Performance Work Statement

Beneficiary Locator Services

For

Veteran Administration – Insurance Service and Operations Center
(VA INS)

Amendment 0001
PWS Changes noted as follows:

- Additions noted via highlight
- Deletions noted via ~~strikeout and highlight~~

1.0 BACKGROUND

VA Insurance Service and Operations Center (INS) offers valuable life insurance benefits that provide Veterans with peace of mind and financial security for their beneficiaries. VA INS is responsible for the administration of seven government life insurance programs, which provide $1.5T in total coverage to 5.5 million Veterans, Service members, and their families.

In accordance with the Faster Payment to Veteran's Survivors Act of 2022 (Public Law No. 117-313), VA INS requires locator and outreach services to assist with locating difficult to find beneficiaries and establishing contact with beneficiaries to facilitate the completion of claims. These services shall include obtaining current contact information for named beneficiaries, conducting research to identify possible alternate beneficiaries, obtaining current contact information for alternate beneficiaries, and conducting outreach to beneficiaries to provide information to facilitate completing claims.

The locator and outreach services will allow VA INS employees to efficiently and effectively disburse payments to beneficiaries who are entitled to VA Insurance proceeds faster and improve the accuracy and timeliness of claims processing.

As of May 26, 2026, VA INS has the following inventory of claims that may require locator and outreach services:

Beneficiary Status	Inventory
Beneficiary Known	8,200
Beneficiary Unknown	6,019

VA INS estimates an additional 2,000 claims may require locator and outreach services each year.

2.0 APPLICABLE DOCUMENTS

In the performance of the tasks associated with this Performance Work Statement, the Contractor shall comply with the following:

1. Faster Payment to Veteran's Survivors Act of 2022 (Public Law No. 117-313)
2. 44 U.S.C. § 3551, "Federal Information Security Management Act (FISMA) as amended"
3. Federal Information Processing Standards (FIPS) Publication 140-3, "Cryptographic Module Validation Program Management Manual" Oct 16, 2025, ver. 2.6
4. FIPS Pub 201-3, "Personal Identity Verification (PIV) of Federal Employees and Contractors," Jan 24, 2022
5. 5 U.S.C. § 552a, as amended, "The Privacy Act of 1974"
6. Department of Veterans Affairs (VA) Directive 0710, "Personnel Security Program," Sep 8, 2025

7. VA Directive 6102 “Internet and Intranet Services,” Aug 5, 2019, VA Web Governance (https://digital.va.gov/web-governance/)
8. U.S. Access Board, “ICT Accessibility 508 Standards and 255 Guidelines,” January 18, 2017
9. OMB Circular A-130, “Managing Information as a Strategic Resource,” July 28, 2016; National Institute of Standards and Technology (NIST) (https://www.nist.gov) and Federal Information Security Modernization Act (FISMA Reform) December 18,2014. PL 113-283, 128 Stat. 3075 (https://www.congress.gov/113/plaws/publ283/PLAW-113publ283.pdf)
10. Sections 504 and 508 of the Rehabilitation Act (29 U.S.C. § 794d), as amended by the Workforce Investment Act of 1998 (P.L. 105-220), August 7, 1998
11. Homeland Security Presidential Directive (12) (HSPD-12), August 27, 2004 and FIPS 201-3 Personal Identity Verification (PIV) of Federal Employees and Contractors (https://csrc.nist.gov/publications/detail/fips/201/3/final)
12. VA Directive 6500, “VA Cybersecurity Program,” February 24, 2021
13. Project Management Accountability System (PMAS) portal (reference PWS References -Technical Library at https://www.voa.va.gov/)
14. OIT ProPath Process Methodology (reference PWS References -Technical Library and ProPath Library links at https://www.voa.va.gov/) NOTE: In the event of a conflict, OIT ProPath takes precedence over other processes or methodologies.
15. Technical Reference Model (TRM) (reference at http://trm.oit.va.gov/TRMHomePage.asp
16. National Institute Standards and Technology (NIST) Special Publications, Cryptographic Module Validation Program (CMVP)
17. VA Directive 6300, Records and Information Management, September 21, 2018 (https://www.va.gov/vapubs/Search_action.cfm)
18. VA Handbook, 6300.1, Records Management Procedures, March 24, 2010 (https://www.va.gov/vapubs/Search_action.cfm)

3.0 SCOPE OF WORK

The Contractor shall provide all resources necessary to accomplish the deliverables as described in this performance work statement (PWS).

4.0 PERFORMANCE DETAILS

4.1 PERFORMANCE PERIOD

The period of performance is one (1) 6-month base period followed by four (4) 12-month option periods. During the base period, VA INS will provide the Contractor with a minimum of 1000 cases including a mix of cases selected from each tier as described below in Table 1. Option periods to be exercised at the Government’s discretion.

4.2 PLACE OF PERFORMANCE

Tasks under this PWS shall be performed off site at the contractor's location(s).

4.3 TRAVEL

The Government does not anticipate travel to perform the tasks associated with the effort, or to attend program-related meetings or conferences throughout the period of performance (PoP).

5.0 SPECIFIC TASKS AND DELIVERABLES

The Contractor shall perform the following:

5.1 PROJECT MANAGEMENT

5.1.1 CONTRACTOR PROJECT MANAGEMENT PLAN

The Contractor shall deliver a Contractor Project Management Plan (CPMP) that lays out the Contractor's proposed approach, work plan, project schedule, and tools to be used in execution of the contract. The CPMP should take the form of both a narrative and graphic format that displays the schedule, milestones, risks and resource support. The CPMP shall also include how the Contractor shall coordinate and execute planned, routine, and ad hoc data collection reporting requests as identified within the PWS. The CPMP should also include the Contractor's plan for transmission of personally identifiable information (PII). The initial baseline CPMP shall be concurred upon and updated monthly thereafter. The Contractor shall update and maintain the VA PM approved CPMP throughout the period of performance. The Contractor shall perform no less than 51% of the total work under this contract and shall clearly identify in the CPMP which tasks, activities, and labor categories the prime Contractor will perform versus those proposed for any subcontractors.

Deliverable:

A. Contractor Project Management Plan

5.1.2 REPORTING REQUIREMENTS

The Contractor shall provide the Contracting Officer's Representative (COR) with Monthly Progress Reports in electronic form in Microsoft Word and/or PDF formats. The report shall include detailed instructions/explanations for each required data element, to ensure that data is accurate and consistent. These reports shall reflect data as of the last day of the preceding month.

The Monthly Progress Reports shall cover all work completed during the reporting period and work planned for the subsequent reporting period. The report shall also

identify any problems that arose and a description of how the problems were resolved. If problems have not been completely resolved, the Contractor shall provide an explanation including their plan and timeframe for resolving the issue. The Contractor shall monitor performance against the CPMP and report any deviations. It is expected that the Contractor will keep in communication with VA accordingly so that issues that arise are transparent to both parties to prevent escalation of outstanding issues.

The Monthly Progress Report shall also include: (a) training completion certificates for any new Contractor/Subcontractor personnel onboarded that month (cybersecurity, privacy, HIPAA, Rules of Behavior), (b) a running log of VA-approved outreach templates (letters, emails, call scripts) and any updates.

Deliverable:

A. Monthly Progress Report

5.1.3 TECHNICAL KICKOFF MEETING

The Contractor shall hold a technical kickoff meeting within 10 days after PO award. During this teleconference, the Contractor shall present its proposed approach, work plan, and project schedule for Government review and approval. The Contractor shall provide the meeting date, virtual meeting invitation, agenda, and any relevant materials at least five calendar days in advance. The Contractor shall invite the Contracting Officer (CO), Contract Specialist (CS), COR, and the VA Project Manager.

5.2 BENEFICIARY LOCATOR AND OUTREACH SERVICES

5.2.1 SELECTION AND REFERRAL OF CLAIMS CASES

VA INS, at its sole discretion, will select cases from its inventory of unpaid pending death awards and provide Contractor with available relevant information to refer cases for each tier of locator and outreach services described below. The Contractor shall implement a solution to allow VA INS to securely transmit and receive data files containing Veteran/Beneficiary information (Veteran Name, Veteran Name SSN, Veteran Name DOB, last known address, phone number, email, PDF images of Beneficiary Designation Forms, etc. as available) through an encrypted method (i.e. SFTP, HTTPS, etc.) to initiate the process of locator and outreach services for selected cases. All personally identifiable information (PII) must be safeguarded in full compliance with applicable VA privacy and information security policies and Federal information security standards. The Contractor shall transfer data using VA-approved secure methods, such as encrypted email or an encrypted shared folder; system integration with VA platforms is neither required nor permitted.

During the base period, VA INS plans to select a minimum of 1000 cases from its inventory of claims, including 300 cases from the “Alternate Beneficiary Locator and Outreach” classification listed in Table 1. For the “Designated Beneficiary Locator and Outreach” cases, VA INS plans to leverage Contractor’s locator and outreach services to perform *Electronic Address Search* (Ref. 5.2.4.A) to obtain current contact

information for listed beneficiaries; *Death Determination* (Ref. 5.2.4.B) to confirm the living status of listed beneficiaries; deliver *Claims Outreach* (Ref. 5.2.4.C) to notify beneficiaries and provide instructions to submit claims; and *Reporting on Updated Information and Results* (Ref. 5.2.4.D) to report back to VA INS on all activities and results. For "Alternate Beneficiary Locator and Outreach" cases, VA INS plans to leverage Contractor's locator and outreach services to perform *In-Depth Expert Search / Research Services* (Ref. 5.2.4.E) to find potential alternate beneficiaries in accordance with the Faster Payment to Veteran's Survivors Act of 2022 (Public Law No. 117-313); to deliver *Claims Outreach* (Ref. 5.2.4.C) to notify potential alternate beneficiaries and provide instructions to submit claims; and *Reporting on Updated Information and Results* (Ref. 5.2.4.D) report back to VA INS on all activities and results.

VA INS at its sole discretion will determine the criteria for how cases are selected and will control the selection of cases from its inventory to decide which cases to refer to Contractor for locator and outreach services.

Table 1. Classification and Required Services

Tier	Classification	Required Services
Designated Beneficiary Locator and Outreach	Locating named Beneficiaries, 6 months to 2 years after Veteran's date of death.	• Electronic Address Search • Death Determination • Claims Outreach • Reporting on Updated Information and Results
Alternate Beneficiary Locator and Outreach	Identifying and locating unnamed Alternate Beneficiaries, 2 years after Veteran's date of death or if all named Primary and Contingent Beneficiaries are Deceased.	• In-Depth Expert Search / Research Services • Electronic Address Search • Claims Outreach • Reporting on Updated Information and Results

5.2.2 DESIGNATED BENFICIARY LOCATOR AND OUTREACH

Cases classified as "Designated Beneficiary Locator and Outreach" include cases that have been pending six months to two years after the Veteran's date of death. For "Designated Beneficiary" cases, the Contractor will use an *Electronic Address Search* (Ref. 5.2.4.A) to locate the designated beneficiary(ies). The Contractor will also utilize *Death Determination* (Ref. 5.2.4.B) to determine the living status of the designated beneficiary(ies). If the designated beneficiary(ies) is located and determined to be living, the Contractor will use *Claims Outreach* (Ref. 5.2.4.C), to complete outreach to the desginated beneficiary(ies). The Contractor will provide *Reporting on Updated*

Information and Results (Ref. 5.2.4.D) to VA Insurance Service documenting all efforts to locate and provide outreach to the designated beneficiary(ies).

5.2.3 ALTERNATE BENEFICIARY LOCATOR AND OUTREACH

For cases in which all named primary and contingent beneficiaries are deceased or more than two years have passed since the date of death of the insured Veteran, the Contractor shall employ expert research capabilities leveraging information resources such as public records databases, commercial financial credit reporting services, court documents, voter registration records, property assessments, genealogy databases, etc. to identify and obtain current contact information for possible alternate beneficiaries. As specified in the *Faster Payment to Veteran's Survivors Act of 2022* (Public Law No. 117-313), alternate beneficiaries may include the surviving spouse of the insured, children of the insured, descendants of deceased children, parents of the insured, survivors of the parents, duly appointed executor or administrator of the estate of the insured person, or other next of kin of the insured entitled under the laws of domicile of the insured person at the time of death.

Once an alternate beneficiary is located, the Contractor will use *Claims Outreach* (Ref. 5.2.4.C), to complete outreach to the alternate beneficiary(ies). The Contractor will provide *Reporting on Updated Information and Results* (Ref. 5.2.4.D) to VA Insurance Service documenting all efforts to locate and provide outreach to the alternate beneficiary.

5.2.4 DEFINITIONS FOR REQUIRED SERVICES IN TABLE 1

A. **Electronic Address Search**: The Contractor will leverage electronic databases and internet resources to identify individual beneficiaries and locate their mailing address, phone numbers, email addresses and other contact information.

B. **Death Determination**: The Contractor will leverage electronic databases and internet resources to confirm the living status of listed beneficiaries. If a beneficiary is determined to be deceased, Contract will cross-reference two or more sources to verify accuracy. Sources for verification of a death include but are not limited to: Social Security Death Index; state death records; obituaries; background check services; and genealogy services, such as Ancestry.com and FamilySearch.org. Contractor will provide to VA INS all documentation showing proof of death of the beneficiary. A state-issued death certificate satisfies this requirement without needing verification from a second source.

C. **Claims Outreach**: The Contractor shall prepare outreach mailings to send to identified beneficiaries to establish contact and to provide instructions and assistance in completing VA's required claims documentation (VAF 29-4125, Death Certificate, VAF-29-541, Letters testamentary, letters of administration, etc.). All outreach services will provide instructions directing claimants to the VA INS website for submitting a claim application online. When communicating with

possible beneficiaries, the Contractor and/or its representatives shall clearly identify themselves as a Contractor working on behalf of the VA to locate possible beneficiaries who may be entitled to claim the proceeds of the deceased Veteran's government life insurance. The Contractor shall coordinate with VA INS to craft and obtain approval from the VA's COR for all letter templates, email templates, and/or call scripts to be used to conduct outreach services prior to initiating contact with any beneficiaries on behalf of VA INS. The Contractor shall coordinate with VA INS to implement any changes to these artifacts and seek approval to update. The Contractor shall assist beneficiaries with the completion of required claims documentation by providing instructions, explaining requirements and procedures and answering questions.

The Contractor will submit to VA electronic files containing all necessary mailing details for all outreach letters so that letters can be printed and mailed by VA's enterprise fulfillment vendor. The Contractor will transmit letter files to VA via encrypted email or encrypted file transfer to ensure the secure handling of beneficiary information.

The Contractor will set up a mailing address/PO Box specifically for receiving mail returned to sender from outreach mailings. The Contractor will process all mail returned to this mailing address/PO Box. Upon receiving mail returned to sender, the Contractor will use the *Electronic Address Search* (Ref. 5.2.5.A) to attempt to find a new address. If a new address is located, the Contractor will provide an updated outreach letter to the VA for mailing through VA's mail vendor.

The Contractor will make two attempted contacts with each identified beneficiary. Attempted contacts should be a minimum of thirty (30)days apart. The VA will, on a bi-weekly basis, notify the Contractor when a VA Form 29-4125 is received from any beneficiary who was contacted through Contractor outreach. Upon receipt of such notification, the Contractor shall discontinue further outreach efforts to that beneficiary.

D. **Reporting on Updated Information and Results**: The Contractor will report on the status of cases sent to them by VA INS monthly. As part of the monthly report, the Contractor will include a list showing any letter and/or email templates that were sent to identified beneficiaries. The list will include pertinent details, such as the date of communication, recipient, and name of letter or email template that was sent to identified beneficiaries. The report will be provided to VA INS no later than ~~the last business day of each month~~ the third business day of each month.

E. **In-Depth Expert Search / Research Services**: ~~to include Next of Kin Search and Geneaology Search~~ The Contractor will conduct comprehensive expert research to complete a Next of Kin or Genealogy search utilizing all available

resources, that may include public records, commercial databases, court documents, voter registration records, property records, genealogy databases, or other related sources to identify, trace, and locate possible alternate beneficiaries in accordance with the Public Law 117-313 (Faster Payments to Veteran's Survivors Act of 2022).

5.2.5 SUCCESS CRITERIA

Successful results and related payment conditions for each classification are listed below.

5.2.5.A Designated Beneficiary Locator and Outreach Payment Conditions:

1. Payment shall be made on a per-case basis when the Contractor achieves the following outcomes:
    a. Confirmed death of the designated beneficiary; OR
    b. A current mailing address is located, and outreach is completed to the designated beneficiary in accordance with VA-approved procedures. The Contractor shall attempt contact with the beneficiary at least two times, with at least one outreach attempt by letter. If the beneficiary submits a VA Form 29-4125 after the first contact, and VA confirms receipt, no further outreach attempts are required for the Contractor to receive payment under this CLIN.
2. Claim Form Submission Line Item
    a. In addition to per-case payments described above, VA will establish a separate Contract Line Item Number (CLIN) for Claim Form Submission.
    b. Under this CLIN, the Contractor shall be paid a fixed amount, not to exceed 10% of the per-case rate established under Section 5.2.5.A.1, if a valid, payable VA Form 29-4125 is submitted by the beneficiary who was contacted through the Contractor's outreach efforts. Claim forms that require additional development or are determined to be non-payable are not eligible for payment. If multiple beneficiaries are eligible for payment, payment under this CLIN will be made for each eligible beneficiary that submits a valid, payable claim form; however, only one VA Form 29-4125 per eligible beneficiary will qualify for payment under this CLIN, regardless of the number of submissions received from that beneficiary.
    c. VA Insurance Service will validate claim form receipt.
    d. Claim forms must be received within 45 days after the close of the performance period to be eligible for payment under this CLIN.
3. VA Insurance Service will notify the Contractor on a bi-weekly basis of all claim forms submitted by beneficiaries who were contacted through the Contractor's outreach efforts for cases assigned to the Contractor. Upon such notification, the

Contractor shall discontinue outreach for the applicable case(s) and may submit a payment request under the designated Claim Form Submission CLIN.

5.2.5.B Alternate Beneficiary Locator and Outreach Payment Conditions:

1. Payment shall be made on a per-case basis when the Contractor achieves the following outcome:
    a. Alternate beneficiary located and outreach is completed to the alternate beneficiary in accordance with VA-approved procedures. The Contractor shall attempt contact with the beneficiary at least two times, with at least one of those contacts via outreach letter; however, if the beneficiary submits a completed claim form after the first contact, as confirmed by VA, no additional contact is needed for payment
2. Claim Form Submission Line Item
    a. In addition to per-case payments described above, VA will establish a separate Contract Line Item Number (CLIN) for Claim Form Submission.
    b. Under this CLIN, the Contractor shall be paid a fixed amount, not to exceed 10% of the per-case rate established under Section 5.2.5.A-B.1, if a valid, payable VA Form 29-4125 is submitted by the beneficiary who was contacted through the Contractor's outreach efforts. Claim forms that require additional development or are determined to be non-payable are not eligible for payment. If multiple beneficiaries are eligible for payment, payment under this CLIN will be made for each eligible beneficiary that submits a valid, payable claim form; however, only one VA Form 29-4125 per eligible beneficiary will qualify for payment under this CLIN, regardless of the number of submissions received from that beneficiary.
    c. VA Insurance Service will validate claim form receipt.
    d. Claim forms must be received within 45 days after the close of the performance period to be eligible for payment under this CLIN.
3. VA Insurance Service will notify the Contractor on a bi-weekly basis of all claim forms submitted by beneficiaries who were contacted through the Contractor's outreach efforts for cases assigned to the Contractor. Upon such notification, the Contractor shall discontinue outreach for the applicable case(s) and may submit a payment request under the designated Claim Form Submission CLIN.

6.0 GENERAL REQUIREMENTS

6.1 ENTERPRISE AND IT FRAMEWORK

The Contractor shall comply will all requirements outlined in VA Handbook 6500.

6.2 POSITION/TASK RISK DESIGNATION LEVEL(S) AND CONTRACTOR PERSONNEL SECURITY REQUIREMENTS

6.2.1 POSITION/TASK RISK DESIGNATION LEVEL(S)

Position Sensitivity	**Background Investigation** (in accordance with Department of Veterans Affairs 0710 Handbook, "Personnel Security Suitability Program," Appendix A)
Low	**National Agency Check with Written Inquiries (NACI)** A NACI is conducted by OPM and covers a 5-year period. It consists of a review of records contained in the OPM Security Investigations Index (SII) and the DOD Defense Central Investigations Index (DCII), FBI name check, FBI fingerprint check, and written inquiries to previous employers and references listed on the application for employment. In VA it is used for Non-sensitive or Low Risk positions.
Moderate	**Moderate Background Investigation (MBI)** A MBI is conducted by OPM and covers a 5-year period. It consists of a review of National Agency Check (NAC) records [OPM Security Investigations Index (SII), DOD Defense Central Investigations Index (DCII), FBI name check, and a FBI fingerprint check], a credit report covering a period of 5 years, written inquiries to previous employers and references listed on the application for employment; an interview with the subject, law enforcement check; and a verification of the educational degree.
High	**Background Investigation (BI)** A BI is conducted by OPM and covers a 10-year period. It consists of a review of National Agency Check (NAC) records [OPM Security Investigations Index (SII), DOD Defense Central Investigations Index (DCII), FBI name check, and a FBI fingerprint check report], a credit report covering a period of 10 years, written inquiries to previous employers and references listed on the application for employment; an interview with the subject, spouse, neighbors, supervisor, co-workers; court records, law enforcement check, and a verification of the educational degree.

The position sensitivity and the level of background investigation commensurate with the required level of access for the following tasks within the Performance Work Statement are:

	Position Sensitivity and Background Investigation Requirements		
Task Number	Low/NACI	Moderate/MBI	High/BI
5.1	☒	☐	☐
5.2	☒	☐	☐

5.3	☒	☐	☐
5.4	☒	☐	☐

The Tasks identified above and the resulting Position Sensitivity and Background Investigation requirements identify, in effect, the Background Investigation requirements for Contractor individuals, based upon the tasks the particular Contractor individual will be working. The submitted Contractor Staff Roster must indicate the required Background Investigation Level for each Contractor individual based upon the tasks the Contractor individual will be working, in accordance with their submitted proposal.

6.3 METHOD AND DISTRIBUTION OF DELIVERABLES

The Contractor shall deliver documentation in electronic format, unless otherwise directed.

6.4 PERFORMANCE METRICS

The table below defines the Performance Standards and Acceptable Performance Levels for Objectives associated with this effort.

Performance Objective	Performance Standard	Acceptable Performance Levels
1. Technical Needs	• Shows clear understanding of requirements. • All deadlines are met per the PWS. • Random sampling of deliverables. • Periodic review with COR.	Satisfactory or higher, measured on an annual basis.
2. Project Milestones and Schedule	• Quick response capability. • Products completed, reviewed, delivered in timely manner. • Contractor notifies the Government in advance of potential problems. • Direct observation of timeliness. • Review of monthly status reports.	Satisfactory or higher, measured on an annual basis.
3. Project Staffing	• Contractor staff maintain currency of expertise. • Personnel possess the knowledge, skills and abilities to perform the tasks. • Periodic review of staffing plan. • Direct observation of performance and responsiveness	Satisfactory or higher, measured on an annual basis.

4. Value Added	• Contractor provides valuable service to the Government. • Services and products are delivered at the desired level of quality. • Customer/Stakeholder Feedback.	Satisfactory or higher, measured on an annual basis.
5. Reporting Requirements	• Monthly reports are accurate, complete, submitted on time. • Includes templates sent, dates, beneficiaries contacted. • 100% inspection of monthly reports. • Sampling of supporting documentation (mailing logs, death verification sources).	Satisfactory or higher. Accurate reports support invoice acceptance; Inaccurate reports may delay payment.
6. Compliance with Privacy & Security	• Adheres to PII protection, VA Handbook 6500, FISMA, privacy requirements. • Periodic review.	Full compliance required. Non-compliance may result in immediate corrective action or removal from contract.

7.0 QUALITY ASSURANCE SURVEILLANCE PLAN (QASP)

7.1 PURPOSE

The purpose of this Quality Assurance Surveillance Plan (QASP) is to outline the Government's approach for monitoring, evaluating, and documenting the Contractor's performance under the Performance Work Statement (PWS) for Beneficiary Locator Services. This QASP provides the framework for ensuring that the Contractor meets all performance requirements, service levels, and success criteria in a manner that supports timely claims processing and compliance with VA regulations and applicable federal laws.

The QASP is a Government-developed and Government-administered document. It is not part of the contract and does not modify any contractual terms or conditions.

7.2 PERFORMANCE MANAGEMENT APPROACH

The Government will assess Contractor performance through a combination of qualitative and quantitative surveillance methods to ensure the services delivered meet the standards outlined in the PWS.

Performance is evaluated across key objectives including technical accuracy, timeliness, staffing adequacy, quality of deliverables, regulatory compliance, and success in locating beneficiaries according to defined Tier-based criteria.

The Contractor is expected to cooperate fully with all monitoring activities and provide access to data, staff, systems (as appropriate), and documentation necessary for the Government to perform oversight.

7.3 SURVEILLANCE METHODS

The Government may employ one or more of the following surveillance methods, depending on the nature of the task or deliverable:

- **100% Inspection:** Used for deliverables that involve legal, privacy, or beneficiary-impacting activities (e.g., CPMP, outreach templates, monthly reports, security documentation).
- **Random Sampling:** Applied to high-volume, recurring tasks such as case outcome reporting, outreach logs, and address/death determination searches.
- **Periodic Reviews and Meetings:** Conducted monthly or quarterly to discuss progress toward milestones, staffing, quality concerns, risks, or performance trends.
- **Contractor Self-Reporting:** Contractors provide monthly reports documenting work performed, problems encountered, outreach activities, and case outcomes. The Government verifies reported results.
- **Direct Observation:** Used to evaluate responsiveness, professionalism, communication, and adherence to required timelines.
- **Stakeholder Feedback:** Informal assessments from VA staff interacting with the Contractor are used to measure value and service quality.
- ~~**Outcome-Based Monitoring:** The Government compares Contractor performance against the success criteria for Tiers 1, 2, and 3 as defined in the PWS.~~

7.4 PERFORMANCE STANDARDS

Performance standards are defined in the PWS and include expected timeliness, accuracy, completeness, compliance with privacy and security requirements, and case completion outcomes. The Government will evaluate the Contractor's performance against:

- Technical quality and adherence to requirements
- Timely completion of deliverables and milestones
- Staff expertise and adequacy
- Quality and value of services provided
- Success in locating beneficiaries and facilitating claims submissions

Each performance area has an associated Acceptable Performance Level (APL). A rating of "Satisfactory" or higher, measured annually, is required for acceptable performance.

7.5 ACCEPTABLE PERFORMANCE LEVELS (APLS)

APLs serve as measurable thresholds for determining whether Contractor performance meets contractual expectations. APLs may differ by performance area but generally require:

- Completion of tasks within the required timeframe
- Accuracy and completeness of deliverables
- Compliance with security, privacy, and data handling requirements
- ~~Achievement of the Tier-based success criteria (e.g., 90% for Tier 1 and 2 cases; 70% for Tier 3 cases)~~

Failure to meet APLs may require submission of a corrective action plan, increased surveillance, or potential withholding of payment as defined in the PWS success criteria.

7.6 DOCUMENTATION AND REPORTING

The Government will maintain written documentation of all surveillance activities, including:

- Inspection findings
- Monthly report reviews
- Meeting minutes
- Correspondence
- Performance deficiencies or corrective actions

This documentation may be used for:

- CPARS evaluations
- Option period decisions
- Invoice validation
- Contract modifications or corrective actions if necessary