



**USDA, Farm Service Agency  
Kansas City Commodity Office**

**Quality Assurance Surveillance Plan (QASP)**

**For Commodity Contracts and  
Empty Bags, Needles and Twine Contracts**

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**USDA, Farm Service Agency  
Kansas City Commodity Office  
Quality Assurance Surveillance Plan (QASP)  
For Commodity Contracts and Empty Bags, Needles and Twine Contracts**

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## **PURPOSE**

The document defines the USDA, Farm Service Agency, Kansas City Commodity Office's Quality Assurance Surveillance Plan (QASP) for commodity contracts and **empty bags, needles and twine** contracts. The following elements of Government quality assurance surveillance (QAS) are contained within this plan:

- Authorities, policy documents and guidelines governing performance of QAS activities.
- Description of the responsibilities of the contracting officer representative (COR) and contracting officer (CO) with respect to QASP.
- Standards and references used in carrying out QAS activities.
- Description of the process and methodologies of QAS activities and reporting.

The goal of QASP is to provide Government surveillance of the contractor's/subcontractor's quality control system, to verify the system's effectiveness, and to ascertain the contractor's ability to deliver product meeting contract requirements. QAS defined herein shall be used to determine contractor compliance with technical and performance requirements.

## **DEFINITIONS**

Contracting Officer Representative (COR). A person designated by the Contracting Officer (CO) to assist in the technical monitoring or administration of a contract. (A CO may delegate many aspects of contract administration; however, authority to make any commitments or changes that affect price, quality, quantity, delivery, or other terms and conditions of the contract remain with the CO.) Certain CORs specialize in quality assurance surveillance, performing duties specific to contract quality assurance, verifying contractors' quality control systems and compliance to contract terms.

Critical Nonconformance: A nonconformance that is likely to result in hazardous or unsafe conditions for individuals using, maintaining, or depending upon the supplies or services; or is likely to prevent performance of a vital agency mission.

Major Nonconformance: A nonconformance, other than critical, that is likely to result in failure of the supplies or services, or to materially reduce the usability of the supplies or services for their intended purpose.

Minor Nonconformance: A nonconformance that is not likely to materially reduce the usability of the supplies or services for their intended purpose, or is a departure from established standards having little bearing on the effective use or operation of the supplies or services.

Quality Assurance Surveillance (QAS): A contract administration support process performed by CORs at such times (including any stage of manufacture or performance of services) and places

(including subcontractors' plants) as may be necessary to verify a contractor's quality control system and its potential effectiveness to produce products meeting contract specifications.

## **RESPONSIBILITIES**

The following Government resources shall have responsibility for the implementation of this QASP:

Contracting Officer (CO): The CO ensures performance of necessary actions for effective contracting, ensures compliance with the terms of the contract, and safeguards the interests of the United States in the contractual relationship. It is the CO that assures that nonconformances are identified, and establishes the significance of a nonconformance when considering the acceptability of supplies or services which do not meet contract requirements. The CO is ultimately responsible for the final determination of the adequacy of the contractor's performance.

Contracting Officer Representative (COR): The COR is responsible for technical administration of the contract and contractor performance. The COR may be responsible for requesting QAS and supplying those CORs specializing in quality assurance with pertinent contractual documents.

CORs designated to perform QAS are responsible for:

- Performing quality assurance surveillance.
- Identifying and documenting nonconformances.
- Providing information to the CO and COR in the contract administration office.

## **AUTHORITY**

Authority for issuance of this QASP is provided under contract clause 52.246-11, "Higher-Level Contract Quality Requirement" which provides for QAS of both commercial and non-commercial commodities and empty bags, needles and twine contracts. Quality assurance surveillance will be performed at contractor and subcontractor facilities in accordance with the policies and procedure prescribed in Federal Acquisition Regulation (FAR) Subpart 46.4 "Government Contract Quality Assurance."

## **QUALITY ASSURANCE SURVEILLANCE METHODOLOGY**

Government contract quality assurance shall be performed at the discretion of the Government at such times (including any stage of manufacture) and places (including subcontractors' plants) as may be necessary to determine that the supplies conform to contract requirements.

QAS may include a review of the contractor's quality management system. Quality assurance may be conducted:

- On first time contractors/subcontractors
- At new plant locations
- On existing contractors/subcontractors
- At existing plant locations
- At CO discretionary request
- To verify nonconformance corrections

QAS may include the following:

- Opening meeting
- Plant walk-through, which includes detailed facilities and equipment assessment, and review of production activities
- Interviews and observation of plant employees
- Review of documentation and procedures
- Review of records
- Review of contract requirements
- Preparation of QAS report and, if applicable, a nonconformance report
- Observation of product and packaging condition
- Collection of samples
- Exit meeting (summary of findings)

## **NONCONFORMANCES**

Nonconformances identified by the COR during the quality assurance surveillance process will be documented and forwarded to the CO for action. Nonconformances will be categorized as critical, major or minor. The CO may issue a nonconformance report to the contractor.

If nonconformances are found, it is the responsibility of the contractor to make all necessary corrections as required by the contracting officer. The CO will determine when the nonconformance has been resolved. If requested by the CO, CORs specializing in quality assurance will verify that corrective action has been successfully taken.

## **STANDARDS**

The contractor shall have in place a quality control system consistent with the following ISO principles specified in ANSI/ISO/ASQ Q9001-2000 “Quality Management Systems Requirements”:<sup>1</sup>

- 4, Quality Management System
  - 5.1, Management Commitment
  - 5.3, Quality Policy
  - 5.5, Responsibility, Authority, Communication
  - 5.6, Management Review (Limited to 5.6.1 and 5.6.2)
- 6, Resource Management
  - 7.1, Planning of Product Realization
  - 7.2, Customer Related Processes
  - 7.4, Purchasing Process
  - 7.5, Production and Service Provision
  - 7.6, Control, Monitoring and Measuring Devices
- 8, Measurement, Analysis and Improvement

(The ISO 9001-2000 standard can be ordered from the ANSI Electronics Standards Store at <http://www.ansi.org>.)

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<sup>1</sup>Official ISO certification is not required.

## REFERENCES

The documents listed below form the basis for QAS.

### Acts

United States Grain Standards Act (as amended)

Agricultural Marketing Act of 1946

Federal Food, Drug and Cosmetic Act (21 U.S.C. 301-392)

Homeland Security Act of 2002

### Regulations

Current Good Manufacturing Practices (GMPs) as amended (21 CFR Part 110)

Federal Acquisition Regulation (FAR)

Agricultural Acquisition Regulation (AGAR)

### Manuals

U.S. Department of Health and Human Services, Public Health Service, Food Code 2005, Chapter 8, Annex 4 “Management of Food Safety Practices-Achieving Active Managerial Control of Foodborne Illness Risk Factors (HACCP)

### The Contract