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A COR's Guide to the Quality Assurance Surveillance Plan

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The quality assurance surveillance plan (QASP) establishes the methodology the government will use to monitor and evaluate contractor performance and ensure the objectives of the contract are met. It is required in the case of a performance-based service contract (PBSA), but also can be a useful tool for the government team in the case of many types of contracts for supplies as well as services. This is because a properly developed QASP provides guidance to all government contract oversight personnel on their contract surveillance roles and responsibilities. Therefore, the QASP should fully incorporate and spell out the what, when, and who relative to the performance of contract surveillance activities.

The guidance contained in the QASP is important to ensure key inspection or surveillance needs are met and inspection procedures that would unreasonably interfere with performance or be wastefully duplicative are avoided. A primary role of the contracting officer's representative (COR) is to exercise day-to-day oversight of the contractor's performance, either singly or working with a team of personnel. The QASP gives the COR a tool to ensure the government adequately and completely measures and documents contractor performance, helping to ensure the required results or service levels are being achieved to meet the agency's ultimate need.

Federal Acquisition Regulation (FAR) 37.601(b)(2) requires performance-based service contracts to include both measurable performance standards and a method of assessing contractor performance against those standards. The QASP provides a means for evaluating whether the contractor is meeting the performance standards identified in the performance work statement (PWS) or statement of objectives (SOO).

What does a QASP include?

The successful contractor's executable solution should be complemented by a QASP that the government can

follow to verify that the contractor's promised level of performance, as defined in the PWS, is achieved. FAR 46.4 provides general guidance on quality assurance surveillance processes and plans. A QASP should include:

- The applicable performance metrics
- A summary of the efforts/outputs to be surveilled, including identification of the specific PWS paragraph or section addressed by each surveillance activity
- The methodology used to evaluate performance
- Performance incentives and disincentives
- The names and organizations of the personnel responsible for the performance objective

Each element must be tied to the specific objectives from the government's performance requirement, i.e., the SOO or PWS. Sample QASPs are available through the Seven Steps to Performance-Based Acquisition [website](#). Sample QASPs and an ASI Government-developed template also are available [on the Virtual Acquisition Office](#).

Who develops the QASP?

According to FAR 37.604, the government may develop the QASP or may require offerors to submit a proposed QASP for consideration in development of the government's plan.

Under the traditional PWS approach, the government generally develops the QASP, which details how and when the government plans to survey, observe, test, sample, evaluate, and document contractor performance according to the PWS. The QASP is written concurrently with the PWS because what is written into the PWS influences what is put into the QASP. Concurrent development also helps ensure the PWS outputs are measurable.

Often the government provides a QASP as part of the solicitation package. However, this may force the contractor to create a solution that will meet the government's objective while fitting within the constraints imposed by the QASP. This approach not only can limit the offeror's

solution, but also may interfere with the government's ability to determine best value.

The government may solicit industry comments on a draft QASP through a draft request for proposals (RFP) or a request for information (RFI).

The alternative performance-based service acquisition process—use of a SOO—is the recommended methodology for defining the government's requirement in the solicitation. It turns the acquisition process around and requires competing contractors to develop the PWS (i.e., define their respective solutions), performance metrics and a measurement plan, and the QASP—all of which are evaluated before contract award.

Although we recommend allowing the contractor to propose the QASP, it remains the government's responsibility and right to accept and/or modify the proposed QASP (for example, identifying in-house personnel who will perform the QASP activities) and then to follow the plan.

Does the COR have a role in developing the QASP?

If the government develops the QASP, the COR should be a key participant in its development; if the QASP is developed by the offeror, the COR is a key player in its review and approval.

Regardless of who develops the QASP, it is important that the plan align with the approach the contractor has proposed. While some items—particularly complex or custom supply or service requirements—may dictate a specific type of surveillance/inspection at critical process steps, the QASP ordinarily should focus on the quality, quantity, and timeliness of the outcomes to be delivered by the contractor as opposed to the steps or procedures used to provide the products or services. Good performance measures are objective, cost-effective to implement, understandable, and, whenever feasible, explicitly tied to positive and negative incentives.

One note regarding the QASP: do not incorporate too many items for surveillance. Only major items that are directly tied to full performance under the contract should be included in the plan. If the QASP is too extensive, the government personnel may not be able to adequately perform the surveillance. Depending on the complexity of the contract, the QASP should contain just five to ten items.

What surveillance methods can the COR use?

Several surveillance methods can be used to measure contractor performance. Use of a particular method, or

combination of methods, will depend on task criticality, the surveillance period, performance requirements and standards, availability of quality assurance evaluators (if used in addition to the COR), surveillance/inspection costs in relation to task value/criticality, and available resources.

The Office of Federal Procurement Policy (OFPP) lists the following acceptable surveillance methods:

- **100 Percent Inspection:** This usually is most appropriate for infrequent tasks or tasks with stringent performance requirements, for example, where safety or health is a concern. With this method, performance is inspected/evaluated at each occurrence. One hundred percent inspection is too expensive to be used in most cases.
- **Random Sampling:** This generally is most appropriate for recurring tasks. With random sampling, services are sampled to determine if the level of performance is acceptable. Random sampling works best when the number of instances of the services being performed is very large and a statistically valid sample can be obtained. Computer programs may be available to assist in establishing sampling procedures.
- **Periodic Inspection:** This method, sometimes called "planned sampling," evaluates tasks selected on other than a 100 percent or random basis. It may be appropriate for tasks that occur infrequently, and where 100 percent inspection is neither required nor practicable. A predetermined plan for inspecting part of the work is established using subjective judgment and analysis of agency resources to decide what work to inspect and how frequently to inspect it.
- **Customer Input:** Although usually not a primary method, this is a valuable supplement to more systematic methods. For example, when random sampling indicates unsatisfactory service, customer complaints can be used as substantiating evidence. In certain situations where customers can be relied on to complain consistently when the quality of performance is poor—for example, dining facilities or building services—customer surveys and customer complaints may be a primary surveillance method, and customer satisfaction an appropriate performance standard. In all cases, complaints should be documented, preferably on a standard form.

What are some good practices or suggestions for implementing the QASP?

The following are good practices and suggestions for implementing the QASP:

- Ensure resources are available to perform the surveillance

- Ensure the relationship between the contractor and the COR is conducted as a partnership in success, grounded in full and open communication, and not an adversarial “gotcha” type relationship
- Ensure a good working relationship between the contracting officer and the COR with frequent and effective communications
- Ensure the COR recognizes his or her limitations (a COR is not a contracting officer and can give no direction to the contractor)
- Ensure the documentation supports any evaluation made by the COR of contractor performance, with specific reference to contract requirements and to the QASP

Is the QASP incorporated into the contract?

There are no hard and fast rules with respect to incorporating the QASP into the contract. Some agencies incorporate the QASP and some do not. There are pros and cons to each approach.

The QASP contains the methodology used by the government to evaluate performance. A QASP that is not part of the contract is not directly enforceable. Therefore, the required performance levels and requirements must be measurable and fully defined in the performance requirements summary, which is part of the contract—generally as a critical portion of the PWS.

To maximize its benefit and effectiveness as a contract administration/management tool, a QASP should be a living document. Plans that are not periodically reviewed and updated may become obsolete and no longer reflect the current scope of services and associated surveillance considerations for their respective contracts, particularly those with longer periods of performance. As a result, the government would have less assurance that surveillance activities conducted are sufficient to ensure the government receives and only pays for the needed quality of services/supplies as defined in the contract.

Incorporating the QASP makes it enforceable, which some perceive as an advantage, but in exchange the gov-

ernment gives up flexibility. Changes to the plan must be made through bilateral modification, which requires contractor approval and may create the potential for dispute. Since the QASP is the means the government uses to verify it is getting the performance agreed to in the contract, it may not make sense to have to ask the contractor’s permission to change the way in which surveillance is performed.

If the QASP is not incorporated into the contract, may it be shared with the contractor?

Yes. We recommend sharing the QASP as it contains valuable information about how the contract will be managed from the government’s perspective. That said, there are no specific rules about sharing a QASP that is not incorporated in the contract with the contractor. We believe the contractor must know how to be successful, so providing the QASP is one way of communicating to the contractor how the government will be conducting its surveillance. Whether or not the QASP is provided, surveillance methods should be discussed with the contractor at postaward orientation to confirm they are fully understood.

Key Takeaways

- The QASP provides an established method to measure and verify that the government is getting the performance agreed to in the contract. Good performance measures are objective, cost-effective to implement, understandable, and, whenever feasible, explicitly tied to positive and negative incentives.
- Either the government or the contractor may develop the QASP. If the contractor develops the QASP, it must be approved by the government. Regardless, the COR should be directly involved in its preparation and/or approval.
- The QASP may be provided to the contractor to ensure complete understanding of the surveillance methods the government will use. ♦

Endnote

1 “A Guide to Best Practices for Performance-Based Service Contracting,” Office of Federal Procurement Policy, October 1998; <https://www.acquisition.gov/bestpractices/bestppbsc.html>.

Other Relevant Quick Reference Guides

“Top 10 Things Every COR Should Do – Postaward”

“A COR’s Guide to Evaluating Contractor Performance”

“A COR’s Guide to the COR File”

“A COR’s Guide to Inspection and Acceptance”

Viewable on the Virtual Acquisition Office™ (VAO) website (www.GoToVAO.com) under “Publications.”

The *Quick Reference Guide for CORs* provides a summary overview of a key topic in acquisition, with a focus on the COR perspective.

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