

## **Corrective Action Plan**

As a pass-through entity for Federal Education funds, the New Hampshire Department of Education (NHDOE) has prepared this **Corrective Action Plan Information Sheet** to assist Federal program subrecipients in the execution of accurately filling out a corrective action plan as a result of a Federal fiscal monitoring report finding. Federal fiscal monitoring reports are issued to those LEA's that were monitored as a result of the risk assessment either onsite or remotely. Depending on the results of the monitoring visit, a report with findings may be issued requiring corrective action. A corrective action plan must be properly executed and returned to the Bureau of Federal Compliance (BFC) within 30 days of receiving the final report.

### **Corrective Action Plan Process**

A corrective action plan template is attached to each Federal fiscal monitoring report with findings. An individual plan must be filled out for each finding (i.e. two findings, two corrective action plans). The corrective action plan must be fully executed in order to be considered received by the Bureau of Federal Compliance. Any issues with the document will be communicated with the LEA. It is the expectation that the LEA reach out to the BFC with any questions so a fully executed corrective action plan can be on file by the 30 day deadline.

### ***What information is required in the CAP?***

- Subrecipient Contact information (typically Business or Grants Manager)
- Subrecipient Name (District/Charter School)
- Action Item- the finding number
- Description- brief description of the finding
- Date (date being filled out)

*There are four boxes to choose from at this point;*

- Partially implemented- most likely to be the case as the requirements of the finding are in the works of being implemented, but will take some time to do so
- Revised CAP being implemented- this should only be the case if you have had a conversation with the BFC about why you need different requirements
- Full implemented- supporting documentation is attached to the CAP to show full implementation of the requirements

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This document is not a substitute for the advice of your own attorney and/or law firm licensed to practice law in the state of New Hampshire. In reading and applying Federal law, we recommend that you seek and obtain the advice of counsel with questions of application, interpretation, and/or to ensure that use of this information is appropriate to your particular situation.

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- No further action required- The subrecipient will not be taking any further action as the issue was resolved before the plan was submitted. Required supporting documentation will be attached.

*Once a box is selected for the status of the plan, the following will need to be completed on the template:*

- Name of person completing the form
- The date
- If options 1 or 2 was selected a brief status update will need to be provided with expectation of completion
- If this is an updated corrective action plan to a plan previously submitted, please put the updated action date (i.e. original plan was partially implemented, the LEA has corrected the issue, the new CAP reflects fully implemented with the status date)
- If option 3 or 4 was selected, we need an explanation of how the item was fully implemented with supporting documentation attached per the requirements in the monitoring report

## **Corrective Action Plan FAQ's**

### ***Who should I send my CAP to?***

The CAP should be sent to the person that originally sent you the monitoring report. If for some reason that person is no longer available, please send it to the Bureau's general email (provided at the end of this information sheet).

### ***How long do I have to resolve my compliance concern?***

The due date for the requirements in the Federal fiscal monitoring report are identified in the timeline and evidence section of the report. The typical timeline for correction is six months after the report was issued to allow ample time for creation, implementation, and sometimes Board approval. It should be identified in your CAP what the anticipated completion date is.

### ***Do you have an example you can provide?***

Yes! We will attach the example to this document. The example is for a finding that identified the need to update a policy (policies) to meet Federal requirements.

### ***Is our CAP going to be posted on the NHDOE website?***

Corrective action plans along with the final Federal fiscal monitoring report issued to the LEA will be made publicly available on the NHDOE website. This will be part of a new monitoring procedure implemented in 2021. At the time of this information sheet the website has not been fully reformed yet.

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***We won't be compliant within 30 days of the report being issued, what should we do?***

The intention of the CAP is to provide the BFC an update that the LEA has acknowledged the findings and requirements of the Federal fiscal monitoring report and that there is a plan in the works to correct that finding. The CAP does not require supporting documentation unless the BFC is being told the issue is fully resolved (plan fully implemented). The CAP alone is the only thing due within 30 days of the final report being issued. The BFC strongly encourages the LEA to take the allotted time to fully execute compliant and comprehensive documents as a result of the CAP.

**Technical Assistance**

Please feel free to contact the Bureau of Federal Compliance staff should you have any questions relative to the contents of this document.

<p>Bureau of Federal Compliance NH Department of Education 101 Pleasant Street Concord, NH 03301 603-271-3837 or 603-271-3808 <a href="mailto:federalcompliance@doe.nh.gov">federalcompliance@doe.nh.gov</a></p>
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# EXAMPLE DOCUMENT

## NHDOE Federal Funds Monitoring Corrective Action Plan

(Use a separate form for each Corrective Action Item)

**Subrecipient contact:** Jessica Lescarbeau, XYZ Manager

**Subrecipient:** Fake District

**Action Item:** Finding #01

**Description:** Implement updated policy in accordance with Federal requirements.

**Date:** 11/01/21

Please check the box that most appropriately matches the District's status in implementing the Corrective Action Plan (CAP). Please also provide any documentation that supports the District's assertion that the CAP has been fully implemented.

- (1) Partially implemented
- (2) Revised CAP being implemented
- (3) Fully implemented
- (4) No further action required (provide detailed explanation below):

Jessica Lescarbeau

Name of person completing this form

11/01/21

Date

If options (1) or (2) are selected, please explain the implementation status &/or how the CAP was revised as well as the anticipated completion date in the space below:

The District will bring to the Board the corrected and Federally compliant policy necessary at the next policy meeting set for 12/21/21. A second reading will take place at the 01/22/22 meeting with the expectation that the policy will be adopted fully by the required completion date of 04/01/22.

Corrective Action Plan Update or other explanation as necessary, (status date: / / )

If option (3) is selected, please explain how this was implemented in the space below:

**Please return to the Bureau of Federal Compliance within 30 days of receipt.**

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TDD Access: Relay NH 1-800-735-2964

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