and preventative maintenance and conduct monthly RT home visits for patients on Ventilator or quarterly RT home visits for patients not on a ventilator	98% of visits are made timely	<b>Periodic Inspection/ Random Sampling.</b> <u>Analysis of contractor reports:</u> The contractor shall provide a monthly report as required in paragraph P11 of the PWS. The COR will conduct random audits to measure compliance.

Task	PWS Reference	Performance Standard	AQL	Method of Surveillance
Patient Travel	Para 27	Contractor shall arrange an adequate home oxygen solution for Veterans traveling within and outside the contract coverage area prior to the Veteran starting travel and will continue support during that travel period.	98% of travel requests are supported timely	<b>Periodic Inspection/ Random Sampling.</b> <u>Analysis of contractor reports:</u> The contractor shall provide monthly reports as required in paragraph 11 of the PWS. The COR will conduct random audits for compliance.
Emergency Services	Para 30	Emergency Response within no more than 6 hours of notification of an emergency situation	100% of emergency services are provided within 6 hours	<b>100% review</b> - The contractor shall provide copies of all documentation related to emergency services
Reports	Para 11	Contractor shall submit reports timely based on the PWS	95% of reports are received timely	<b>100% Review</b> <u>Analysis of contractor reports.</u> The COR will review the timeliness of reports each month as they are due.

**3.4. Performance Assessment Report (PAR).** The PAR (see Attachment 1) is used to document contractor assessments. PAR Section I is used to document assessment results. PAR Section II is used to document nonconformities (findings) identified during the assessment documented in Section I and forwarded to the contractor for response. When a PAR section II is used to document nonconformity, it is known as a Contract Discrepancy Report (CDR).

**3.5. Types of Nonconformities.** There are two types of Nonconformities, contractor identified or COR identified.

**3.5.1. Contractor Identified Nonconformities.** CORs will review contractor identified



nonconformities to ensure corrective measures were successfully implemented with all necessary actions taken to prevent recurrence. If documentation exists which substantiates the contractor has identified the deficiency and timely corrective action is being taken to correct the deficiency, the deficiency may be excused from PAR with Finding. If the nonconformity has not yet been resolved but the contractor has established a timely estimated completion date (ECD) for correction and resolution, CORs will monitor the contractor's resolution efforts until the nonconformity has been corrected.

**3.5.1.1.** A PAR with Finding for nonconformities when the contractor has already self-identified may be considered if; the deficiency is identified as a critical item under the Service Summary, this is a repeat identification, the contractor fails to follow through with the agreed way-ahead or timeframes, contractor failed to follow its Quality Control Plan, or involves safety, environmental, or security issues.

**3.5.2. COR Identified Nonconformities.** Nonconformities should be documented as early as possible after discovery and CO concurrence on a CDR using PAR section II. It is then issued to the contractor with instructions on when and how to reply. When the contractor's reply is received and deemed to be acceptable, the COR will then close and file the CDR.

**3.5.2.1.** The COR will notify the CO and the contractor of a suspected nonconformity as soon as practicable. Follow up reports may be necessary if the situation surrounding the nonconformity is still in motion at the time of the initial CDR.

**3.5.2.2.** The COR will investigate to determine if the contractor has self-identified the nonconformity within their quality system. If so, the COR will revert to the process in paragraph 3.5.1 above.

**3.5.2.3.** Only the CO may issue a CDR to the contractor.

**3.6. Performance Assessment File.** CORs establish and maintain a Performance Assessment File. Multiple CORs on the same contract should share common documents for increased efficiency. The performance assessment file should be electronic and paperless. These files shall be passed on to the subsequent COR appointed to the contract and shall be retained as part of the official contract file. The file must contain all records required by the COR SOP found in the VHA Procurement Manual.

**3.7. Performance Assessment Types.** Performance Assessment is accomplished in the following ways:

**3.7.1. COR Assessment.** CORs assess and document the Performance Standards outlined in Table 1 and assess and document other requirements within their functional areas as needed. The COR should use data and nonconformities discovered to trace back the effectiveness of the contractor's quality system. CORs are more overall quality system focused ensuring the contractor's quality system is effective and complies with

PWS requirements but may also at times identify nonconformities based on other actual PWS requirements as well. All assessment results are documented in the contract files and efforts should be made to assess all PWS requirements as possible.

**3.7.2. Contractor Self Assessments.** The contractor assesses their own performance IAW their quality system requirements and maintains documentation of the results IAW the PWS and their quality plan. This is the vehicle whereby the contractor may generate contractor identified nonconformities and devise corrections and subsequent actions to prevent recurrence.

## **4. Managing Contract Performance**

**4.1. Approach.** To ensure the contractor is meeting PWS, schedule and performance requirements, the AT utilizes performance assessment outcomes and/or other applicable indicators to continuously implement improvements wherever possible. The contractor is a vital partner in identifying performance improvements and ways to increase both efficiency and effectiveness in contract performance.

## **5. Reporting Performance Results**

**5.1. Contractor Performance Assessment Report (CPAR).** The CPAR is an annual report of contractor performance. It is based on the COR assessment reports generated throughout the year. CPARs are used to provide past performance information to source selection teams for consideration in other acquisitions. Therefore, accuracy, completeness and appropriate ratings within the CPAR are critical.

**6. Assessment Records.** Assessment Records are maintained in the performance assessment folder within the electronic COR file or the contract file for the life of the contract or as specified by the records disposition schedule. The COR must contact the CO for the final disposition instructions upon contract completion.

## Attachment 1

<b>PERFORMANCE ASSESSMENT REPORT (PAR)</b> <small>For Check Blocks, enable and lock Forms Toolbar</small>			
Section I. Performance Assessment			
1. CONTRACTOR	2. CONTRACT NUMBER	3. TYPE OF SERVICES	4. FINDING CATEGORY <input type="checkbox"/> No Finding <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Major Nonconformity
5. CONTRACT REQUIREMENT		6. PWS REFERENCE	
7. PERFORMANCE ASSESSMENT—DESCRIBE CONTRACTOR PERFORMANCE			
8. ASSESSING COR GRADE/NAME			9. ASSESSMENT DATE
Section II. Nonconformities Identified			
10. CONTROL NUMBER	11. ISSUING AUTHORITY GRADE/NAME	12. SUSPENSE DATE	
13. BRIEF DESCRIPTION OF THE FINDING (Include PWS reference narrative)			
14. FINDING IMPACT			
15. INSTRUCTIONS TO THE CONTRACTOR: If a suspense date is entered in block 12, respond with a corrective action plan that details the corrective action of the cited deficiency, the cause of the deficiency, and actions taken to prevent recurrence. If date was not entered in Block 12, the Contractor is not required to provide a response.			
16. COR ASSESSMENT TO CONTRACTOR'S CORRECTIVE ACTION PLAN			
17. CONTRACTOR RESPONSE	18. EVALUATING COR GRADE/NAME	19. CLOSURE DATE	
<input type="checkbox"/> Accepted <input type="checkbox"/> Rejected			

Continuation Sheet	