RFP NNG17611358R

GOVERNMENT QUALITY ASSURANCE SURVEILLANCE PLAN

RANGE OPERATIONS CONTRACT II

CONTRACT NO. TBD

Provided by
NASA Wallops Flight Facility
Range and Mission Management Office
Wallops Island, Virginia 23337

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Abbreviations, Acronyms, and Initializations

AETD	Applied Engineering and Technology Directorate
ANSI	American National Standards Institute
ASQC	American Society for Quality Control
CCB	Configuration Control Board
CMMI-DEV	Capability Maturity Model Integration for Development
CO	Contracting Officer
COR	Contracting Officer's Representative
CPARS	Contractor Performance Assessment Reporting System
DCMA	Defense Contract Management Agency
FOM	Facilities Operation Manager
GFP	Government Furnished Property
GPR	Goddard Procedural Requirements
GSFC	Goddard Space Flight Center
IAGP	Installation-Accountable Government Property
ISO	International Organization for Standardization
IPT	Integrated Product Team
IT	Information Technology
ITAR	International Traffic in Arms Regulations
NASA	National Aeronautics and Space Administration
NPR	NASA Procedural Requirements
OCI	Organizational Conflict of Interest
PIV	Personnel Identity Verification
PPIRS	Past Performance Information Retrieval System
QA	Quality Assurance
QAP	Quality Assurance Plan
QMS	Quality Management System
QASP	Quality Assurance Surveillance Plan
RMMO	Range and Mission Management Office
ROC	Range Operations Contract
RRS	Research Range Services
SOW	Statement of Work
SSOPD	Suborbital and Special Orbital Projects Directorate
TO	Task Order
UAS	Unmanned Aircraft System
WFF	Wallops Flight Facility

Section 1: Introduction

1.1 PURPOSE

The purpose of this Government Quality Assurance Surveillance Plan (QASP) is to define the overall approach the National Aeronautics and Space Administration (NASA) Goddard Space Flight Center (GSFC) intends to use to monitor and survey Contractor onsite performance under the Range Operations Contract II, Contract No. TBD. This QASP defines the process the Government expects to follow to obtain data, evaluate the Contractor, and determine if contract performance conforms to contract requirements. The goal is to balance the level of Government surveillance with perceived impacts and risks associated with performance hereunder. The QASP can be changed unilaterally by the Government at any time during the contract.

The GSFC plans to utilize a surveillance team to evaluate Contractor performance and direct surveillance activities. The team will establish and rely on objective and subjective performance metrics based on the contract Statement of Work (SOW) and task orders issued thereunder to evaluate Contractor performance against requirements.

The QASP is a Government-developed surveillance tool prepared in accordance with FAR 46.601 and NFS 1846.401. It is not part of the contract, per NFS 1846.401, but provided to the Contractor for informational purposes only.

1.2 SCOPE

This QASP identifies the program requirements, strategies, resources, review and control processes, surveillance activities, and metrics for continuous measurement of Contractor performance. This plan provides effective and systematic surveillance methods for evaluating the Contractor services, processes, and products provided under this contract. The Government may evaluate work at any time during the Contractor's work performance.

The intent of the QASP is to ensure that the Contractor performs in accordance with acceptable quality levels and the Government receives the quality of services and products called for in the contract. This QASP does not detail how the Contractor accomplishes the work. Rather, the QASP is based on the premise that the contractor, not the Government, is responsible for managing its quality controls and ensuring that performance meets the terms of the contract. The role of the Government is quality assurance to ensure contract standards are achieved.

The QASP is intended to be a "living" document from which resources and activities will evolve from one phase to another during the life of the contract, and will be updated as required and defined in this document.

This plan is applicable to any service or product provided, as well as all areas in which work is being performed by the ROC II Contractor(s). Throughout this QASP, the term ROC II Contractor is used. In terms of this plan, it should be known that unless explicitly

stated, this term is applicable to both the ROC II Contractor and any and all subcontractors.

The surveillance program shall be a collaborative and integrated effort that includes all areas of contract management, including the following:

a. Engineering & Technology
b. Quality Assurance
c. Procurement/Subcontracting/Purchasing
d. Finance
e. Property
f. Environmental
g. Export Control
h. Safety and Health
i. Security

1.3 PROGRAM DEFINITION AND CONTRACT DESCRIPTION

1.3.1 Program Background and Definition

The NASA Research Range Services (RRS) Program is executed by the Range and Mission Management Office (RMMO), Code 840 and supports NASA's mission objectives by providing tracking, telemetry, meteorological, optical, and command and control services for flight vehicles including orbital and suborbital rockets, aircraft, satellites, balloons and Unmanned Aircraft System (UASs), providing real-time display and capture of mission-specific flight, payload and science data.

RRS Program staff also provides sustaining engineering and project management services. Sustaining engineering services include verifying and validating instrumentation performance, assisting in determining and correcting root causes to system failures, implementing minor to moderate system upgrades and enhancements, and performing link analysis calculations to ensure required radar, telemetry, and command support of missions.

1.3.2 Contract Goals and Objectives

The GSFC WFF RMMO goal for this ROC II contract is to demonstrate flexibility and adaptability in meeting the aerospace research needs of the United States. Wallops Research Range embodies key characteristics that enable the pursuit of opportunities in an evolving aerospace environment. Opportunities which include: the emergence of commercial space sector capabilities to serve U.S. civil and national security needs for low earth orbit transportation, a recommitment and focus on low cost and efficient operations, the need to develop technologies for integration of Unmanned Aircraft Systems (UAS) into the national airspace, and expanding science and technology market positions for the Wallops Range as a launch, test, and evaluation facility.

The purpose of this Indefinite Delivery Indefinite Quantity, Cost-Plus-Fixed-Fee contract, is to provide Wallops Range instrumentation operations and maintenance; support

services; training; command, control, communications, information and computer systems services; testing, modifying, installing, and operating communications and electronic systems, ground support systems, and spacecraft and launch vehicle processing systems at launch facilities, spacecraft processing facilities, launch vehicle processing facilities, launch control centers and test facilities; operating and maintaining suborbital launch systems; and flight and ground systems technology development engineering services.

1.4 GUIDING DIRECTIVES

The guiding documents for this surveillance effort include the Contract SOW, performance standards, deliverable requirements, and requirements as specified in individual Task Orders. The contract identifies general requirements and the Task Orders identify specific objectives, results, and requirements.

1.5 REFERENCES AND APPLICABLE DOCUMENTS

The following documents external to the contract affect the surveillance approach:

a. American National Standard Quality Systems - Model for Quality Assurance (QA) in Design, Development, Production, Installation and Servicing, American National Standards Institute (ANSI)/International Organization for Standardization (ISO)/American Society for Quality Control (ASQC) Q9001: 2000
b. American National Standard Quality Management System - Requirements, ANSI/ISO/ASQ Q9001: 2000
c. Capability Maturity Model Integration® for Development (CMMI®-DEV), Maturity Level 2/Capability Level 2
d. NASA Procedural Requirements (NPR) 7120.4, NASA Engineering and Program/Project Management Policy
e. NPR 7120.5, NASA Space Flight Programs and Project Management Requirements
f. NPR 7120.7, NASA Information Technology and Institutional Infrastructure Program and Project Management Requirements
g. NPR 7120.8, NASA Research and Technology Program and Project Management Requirements
h. NPR 7150.2, NASA Software Engineering Requirements [must include if CMMI® applies]
i. NPR 8735.2A, Management of Government Quality Assurance Functions for NASA Contracts
j. Goddard Procedural Requirements (GPR) 5100.2, Supplier Performance Evaluations
k. GPR 5100.4, Supplier Assessment Process
l. GPR 7120.4, Risk Management
m. GPR 7123.1, System Engineering
n. GPR 8700.6, Engineering Peer Reviews

Section 2: Surveillance Strategy and Approach

2.1 GENERAL

There exists a wide-ranging spectrum associated with surveillance, ranging from oversight to insight. The strategy and approach to surveillance by GSFC WFF RMMO for ROC II contract, as detailed in this plan, is one that concentrates primarily on insight as opposed to oversight. However, some limited areas do exist where oversight is conducted either via GSFC exercising approval authority on contract-deliverable documentation in critical areas of performance or participation in the Contractor's configuration management process. Regardless, the Government reserves the right to initiate additional surveillance activities (insight or oversight) on an ‘as-needed’ basis, based upon circumstances and data collected (adverse trends, negative data points, lack of corrective action, etc.) via the surveillance activities defined in this plan. As applicable, any and all oversight activities would be communicated and coordinated with the Contractor and subsequently documented within this QASP.

The level of risk and the impact of failure define the type of surveillance to be conducted. Clearly, if the impact of failure is minor and the level of risk is low, only a small amount of insight-driven surveillance would normally be needed. Conversely, if the impact of failure could be significant and the level of risk is high, more extensive surveillance (including possible oversight surveillance) is warranted.

This insight-based approach to surveillance will utilize and leverage the ROC II Contractor's Quality Assurance Plan (QAP) and Quality Management System (QMS). Definitions, requirements, and specifications contained in the contract, SOW, and referenced documents will establish a baseline for the surveillance activities. This insight-based approach will seek objective evidence and data that the ROC II Contractor's program and processes are functioning as intended in accordance with the terms of the contract. The focus will be on trusting the ROC II Contractor's QMS, and verifying that the ROC II Contractor is performing according to the policies, procedures, plans, and processes defined by their QMS.

GSFC will strive to use an insight-driven surveillance approach throughout the performance of this contract. The overall surveillance goal will be to obtain objective evidence and data that enable the Government to determine whether the Contractor's program and processes are functioning as intended in accordance with the terms of the contract. The focus will be on prevention rather than detection, i.e., emphasizing controlled processes and methods of operation, as opposed to relying solely upon inspection and test to identify problems.

This insight-based approach to surveillance as applied to the contract will result in lower levels of Government intervention, thus allowing the ROC II Contractor to assume full accountability and responsibility for integrity of processes. Although less obtrusive than

oversight, this insight-based approach to surveillance continues to provide the Government with visibility into the ROC II Contractor's programmatic processes, technical processes, progress, and issues at all levels.

As required by FAR 42.1502 and GPR 5100.2, Supplier Performance Evaluations, the Contracting Officer (CO), in collaboration with the Contracting Officer's Representative (COR), will annually complete a 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 SURVEILLANCE ACTIVITY LIMITATIONS AND GUIDANCE

2.2.1 General

Surveillance of ROC II contract, will be conducted on a non-interference basis and in a manner that will not unduly delay work being performed by the ROC II Contractor.

2.2.2 Insight

Insight is an assurance process that uses performance requirements and, if definable, performance metrics to ensure process capability, product quality and end-item effectiveness. Insight relies on gathering a minimum set of product or process data that provides adequate visibility into the integrity of the product or process. The data may be acquired from Contractor records, usually in a non-intrusive parallel method.

Insight as applied to this contract will result in lower levels of Government surveillance and allow the Contractor to assume increased responsibility and accountability for the integrity of processes. Insight will rely heavily on evaluating planned contract deliverables, performance standards, and existing Contractor procedures and working documents, if available.

2.2.3 Oversight

Oversight as applied to this contract will result in higher levels of Government surveillance. The Government will gather information pertaining to the Contractor's process through on-site involvement and/or inspection in the process and will monitor the process itself. The Government's involvement in the Contractor's performance, through oversight, will be determined necessary by the COR.

2.3 SURVEILLANCE ORGANIZATION AND RESOURCES

2.3.1 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. Specific entities supporting the ROC II contract surveillance activities include the identified NASA personnel; ROC II Contractor QA Department personnel (including their subcontractors); and contractor support services and delegated agency personnel, if

applicable. Each of these entities and their associated responsibilities/input to the surveillance activities on ROC II contract are described in the following paragraphs.

2.3.2 Surveillance Team

2.3.2.1 General Organization and Responsibilities

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

a. The surveillance team will be composed of key ROC II Government personnel. All surveillance activities will be implemented using NASA and contractor support personnel, and a delegated agency if applicable at the discretion of NASA CO & COR (e.g., Defense Contract Management Agency, and/or a surveillance support contractor(s). The surveillance team may be composed of:

   1. GSFC Procurement Personnel (i.e., CO, Contract Specialist)
   2. GSFC's Code 840 support personnel (i.e., COR, Task Monitors/Technical Monitors and Resource/Financial Analysts)
   3. GSFC WFF Safety (Code 803) & Health (Code 200) and Security (Code 200) personnel (both physical and Information Technology (IT) Security);
   4. GSFC Property Administrator personnel;

b. The team's primary purpose will be to provide direction for contract surveillance activities and to serve as the Government's focal point in reviewing and evaluating overall Contractor performance under the ROC II contract. The team will obtain information from various sources, including deliverable documents from the Contractor, communications with the Contractor, and reports by other personnel or representatives (e.g., Task Monitors and Technical Monitors), GSFC Health & Safety personnel, DCMA who interact with the Contractor.

c. NASA/GSFC has the responsibility for independently assuring that the ROC II Contractor's operations meet NASA's contract performance requirements and enable success. As such, surveillance team members will have open access to all areas in which this contract is being performed and will interface directly with their ROC II Contractor counterparts. Government expertise with regards to the ROC II contract may be applied in the form of technical consultants and/or providing assistance at working group meetings, design/development and specification reviews, review board meetings, surveys, audits, program reviews, and as in-plant representatives. The team will document problems, concerns and issues, and take note of Contractor accomplishments. They will collect performance metric data, where applicable, and will participate in Contractor review meetings, such as those described herein. Information will flow from individual team members through the COR to surveillance team representatives, who will present issues and achievements at surveillance team meetings. Information gained from these formal and informal exchanges of ideas and

collection of data will be compiled and evaluated as a continuous measure of contract performance.

d. All available information will be evaluated, and any action by GSFC will be determined based upon the scope and magnitude of any particular issue or problem. The surveillance team chairperson, the COR, will formally notify the CO of situations where it is perceived that the Contractor has failed to take prudent corrective or preventive action, of situations that increase risk, or of findings of continued contractual non-compliance.

2.3.2.2 ROC II Contracting Officer

ROC II CO responsibilities are as follows:

a. The CO is responsible for ensuring performance of all necessary actions for effective contracting, ensuring compliance with the terms of the contract, issuing task orders, and safeguarding the interests of the United States in its contractual relationships. Within the surveillance area the CO takes inputs from the Program/Project managers, COR, Technical/Task Monitors, GSFC Safety and Mission Assurance Office, and others to establish the detailed surveillance requirements to be performed by NASA personnel, delegated to another Federal agency via a GSFC Letter of Delegation, or to be performed under contract by a surveillance support contractor. 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.

b. The CO will complete an annual Contractor performance assessment report using the CPARS that will also be reviewed by the Contractor and become a part of the PPIRS.

2.3.2.3 ROC II Contracting Officer's Representative

ROC II COR responsibilities are as follows:

a. The COR is designated in writing by the CO to act as his or her authorized technical representative to assist in administering the contract. The COR monitors the technical work performed under the contract, evaluates Contractor performance, serves as the primary interface for the Contractor and the CO for all technical matters, reports on contract status to Program/Project Management, and recommends corrective action when necessary. 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 the contract [or order] value, terms, or conditions shall be referred to

the CO for action. The COR's limitations of authority are contained in the NASA Form 1634, COR Delegation.

b. The COR assumes full responsibility for directing the surveillance activities identified in this plan. The COR (with assistance as requested from the CO) also trains Task Monitors and Technical Monitors on procedures for evaluating contractor performance.

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

2.3.2.4 ROC II Task Monitors

Task Monitors are individuals appointed by the COR for developing Task Orders, reviewing the Contractor's Task Plans and Task Order reports, and monitoring Task Order performance. Task Orders will include quantitative metrics, as appropriate. Task Monitors provide detailed technical oversight of the Contractor's performance and report findings to the COR in a timely, complete, and impartial fashion. The Task Monitor is also responsible for developing requirements of the task and performing an initial technical evaluation of the Contractor's task plan, subject to final approval and signature by the COR. While the Task Monitors may serve as a direct conduit to provide Government guidance and feedback to the Contractor on technical matters, the Task Monitors are not empowered to make any contractual commitments or to authorize any contractual changes on the Government's behalf.

2.3.2.5 ROC II Technical Monitors

Technical Monitors are individuals appointed by the COR for the oversight of specific technical work on the contract and in some cases may also be the Task Monitor. Technical Monitors provide detailed technical oversight of the Contractor's performance and report findings to the COR in a timely, complete and impartial fashion. While the Technical Monitors may serve as a direct conduit to provide Government guidance and feedback to the Contractor on technical matters, the Technical Monitors are not empowered to make any contractual commitments or to authorize any contractual changes on the Government's behalf.

2.3.2.6 ROC II Systems Assurance Manager

GSFC WFF Safety Office, Code 803, assigns a Systems Assurance Manager to provide surveillance support to assure that contractor and subcontractors meet ROC II. The Systems Assurance Manager is the principle interface between ROC II and Code 803, and has leadership responsibility for accomplishing overall ROC II contract QA surveillance within the guidelines of this plan. The Systems Assurance Manager and its service support contractor are responsible for surveillance support of matters pertaining to hardware and software QA, systems reviews, system safety and reliability, parts, materials and processes, testing, and anomaly reporting/resolution. The Systems

Assurance Manager manages the collection of data and metrics from performance assurance, integration and test, fabrication, and system safety organizations and/or activities to facilitate the evaluation of ROC II Contractor performance.

2.3.2.7 ROC II Contractor Quality Assurance

It is expected that the selected ROC II Contractor will maintain a QA lead as part of its QMS. It is expected that the QA lead will perform QA-related activities for the ROC II efforts. The ROC II Contractor's QA lead will serve a vital role in the success of the surveillance efforts detailed in this plan. In particular, it is expected that the ROC II Contractor will task its QA lead to serve as a focal point for the Government in several areas including but not limited to provision of and access to all requested insight data/lifecycle-related assets and artifacts as they pertain to the insight areas described in this plan, and all QA-related activities conducted by this group.

The Government expects that as necessary and applicable, the QA lead may direct the Government to other groups/individuals supporting the ROC II effort in order to obtain requested insight data. These groups/individuals may include the ROC II Contractor's Program/Business Management office and/or representatives, discipline engineers, Configuration Management representatives, etc.

2.4 FORMS OF SURVEILLANCE

2.4.1 General

Surveillance on ROC II contract will be performed using any of the primary surveillance forms applied to the insight areas described in Section 3 of this document, during applicable stages of the ROC II contract. These primary forms of surveillance are described below.

2.4.2 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 ROC II 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 ROC II Contractor of letters, reports, review results, etc.
c. Ad hoc information submitted by COR and/or Task Monitors or Technical Monitors to the CO related to the ROC II Contractor’s electronic mail.

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

a. Informal telephone calls, teleconferences.
b. Informal verbal inquiries, discussions, engineering consultations.

c. Working group meetings, IPT participation, technical/status briefings, progress reviews, technical information meetings, and formal and informal reviews.
d. Informal discussions.

2.4.3 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
c. Documentation of problems, issues and concerns
d. Data collection reporting
e. Review of task order deliverables, products, and documentation

2.4.4 Engineering Peer Reviews

GPR 8700.6 will be used by NASA to review products developed under the ROC II contract at critical milestones.

The RMMO will utilize the Applied Engineering and Technology Directorate (AETD Code 500) Engineering Review processes to review the contractor's readiness for certain engineering modifications and/or technology development milestones.

The RMMO will utilize existing RMMO Operations Readiness Review processes to review the contractor’s readiness for mission operations.

NASA will also use GPR-8621.3 Mishap and Close Call Investigation process in the event that special evaluations of Range Operations services contractor activities are required, such as investigations of significant service interruptions, major equipment damage, flight anomaly investigations, etc.

2.4.5 Participation in Contractor Configuration Management Processes

Configuration Control Board (CCB) approval is required for changes that affect ROC II contract capabilities and external interfaces. The ROC II Contractor is required to facilitate NASA insight into the contractor configuration management process. This process will be accomplished through NASA participation in the contractor configuration management process, and insight into ROC II Contractor configuration controlled documentation. RMMO personnel monitor network performance and activities with metrics. These metrics are used to assess network and contractor performance as well as to ensure mission customer requirements are met.

Section 3: Surveillance Activities

3.1 GENERAL

There exist specific insight areas that the Government and the ROC II 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.

Area of Risk Identified	Impact to Government	Surveillance Team Activity
System Maintenance and Availability	System downtime or loss of functionality could result in loss of service to the user community	Review Contractor-developed maintenance plan for improvements. Review data and trouble data. Review corrective action performance.
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.
Configuration Management (CM) Documentation	Uncontrolled models, hardware, software, or documents could lead to erroneous results, incompatible interfaces, wasted resources, and/or mission failure	Periodically sample current documentation, and active management documents to verify compliance with the Contractor's CM System and CM Plan.
Property Management, Control, and Maintenance	Loss of or damage to equipment; potential schedule impact	Review Contractor property management techniques, compliance with policies, and record-keeping.
Safety	Loss of work-time or equipment, with schedule or cost 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 CM control.
Process Controls	Degradation of work products; increase in safety risk; potential schedule impact	Periodically monitor, with assistance from DCMA as needed, the Contractor's adherence to key processes and their internal audit schedules/results.
Continuous Risk Management	Technical, cost, 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, cost, schedule, safety, and program success	Monitor the Contractor's internal and external audits for compliance with the Contractor's established Quality Management Systems, including CMMI® or ANSI/ISO/ASQ Q9001:2000 or AS 9100.

Table 1. Surveillance Insight Areas (continued)

Area of Risk Identified	Impact to Government	Surveillance Team Activity
Quality of Work Force	a. Inability to fill positions and meet commitments on scheduled deliverables or science results, including NASA Performance Metrics b. Additional cost resulting from decreased productivity of other staff reliant on unfilled positions c. Lack of expertise or inadequate experience in key areas d. Delayed data delivery and/or poor data quality	a. Monitor time required to fill positions, and evaluate Contractor efforts and approaches used to fill vacancies. b. Assess Contractor efforts to train staff in areas of required expertise. c. Evaluate Contractor technical performance d. Monitor progress and timeliness and evaluate the quality of data received.
Quality of Workmanship (End-Items)	a. Inability to meet commitments of scheduled deliverables b. Additional cost and time resulting from rework, nonconforming, latent defects	a. Monitor and track schedules and delivery due dates. b. Conduct/witness testing and inspections, when necessary. Ensure end-item deliverables conform prior to acceptance.
Schedule	Services or products not provided in a timely manner can impact project schedule and cost	Monitor progress via management reviews and reporting.
Cost and Funding	Cost Overrun: a. Inability to implement contract requirements within negotiated costs may lead to erosion of technical performance, delay, or deletion of work b. Reduction of work due to funding limitations/fluctuations	Monitor and track costs incurred through the NASA Form 533, NASA Contractor Financial Management Report submitted on a monthly and quarterly basis.
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.

3.2 SURVEILLANCE TEAM ACTIVITIES

The surveillance team members will participate in review meetings, if applicable. They will provide support, as necessary, with the development and approval of technical requirements; flow-down of requirements; and with design, development, production and 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, products, documentation and data, in order to provide assurance that the program is being implemented according to all requirements and specifications. These audits will normally be conducted with advance notification and coordinated with the Contractor. However, the Government reserves the right to conduct unscheduled audits solely at its discretion.

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

3.3.1 Work Area/Floor Check

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

a. All Contractor employees have a GSFC 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 can identify the building's Facilities Operation Manager (FOM) and his/her functions.
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 and GSFC 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 GSFC (e.g., returning PIV card (badges), library books). The PIV data

forms will be checked against the monthly Onsite Reports to identify exiting employees.

l. The Contractor employees are aware of the GSFC IT Security compliance requirements.

m. The Contractor employees are aware of the Contractor's Organizational Conflict of Interest (OCI) Avoidance Plan and the appropriate Non-Disclosures.

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

3.3.2 Work Review and Performance Monitoring

The COR, with the assistance of the Task Monitors and/or Technical Monitors will perform the following functions to evaluate the Contractor's performance:

a. Reviews specific SOW areas with the Task Monitors and/or Technical Monitors to assure that work being performed and deliverables are in accordance with the technical requirements of the SOW and timely.

b. Reviews individual Task Orders with the Task Monitors and/or Technical Monitors to assure that each Task Order is technically within the scope of the contract and its personnel requirements and schedule are within the Contractor's capabilities. Reviews preliminary technical evaluations of Contractor Task Plans to assure each task plan satisfies the scope of the task order itself and the contract and serves as the final approver/signatory on the technical evaluation form as the COR with Task/Technical Monitor concurrence.

c. Reviews Contractor Task Plans to ensure that performance estimates are acceptable and that all milestones and deliverables have been identified.

d. Reviews the Contractor's monthly Progress Report for accuracy and completeness. Consult with Task Monitors and Technical Monitors as necessary, to assess the fidelity of reports.

e. Meets monthly, or more often if required, with the Contractor's Program Manager to discuss overall contract management and performance, review staffing and schedule issues, and review cost related issues.

f. Certifies the Contractor's invoices as applicable within the NF1634 for payment in accordance with GSFC procedures.

e. Perform QA inspections and QA witnessing/monitoring of tests.

g. 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.

3.3.3 Government Property Administration

The COR will carry out the following functions.

a. Review Contractor's request to purchase controlled property and facilities and make recommendations to the CO.

b. Validate that **no property or facilities** are being acquired without the CO's prior approval.

c. Review and approve Contractor's requests for acquisitions of supplies from Goddard's store stock.

d. Validate that all Installation-Accountable Government Property (IAGP) is being properly utilized and maintained.

e. Conduct periodic inspection of equipment and its location, compared to the data on the property records.

f. Validate that all existing and new equipment is properly tagged.

g. Validate that Government property is made available in accordance with the terms of the contract.

h. Validate that the Contractor does not modify or provide additional facilities, plant equipment, or real property at Goddard, except as specifically required by the contract, or as directed or approved in writing by the CO.

i. Validate that the Contractor is maintaining records for all offsite Government-Furnished Property (GFP).

j. Review all requests to move IAGP to an offsite location for a period longer than 30 days ensure the required documentation has been properly completed and all required COR/CO signatures obtained [on the GSFC 20-4].

3.3.4 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.

3.3.5 Safety

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.