



CMMI® Quality - Corrective Action Policy

Purpose

This policy defines ISACA's corrective actions for the CMMI community and details scenarios in which ISACA takes these actions to address violations of CMMI method, model, policy, or ethical standards.

Scope and Applicability

All CMMI Partners and credentialed individuals are subject to the requirements of this policy. CMMI Partners are responsible for maintaining current knowledge of CMMI policies, processes, requirements, and guidelines and for ensuring that credentialed individuals sponsored under their Partner agreement adhere to them.

Background

CMMI products and services help organizations thrive in the competitive global marketplace; however, global adoption has also introduced new challenges. Standards of excellence must be applied globally, and the CMMI community must be held accountable when conducting business in accordance with ISACA's CMMI agreements, policies, processes, requirements, and procedures. When violations arise, corrective action will be imposed.

ISACA defines four primary violation types:

- Model – Failure to correctly interpret CMMI model practices or practice areas.
- Method – Failure to perform or correctly perform any of the required activities of the CMMI Method Definition Document (MDD).
- Policy – Failure to comply with any of the requirements of an ISACA CMMI policy.
- Ethics – Failure to uphold any of the tenets of the ISACA CMMI Code of Professional Conduct (COPC).

Corrective action covers a wide spectrum, from measures considered remedial in nature to more severe penalties, including loss of certification and termination of an organization's CMMI Partner agreement. Each issue subject to corrective action is evaluated using a quantitative scoring method that factors in the intent, severity, and number of violation occurrences of similar violation types for the transgression; professional judgement is applied that analyzes the specific circumstances surrounding the violation when determining the appropriate corrective action. ISACA analyzes and investigates each issue with the goal of having the corrective action be in proportion to the error. ISACA always looks to help the individual recover from the

mistake and learn from it. Decertification is never the first choice but is arrived at if all other measures have not solved the problem or if remediation is not the appropriate solution.

Policy Implementation Detail

A corrective action is an action taken for remedial or disciplinary reasons which could adversely affect certification and authorization credentials, certification candidacy, or CMMI Partner licenses. These actions are taken by CMMI Quality Management and include, but are not limited to,

- Issuance of warning emails or letters
- Coaching sessions with CMMI Subject Matter Experts (SMEs)
- Defined probationary period mentored by an experienced Lead Appraiser (LA) or Instructor
- Assignment of required remediation
- Forfeiture of certification renewal credit
- Suspension of credentials, candidacy, or licenses for a defined period
- Rejection of course or appraisal deliveries
- Cancellation of credentials or licenses, with no possibility of re-entry into licensing, certifications, authorizations, and partnerships

Any corrective action is assigned must be acknowledged within 10 business days upon notification. Failure to acknowledge assigned corrective action may result in heightened action being taken at ISACA's discretion.

Causes for Corrective Action

CMMI Quality Management thoroughly reviews all quality and ethical concerns that result in corrective action. The items below represent some, but not all, causes for corrective action to be assigned.

- Failure to comply with ISACA CMMI:
 - Policies
 - Procedures
 - Methods
 - Course or appraisal audits
 - Certification and authorization agreements
 - Licensing agreements, including the Partner Guide
 - Code of Professional Conduct (COPC)
- Training and Certification issues:
 - Completing a course under a false or shared identity
 - Having ethical issues during an observation e.g., dishonesty or failure to adhere to the COPC
 - Cheating or plagiarism
 - Failing a remedial assignment
- Licensing issues:
 - Failing to be sponsored by an active CMMI Partner in good standing

- Failing to remit support and use fees
- Setting contractual terms with clients that create violations of method, model, policy, COPC, etc.
- Failing to have written agreements between a CMMI Partner and its clients for the delivery of courses and appraisals
- Representing uncredentialed individuals as qualified to deliver courses or appraisals
- Appraisal-related violations:
 - Failing to submit appraisal results packages to ISACA in accordance with defined policies and the MDD
 - Failing to communicate the responsibilities of the Appraisal Sponsor role to clients
 - Using Appraisal Team Members who do not meet the requirements specified in the MDD
 - Granting inflated maturity or capability levels for appraisals
 - Guaranteeing maturity or capability levels to Appraisal Sponsors
 - Knowingly accepting falsified evidence as valid in an appraisal
 - Inaccurately interpreting the CMMI Model or MDD
 - Using unauthorized modifications of the CMMI Model or MDD
 - Leading an appraisal team outside the guidelines of the CMMI Model or MDD
- Course delivery-related violations:
 - Failing to submit course attendee lists, including all course participants, to ISACA
 - Allowing non-ISACA personnel to audit courses
- Data integrity issues:
 - Sharing individual user accounts in CMMI systems, e.g., the CMMI Appraisal System (CAS)
 - Accessing information or accounts belonging to another individual. System accounts cannot be created, monitored, shared, or used on behalf of another individual or organization
 - Registering accounts that do not belong to a legitimate user
 - Providing false identification
 - Setting up organizational accounts
 - Submitting feedback forms, surveys, and course evaluations on behalf of another individual
- Respect for Intellectual Property (IP)
 - Licensees do not have permission to create derivative products
 - Written permission must be requested and granted to use copyrights, trademarks, logos, and service marks
 - Only CMMI Appraisal Marks are approved for distribution to Appraisal Sponsors; all other logos are considered unauthorized

Possible Corrective Action

Corrective actions assigned may include, but are not limited to, one of the examples described below. ISACA reserves the right to take any corrective action deemed appropriate at its sole discretion:

- **Warning:** Usually issued for first instance or lesser severity violations, ISACA notifies the credentialed individual or Partner organization that a violation has occurred. The violation is described, and the credentialed individual or Partner organization is warned of potential future corrective action if similar violations are repeated.
- **Engagement/Coaching:** ISACA communicates with the credentialed individual to provide mentorship and coaching related to the issue being evaluated. This action is taken to ensure that the credentialed individual is aware that an issue or violation has occurred and to help the individual correct or avoid the issue in the future.
- **Probation/Suspension:** This is enacted for repeat or more serious violations. ISACA may assign probation or suspension for a credentialed individual's entire certification portfolio or for a subset of certifications, depending on the scope of the violations identified. The credentialed individual's certifications are placed under probation or suspension for a predetermined period, usually three to six months. During probation, the credentialed individual is permitted to perform the activities for which he or she is certified; mentorship is typically assigned with a report due on the individual's progress at the end of this period. If the progress is deemed satisfactory, the probation may be lifted at ISACA's discretion. If the progress is deemed unsatisfactory, additional corrective action may be assigned. During suspension, the credentialed individual is not permitted to perform the activities for which he or she is certified under the suspended certifications. When a credentialed individual or CMMI Partner is under suspension, all publications of the applicable credentials on the CMMI Partner Directory are removed and access to CMMI systems is suspended if all credentials are suspended.
- **Decertification and/or termination of Partner agreement:** In the case of serious violations, all affected credentials are cancelled and affected parties may not re-apply for certification. Partner organizations are responsible for ensuring the integrity and competence of the individuals performing work under their Partner agreement. If a corrective action results in the cancellation of an individual's certification or credential, ISACA reserves the right to also cancel the sponsoring organization's licensed Partner agreement. Credentialed individuals not involved with the corrective action may find other licensed Partner sponsorship to remain active at ISACA's discretion.

Violations may compromise the quality and/or integrity of a CMMI course or appraisal delivery. Accordingly, ISACA may reject the course or appraisal result if a corrective action is imposed. If an appraisal is rejected, the Appraisal Team Leader (ATL) is required to debrief the Appraisal Sponsor regarding the cause. If a course is rejected, the Instructor is required to notify all attendees of the outcome. Usage fees are not refunded for appraisals and courses that have been rejected. Appeals to corrective actions assigned by Quality Management may be requested if they meet the criteria outlined in the [Complaints and Corrective Action Appeals Policy](#).

Additional References

- Questions regarding this policy should be submitted via support.isaca.org

- Published policies are available at cmmiinsitute.com on the policy page: <https://cmmiinsitute.com/partners/policies>

Revision History

Version Number	Date Published	Date Effective	Changes
V2.2	2 June 2023	29 March 2016	Updated Background section with definitions of violation types and clarification of corrective action assignment process; Updated Possible Corrective Actions and Causes for Corrective Actions sections to align to current process; Added link to Appeals policy; minor grammar, readability, and clarifications throughout
V2.1	9 November 2021	29 March 2016	Updated to ISACA branding; minor grammar and readability edits
V2.0	15 October 2019	29 March 2016	Updated content for alignment with MDD, format & structure.
V1.0	29 March 2016	29 March 2016	Initial release.