



CORRECTIVE ACTION POLICY

Policy Number: 1040

Effective Date: May 1, 2017

A. BACKGROUND

Corrective action plans reduce risk by bringing subrecipients and contractors into compliance with administrative requirements when an issue has been identified. Corrective action plans provide an opportunity for subrecipients and contractors to resolve administrative and compliance issues in a timely and effective manner.

B. POLICY

Workforce Snohomish monitoring reports or other administrative activity which identify a compliance exception, administrative issue, negative observation, or non-performance under WIOA, associated regulations, State provisions, local policy, or contract provisions shall require the development and approval of a written corrective action plan. This plan shall describe the problem, the corrective action to be taken, proposed implementation and completion dates, and possible consequences.

A corrective action plan may be developed by the subrecipient/contractor for approval by Workforce Snohomish, or jointly by the subrecipient/contractor with Workforce Snohomish. All corrective action plans must be approved by Workforce Snohomish. Workforce Snohomish may, at its sole discretion reject or require amendment of a corrective action plan that is insufficient to address the issue. Subrecipients/contractors may appeal using Workforce Snohomish's dispute resolution procedure.

Failure to comply with the actions and timeframes established in the plan may result in a reduction, cancellation, or termination of the contract with the subrecipient or contractor.

Written record of each corrective action requested and submitted will be retained in the subrecipient or contract file at Workforce Snohomish.

C. DEFINITIONS

- **Compliance Exception:** A compliance exception is any exception to WIOA, associated regulations, State provisions, or local policy that creates a risk to the resources or services of the program.
- **Administrative Issue:** An administrative issue is a condition or weakness which causes a circumstance or situation that presents a risk to the resources or services of the program.
- **Negative Observation:** A negative observation is a local condition which presents a potential weakness in regard to the risk of the program's resources or services.
- **Non-Performance:** Non-performance is a local condition which results from the subrecipient not attaining program outcomes as specified in the subcontract.

References:

- [Workforce Snohomish Dispute Resolution Procedure](#)

Supersedes:

- Memorandum #01-10