



AmeriCorps

Awardee Guide to Developing Corrective Action Plans

Office of Monitoring
March 2023

Overview

The AmeriCorps Office of Monitoring Corrective Action Planning (CAP) process provides grant recipients with a standard approach to reviewing and addressing identified findings of noncompliance. The process can assist awardees in validating compliance, identifying breakdowns in processes and systems that may have contributed to noncompliance, as well as identifying preventative measures to reduce and eliminate findings in future monitoring activities. The CAP is structured to support the grantee in facilitating an internal process to identify the root causes of the event that resulted in a finding, while fostering a timely, concise, and technically adequate corrective action proposal for submission to the Office of Monitoring (OM) for review and approval.

Grantees may use this guide to assist in the development of responses to each CAP element for findings of noncompliance that were identified within the monitoring summary results. As a reminder, the Office of Monitoring receives CAP submissions from awardees within the Excel Based Tool used for monitoring activities. Each finding of noncompliance requires a response to four elements of the CAP. More details on the four CAP elements are described below.

CAP Element: Root Cause Analysis

Grantees should describe the results of an analysis of contributing factors that led to the underlying process and system issues (root causes) of the non-compliant finding. A root cause analysis identifies the underlying cause of the issue by collecting data/evidence related to the problem. This section should focus on what happened, why it happened, and what to do to reduce or eliminate any reoccurrences.

- What is causing the problem at hand?
- What flaws in the work processes led to the issues?
- Has this type of issue occurred before and, if so, what caused it to recur?
- What should be happening?

CAP Element: Corrective Measures

Grantees should describe the proposed corrective changes to the processes and systems that will eliminate the root cause and reduce the likelihood of a reoccurrence of noncompliance, as well as how these changes will be implemented. The key is to choose corrective actions that address each root cause. These actions will generally require creating a new process or making a change to a current process. Corrective actions that change the system and do not allow errors to occur are the strongest. If a particular corrective action or

change cannot be completed due to current constraints (e.g., lack of resources), the awardee should look for other ways of changing the process to prevent a similar event from occurring in the future. Doing nothing is not an appropriate option.

- How can the problem be fixed?
- Re-evaluate the policy/procedure.
- Determine who will conduct training on the correct way to do the tasks?
- Identify checks and balances to be strengthened to ensure issues do not recur?
- What improved protocols will be established?

CAP Element: Required Plan of Action

Grantees should clearly state what is to be done, by whom, and when. Some action plans may be short-term interventions that can be accomplished quickly, while others may require a longer implementation period. Consider how to effectively implement the plan so people are complying with the proposed changes and if the changes have made a difference. Create SMART (specific, measurable, achievable, realistic, and time-bound) goals and allot feasible deadlines. Make sure these goals or solutions are centered around the root cause, detailing every step necessary to eliminate the underlying cause of a problem.

- Who is doing what?
- How will the plan be implemented?
- What supporting documentation will be needed?

CAP Element: Evaluation/Follow-Up

Grantees should describe how successful implementation of corrective actions will be evaluated and measured. This should include details on how the organization will know that the proposed corrective actions are effectively implemented during the anticipated timeframe, including an assessment of individuals responsible for adhering to changes and whether the CAP is achieving the desired results. Evaluating the success of the corrective actions usually becomes the responsibility of the person designated to oversee the corrective actions.

Satisfactory implementation of the corrective actions will be reviewed by AmeriCorps staff, so it is important to have a clearly defined plan and to be able to demonstrate that measures of success were monitored by organizational staff

over time and that each responsible individual or party is confident that the change is permanent.

- What is the plan/procedure to evaluate the plan implemented?
- How often will the plan be evaluated?
- What are the desired results?

Additional Fields for Completion by Grantee

Enter the Planned Completion or Implementation Date - Enter the expected date to complete the plan and submit documentation. If the plan must be implemented over time, enter the date the documentation/evidence will be submitted to OM for review.

Person(s) Responsible for Implementation - Identify the person or persons who will be responsible for evaluating/monitoring the implementation of the plan.

Monitoring Officer Fields

OM Review Status

The Monitoring Officer will indicate if the CAP information meets the required standards by selecting one of the following options:

- **Resolved**- Grantee has submitted a CAP with supporting documentation to confirm the work has been completed. Grantee is now in compliance with regulation and no more action is required.
- **Approved In-Progress**- Grantee has submitted approved CAP and documentation will need to be submitted to establish once the work is completed or implemented.
- **Insufficient**- The submitted CAP is not approved as the information provided by the grantee in their CAP is insufficient to achieve approval.

OM Review Notes

Notes section for Monitoring Officer to communicate information about the finding to Grantee.