



POLICY AND PROCEDURE NOTICE: PPPN-064 CORRECTIVE ACTION PLANS

Summary and Purpose of PPN: To guide the administration of the Ryan White Part A Program to ensure legislative, contractual, fiscal and programmatic requirements are followed by Part A-funded subrecipients and to verify that funds are expended in an appropriate manner. Corrective Action Plans (CAPs) are submitted by subrecipients to remedy citations and recommendations issued as a result of program monitoring and describe the action the subrecipient will take to address the citations and/or recommendations.

Authority:

- Section 2604(h) of Title XXVI of the PHS Act as amended by the Ryan White HIV/AIDS Treatment Extension Act of 2009 (Public Law 111-87)
- 45 CFR 75.351-75.353
- 74 CFR 74.51(a)
- 2 CFR 215.51(a)
- 2 CFR 75 Subpart F – Audit Requirements
- HIV/AIDS Bureau, Division of Metropolitan HIV/AIDS Programs & Division of State HIV/AIDS Programs National Monitoring Standards for Ryan White Part A and Part B Grantees: Universal – Part A and B
- NOA Program Specific Terms
- Fulton County Ryan White Part A Contract/Agreement
- GAO Report on Oversight of Ryan White Part A/B Grantees
<https://careacttarget.org/library/gao-report-oversight-part-ab-grantees>
- Fulton County Ryan White Part A Contract/Agreement

Policy and Procedures:

When findings are identified during a site visit, the subrecipient will be required to submit and implement a Corrective Action Plan to address all findings. A Corrective Action Plan may also be required when deficiencies are found through desktop monitoring or if issues are identified between site visits.

1. The Ryan White Program Office will identify the findings and provide to the appropriate subrecipient's Designee (Programmatic, Fiscal, and/or Quality Management).

2. The subrecipient will complete the provided “Corrective Action Plan Form” incorporated herein by reference. For each item identified by the Ryan White Program Office, the Corrective Action Plan must satisfactorily address the following:
 - Remedial Action – Description of the change in policy, procedure, or process to correct the issue. Includes language which specifies the actions to be taken to address each citation
 - Name & title of person(s) accountable for change implementation.
 - Target implementation date(s).
 - Follow-up process describing how changes will be monitored or incorporated into an internal CQI process.
 - Name & title of person(s) accountable for follow-up.
 - Data source for documentation of follow-up.
3. The subrecipient will have ten business days from the date of notification by the Ryan White Program Office of the need for corrective action to submit the completed “Corrective Action Plan Form” and submit to the subrecipient’s designated Project Officer. An e-mail is acceptable so long as it includes a scan of the signatures of the individuals required to submit the form.
 - A. If the CAP is not received by the deadline, the Project Officer will send one reminder e-mail. Failure to submit a Corrective Action Plan within the allotted timeframe may result in suspension of reimbursement or the implementation of sanctions.
4. The Project Officer will provide the subrecipient with written notice of approval or denial of the CAP within five business days of receipt of the CAP.
 - A. If the CAP is not approved, the Project Officer will return the CAP to the subrecipient with comments and recommendations. The subrecipient shall have five business days to submit a revised CAP.
 - B. If the CAP is approved the Project Officer will review progress/implementation of the plan through monthly conference calls and/or will schedule subsequent site visits as appropriate.
5. Failure to implement a CAP will result in sanctions. This can include, but is not limited to, disallowing expenses, suspending reimbursements, or terminating the contract.
6. After all findings have been cleared and all corrective actions implemented, the RW Project Officer will send a letter to subrecipient indicating all issues have been resolved. A copy of the letter will be maintained in the subrecipient’s file in the Ryan White Programmatic Office.

Verification:

- Review of CAP.
- Site visit.

See “Corrective Action Plan Form”



PPPN-064 Corrective
Action Plan Form.xls

Approved: January 2017

Reviewed: January 2021