



**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 issues of noncompliance. The process assists 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 issues in future monitoring activities. The CAP supports the grantee in facilitating an internal process to identify the root causes of the event that resulted in an issue, 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 issues of noncompliance that were identified within the monitoring summary results. A checklist for reviewing CAPs before submission to the Office of Monitoring is available on the last page of this guide. As a reminder, grantees use the CAP tab on the Excel monitoring report to submit CAPs to the Office of Monitoring. Each issue of noncompliance requires a response to four elements of the CAP. More details on the four CAP elements are described below.

### CAP Elements



ISSUE	Root Cause	Action Steps	Deliverables	Long-Term Compliance
	Describe in detail the underlying reason for the issue.	What specific steps will you take to address the identified root cause of the issue? Describe the policy/ procedure/ practice that will be created or modified.	List the items that will be provided to the Office of Monitoring to resolve the finding.	Describe the plan to maintain compliance post-monitoring.
[automated response based on monitoring question]	[Response should identify the root cause of the identified issue of non-compliance]	[Response should outline how grantee will address non-compliance and the root cause]	[Response lists the documentation needed to show implementation of the action steps]	[Response should explain plan for self-monitoring to reduce the likelihood of reoccurrence]

### 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.

**Note:** Consider including the following:

- Noting evidence that policies/procedures are internally approved
- Staff training on new/updated procedures
- Staff awareness of new/updated policies

### **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 self-monitoring process/procedures will be implemented to reduce the likelihood of the reoccurrence?
- How often will the plan be evaluated?
- What are the desired results?

## Additional Fields for Completion by Grantee

**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

### Phase One: CAP Intake documentation Due Date

The Monitoring Officer will provide the due date for the CAP Intake activity to be completed. This includes developing a plan in which each issue is either in Resolved or Approved-In Progress status before the Phase One due date. If the plan requires a rework, it must be revised and approved before the due date.

### 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 issue 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 is insufficient to resolve the issue.
- **30 - Business Day Requirement** - The issue of non-compliance involves a tangible debt and/or report requiring it to be resolved within 30 - business days. Grantee must submit an approved CAP before the Phase 1: due date in addition to submitting documentation resolving the issue before

the 30 - Business Day Requirement due date. Grantees missing this 30 - day deadline will be subject to additional enforcement actions.

### 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 issue is unresolved, the comments will provide the necessary next steps for the grantee to resolve the issue. **It is extremely important to consult the review notes for each issue after each review.**



## Developing Corrective Action Plan Checklist

CAPs with responses to all the questions on this checklist are less likely to require requests for revisions. If the answer to any of the checklist questions is no, consider revising your response(s) before submitting the CAP to the Monitoring Officer.

Initial CAP Submission		
<input type="checkbox"/>	<b>Root Cause</b>	<ul style="list-style-type: none"> <li>✓ Was a response provided?</li> <li>✓ Does the response explain the conditions leading to the issue of non-compliance?</li> <li>✓ Would addressing this response reduce the likelihood of noncompliance reoccurrence?</li> </ul>
<input type="checkbox"/>	<b>Action Steps</b>	<ul style="list-style-type: none"> <li>✓ Was a response provided?</li> <li>✓ Do the described steps address the identified root cause of the issue?</li> <li>✓ Are planned changes made to policies/procedures described?</li> <li>✓ Do the described steps include the internal policy/document approval process, if/when applicable?</li> <li>✓ Does the response implement SMART (smart, measurable, achievable, realistic, and time-bound) goals?</li> </ul>
<input type="checkbox"/>	<b>Deliverables</b>	<ul style="list-style-type: none"> <li>✓ Was a response provided?</li> <li>✓ Is there a deliverable listed for each activity described in the action steps?</li> <li>✓ Do the deliverables inform whether revised/updates policies will be internally approved before submission?</li> </ul>
<input type="checkbox"/>	<b>Long-Term Compliance</b>	<ul style="list-style-type: none"> <li>✓ Was a response provided?</li> <li>✓ Does the response describe how the plan reduces the likelihood of recurrence of noncompliance?</li> <li>✓ Does the response describe the plan for self-monitoring to maintain compliance?</li> </ul>
<input type="checkbox"/>	<b>Person Responsible for Implementation</b>	<ul style="list-style-type: none"> <li>✓ Was a response provided?</li> <li>✓ Are specific persons/titles described for the persons responsible for resolving the issue and submitting documentation to the Office of Monitoring?</li> </ul>
CAP Rework Requested		
<input type="checkbox"/>	<b>CAP Elements</b>	<ul style="list-style-type: none"> <li>✓ Were responses provided for all CAP elements?</li> <li>✓ Were all questions in the check list above answered in CAP element responses?</li> </ul>
<input type="checkbox"/>	<b>OM Review Notes</b>	<ul style="list-style-type: none"> <li>✓ Were all deficiencies described in the OM Review Notes addressed in the applicable CAP element responses?</li> </ul>