



Developing Subrecipient Corrective Action Plans



MIECHV program awardees are responsible for conducting subrecipient monitoring activities with their local implementing agencies (LIAs) and other subrecipients. These activities help to ensure that all subrecipients comply with federal statutes and regulations and the terms and conditions of the MIECHV award, use the funds for authorized purposes, and spend their award dollars in ways that are allowable, allocable, and reasonable.

As part of their subrecipient monitoring plans, awardees should develop a process for addressing deficiencies and assessing corrective action if warranted. Awardees should conduct regular monitoring to review and document subrecipients' strengths, areas in need of improvement, and areas of noncompliance.

When necessary, awardees may ask subrecipients to complete a corrective action plan (CAP) that supports and guides the subrecipient in meeting contractual deliverables. CAPs should be viewed as opportunities to work through and resolve issues, and to reduce the risk of future noncompliance.

Below are some tips for developing a systematic and straightforward corrective action plan. Awardees should consider how to share these practices with their subrecipients and how to monitor them. Awardees should always contact their project officer (PO) and grants management specialist with specific fiscal questions.

[Visit the MIECHV Program website to learn more!](#)

Tips

- ✓ **Develop a consistent format.** CAPs should include the following sections: statement of the noncompliance, analysis of why the noncompliance occurred, steps to correct the noncompliance, measures to determine if the issue has been satisfactorily resolved, names of the persons(s) responsible, and timelines for completion. Contact your HRSA project officer or technical assistance (TA) specialists for examples of CAP templates.
- ✓ **Meet with the subrecipient and develop a process for completing the CAP.** This process may include working together to analyze the issues underlying the noncompliance, brainstorming solutions, offering technical assistance, scoping out action steps, and writing the plan. The team should ensure that the plan is being followed and that corrective actions have been effective.
- ✓ **Review the CAP once it has been submitted.** Consider the following:
 - Does the CAP show an understanding of why the noncompliance occurred?
 - Are the action steps appropriate?
 - Are the timelines realistic and manageable?
 - Are there concrete indicators of how progress will be measured?
 - Has the subrecipient addressed not only the specific noncompliance but also how the subrecipient will avoid a recurrence?
- ✓ **Follow up regularly to make sure the CAP is being implemented.** Schedule regular calls to review progress and make sure that timelines are being met. Remember that subrecipients working under a CAP may need more frequent follow-up, so consider monthly calls. Also identify any needed support, such as training, technical assistance, or additional site visits.
- ✓ **Determine and communicate remedies that may be imposed for unacceptable performance.** These may include temporarily withholding cash payments pending correction of the deficiency, disallowing use of funds for the activity or action not in compliance,¹ or terminating the agreement.
- ✓ **Encourage the use of continuous quality improvement processes.** Work with subrecipients to test and measure methods that will have an impact on their needed area of improvement.

¹ Code of Federal Regulations, Title 45: Public Welfare, Part 75—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards. Retrieved from <https://www.govinfo.gov/content/pkg/CFR-2016-title45-vol1/xml/CFR-2016-title45-vol1-part75.xml#seqnum75.341>.

HRSA Resources

[Code of Federal Regulations, Title 45: Public Welfare, Part 75—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards](#)

This document contains the regulations for grant management for the Department of Health and Human Services. The sections that relate to compliance are:

- [45 CFR §75.207: Specific award conditions](#)
- [45 CFR §75.371: Remedies for noncompliance](#)

[HHS Grants Policy Statement](#)

This online document describes the general terms and conditions of HHS grant awards.

[Subrecipient Monitoring Manual for Maternal, Infant, and Early Childhood Home Visiting \(MIECHV\) Award Recipients](#)

This resource includes information for MIECHV awardees about CAPs tied to subrecipient monitoring.

Additional Resources

Please note: The resources below contain information relevant to this topic but are not endorsed by the Health Resources & Services Administration (HRSA). They were not developed in collaboration with HRSA nor does HRSA play any role in their maintenance.

[Corrective Action Plan \(CAP\) Process](#)

This PowerPoint presentation by the Division of Error Rate Measurement, Centers for Medicare & Medicaid Services, provides key points about developing and implementing a CAP.

[How to Write a Corrective Action Plan](#)

This resource from MyFedTrainer describes what a CAP is and provides a five-step process for developing and implementing a CAP.