



AmeriCorps

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Grantee Guide to Developing Corrective Action Plans

Office of Monitoring

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 grantees 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 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, grantees use the CAP Summary tab on the Excel monitoring report to submit CAPs to the Office of Monitoring. 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

Grantees should identify the contributing factors that led to the root cause (the underlying process and system issues) of the non-compliant issue. This section should focus on what happened, why it happened. A sufficient response will identify gaps in work processes or policies that led to the issue.

CAP Element: Action Steps

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. **Action steps proposed must directly address the root cause.**

Action steps will 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 action step or change cannot be completed due to current constraints (e.g., lack of resources), 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.

When considering the action steps, create SMART (specific, measurable, achievable, realistic, and time-bound) goals and allot feasible deadlines. Make sure all action steps directly address the root cause, detailing every step necessary to eliminate the underlying cause of the issue. Some action steps may be short-term steps that can be accomplished quickly, while others may require a longer implementation period.

Things to consider:

- How can the problem be fixed?
- How can a policy/procedure be re-evaluated?
- What training will be conducted to ensure tasks are done correctly?
- What checks and balances could be strengthened to ensure issues do not recur?
- What protocols will be established?
- What steps need to be addressed to correct the specific issue at hand? (i.e., FFR updates, repayment of unallowable costs, updated subrecipient agreements, etc.)

CAP Element: Deliverables

The plan must identify all applicable deliverables, which are specific items to be submitted to AmeriCorps for review. Grantees should clearly state what is to be done, by whom, and when. Deliverables provided to AmeriCorps must demonstrate proof of completion of the listed and approved Action Steps.

- What supporting documentation will be needed to effectively implement the Action Steps?
- What deliverables will be provided to AmeriCorps to ensure CAP resolution?

Examples of deliverables are:

- A policy to ensure that recordkeeping requirements are in accordance with federal regulations. The policy has been approved by the grantee's board of directors and includes the date of approval. Board meeting minutes from the date of approval confirm the approval process.
- Timesheets to demonstrate that AmeriCorps members are serving the appropriate number of hours and that leave is being tracked as required. Timesheets are signed by the member and supervisor and align with the grantee's timekeeping policies and procedures.

- A screenshot of the program website, consistent with current AmeriCorps branding guidelines and compliant with all AmeriCorps public notice of nondiscrimination requirements.

CAP Element: Long – Term Compliance

Grantees should describe how, after the plan has been executed, corrective actions will be evaluated and measured to ensure continued long-term compliance. This section describes the processes required to confirm that the corrective actions are complete and effective. These processes should identify individuals within the grantee organization responsible for adhering to changes and whether the CAP is achieving the desired results. Evaluating the success of the corrective actions is usually the responsibility of the person designated to oversee the corrective actions.

Satisfactory implementation of the action steps will be reviewed by AmeriCorps staff, so it is important to:

1. Have a clearly defined plan
2. Demonstrate that measures of success were monitored by organizational staff over time
3. Ensure 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

Planned Completion 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 - List individual(s) within the organization who will complete and maintain the required plan of action, including who will provide all deliverables, to the Office of Monitoring.

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.
- **Closed – Debt Referral Submitted** – Grantee has resolved the finding as noted above, but a debt referral has been submitted to OADR.
- **Closed – Unresolved** – The CAP will be closed due to the corrective actions no longer having a tangible impact on current AmeriCorps members or resources. No additional work is required from the grantee. If the grantee elects to apply for AmeriCorps support in the future, they must complete all unresolved corrective actions before entering into a new grant.
- **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 Plan** – The submitted CAP is not approved as the proposed plan provided by the grantee in their CAP is insufficient to resolve the finding.

OM Review Notes/Next Steps

This section confirms that the Monitoring Officer and/or CAP Specialist has reviewed the CAP. Comments related to their review are included here for the grantee's reference. Comments will be added during each review and if the finding is unresolved, the comments will provide the necessary next steps for the grantee to resolve the finding. **It is extremely important to consult the review notes for each finding after each review.**