

ATTACHMENT SIX (6) – QUALITY ASSURANCE SURVEILLANCE PLAN

The contractor will be evaluated in accordance with the following:

1. PURPOSE

This Quality Assurance Surveillance Plan (QASP) provides a systematic method to evaluate performance for the stated contract. This QASP explains the following:

- What will be monitored?
- How monitoring will take place.
- Who will conduct the monitoring?
- How monitoring efforts and results will be documented.

This QASP does not detail how the contractor accomplishes the work. Rather, the QASP is created with the premise that the contractor is responsible for management and quality control actions to meet the terms of the contract. It is the Government's responsibility to be objective, fair, and consistent in evaluating performance.

This QASP is a "living document" and the Government may review and revise it on a regular basis. However, the Government will coordinate changes with the contractor through contract modification. Copies of the original QASP and revisions will be provided to the contractor and Government officials implementing surveillance activities.

2. GOVERNMENT ROLES AND RESPONSIBILITIES

The following personnel will oversee and coordinate surveillance activities.

a. Contracting Officer (CO) – The CO will ensure performance of all necessary actions for effective contracting, ensure compliance with the contract terms, and will safeguard the interests of the United States in the contractual relationship. The CO will also assure that the contractor receives impartial, fair, and equitable treatment under this contract. The CO is ultimately responsible for the final determination of the adequacy of the contractor's performance.

Assigned CO: Shaundrica Close

Organization or Agency: Orlando Veterans Affairs Medical Center

b. Contracting Officer's Representative (COR) – The COR is responsible for technical administration of the contract and will assure proper Government surveillance of the contractor's performance. The COR will keep a quality assurance file. The COR is not empowered to make any contractual commitments or to authorize any contractual changes on the Government's behalf.

Assigned COR: Dorian Breau

Organization or Agency: West Palm Beach Veterans Affairs Medical Center

3. CONTRACTOR REPRESENTATIVES

The following employee(s) of the contractor serve as the contractor's program manager(s) for this contract.

Primary:
Alternate:

4. PERFORMANCE STANDARDS

The contractor is responsible for performance of ALL terms and conditions of the contract. CORs will provide contract progress reports quarterly to the CO reflecting performance on this plan and all other aspects of the resultant contract. The performance standards outlined in this QASP will be used to determine the level of contractor performance in the elements defined. Performance standards define desired services. The Government performs surveillance to determine the level of Contractor performance to these standards.

The Performance Requirements are listed below in Section six (6). The Government will use these standards to determine contractor performance and will compare contractor performance to the standard and assign a rating. At the end of the performance period, these ratings will be used, in part, to establish the past performance of the contractor on the contract.

5. METHODS OF QA SURVEILLANCE

Various methods exist to monitor performance. The COR will use the surveillance methods listed below in the administration of this QASP.

- a. **PERIODIC INSPECTION/SAMPLING:** Inspections scheduled and reported quarterly per COR delegation or as needed. Ten (10) patient files will be reviewed per inspection period. All inspections and reports will be conducted in compliance with VA Privacy and Information security standards.)
- b. **VALIDATED USER/CUSTOMER COMPLAINTS**
- c. **RANDOM SAMPLING:** Ten (10) randomly selected patient files will be reviewed per quarter. All reviews and reports will be conducted in compliance with VA Privacy and Information security standards.
- d. **Verification and/or documentation provided by Contractor:** The contractor shall provide evidence of training upon completion by each contractor's personnel.

6 QASP PERFORMANCE REPORT (Reference Below)

Measure	PWS Para.	Performance Requirement	Standard	Acceptable Quality Level	Surveillance Method	Met AQL/DID NOT MEET AQL- CPAR RATING/ADD COMMENTS
Qualifications and availability of key personnel	2. 2.13. 6.1.	Contractor's Radiation Oncology Physician(s) and Advanced Therapeutic Medical Physicist(s) shall be board certified in accordance with ACR Standards.	All (100%) of Contractor's Radiation Oncology Physician(s) and Advanced Therapeutic Medical Physicist(s) shall be board certified in accordance with ACR Standards and available to provide the required scheduled services to veterans.	No deviations from the standard (100%).	Periodic Sampling of qualification documentation and medical records submitted in accordance with contractor reporting requirements.	

Patient Reports and Documentation	4.5.7.1. 4.5.7.3. 6.2.	All notes must be electronically signed and all encounters closed within 24 hours. All patient care documentation including, but not limited to consultations, encounters, weekly progress notes, procedure notes, treatment discharge notes, follow-up notes, attending consultation, continuing physics consultation which covers weekly chart review checks, special physics consultation notes, and other required documentation, shall be recorded in CPRS in accordance with VA rules and regulations.	Compliance with VA Rules and Regulations	95%	Periodic and Random Inspection	
Standard Operating Procedures (SOP) followed for all radiotherapy techniques (for physicians)	6.3.	Reviewable documentation of all SOP's shall be maintained. Radiotherapy techniques, such as 3DCRT, IMRT, Rapidarc, Electron Therapy and IGRT, have written procedures.	100% of procedures are documented, reviewed and updated annually.	100%	Inspection after assignment completion	

Contractor's Advanced Therapeutic Medical Physicist(s) shall follow established clinical SOP's for assigned clinical duties meeting ACR standards.	6.4.	Contractor's Advanced Therapeutic Medical Physicist(s) shall follow established SOP's in performing clinical duties on assignment dates. These clinical duties include documentation of patient QA performed, new and weekly chart checks, chart completions, and may include documentation of machine or device calibrations. These tasks will conform to the reference ACR standards as adopted by the radiation oncology clinic.	All (100%) of required medical physicist reports documenting the successful evaluation of equipment performance (meeting or exceeding ACR Standards) to include therapy machines and devices, as tasked on assignment dates, if applicable . All (100%) of patient treatment related (QA, chart review) documents tasked by the physician or dosimetrist or therapists, must be present in Aria following completion of these tasks.	100%	Inspection upon return of WPBVAMC Chief Therapeutic Medical Physicist.	
Maintains licensing, registration, and certifications	2.1.1. 2.2. 2.2.2. 6.5.	Updated Licensing, registration and certifications shall be provided as they are renewed.	100% Licensing and registration information kept current.	100%	Periodic and Random Inspection	

Privacy, Confidentiality and HIPAA	2.6.1. 4.3.1. 4.3.3. 4.3.5. 6.6. 12. 12.2.6. 12.3.1. 12.3.6. 12.3.7.1. 12.3.7.2. 12.3.7.3. 12.4. 12.5. 12.6.	Contractor is aware of all laws, regulations, policies and procedures relating to Privacy, Confidentiality and HIPAA and complies with all standards	Zero (0) breaches of privacy or confidentiality	100%	Contractor to provide evidence of annual training required by the WPBVAMC, reports violations per policy.	
Professionalism/ Conduct	2.2.1.3. 6.7.	Contractor employees maintain excellent relationships with patients, Radiation Therapy staff members, VA Medical Center staff members, and vendors.	Zero (0) complaints from WPBVAMC staff members related to the contractor's employee interfering with patient care or the ordinary operation of the facility.	100%	COR notification of complaints	
Mandatory Training	2.6. 2.6.2. 2.6.3. 2.6.4. 6.8. 12.8.	Contractor completes all mandatory required training	All Training (100%) completed as required per WPBVAMC Policy	100%	Contractor to provide documented evidence	

7. CPAR RATINGS ASSIGNED TO QASP ITEMS:

Metrics and methods are designed to determine rating for a given standard and acceptable quality level. The following ratings shall be used (Reference: CPARS User Manual <https://www.cpars.gov/pdfs/CPARS-Guidance.pdf> p. A2-1):

EXCEPTIONAL:	Performance meets contractual requirements and exceeds many to the Government's benefit. The contractual performance of the element or sub-element being assessed was accomplished with few minor problems for which corrective actions taken by the contractor were highly effective.
VERY GOOD:	Performance meets contractual requirements and exceeds some to the Government's benefit. The contractual performance of the element or sub-element being assessed was accomplished with some minor problems for which corrective actions taken by the contractor were effective.
SATISFACTORY:	Performance meets contractual requirements. The contractual performance of the element or sub-element contains some minor problems for which corrective actions taken by the contractor appear or were satisfactory.
MARGINAL:	Performance does not meet some contractual requirements. The contractual performance of the element or sub-element being assessed reflects a serious problem for which the contractor has not yet identified corrective actions. The contractor's proposed actions appear only marginally effective or were not fully implemented.
UNSATISFACTORY:	Performance does not meet most contractual requirements and recovery is not likely in a timely manner. The contractual performance of the element or sub-element being assessed contains serious problem(s) for which the contractor's corrective actions appear or were ineffective.

8. DOCUMENTING PERFORMANCE

a. The Government will document positive and/or negative performance. Any report may become a part of the supporting documentation for any contractual action and preparing annual past performance using CONTRACTOR PERFORMANCE ASSESSMENT REPORT (CPAR).

b. If contractor performance does not meet the Acceptable Quality level, the CO will inform the contractor. This will normally be in writing unless circumstances necessitate verbal communication. In any case the CO will document the discussion and place it in the contract file. When the COR and the CO determines formal written communication is required, the COR will prepare a Contract Report (CR), and present it to CO. The CO will in turn review and will present to the contractor's program manager for corrective action.

The contractor shall acknowledge receipt of the CR in writing. The CR will specify if the contractor is required to prepare a corrective action plan to document how the contractor shall correct the unacceptable performance and avoid a recurrence. The CR will also state how long after receipt the contractor has to present this corrective action plan to the CO. The Government will review the contractor's corrective action plan to determine acceptability. The CO will also assure that the contractor receives impartial, fair, and equitable treatment. The CO is ultimately responsible for the final determination of the adequacy of the contractor's performance and the acceptability of the Contractor's corrective action plan.

Any CRs may become a part of the supporting documentation for any contractual action deemed necessary by the CO.

9. COR AND CONTRACTOR ACKNOWLEDGEMENT OF QASP

SIGNED:

Dorian Breau/Contracting Officer Representative DATE

SIGNED:

CONTRACTOR NAME/TITLE DATE

CONTRACT REPORT				
1. CONTRACT NUMBER		2. REPORT NUMBER FOR THIS DISCREPANCY		
3. TO: <i>(Contracting Officer)</i>		4. FROM: <i>(Name of COR)</i>		
5. DATES				
a. CR PREPARED	b. RETURNED BY CONTRACTOR:		c. ACTION COMPLETE	
6. Issue Identified <i>(Describe in detail. Include reference to PWS Directive; attach continuation sheet if necessary.)</i>				
7. SIGNATURE OF COR			Date:	
8. SIGNATURE OF CONTRACTING OFFICER			Date:	
9a. TO <i>(Contracting Officer)</i>		9a. FROM <i>(Contractor)</i>		
10. CONTRACTOR RESPONSE AS TO CAUSE AND ACTIONS TO PREVENT RECURRENCE. <i>(Cite applicable quality control program procedures or new procedures. Attach continuation sheet(s) if necessary.)</i>				
11. SIGNATURE OF CONTRACTOR REPRESENTATIVE			Date:	
12. GOVERNMENT EVALUATION.				
13. GOVERNMENT ACTIONS				
14. CLOSE OUT				
	NAME	TITLE	SIGNATURE	DATE
CONTRACTOR NOTIFIED				
COR				

CONTRACTING OFFICER				
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