

**NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
(NASA)**

**GOVERNMENT QUALITY ASSURANCE
SURVEILLANCE PLAN**

**SPECTRUM MANAGEMENT, ENGINEERING SERVICES AND
PROGRAMMATIC RESOURCES MANAGEMENT SUPPORT
(SMESPRMS)**

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(QASP)**

1 INTRODUCTION

This Government Quality Assurance Surveillance Plan (QASP) is pursuant to the requirements listed in the Statement of Work (SOW) entitled **Spectrum Management, Engineering Services and Programmatic Resources Management Support**. This plan sets forth the procedures and guidelines NASA HQ Space Communications & Navigations will use in ensuring the required performance standards or services levels are achieved by the Contractor.

This plan is applicable to all services performed by the Contractor(s). Throughout this QASP, the term Contractor is used. In terms of this plan, it should be known that unless explicitly stated, this term is applicable to both the Contractor and any and all subcontractors.

1.1 Purpose

The purpose of the QASP is to describe the systematic methods used to monitor performance and to identify the methodologies and resources to be employed. The QASP provides a means for evaluating whether the Contractor is meeting the performance standards/quality levels identified in the SOW and the Contractor's quality control plan (QCP), and to ensure that the Government receives the level of services contracted.

This QASP defines the roles and responsibilities of all members of the surveillance team, defines the process the Government expects to follow to obtain data, evaluate the Contractor, and determine if Contractor's performance conforms to the contract requirements.

The QASP is intended to be a "living" document from which resources and activities will evolve during the life of the contract, and can be updated and changed unilaterally by the Government at any time during the contract.

1.2 Contract Goals and Objectives:

The HQ goal for this Spectrum Management, Engineering Services and Programmatic Resources Management Support contract is to support the Space Communication and Navigation Program implement its responsibilities. These responsibilities can be divided in two areas: Spectrum Management and Program Management. Within the Spectrum Management area, the SCaN Program is the designated authority for the Agency to support the Agency and the U.S. commercial space communication industry for spectrum allocations and assignments through

leadership and coordination with national and international spectrum management organizations. Within the Program Management area, the SCaN Program is the designated authority for maintaining operational readiness of space communication and navigation capability to NASA missions and enhancing such capability through maturation of technology, development of new systems and leading the development of international standards in space communication and navigation.

The purpose of this cost plus fixed fee contract is to provide professional expertise in the disciplines of regulatory, engineering, management accounting and public outreach. The professional expertise is implemented in the following services and activities:

Core services and activities:

- A. Domestic and International Spectrum Management and Regulatory Services
- B. Programmatic and Management Accounting Tools and Services
- C. Web presence and applications, Education and Public Outreach Activities

IDIQ services and activities:

- D. Space Communications and Navigation Engineering Services

1.3 Performance Management Approach

The SOW 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 NASA HQ’s Space Communications & Navigation Office ensures to monitor and manage the Contractor’s performance to ensure the expected outcomes or performance objectives communicated in the SOW 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.

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 or security. 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.

1.4 Performance Management Strategy

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 SOW. The Contractor will develop and implement a performance management system with processes to assess and report its performance to the designated Government representative. This QASP enables the Government to take advantage of the Contractor's QC program (QCP).

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 Contractor will be responsible for making required changes in processes and practices to ensure performance is managed effectively.

2 ROLES AND RESPONSIBILITIES

General organization and responsibilities of the Surveillance Team are as follows:

2.1 General

The activities detailed in this plan will be supported and performed by a group of individuals, many with differing levels of responsibilities, but all maintaining a level of consistency in terms of the surveillance strategy, approach, and activities in general. The specific entities and their associated responsibilities/input to the surveillance activities on the Spectrum Management, Engineering Services and Programmatic Resources Management Support contract are described in the following paragraphs.

2.2 Surveillance Team

2.2.1 Contracting Officer

The NASA GSFC Contracting Officer (CO) is responsible for monitoring contract compliance, contract administration, and for resolving any differences between the observations documented by the NASA GSFC Contracting Officer's Representative (COR) and the Contractor. The CO will designate one full-time COR as the Government authority for performance management.

As required by FAR 42.1502(c), the CO will complete an annual Contractor performance assessment report for this contract using the Contractor Performance Assessment Reporting System (CPARS) evaluation, which will also be reviewed by the Contractor, and become a part of the Past Performance Information Retrieval System (PPIRS).

2.2.2 Contracting Officer's Representative

The NASA HQ COR is designated in writing by the NASA GSFC CO to act as his or her authorized representative to assist in administering the contract. The COR's limitations of authority are contained in the NASA Form 1634, COR Delegation. 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, authorize any contractual changes on the Government's behalf, or in any way direct the Contractor to operate in conflict with the contract terms and conditions. Any changes that the Contractor deems may affect contract price, terms, or conditions shall be referred to the CO for action. The COR and the NASA HQ Technical Monitors (TMs) will have the responsibility for monitoring, inspecting, and evaluating the Contractor's work performance. Government surveillance may occur under the inspection of services clause for any service relating to the contract.

The COR will assist the CO in the completion of the contract's annual performance assessment report using CPARS.

2.2.3 Technical Monitors

The NASA HQ TMs are individuals appointed by the COR for the oversight of specific technical work under the contract. TMs provide detailed technical oversight of the Contractor's performance and report findings to the COR in a timely, complete and impartial fashion. While the TMs may serve as a direct conduit to provide Government guidance and feedback to the Contractor on technical matters, the TMs are not empowered to make any contractual commitments, authorize any contractual changes on the Government's behalf, or in any way direct the Contractor to operate in conflict with the contract terms and conditions.

3 METHODOLOGIES TO MONITOR PERFORMANCE

3.1 Surveillance Techniques

In an effort to minimize the performance management burden, simplified surveillance methods will be applied to the insight areas described in Section 4 of this document to evaluate Contractor performance to determine whether the performance standards/service levels contracted have been met. The primary methods of surveillance are described below.

3.1.1 Communications

Communications is a general surveillance activity. Communications is a two-way process and includes both written and oral communication. Examples of written communications activities that may be used in conducting surveillance include:

- a. Exchanges from the RII Contractor to the Government of plans, procedures, quality records, reports, etc., and/or provision of read-only access to repositories which retain these items.
- b. Exchanges from the Government to RII Contractor of letters, reports, review results, etc.
- c. Ad hoc information submitted by NASA HQ COR and/or TM(s) to the CO related to the RII Contractor's Electronic mail.

Examples of oral communications activities that may be used in conducting surveillance include:

- a. Informal telephone calls, teleconferences.
- b. Informal verbal inquiries, discussions, engineering consultations.
- c. Working group meetings, technical/status briefings, progress reviews, technical information meetings, and formal and informal reviews.
- d. Informal discussions.

3.1.2 Management Reviews and Reporting

Examples of management review and reporting activities that may be used in conducting surveillance include:

- a. Formal, process, and progress reviews
- b. Review of contract deliverables and documentation
- c. Documentation of problems, issues and concerns
- d. Data collection reporting

3.1.3 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 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 COR. The COR will accept those customer complaints, perform an investigation, and notify the CO and Contractor, accordingly. Customer feedback may also be obtained either from the results of formal customer satisfaction surveys or from random customer complaints.

4. SURVEILLANCE ACTIVITIES

4.1 General

There exist specific insight areas that the Government and the RII Contractor shall concentrate on during applicable stages of contract performance. Each of these insight areas and the Government's expectations for these areas are described in Table 1.

Table 1. Surveillance Insight Areas

Area of Risk Identified	Impact to Government	Surveillance Team Activity
Information Technology (IT) Security	Computer Security: Potential corruption and loss of data; disruption of schedule	Annual review of IT security plans and contingency test results and controls. Review compliance with policies, firewalls, protection software, vulnerability scans and external systems.
Safety	Loss of work-time or equipment, with schedule impact	Evaluate compliance with the Contractor's Safety and Health Plan and safety requirements.
Technical Documentation and Control	Loss of knowledge of processes and results	Periodically sample documents (review for accuracy) and ensure they are under proper control.
Process Controls	Degradation of work products; increase in safety risk; potential schedule impact	Periodically monitor the Contractor's adherence to key processes, their internal audit schedules/results, and QCP.
Continuous Risk Management	Technical, schedule, safety, and program success	Periodically ensure that the Contractor is performing a Continuous Risk Management program that identifies, analyzes, tracks, mitigates, controls and reports on related risks.
Quality Management	Technical, schedule, safety, and program success	Monitor the Contractor's internal and external audits for compliance with the Contractor's established QCP.
Quality of Work Force	<p>a. Inability to fill positions and meet commitments on scheduled deliverables or science results, including NASA Performance Metrics</p> <p>b. Additional cost resulting from decreased productivity of other staff reliant on unfilled positions</p> <p>c. Lack of expertise or inadequate experience in key areas</p> <p>d. Delayed data delivery and/or poor data quality</p>	<p>a. Monitor time required to fill positions, and evaluate Contractor efforts and approaches used to fill vacancies.</p> <p>b. Assess Contractor efforts to train staff in areas of required expertise.</p> <p>c. Evaluate Contractor technical performance</p> <p>d. Monitor progress and timeliness and evaluate the quality of data received.</p>
Schedule	Services not provided in a timely manner can impact project schedule	Monitor progress via management reviews and reporting.

Organizational Conflicts of Interest (OCI) Avoidance	Potential restrictions, ineligible to perform, and/or unfair competitive advantage on future work	Monitor submittal, enforcement and compliance with Contractor OCI Avoidance Plan.
Environmental	Environmental damage to local and remote sites	Conduct periodic inspections to ensure compliance with environmental requirements.
Export Control	Violation of International Traffic in Arms Regulations (ITAR)	Ensure the Contractor has Technical Assistance Agreements as required by the NASA Export Control Program.

4.2 Surveillance Team Activities

The surveillance team members will participate in review meetings, if applicable. They will provide support, as necessary, with the review of technical requirements, flow-down of requirements, and inspection/test activities. They will also maintain insight into the Contractor's compliance with relevant deliverables submitted under the contract and services performed. When the Government has concerns regarding Contractor performance, surveillance team members may conduct independent audits of the Contractor's activities, processes, documentation and data, in contract to provide assurance that the program is being implemented according to all requirements and performance standards. These audits will normally be conducted with advance notification and coordinated with the Contractor. However, the Government reserves the right to conduct unscheduled audits when evidence indicates that Contractor performance is deficient.

The following selected surveillance team activities will be performed by various surveillance team members during applicable stages of contract performance:

4.2.1 Work Area/Floor Checks

The surveillance team members will make a physical inspection of the Contractor's onsite work annually. In addition, the COR and TMs may make informal inspections, as required. These inspections are made to assure compliance with NASA HQ regulations regarding:

- a. All Contractor employees have a HQ NASA identification badge.
- b. The total number of Contractor employees provided onsite office space.
- c. The Contractor's office space is physically separated from the Government's workspace and is properly identified by a sign with the contractor employee & company's name clearly displayed.
- d. The names and locations (buildings/room numbers) of the Contractor employees match their monthly onsite Personnel Identity Verification (PIV) Report.

- e. The Contractor knows who the building's Facilities Operation Manager (FOM) is, and what his/her functions are.
- f. The Contractor is familiar with the building emergency evacuation procedures.
- g. The Contractor employees are aware that work area checks may be conducted at any time.
- h. The Contractor is familiar with NASA Policy Directives and Procedural Requirements as it pertains to ANSI/ISO/ASQ Q9001:2000 or AS 9100 governing onsite performance. These procedures can be accessed via the following NASA Online Directive Information System Website: <http://nodis3.gsfc.nasa.gov/>
- i. The Contractor is aware of the appropriate protection procedures for handling Government planning data and other Contractor confidential or financial data.
- j. The Contractor employees are aware that the use of Government telephones is for official business only.
- k. The Contractor employees are following the proper Checkout Procedures when leaving NASA (e.g., returning PIV card (badges)). The PIV data forms will be checked against the monthly Onsite Reports to identify exiting employees.
- l. The Contractor employees are aware of the NASA IT Security compliance requirements and shall complete the HQ Annual IT Security Training.

In addition to checking conformance with NASA HQ regulations listed above, the COR and TMs may make periodic checks of the Contractor's workspace to assess adequacy of facilities, equipment, and materials.

4.2.2 Work Review and Performance Monitoring

The COR, with the assistance of the TMs, will perform the following functions to evaluate the Contractor's performance:

- a. Reviews specific SOW areas with the TMs to assure that work being performed and deliverables are in accordance with the technical requirements of the SOW and timely.
- b. Reviews the Contractor's monthly Progress Report for accuracy and completeness. Consult with TMs, as necessary, to assess the fidelity of reports.
- c. Meets as necessary with the Contractor's Program Manager to discuss overall contract management and performance, and review staffing and schedule issues.

- d. Certifies the Contractor's invoices for payment in accordance with GSFC procedures.
- e. Perform QA inspections and QA witnessing/monitoring of tests as necessary.
- f. In the event of a discrepancy in the Contractor's performance, the COR promptly notifies both the CO and the Contractor's Program Manager and arranges a meeting to rectify the situation.

4.2.3 Government Property Administration

The COR, with the assistance of the TMs, will carry out the following functions.

- a. Validate that all Installation-Accountable Government Property (IAGP) is being properly utilized and maintained.
- b. Conduct periodic inspection of equipment and its location, compared to the data on the property records.
- c. Validate that all existing and new equipment is properly tagged.
- d. Validate that Government property is made available in accordance with the terms of the contract.
- e. Validate that the Contractor does not modify or provide additional facilities, plant equipment, or real property at NASAHQ, except as specifically required by the contract, or as directed or approved in writing by the CO.

4.2.4 Performance Monitoring

The COR will ensure that employer–employee relationships do not occur between Government and Contractor personnel. This is achieved if the following is adhered to:

- a. Only the Contractor interviews prospective employees.
- b. Only the Contractor's Program Manager assigns work directly to the employees.
- c. Only the Contractor approves timecards and absences.
- d. Government personnel do not interfere with the Contractor regarding personnel and administrative prerogatives.

4.2.5 Safety and Health

The responsibility for meeting all safety requirements rests with the Contractor. Surveillance team safety engineers and technical personnel will review Contractor-generated hazard analyses, safety compliance data packages or other safety-related documentation, as appropriate; to help ensure all safety requirements have been satisfied. Surveillance team personnel will also maintain insight into the Contractor's safety activities through the review of the Contractor's submitted Health and Safety Plan, and updates, as required by this contract (CFR 48 1852.223-70 (April 2002)).

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