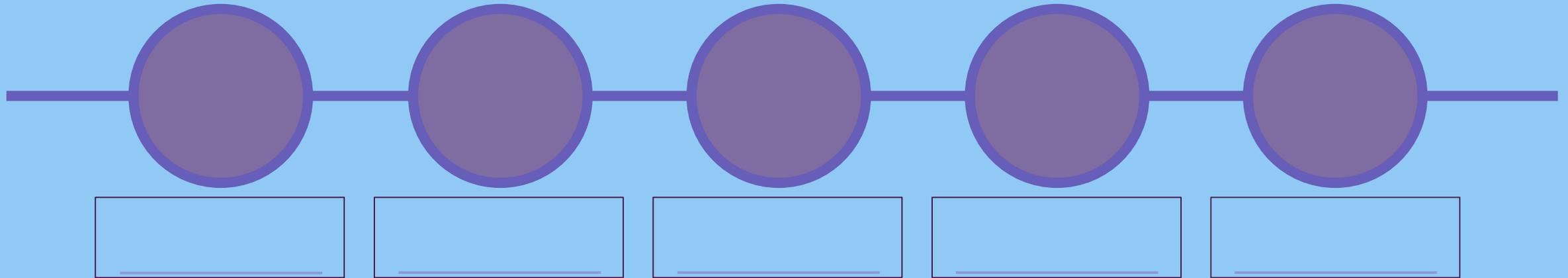


# Corrective Action Plan (CAP) Basics

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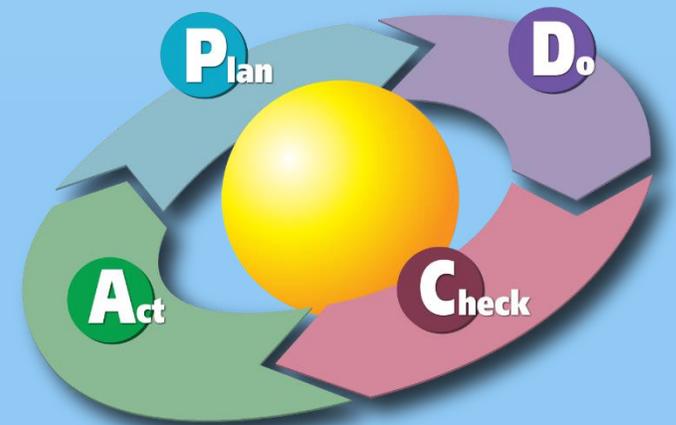
DSS/FSD/Performance Monitoring Unit



# Corrective Action Plan (CAP) Basics

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A CAP is a tool to help ensure a contractor fulfills their responsibilities under the contract and to ensure services are provided in accordance with contract requirements.



# Corrective Action Plan (CAP) Basics

The State Agency's role is to:

1. Initiate a CAP when it is determined necessary based on contract provisions and non-compliance findings
2. Review the CAP provided by the contractor
3. Accept, reject or request clarification on the responses
4. Monitor the contractor's completion of the CAP action items
5. Revisit findings in 6 months to ensure continued compliance

# Corrective Action Plan (CAP) Basics

The Contractor's role is to:

1. Develop a CAP for approval by the State Agency
2. Execute the CAP once approved
3. Achieve the expected outcomes



# Benefits of a CAP

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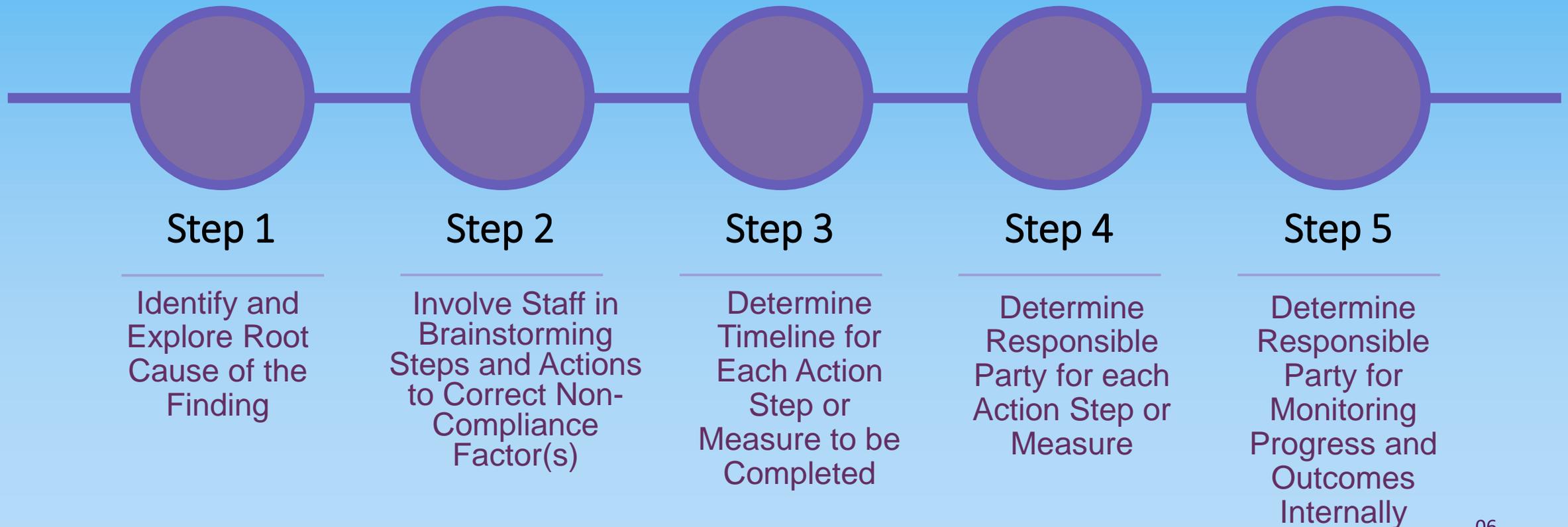
- The benefits of a CAP process are to:
  - Clearly identify, agree upon, manage, and monitor step-by-step actions to remediate contract deficiencies
  - Ensures accountability for the implementation of the improved process/change
  - Includes follow-up and/or reviews that evaluates the effectiveness of the correction actions
  - Follows a standardized process for reviewing and approving CAP remediation activities
  - Determines root causes of deficiencies to reduce the probability of recurrence
  - Reduces uncertainty and minimize risk to both parties





# Corrective Action Plan Basics

DSS/FSD/Performance Monitoring Unit



# Common Deficiencies or Findings - MWA

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## Possible Action Steps or Measure for Resolution

Contractor failed to comply with section 2.7.4 of the contract requiring referred participants be engaged in work activities or an alert sent to FSD to initiate sanction within 90 days of the referral date.

- Develop staff training to address the deficiency
- Initiate standard internal processes to avoid recurrences
- Designate a responsible party to review and monitor the process

2.7.5 The MWA.001 call -in letter is not mailed within 3 days of the referral and/or the initial meeting is not scheduled within 5 to 10 days from the date the notice is mailed.

- Hold staff meeting to clarify requirements and timeframes
- Develop a backup plan to accommodate staff absences
- Designate responsible party to review and monitor the process

2.7.6 Assessments not completed in 30 days of the initial meeting or the CR 101 or a comparable assessment not used to measure literacy, math, and work skills and/or was not used as the foundation of the participant's IEP.

- Develop staff training to address deficiency
- Coordinate with MoJobs Center staff to ensure assessments are completed
- Designate responsible party to review and monitor the process

# Common Deficiencies or Findings - MWA

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## Possible Action Steps or Measure for Resolution

2.7.7 Participant IEP's did not contain a career pathway, benchmarks for goals, backup plans, or steps for achieving goals or to remove barriers.

- Develop staff training to address the deficiency
- Conduct staff observations and offer guidance as needed
- Designate a responsible party to review and monitor the process

2.10.1a Sufficient documentation of activities, participation, compliance, or employment progress was not entered in the MWA system or was missing from the case file.

- Develop staff training on documentation required for each work activity
- Conduct second level review of documentation and MWA System entries monthly
- Designate a responsible party to review and monitor the process

2.7.8 The contractor failed to coordinate participant services provided by all services providers, monitor participant progress or identify and provide service coordination for barrier removal.

- Develop staff training to address the deficiency
- Hold community partner meetings to educate partners and develop a referral and follow-up plan
- Designate a responsible party to review and monitor the process

# Common Deficiencies or Findings - MWA

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## Possible Action Steps or Measure for Resolution

2.7.10 The minimum of three (3) monthly contacts were not maintained or documented.

- Develop staff training to address the deficiency
- Conduct staff observations and offer guidance as needed
- Designate a responsible party to review and monitor the process

2.7.11 The contractor is not providing TRE that allows the participant to be in countable work activities or the services are not documented in the MWA system or in accordance with their internal policy.

- Review and update TRE internal policy as needed
- Hold staff meetings to ensure all staff are aware of policy and MWA system entries requirements
- Designate a responsible party to review and monitor the process

2.7.12 The contractor is not providing WRE that allows the participant to be in countable work activities or the services are not documented in the MWA system or in accordance with their internal policy.

- Review and update WRE internal policy as needed
- Hold staff meetings to ensure all staff are aware of policy and MWA system entries requirements
- Designate a responsible party to review and monitor the process

# Common Deficiencies or Findings - SkillUP

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## Possible Action Steps or Measure for Resolution

The contractor did not comply with the SkillUP Handbook, page 22, in establishing the participant's IEP. IEP's must contain a career pathway, benchmarks for goals, objectives to meet goals, and steps to remove barriers.

- Develop staff training to address the deficiency
- Develop a checklist of actions required during the assessment and IEP process
- Conduct staff observations and offer guidance as needed
- Designate a responsible party to review and monitor process

The contractor did not comply with the SkillUP Handbook, pages 10-12, on entering Case Notes and/or did not follow the DWD statewide Service Notes policy.

- Hold staff meetings to review policy and MoJob system entries requirements
- Designate a responsible party to review services reports and case notes entered
- Designate a responsible party to review and monitor process

The contractor did not comply with the SkillUP Handbook, page 15, stating every participant record must contain 5 core services entered on the SNAP application in MoJobs including S10 or S20 funding service, 213, 205, 101, and 107.

- Hold staff meetings or trainings to review services required for SkillUP participants
- Designate a responsible party to review services reports
- Designate a responsible party to review and monitor process

# Common Deficiencies or Findings - SkillUP

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## Possible Action Steps or Measure for Resolution

The contractor did not comply with the SkillUP Handbook, page 21, requiring an Objective Assessment Summary be completed in MoJobs for each participant.

- Develop staff training to address assessment requirements
- Designate a responsible party to review services reports or conduct focused file reviews
- Designate a responsible party to review and monitor process

The contractor did not comply with the SkillUP Handbook, pages 36 – 39, on providing and documentation of need for support services such as TRE/WRE.

- Hold staff meetings to review policy and MoJob system entries requirements
- Designate a responsible party to review supportive services and MoJob entries
- Designate a responsible party to review and monitor process

The contractor did not comply with the SkillUP Handbook, pages 24-28, requiring SkillUP forms and documentation were not obtained, retained, or submitted in accordance to requirements.

- Hold staff meetings or trainings to review documentation and forms requirements
- Designate a responsible party to conduct internal file and MoJobs reviews
- Designate a responsible party to review and monitor process

# Tips for Writing a CAP

## Assign the right person to write the CAP

- Familiar with internal process and procedures
- Familiar with the areas of noncompliance to ensure appropriate response

## Research Root Cause prior to writing CAP

- Why is this happening?
- Has this problem been address previously?
- Why is it happening again?
- Why?

## Ensure the CAP answers:

- Who?
- What?
- When?
- How?



*For every effect, there is a root cause. Find and address the root cause rather than try to fix the effect, as there is no end to the latter.  
~Celestine Chua*

# What is Included in a CAP for each finding?

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- **Findings:**
  - List the exact finding in the FSD monitoring report
- **Plans for Addressing Deficiency:**
  - A detail of action step for resolution
- **Plan for Tracking Progress:**
  - Specifically list how each action step will be tracked
- **Target Completion Date:**
  - The target or actual completion date of each action step
- **Responsible Person(s):**
  - Person responsible for each action step

# Sample CAP Response

Findings	Plans for Addressing Deficiency	Plan for Tracking Progress	Target Completion Date	Responsible Person(s)
<p>(1) 2.7.5 The MWA.001 call -in letter is not mailed within 3 days of the referral and/or the initial meeting is not scheduled within 5 to 10 days from the date the notice is mailed.</p>	<p>The contractor understands the importance of following policy when sending out 1<sup>st</sup> Call-in appointment letters. Staff received a refresher training. Letters are being mailed and Initial meetings are being held in accordance with policy requirements.</p>	<p>The contractor's internal compliance department will ensure the correct policy and process is followed in the future by tracking the process and timeframes.</p> <p>(See attached tracking spreadsheet.)</p>	<p>06-30-2019</p> <p>Ongoing</p>	<p>Intake Specialist, Case Managers, Career Coaches, Supervisors, Directors, and Compliance Manager</p>
<p>(2) 2.7.10 The contractor did not comply with requiring a minimum of three (3) monthly contacts with the participant.</p>	<p>Staff have received refresher training and understand the importance of three (3) monthly contacts with each participant .</p>	<p>The contractor's internal compliance department will ensure three (3) monthly contacts are made by conducting focused reviews for all caseloads.</p>	<p>06-30-2019</p> <p>Ongoing</p>	<p>Intake Specialist, Case Managers, Career Coaches, Supervisors, Directors, and Compliance Manager</p>

