

Aging Programs Corrective Action Plan Template

General Instructions

Grantees are required to comply with all terms and conditions contained in Notices of Award (NoA) issued by the Administration for Community Living (ACL). Such terms and conditions include, among other things, all applicable statutes, regulations, executive orders, and agency policies. When it is determined that a grantee is not in compliance with one or more of these requirements, ACL may require a grantee to submit to ACL a plan to come into compliance under a Corrective Action Plan (CAP), and any such CAP may require ACL's prior written approval, as determined by ACL.

The grantee's proposed CAP, together with the required cover letter (see below), should be submitted to ACL as set forth in these instructions.

The CAP process is intended to be collaborative. Under a CAP, a grantee and ACL will jointly identify progress milestones and a feasible timeline for the grantee to come into compliance with the applicable requirement(s). Grantees must make a good faith effort at achieving full compliance to continue to have permission from ACL to operate under a CAP. ACL also may impose additional requirements and/or restrictions with respect to any noncompliance issue.

Instructions:

The attached template must be used for the CAP.

Grantees should complete the CAP template and submit it via email, as directed by ACL and within the time frame required by ACL, for ACL's consideration and approval. The CAP template submission must be accompanied by a cover letter on the grantee's letterhead and signed by the highest ranking management official (e.g., chief executive officer, executive director, etc.) of the grantee (and, when applicable, also by the Long-Term Care Ombudsman), which includes the following information:

- Written confirmation that the grantee will:
 - use good faith efforts to fully comply with the applicable requirement(s);
 - collaborate with ACL in the finalization of the CAP (e.g., identification of progress milestones and a feasible timeline for the grantee to come into compliance); and
 - provide written updates to ACL as to the status of the action steps to be taken under the CAP, as agreed to by the parties and as otherwise requested by ACL.
- The projected date by which the grantee will fully comply with the applicable requirement(s).

How to Complete the Template

Column A:

Insert the specific requirement with respect to which the grantee is out of compliance. For example, if the grantee is out compliance with a specific section of the Older Americans Act (OAA), of the Elder Justice Act (EJA), or of the Code of Federal Regulations (CFR), that specific OAA, EJA or CFR section should be clearly identified; if the grantee is out of compliance with a term contained in a NoA, such as a limitation on the permitted use of the grant funds or match or reporting requirements specific to the grant award, the applicable term of the NoA should be clearly referenced.

Column B:

Explain: (1) *how* the grantee is out of compliance with the specific requirement referred to in Column A, (2) the amount of time the grantee will need to comply with the applicable requirement, and (c) *why* that amount of time will be needed.

Column C:

Set forth the action steps to be taken by the grantee to remedy the non-compliance issue. For each action step, also include the date by which that action step is projected to be completed.

Column D:

The projected date by which the grantee will be in compliance with the section listed in Column A should be inserted here.

Column E:

This space should be used for updates as to the status of the grantee's efforts to resolve the noncompliance issue, such as the status of the action steps to be taken by the grantee to resolve the noncompliance issue and when the grantee believes it has fully resolved the non-compliance issue.

Please address one issue per row, and add additional rows and pages as needed. Please contact ACL with any questions.

Paperwork Reduction Act Public Burden Statement

According to the Paperwork Reduction Act of 1995 5 CFR § 1320.8(b)(3), no persons are required to respond to a collection of information unless such collection displays a valid OMB control number (OMB 0985-008X). Public reporting burden for this collection of information is estimated to average eight (8) hour per response, including time for gathering, maintaining the data needed, completing, and reviewing the collection of information. The obligation to respond to this collection is required to obtain or retain benefits under the Older Americans Act (P.L. 116-131). Information collected is planned for use by ACL to conduct federal oversight of Aging Programs. ACL uses information collected to monitor federal funds. Data will be kept private to the extent allowed by law. There are no assurances of confidentiality. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Administration for Community Living, U.S. Department of Health and Human Services, 330 C Street, SW, Washington, DC 20201-0008, Attention Adam Mosey adam.mosey@acl.hhs.gov and reference the OMB Control Number 0985-xxxx. Note: Please do not return the completed information collection to this address.