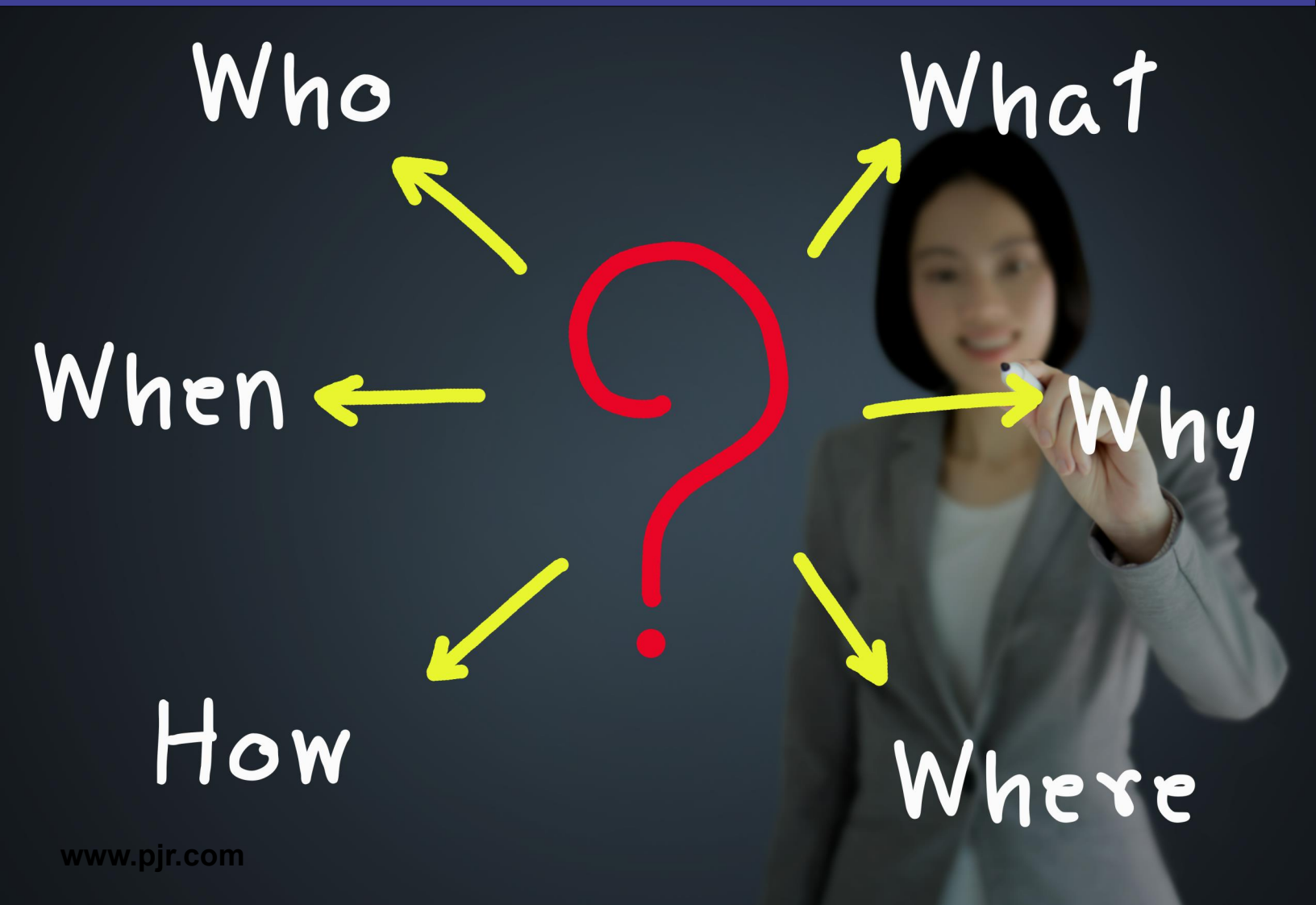
PERRY JOHNSON REGISTRARS, INC.

Root Cause and Corrective Action: An Overview



www.pjr.com

Why?

At Perry Johnson Registrars, we pride ourselves on constantly working to help our clients improve through certification. After all, there is a strong correlation between third-party audit performance and an organization's quality record with its customers; the purpose of a management systems audit is not to convince the auditor to write as few nonconformities as possible. Rather, the objective is to take systemic corrective action for each and every instance of nonconformance that is found – only then will the strong correlation become fully apparent!

Audit Findings

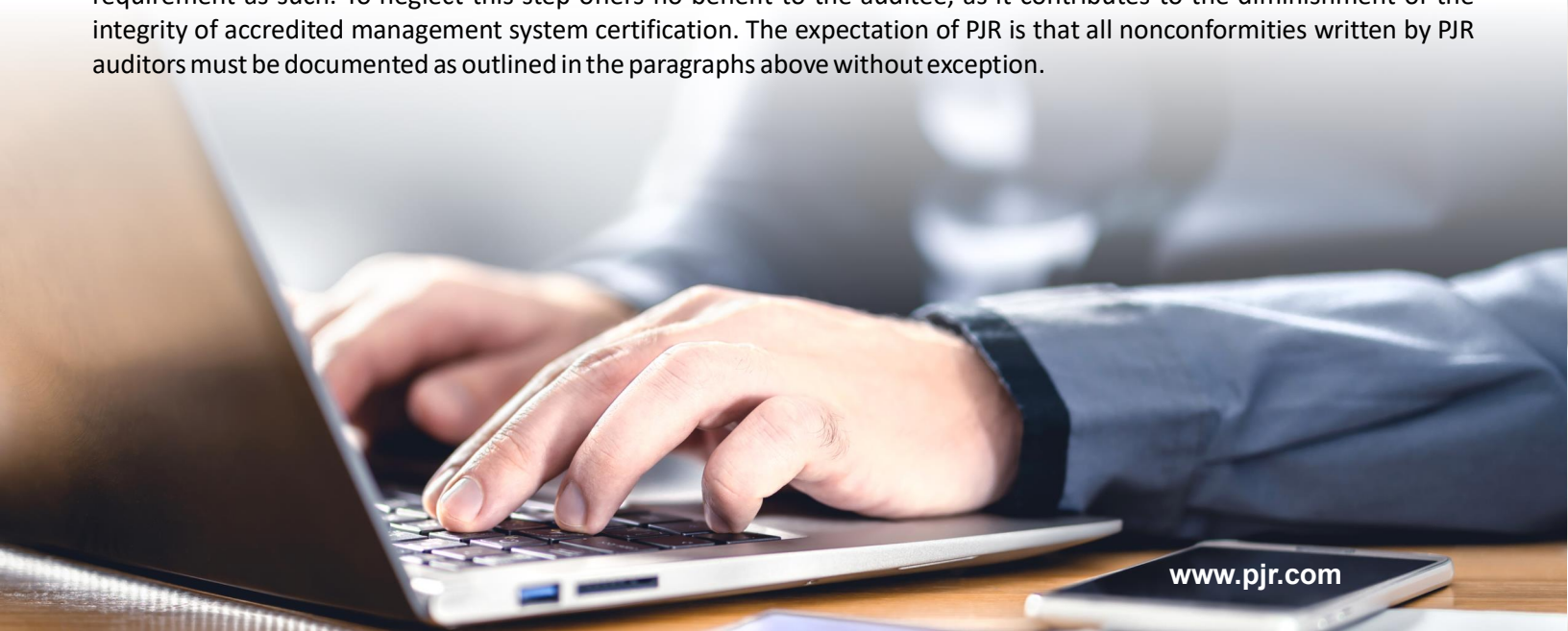
In a third-party audit with PJR, an audit finding will have three distinct parts: a statement of nonconformity, objective evidence, and a citation of the requirement that has not been fulfilled. Audit findings that do *not* for some reason contain all three parts should not be accepted by PJR clients; we encourage any such findings to be rejected during the audit's closing meeting. Likewise, opportunities for improvement should exist only as statements or recommendations, not as a citation of an unfulfilled requirement.

The first part of an audit finding, the statement of nonconformity, is typically the first thing a viewer sees. It is not, however, usually the problem itself – but rather a *symptom* of the problem. It must be expressed as an issue with the system; if expressed in terms of a person or specific incident, then it is in the "symptom stage." This is a common mistake to watch for and is made by both internal and third-party auditors, as it is crucial to get to the true problem, aka the *systemic issue*, otherwise the problem-solving efforts will not be effective. Fixing symptoms of a systemic issue is similar to taking Tylenol for a fever; the temperature reading may go down, but the underlying infection that caused the fever needs antibiotics instead!

A well-written nonconformity should not only identify the systemic problem in question but should also stand the test of time. It should be simple to look back at nonconformities written years ago and understand what the problem was. By clearly outlining the problem (rather than the symptom) and describing the objective evidence that points to why the problem is apparent, the nonconformity is concise and easy to reference.

When reviewing a statement of nonconformity written by your internal audit team or a third-party auditor, it is key to ask these three questions: "Are there any issues between "symptoms" and the real problem?", "Does the final statement of nonconformity focus on a systemic issue?", and "Are there data (objective evidence/citation of requirement not fulfilled) to assist in understanding?"

Though policies differ between certification bodies, at PJR it is required that all auditors document any nonfulfillment of a requirement as such. To neglect this step offers no benefit to the auditee, as it contributes to the diminishment of the integrity of accredited management system certification. The expectation of PJR is that all nonconformities written by PJR auditors must be documented as outlined in the paragraphs above without exception.



Actions Taken to Correct

The actions taken to correct a nonconformity, also referred to as "corrections" or "containment actions," are taken with respect to the symptom or incident. That is to say that they are incident-specific actions. It is important that these corrections are made immediately to halt the symptom, and ought to be as detailed as possible, citing specific forms, job numbers, procedures, etc. Any corrections undertaken should also include an extent analysis or look-across, such as "If the auditor found one instance, how many more are there?" and "What is the depth and breadth of the problem?"

Root Cause Analysis

A good root cause analysis answers this question: "What in the system failed such that the problem occurred?" As previously stated, the focus is on the *system*, not the *incident*. While some problems may have multiple root causes, or several possible root causes; if the root cause cannot be absolutely determined, then all require corrective action. If the root cause has been found, then the problem can be turned on and off like a light switch. If, however, the problem cannot be turned on and off at will, then the root cause has not been properly identified and requires further investigation.

Techniques

There are many different techniques that may be employed for root cause analysis, including "is/is not," fishbone diagrams, or the why technique. Regardless of which method is used to identify the root cause of a problem, there are multiple unacceptable root causes that will not be accepted, such as blaming "Oversight," "We misunderstood the requirement," "I forgot," "Our consultant messed up," or the highly common "Human error."

Corrective Action

At the most basic level, corrective actions should address the root cause, particularly the question asked previously: "What in the system failed such that the problem occurred?" It is common to see an organization offer containment actions or corrections (addressing systems) rather than true corrective actions, which involve a change in the system itself. Each root cause identified should have at least one designated corrective action, and subsequent data should show that the problem has 100% disappeared or been resolved. In the case of training being a part of the corrective action response, the technique used to validate the effectiveness of training should also be included.

Preventive Actions

Corrective actions should not be confused with preventive actions. Preventive actions answer one of two questions: “What other systems exist that might have the same root cause(s) present?” or “What system(s) could I have had in place that would have prevented this from happening?”

At their core, preventive actions address the future, not the past – aka what could *still* happen, not what *did* happen. The actions taken should address the system without being fixated upon the individual incident in order to best prevent future problems of similar type. Many times, preventive actions are not identified only because of nonconformities. Many management system standards require preventive action as a proactive process with multiple inputs, such as near-miss reports, 5-S programs, or other lean initiatives, etc. To put it plainly, a lack of nonconformities should never mean there are no preventive actions being taken by an organization.

Verification Activities

One final step in the problem-solving process that is commonly missed is verification. A sound verification exercise includes ensuring corrections have been implemented, including removal of correction steps that involve an added layer of inspection. After all, the true root cause should have been found. Additionally, one should verify that the corrective action addresses the root cause and the problem can be turned on and off, like a light switch. Client's 2021 audit can be conducted remotely due to the COVID-19 pandemic. Client's responses on the F-108ict indicate that they are a suitable candidate. Using verification to regularly check up on previously-executed corrective actions ensure that the system has continued to operate as intended; change is difficult, after all, and systems tend to return to where people are most comfortable.

Conclusion

While root cause analysis may seem overwhelming or frustrating, it truly lies at the core of certification. Learning how to think through problems in the mindset of identifying systemic issues and implementing preventive actions can take time. PJR is here to help – for more information on this topic or a wide range of others, visit **www.pjr.com** or call **(248) 358-3388**.