

Quality Assurance Surveillance Plan (QASP)

CAVHS – Hazardous and Universal Waste Services

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 shall coordinate changes with the contractor. Copies of the original QASP and revisions shall be provided to the contractor and Government officials implementing surveillance activities.

2. GOVERNMENT ROLES AND RESPONSIBILITIES

The following personnel shall oversee and coordinate surveillance activities.

a. Contracting Officer (CO) - The CO shall ensure performance of all necessary actions for effective contracting, ensure compliance with the contract terms, and shall safeguard the interests of the United States in the contractual relationship. The CO shall 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 Contracting Officer (CO): Joey Grismore
- Organization or Agency: Department of Veterans Affairs, Network Contracting Office (NCO) 16

b. Contracting Officer's Representative (COR) - The COR is responsible for technical administration of the contract and shall assure proper Government surveillance of the contractor's performance. The COR shall 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(S): Brian Green, 501-257-1137

3. CONTRACTOR REPRESENTATIVES

The following employees of the contractor serve as the contractor's program manager for this contract.

a. Program Manager –

b. Other Contractor Personnel –

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4. PERFORMANCE STANDARDS: Performance standards define desired services. The Government performs surveillance to determine if the contractor exceeds, meets or does not meet these standards.

| QASP | | | | | | |
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| # | PWS Paragraph | Indicator/Performance Standard | Standard for Quality Level | Acceptable Quality Level | Method of Surveillance ¹ | Incentive |
| 1 | 3.1 | The Contractor shall perform disposal services, which includes the collection, sorting, packaging, removal and disposal of hazardous, non-hazardous, pharmaceutical and universal wastes in the most environmentally preferred method (i.e. means of incineration, fuel blending and/or reclamation/recycling) in compliance with all existing laws and regulations of the United States including, but not limited to EPA Hazardous Waste Regulations in 40 CFR 260 et seq; EPA storage and disposal regulations in 40 CFR 761 et seq.; Arkansas Hazardous Waste Management Code (latest edition); Hazardous Material Transportation Regulations in 49 CFR 100 et seq.; and laws and regulations of any state, country, township or municipal subdivision thereof or other governmental agency which may be applicable to the removal, transportation and disposal of the waste | 100% | 100% | Periodic Inspection | Positive Past Performance Rating |
| 2 | 3.2 | The Contractor shall perform weekly removal of pharmaceutical waste from within the LR and NLR campuses (1x per week each). Waste will be on each ward in 2 (two) locations per ward (approximately 50 locations); Provide staff that will collect and segregate waste medications into hazardous, nonhazardous and P and U listed wastes (or as acceptable by federal and state regulations) and weigh each category, document, inventory the items and provide totals to the COR/GEMS Program manager weekly; provide 100 Containers for the wards – of at least 5 quart in-room counter balance containers or wall-mounted containers (not PGIII rated); 6, Containers for the pharmacy/secure sorting and storage area - 5-gallon Buckets DOT Approved; and monthly removal of pharmaceutical waste from both facilities. Staff must be trained to handle hazardous wastes and materials, narcotics and spills to include clean-up disposal | 100% | 100% | Periodic Inspection | Positive Past Performance Rating |
| 3 | 3.3 | The contractor shall obtain all permits, licenses, manifests and other forms of documentation required to comply with the above laws and regulations. Prior to commencement of contract performance Contractor shall provide Hazardous | 100% | 100% | Periodic Inspection | Positive Past Performance Rating |

¹ See “Methods of Surveillance,” paragraph 6 of this QASP, for additional methods of monitoring performance.

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| | | Waste Management Permit, Hazardous Waste Transportation Permit and information on the disposal Site. All manifests and permits shall be obtained and processed to all necessary agencies within the required notification period by the contractor. Upon contact from the Contracting Officers Representative (COR), the contractor shall pick up waste no less than six (6) times per year for each facility, unless otherwise approved by the Contracting Officer (CO). Exact dates will be agreed upon by the COR and the Contractor, subject to approval by the CO. | | | | |
| 4 | 5.1 | The Contractor shall perform all operations in a prudent, conscientious, safe, and professional manner. At a minimum, contractor personnel and equipment shall comply with all safety requirements set forth in applicable state, Federal, and local laws and regulations and shall ensure that its agents and employees perform the work in a safe manner. The contractor shall ensure that all personnel involved in handling and packaging hazardous waste be trained for the level of expertise required for the proper performance of the task and in the areas of chemical incompatibility, general first aid procedures, and spills. Handling and personnel protective equipment shall be provided by the contractor and be appropriate to ensure safe handling of the hazardous waste. All employees present at the work site shall be trained to use all protective equipment. Prior to commencement of contract performance, Contractor shall provide references and record of required training. | 100% | 100% | Periodic Inspection | Positive Past Performance Rating |
| 5 | 5.2 | The contractor shall have a medical surveillance program for personnel involved in the direct handling and /or exposure to the chemical waste or to the chemical's primary containers to detect and correct job-related injuries or conditions. Medical surveillance programs typically involve a medical history, an annual generated physical to assess an individual's capability to work using respiratory-protective equipment, blood and urine tests to assess the status of an individual's kidneys, liver, and nervous system and other laboratory tests for contaminants to which the person may be exposed; e.g.: heavy metals, organophosphate pesticides, etc | 100% | 100% | Periodic Inspection | Positive Past Performance Rating |
| 6 | 5.3 | The Contractor shall have required EPA and state registry for hazardous waste transport and shall also have verifiable records of good shipping practices which may be checked through local DOT authorities. The Environmental Protection Agency Uniform Hazardous Waste Manifest shall be used unless superseded by other requirements. | 100% | 100% | Periodic Inspection | Positive Past Performance Rating |

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| 7 | 5.4 | The Contractor shall use their environmentally sound methods of treating and destruction of wastes such as incineration and recycling or any other acceptable methods, in accordance with EPA and industry standards. Disposal shall be performed in such a manner as not to create conditions detrimental to public health or to constitute a public nuisance. The pick-up area where containers are placed shall be maintained in a clean, orderly, sanitary condition. Attention shall be paid to the prompt cleanup of oil and/or grease spills, either generated from the vehicles used to haul containers or because of container leakage. Contractor furnished containers shall be kept neat, in clean and sanitary appearances, and repaired or replaced as necessary | 100% | 100% | Periodic Inspection | Positive Past Performance Rating |
| 8 | 5.5 | The contractor shall provide the Certification of Disposal (COD) within six (6) months of material pick-up, or shall provide a written statement of status to the COR. | 100% | 100% | Periodic Inspection | Positive Past Performance Rating |
| 9 | 5.6 | The Contractor shall report all spills and personnel exposures during waste preparation, packaging or shipping to the COR. The contractor shall be responsible for, and bear the cost of, cleanup. The contractor shall be responsible for all spills and shall provide all labor, equipment, and personal protective equipment required or needed for the clean-up of hazardous waste. Clean up shall be considered complete only upon the final inspection and clearance by the COR. Such incidents shall first be reported by telephone to the Safety Office immediately following discovery and followed in writing to the Safety Office not later than five (5) days after initial telephone report. | 100% | 100% | Periodic Inspection | Positive Past Performance Rating |
| 10 | 5.7 | The Contractor shall provide spill response/clean-up as required by the Government. The Government will provide the Contractor with the location, size, name of chemical or material involved, proximity of sewers and urgency and any governmental agencies called. The Contractor has four (4) hours to be on site after the phone call has been placed. The Contractor shall provide appropriate personnel and equipment to mitigate and remove released hazardous materials. Coverage will be on a 24-hour, 7 day a week basis. | 100% | 100% | Periodic Inspection | Positive Past Performance Rating |
| 11 | 5.11 | During the entire period of performance under this contract the contractor shall procure and maintain the minimum required amount of insurance | 100% | 100% | Periodic Inspection | Positive Past Performance Rating |
| 12 | 5.12 | The contractor shall provide necessary personnel and all required materials to inventory, classify, sample, manifest, package, mark, label, and load the waste for transport. When repackaging is necessary the contractor shall be responsible for disposal of the original containers | | | | |

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| 13 | 5.13.1 | The contractor shall provide a minimum of six (6) performances each contract period consisting of a pick-up at each of the two facilities. The pick-up quantity will be at least the equivalent of one (1) fifty-five (55) gallon size lab packs per performance with an estimated quantity of 25 per contract period. All packaged waste shall be removed at one time between the hours of 7:00 AM and 3:00 PM, Monday through Friday, excluding Federal Holidays. The Contractor is required to contact the COR seven (7) days prior to coming to either facility | 100% | 100% | Periodic Inspection | Positive Past Performance Rating |
| 14 | 7.3 | The contractor shall submit requests for payment electronically to the VA's Tungsten Network. Invoices shall be paid monthly in arrears for all authorized work performed upon receipt of a properly prepared invoice. Invoices must include contract number, purchase order number, location inspected/treated, and date inspected/treated. Non-performance or late performance may result in delayed or reduced payment under this contract. | 100% | 100% | Periodic Inspection | Positive Past Performance Rating |

5. INCENTIVES/RATING STANDARDS

Incentives shall be based on exceeding, meeting, or not meeting performance standards.

6. METHODS OF QA SURVEILLANCE

Various methods exist to monitor performance.

- a. DIRECT OBSERVATION
- b. PERIODIC INSPECTION
- c. USER SURVEY
- d. VALIDATED USER/CUSTOMER COMPLAINTS
- e. INSPECTION
- f. PERIODIC SAMPLING
- g. RANDOM SAMPLING
- h. PROGRESS OR STATUS MEETINGS
- i. ANALYSIS OF CONTRACTOR'S PROGRESS REPORTS

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7. RATINGS

Metrics and methods are designed to determine if performance exceeds, meets, or does not meet a given standard and acceptable quality level. A rating scale shall be used to determine a positive, neutral, or negative outcome. The following ratings shall be used:

See above Acceptable Quality Level & Method of Surveillance located in QASP

8. DOCUMENTING PERFORMANCE

a. ACCEPTABLE PERFORMANCE

The Government shall document positive OR NEGATIVE performance. Any report may become a part of the supporting documentation for any contractual action.

b. UNACCEPTABLE PERFORMANCE

When unacceptable performance occurs, the COR shall work with the Contracting Officer (CO) inform the contractor. This will normally be in writing unless circumstances necessitate verbal communication. In any case, the COR shall document the discussion and place it in the COR file. To assure that the contractor receives impartial, fair, and equitable treatment under this contract, the COR will work with the contractor to increase performance to an acceptable level.

When the COR and CO determines formal written communication is required, the COR and CO shall prepare a Contract Discrepancy Report (CDR) and present it to the contractor's program manager.

The contractor shall acknowledge receipt of the CDR in writing. The CDR 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 CDR will also state how long after receipt the contractor must present this corrective action plan to the COR. The Government shall review the contractor's corrective action plan to determine acceptability.

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

9. FREQUENCY OF MEASUREMENT

a. Frequency of Measurement.

During contract performance, the COR will periodically analyze whether the negotiated frequency of surveillance is appropriate for the work being performed.

b. Frequency of Performance Assessment Meetings.

The COR shall meet with the contractor as needed to assess performance and shall provide a written assessment.

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Contractor

Brian C. Green
Contracting Officer Representative