

Subrecipient Corrective Action Procedures

All grants administered by the Pennsylvania Emergency Management Agency (PEMA) are subject to the many requirements found in federal and state laws, federal regulations (e.g., Code of Federal Regulations), federal requirements (e.g., Office of Management and Budget Circulars), federal grant guidance, and state policy guidance. Recipients of these grant funds (referred to as Subrecipients) are also subject to periodic reviews in the forms of audits and monitoring to assure compliance with all applicable requirements and that performance goals are being achieved. Such reviews often result in the identification of “Findings of Non-Compliance.”

Findings are defined as discoveries that, within the context of any review process, represent operational deficiencies or errors, material program weaknesses or unacceptable program liabilities that would probably result in questioned grant costs or, collectively characterize a significant risk to program integrity.

PEMA is required to monitor the activity of Subrecipients per 44 CFR § 13.40 and 2 CFR § 200.331. Monitoring activity will be completed through desk reviews and site visits.

This document provides instructions to Subrecipients regarding PEMA’s requirements for corrective action(s) relative to monitoring Findings. Whenever a Finding is issued against a grant, the Subrecipient is required to formally respond and demonstrate either the completed or proposed corrective actions. In simple terms, corrective action identifies the “who did what to address the issue?” referenced in the Finding, and “when was it done, or when will it be completed?”

By answering such questions, the Subrecipient develops a Corrective Action Plan (CAP) that provides detailed information for the activities either completed or planned to address the issue(s) referenced in the Finding. In order to expedite this response process, PEMA has developed a CAP template with detailed instructions. The Subrecipient is encouraged to consult with the monitoring team lead for assistance with developing their CAP if needed.

The Subrecipient must submit the required CAP to PEMA within 45 calendar days of the date the monitoring report is issued. If the Subrecipient does not provide or comply with the CAP, future grant funding could be withheld.

To determine if the Subrecipient’s Corrective Action Plan is sufficient, the CAP must:

- Identify the staff responsible for corrective action, including title and complete contact information.
- Describe the specific corrective action taken (or to be taken) for each Finding.
- Show the planned completion date for each major activity.
- Include documentary evidence to verify compliance of Findings that have been resolved.
- Include the signature of an authorized agent of the subrecipient.

When the CAP is received, PEMA staff will determine whether the Plan reasonably and sufficiently addresses the Non-Compliance Findings. PEMA will notify the subrecipient if the CAP is approved, or, if further information or documentation is required.

