Corrective Action Policy & Procedures

The subrecipient is expected to work closely with SDWP to meet and exceed federal, state, and local performance measures in order to provide high quality services and outcomes to our customers.

This Corrective Action Policy and Procedures covers all contracted subrecipients serving participants with funds from the San Diego Workforce Partnership (SDWP). This document outlines the procedures for corrective action, and details the manner in which SDWP staff and subrecipients will address program performance, financial reporting, and monitoring deficiencies.

Corrective action will be taken when a contracted subrecipient fails to meet compliance or performance in any of the following areas:

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| * Achieving performance measures or milestones as outlined in the scope of work and/or fidelity to the program design as outlined in the subrecipient’s proposal |
| * Significant monitoring findings and/or not working to address and/or close findings in a timely manner |
| * Underspending contract amount against planned budget/trend |
| * Mismanagement of contract which impacts SDWP performance standards, expenditure rates, employer relations and/or customer service |
| * Other violation of the legislative, regulatory, legal, and other contractual requirements |

Please note that the above measures, and their respective performance standards, are subject to change based on federal, state, and local laws, policies, and SDWP and subrecipient negotiated contract changes.

# PERFORMANCE MEASURES, STANDARDS AND MONITORING

SDWP will monitor the performance of the subrecipient throughout the program year using 1) data reporting from the program’s system of record, 2) monitoring reports, 3) financial reports from SDWP’s finance team and 4) other program reporting requirements as specified in contract and/or requested by SDWP.

It is the responsibility of the subrecipient to ensure all staff involved in the service delivery and program management are properly trained to perform the tasks outlined in their scope of work. SDWP will provide technical assistance, as needed.

Corrective Action Process

The following outlines the progressive manner in which SDWP staff and subrecipients will address performance deficiencies.

1. If an area of deficiency in contract compliance or performance is identified, SDWP will send a corrective action letter noting the area(s) of deficiency to the subrecipients’s Executive Director or equivalent position.
2. The subrecipient is required to provide a response to the SDWP within five (5) business days of the issuance of the corrective action letter and complete the following:
   1. Submit a corrective action plan using the Corrective Action Plan Template (Exhibit 1) and provide progress updates on plan, on frequency designated by SDWP
   2. Meet with the Program Specialist to discuss corrective action and any necessary technical assistance, on frequency designated by SDWP
3. It is the responsibility of the subrecipient to address and resolve performance and contract compliance issues. SDWP will work with the subrecipient to provide identified technical assistance and/or capacity building needs to ensure the delivery of high quality services to participants.
4. Once a corrective action letter has been issued, the deficiency will be reviewed by the Program Specialist, on a frequency selected by SDWP, to determine if the issue has been resolved by the end of the period specified in the Corrective Action Plan Template (Exhibit 1).
5. When/if SDWP staff have verified the corrective action plan has been carried out and the subrecipient has corrected the contract underperformance, SDWP staff will notify subrecipiebt it is no longer on corrective action.

1. If the deficiency(ies) is not satisfactorily rectified, subrecipients shall be subject to one or more of the following actions:
   * 1. The Corrective Action may be continued for an additional time period depending upon the circumstances of the deficiency and ability to resolve the issue promptly, as determined by the SDWP; or
     2. Subrecipients with outstanding or unresolved Corrective Action Plans may face one or more of the following consequences:

* Subrecipient may not be considered for continued funding, or an extension of their contract from SDWP;
* Subrecipient may be subject to a de-obligation of funds;
* Subrecipient may be considered ineligible for funding in future procurements, for a specified time period, from SDWP; and/or
* Subrecipient may be subject to a termination of contract.

1. If it is determined that a de-obligation of funds or a termination of contract is warranted, this recommendation will be brought forward at an action item to SDWP’s board and relevant committee(s). Written notification will be sent to the subrecipients Signature Authority informing them of such action.