

Writing Effective Recommendations for Incidents, PHAs, LOPAs, MOCs, Reviews, Projects and Audits

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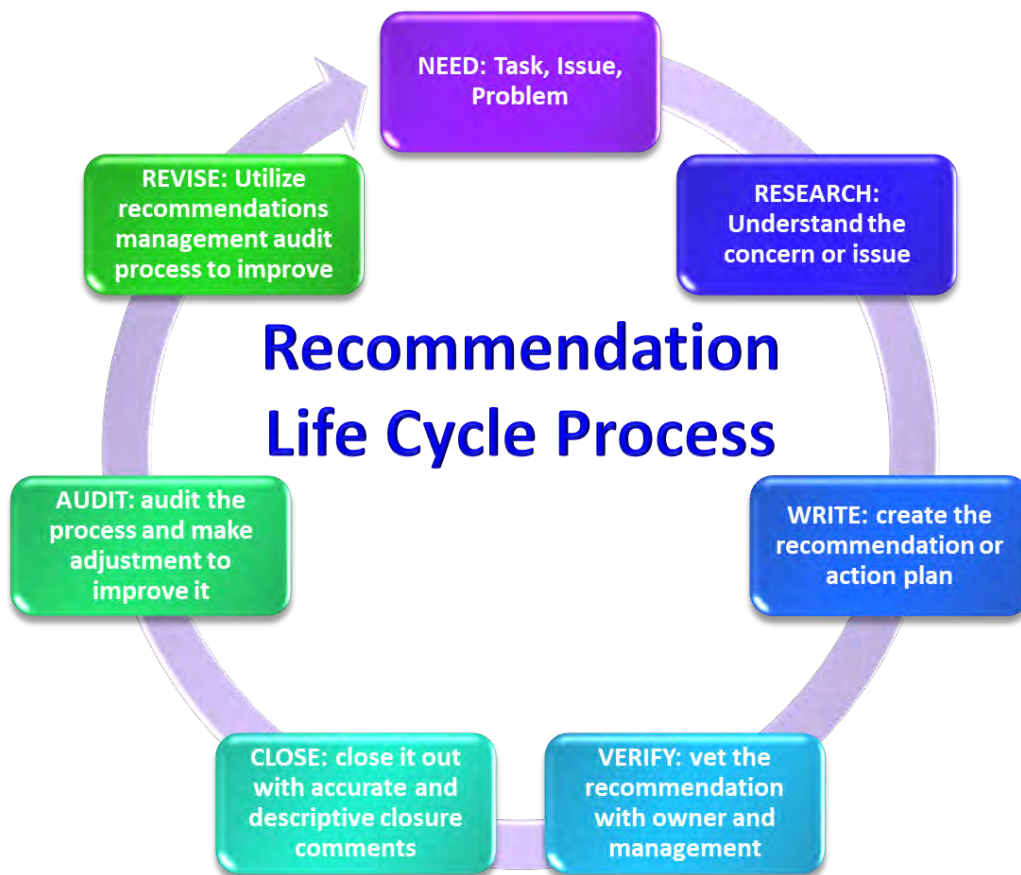
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Recommendation Life Cycle

An introduction to recommendation writing begins with an understanding of the entire life cycle for a single recommendation, whether this takes place in groups as part of a larger plan, or in the form of a single improvement.



The **NEED** arises from several sources that will be described in detail later. However, the need is a double-sided pickaxe required for mining long term improvement. Recommendations are either bread as a preventative action or corrective action.

Preventative actions are mined from audits, reviews, inspections, process hazard analysis (PHAs), layers of protection analysis (LOPA), opportunities for improvement (OFIs), near misses, and reviews of projects, programs, studies.

Corrective actions are mined from incidents and issues that have already happened. This is not the ideal place to be mining recommendations; however, you have proven that the current systems are flawed.

RESEARCH is required to frame the recommendation and provide context. This portion not only supports the definition of a recommendation, but also supports the information that the data management and the recommendation owner will require to justify its creation. This is your defense when the question “Why do we need to do this?” arises. Remember from the *“Incident Investigation Principles & Techniques 101,”* to practice GOAL.

What is GOAL? Go Out And Look. When performing research to make field changes, it is always preferred to experience the work environment for yourself. Once the recommendation is written, and you feel a solution has been discovered, practice this same oversight to ensure it will work.

WRITING is the primary focus of this training. Because much of this training is dedicated to recommendation writing, a simple definition is provided in the Life Cycle review. This is the culmination of the first two steps. This is the descriptive action you want improvement.

VERIFICATION is also a part of the writing process, even though it is listed as the next step. Verify is utilized during the writing phase to ensure the recommendation and its context are properly framed. It is used afterward to vet the recommendation with owners and management to gain support and buy-in.

CLOSURE is the process of executing the action and completing it as intended.

AUDITING is the process of reviewing your recommendation process and adjusting to improve it.

REVISION is the final process in the recommendation life cycle. This is applying the audit results.

TIP: All management processes require a system to ensure continuous improvement. The Plan, Do, Check, Adjust system, or similar, made popular by Edward Deming, a.k.a. The Shewhart Cycle should be utilized with a recommendation management process.

What are the required elements for a good recommendation?

Before we dive into mining for our golden recommendation nugget, let's review some history. Many companies have adopted the practice of utilizing acronyms to help the remembrance of persons. Wikipedia acknowledges the first-known use of the most popular term, SMART, occurred in the November 1981 issue of Management Review by George T. Doran. The advantage of SMART objectives is that they are easier to understand and to know when they have been done. SMART criteria are also associated with Peter Drucker's management by objectives concepts.

Over time, other companies and authors have expanded on this concept with their versions. These versions may change a single word descriptor or lengthen the acronym to SMARTER. Still, others have used completely different words, like DART, CLEAR, SMARTTA, SMARRT, PURE. The table below demonstrates the definitions and terms for the basic elements that should be contained in a well-written recommendation for SMART. The web offers the opportunity to explore additional acronyms.

SPECIFIC: Target a specific area for improvement. This could be an engineered solution, training, procedure, policy, repair, etc.
MEASURABLE: How will you measure progress and completion?
ASSIGNABLE: Who specifically will be responsible for resolving the recommendation, and do they have the authority and resources they need?
RELEVANT or REALISTIC: What can realistically be achieved with available resources? Is it relevant, and will it address the intent of the recommendation?
TIME-BOUND: What is a reasonable time to complete in order to close the recommendation?

It can be preferable to keep things simple. KISS, keep it simple stupid, is another acronym that comes to mind. DART is similarly helpful: definable, assignable, realistic, time-bound. The point of first showing acronyms is that they are essentially a formula for success in writing recommendations.

Recommendation elements are very simple. They are:

- Each recommendation must address a specific issue. If multiple steps are required by different groups of people, then multiple recommendations are required.
- An owner is required that has access to the available resources and has the knowledge, skills, and resources to complete it. General or generic recommendations that cannot be owned by an individual will need to be further defined. Recommendations from regulatory or auditing groups often fall under this umbrella.
- The recommendations need to be realistic. What this means it must be something that can be reasonably accomplished. For example, gold may be a very good seating material for common

valves. However, the expense may be overwhelming, and a comparable material that is much less expensive and offers the same level of function like stainless steel is more realistic.

- Time limits must be set. Reasonable time limits are further suggested. In the recommendation management section, we will go into suggestions for setting time limits for recommendations.

You may be saying to yourself, at this point, “I got this. I don’t need to learn anything further.” However, we have all fallen victim to a poorly written recommendation that cannot be closed without much effort. This training will take you deeper into understanding the complete cradle to the grave lifecycle of a recommendation.

TIP: A good recommendation is one that fixes the problem permanently and prevents reoccurring failures. It is also the one that can be completed as intended. If the person or group is having to dig for information to understand the recommendation, then they most likely will have flawed results when they are completing the action.

What is the difference between an Action Item, Corrective Action, Preventative Action, and Recommendation?

Some people can be confused by differing terminology; however, the basic elements required to write recommendations for each of these is the same. Do not become hung up on the terminology. The basic tenant is that something needs to be completed to prevent, repair, or fix an existing issue.

Action items are normally attributed to tasks developed in a management-employee relationship. Even though this may be the origins, the basic elements described above are still required to ensure that the action item is well written, realistic, assignable, and time-bound.

Corrective actions are predominantly related to the incident investigation community. Although no one has a copy write on common words, the words as written some companies have a proprietary trademark on certain terms and words in the way they are defined and graphically displayed. Again, the same elements apply to writing an effective correction item.

Later in this training, under the Source Generation section, we will discuss terminology for recommendations that have built-in priorities. In the auditing world, a finding is first scribed detailing the what, who, and why something was chosen. Then a recommendation or recommendations are crafted on how the auditor thinks that they should be resolved. The recommendations are guided by the level of priority.

Does the terminology matter? It could, and it should not be discounted because knowing the source a recommendation was created under is important. However, if someone calls it a corrective action, another person an action item, and still another a recommendation, then the author says it depends. If they were all generated from the same source, such as an audit or an incident, it really does not matter. If they were generated from different sources or processes, then it could matter, but most likely, the differences will be subtle.

Preventative actions are different than the previous three mentioned. Preventative action is not based on an issue or problem that has already happened. A preventative action, like the name suggest, is meant to prevent something from occurring that has not yet happened. However, the elements required to write a good preventative action involves the same process.

Breaking down the elements required in a Recommendation

Defined and Specific

What needs to be accomplished? Specific means that the objective is concrete, detailed, focused, and well-defined. The recommendation states a specific outcome or a precise objective to be accomplished.

To help set specific Action Items, it is helpful to ask:

- **WHAT** needs to be done? These are best written using strong, action verbs such as conduct, develop, build, plan, execute, etc. This helps your Action Item to be action-orientated and focuses on what's most important.
- **WHY** is this important for risk reduction? (Relevance)
- **WHO** is going to do what? Who else needs to be involved? (Assignable)
- **WHEN** does this need to be completed? (Time-Bound)
- **HOW** is it going to be done? (Definition)

Diagnostic Questions

- Is the Action Item well-understood? Do you, as the recommendor, truly understand what you are writing the recommendation for? Edward Deming said, "If you do not understand the process, then you don't know what you are writing a recommendation to prevent." If you are writing a recommendation to prevent a problem, you need to understand what it is you are writing a recommendation to prevent. It may take multiple recommendations from different people to create an action plan. If you are writing a recommendation to prevent a problem, you decide to create an action plan. If you are writing a recommendation to prevent a problem, you make up the whole. When you are writing a recommendation to prevent a problem, the emphasis is lost, and an individual is not responsible for the entire action plan.
- Is the Action Item described in a way that is clear and concise? For example, "create, define, evaluate, engineer, repair, and replace" is not a clear description of an action item. The verb "create, define, evaluate, engineer, repair, and replace" is important. In the examples section, we will see how to write a clear and concise action item. The action items should look like: "Create, define, evaluate, engineer, repair, and replace the product." The action items should be clear and concise. There are two ways to write an action item. One way is to write the entire action plan. The other way is to write the entire action plan.
- Is it clear what needs to be done to prevent the issue or prevent it? The first purpose for this is to prevent the issue or prevent it. The second purpose for this is to prevent the issue or prevent it.
- Is the outcome clear? Personal responsibility is important. There are two ways to write an action item. One way is to write the entire action plan. The other way is to write the entire action plan.
- Will this Action Item lead to a significant mitigation? What this means is the outcome clear to everyone involved. Will it prevent or significantly reduce the chances of a recurrence. Does this resolve the issue?

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