



Boston Government Services LLC

SURVEILLANCES


BGS-QA-26

Revision 0

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Revision History

Rev. #	Date	By	Type¹	Changes
0	3-2-16	R. Lambert	N	Original issue

¹ M = major change, mc = minor change, N = new

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1. PURPOSE

This procedure describes the roles, responsibilities, and processes to be used by Boston Government Services, LLC (BGS) in the performance of Surveillances.

2. SCOPE

Surveillances are utilized to capture and document monitoring activities or BGS Management observations. Surveillances are utilized to examine conformance to specified requirements, BGS Management and Customer expectations, or to identify areas for improvement.

3. REFERENCES

- 3.1. BGS-QAP-01, *BGS Corporate Quality Assurance Plan*
- 3.2. BGS-MG-02, *Continuous Improvements*
- 3.3. BGS-QA-16, *Corrective Action*
- 3.4. BGS-RM-01, *Quality Assurance Records*

4. DISCUSSIONS AND OVERVIEW

- 4.1. Surveillances are typically performed by BGS Managers [e.g., Functional Managers (FMs), Project Managers (PMs)], but can be performed by anyone, including Subject Matter Experts (SMEs) and independent consultants. The objectives of a Surveillance may include one or more of the following:
 - 4.1.1. Observe compliance with standards and requirements.
 - 4.1.2. Capture and document major project events or milestones.
 - 4.1.3. Document management observations.
 - 4.1.4. Reinforce positive safe behavior.
 - 4.1.5. Examine process effectiveness/adequacy.
 - 4.1.6. Identify opportunities for improvement.
- 4.2. Surveillances are not typically included in the BGS Assessment Schedule, but the results of Surveillances may be considered by the Quality Assurance (QA) Manager when determining the need for further review as part of a Management Assessment program.
- 4.3. BGS Personnel performing a Surveillance must be knowledgeable of the activities included in the scope of the surveillance and must have completed Required Reading of this procedure.

5. DEFINITIONS AND ACRONYMS

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BGS Boston Government Services, LLC

BGS Personnel BGS employees and consultants.

Condition Adverse to Quality (CAQ) An all-inclusive term used when a requirement has not been met and in reference to any of the following: failures, malfunctions, deficiencies, defective items, and non-conformances. Assessment/Audit findings identify CAQs. (NQA-1-2008)

Finding An individual condition not meeting a committed requirement (e.g., contract, regulation, QA program, or procedure).

Finding Levels A system for classifying findings. BGS' two finding levels are defined in Attachment 2.

Functional Manager (FM) A person who has management authority over an organizational unit, such as a department, within BGS. BGS identifies and assigns individuals to functional areas (e.g., Accounting, Quality Assurance, Information Management, and Business Development).

Issue Term used to refer to events, findings, adverse conditions, observations, recommendations, suggestions, and opportunities for improvement. For example, any situation that may warrant Management attention.

Noteworthy Practice A positive observation, based on objective assessment data, of a particular practice, procedure, process, or system considered unique or innovative. Mere compliance with mandatory requirements is not considered to be a noteworthy practice.

Observation An area of potential weakness or a strength identified during the assessment. Observations support identification of findings and noteworthy practices.

Project Manager (PM) A person assigned to manage BGS Personnel and activities providing services and is responsible for project performance and on-time delivery of quality products.

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Significant Condition Adverse to Quality (SCAQ) A condition adverse to quality that, if left uncorrected, could have a serious effect on safety, operability, or credibility of BGS work. (NQA-1-2008).

Subject Matter Expert (SME) An individual with demonstrated experience and documented knowledge of a program area or technical discipline.

Surveillance The act of monitoring or observing to verify whether an item or activity conforms to specified requirements. (NQA-1-2008)

Surveillance Lead Person assigned or selected to lead the surveillance team.

6. RESPONSIBILITIES

6.1. BGS President

- 6.1.1. Ensures that BGS managers and personnel are aware that Surveillances can improve performance and help BGS achieve its objectives.

6.2. FMs and PMs

- 6.2.1. Conduct and encourage BGS personnel to participate in Surveillances.
- 6.2.2. Select the Surveillance Lead.
- 6.2.3. Enlist reviewers and SMEs to conduct Surveillances of activities for which the FM/PM is responsible.

6.3. QA Manager:

- 6.3.1. Assign and maintain Surveillance identifiers in a Surveillance Log.
- 6.3.2. Maintain this procedure.

6.4. Surveillance Lead

- 6.4.1. Responsible for selection of Surveillance team members (if more than one person is performing the Surveillance).
- 6.4.2. Ensures Surveillance team members have completed Required Reading of this procedure.
- 6.4.3. Coordinate all aspects of the Surveillance.

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6.5. BGS Personnel

6.5.1. Identify and suggest surveillances that would be beneficial to BGS.

6.5.2. Conduct and document surveillances as team members when assigned.

7. PROCEDURE

7.1. Identifying Surveillances

7.1.1. Surveillances are identified by the following:

- a) FM/PM identify the need for a Surveillance.
- b) BGS Personnel determine when a Surveillance in their area of expertise would provide benefit to BGS.
- c) BGS Personnel identify the need to capture observations or items or activities to promote continuous improvement.

7.2. Surveillance Performance

7.2.1. Surveillance Lead obtains a surveillance identifier from the QA Manger.

7.2.2. BGS Personnel performs the surveillance based on specific direction from FM, PM, or Surveillance Lead.

7.2.3. BGS Personnel monitor and record observations.

7.2.4. The Surveillance Lead, in consultation with team members, utilize Attachment 2, Finding Levels, to assist in the categorization of any identified findings from the Surveillance. (Level 1 Findings will be immediately communicated to the FM and QA Manager for appropriate action.)

7.2.5. Surveillance Personnel prepare a report using the guidance in Attachment 1.

7.2.6. The Surveillance Lead signs the completed Surveillance report and forwards a copy to the FM/PM and QA Manager.

7.2.7. The Surveillance Lead submits the signed Surveillance report as a QA record, per Section 8.0.

7.2.8. The FM or designee ensures entry of any Surveillance issues (findings and observations) into the BGS Corrective Action system per BGS-QA-16, *Correction Action*, no later than 15 days following receipt of the Surveillance report.

7.2.9. If Lessons Learned were identified during the performance of the Surveillance, the FM or designee forwards them to the BGS Lessons Learned Coordinator, per BGS-MG-02, *Continuous Improvements*.

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8. RECORDS

8.1. The surveillance report is a QA record and shall be maintained and transmitted per BGS-RM-01, *Quality Assurance Records*.

9. ATTACHMENTS

9.1. Attachment 1 – Surveillance Report Content

9.2. Attachment 2 – Finding Levels

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ATTACHMENT 1 – Surveillance Report Content

Elements of a surveillance report that shall be included in all surveillances:

- Surveillance Identifier and Title;
- Surveillance Lead Name and Signature;
- Surveillance team names (if applicable)
- Date Surveillance performed;
- Surveillance scope;
- Surveillance Summary; and
- Identified issues of non-compliance (Finding(s)).

Elements of a surveillance report which may be included at the Surveillance Lead discretion:

- Work or Activities observed;
- Surveillance criteria and approach;
- Surveillance results (beyond a listing of Finding(s)) including identification of areas for improvement, observations, noteworthy practices, and Lessons Learned;
- Personnel contacted;
- Documents reviewed; and
- Supporting Attachments (evidence, etc.)

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ATTACHMENT 2 – Finding Levels

The BGS Finding level system is designed to assist assessors in determining the relative importance of issues identified during performance of surveillances, assessments, etc. Finding level determinations are based upon the professional judgment of the finding originator. The Assessor should consult the BGS Quality Assurance Manager to address questions regarding selection of the finding level. The following criteria are guidelines for establishing priority levels:

Finding Level 1 - A finding identifying a significant condition adverse to quality (SCAQ) or systemic breakdown in safety, quality, or Integrated Safety Management. The adverse condition identified in the finding has impact on quality, worker health or safety, the public, the environment, facility operations, or regulatory compliance. The FM is to take appropriate interim action (e.g., stop work) and consult with the BGS President, Functional Manager, and QA Manager if a potential Finding Level 1 is identified.

Finding Level 2 – A finding identifying a condition adverse to quality (CAQ) that requires Management attention to correct. The condition identified in the finding is a non-compliance with a requirement that could affect quality, worker health or safety, the public, the environment, facility operations, or regulatory compliance. Management attention is required for activities such as procedure revisions, training, etc.