



IOWA DEPARTMENT OF JUSTICE

ATTORNEY GENERAL
BRENNA BIRD

Corrective Actions

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On-Site Monitoring Corrective Actions

Within 60 days of the on-site monitoring visit, the CVAD staff who conducted the on-site monitoring visit will issue a report outlining any corrective action(s) including any requirements or recommendations. This letter will be sent to the agency's key personnel. If the agency is a non-profit, the letter will also be sent to the chair/president of the nonprofit-agency's board.

The letter will also be uploaded into the grants management system and the agency will be required to fill out a [site monitoring corrective action tracking form](#) to provide required updates to the corrective action plan (CAP). CVAD will monitor the agency's compliance with the CAP.

Financial Corrective Action

If CVAD has documented financial concerns about a subrecipient, CVAD will determine if:

1. Financial risk assessment designation needs to be changed;
2. CVAD financial staff needs to conduct an immediate desk review;
3. CVAD financial staff needs to conduct an immediate on-site monitoring visit.

If an organization is placed on financial corrective action regarding claim submissions, they will be required to submit 100% documentation for three months. After the end of three months, CVAD finance and the grant managers will determine if the corrective action status is released in full, released with conditions or extended.

Financial corrective action and probationary status impacts the entire organization, therefore, all CVAD grant projects within an organization are affected.

Programmatic Corrective Action

If CVAD has documented programmatic concerns about an organization or a program within an organization, the CVAD grant manager will determine if:

1. CVAD's programmatic risk assessment designation needs to be changed;
2. The problem/problems warrant a formal corrective action plan;
3. CVAD needs to provide additional technical assistance;
4. CVAD staff need to conduct an immediate on-site visit.
5. CVAD will either release or extend the subrecipient from corrective action as appropriate.

Other Corrective Actions

An event or series of events, could substantiate a review of the financial or programmatic risk assessment and, or the monitoring of an organization or project. This review may result in the changing of the risk designation for the remainder of the grant cycle, the implementation of a probationary period, a written corrective action plan or other actions deemed appropriate, based on the findings of the review.

Examples of events which warrant a review of the risk assessment, or monitoring are: audit findings, significant and continual errors on CVAD claims, findings from CVAD on-site monitoring or financial desk reviews, programmatic concerns stemming from complaints from other organizations or from program participants or from the results of program reports submitted to CVAD.

Once CVAD is aware of a potentially adverse situation, a grant manager will do the following:

1. Review and document the situation;
2. Consult with CVAD financial staff regarding potential financial issues, if necessary;
3. Determine if a new risk assessment level or corrective action plan is needed;
4. Notify appropriate organization/programs.

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