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1. PURPOSE:

The purpose of this document is to define the procedure for processing requests for corrective or preventive actions within the Program Management Office (PMO).

2. RESPONSIBILITIES:

2.1 Quality Management – It is the responsibility of Quality Management to monitor:

- NCRs for trends that may require systemic corrective action
- Customer complaints, or other customer feedback to identify needs for corrective or preventive action requests
- Internal Audit results for trends that may require systemic corrective action

2.2 Originator – Any NTTA stakeholder may originate a corrective or preventive action (CAR or PAR) request. A CAR or PAR request may be created and activated by the Originator, and submitted to the Quality Team for review. The Originator shall:

- Clearly define the identified nonconformance and provide supporting data / evidence
- Make a recommendation for the individual who will be assigned as the Responsible Party

2.3 Quality Team – Quality personnel shall be responsible to review submitted requests for a CAR or PAR to determine if they are valid and best suited to resolution through the CAR process. The Quality Team shall:

- When opening a CAR / PAR clearly define the identified nonconformance and provide supporting data / evidence
- Identify and assign the responsible party for effective resolution of the CAR / PAR
- Review submitted CAR / PAR to determine if the true root cause has been addressed and if the proposed action plan is sufficient to prevent recurrence
- When a CAR / PAR is completed, verify the action plan has been implemented
- Designate an individual responsible for limited process oversight when the CAR / PAR is generated by someone outside of the PMO office, or more familiar with the subject matter, in the judgment of the Quality Team
- Validate the actions taken for all CAR / PAR and schedule follow-up, when advised by the Quality Manager, to determine long term effectiveness of the action taken
- Approval and closing all completed CAR / PAR

2.4 External Oversight Person (EOP) – Responsible for limited oversight of CAR / PAR and shall:

- Review the CAR / PAR submitted by the Responsible Party to determine if the true root cause has been addressed and if the proposed action plan is sufficient to prevent recurrence
- When a CAR / PAR is completed, verify the action plan has been implemented
- Recommend CAR / PAR to the Quality Team for closure

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- 2.5 PMO Staff and Corridor Managers – PMO staff and CMs shall be responsible to monitor:
- NCRs generated on NTTA projects for trends that may require systemic corrective action
 - Customer complaints, or other customer feedback to identify needs for corrective or preventive action requests
 - Provide input on potential corrective or preventive action requests to the PMO Quality Manager
- 2.6 Responsible Party – CAR / PAR owner are assigned as the Responsible Party shall be responsible for:
- Providing a response to Quality Team / EOP within the time allowed and identifying the true root cause or causes of the nonconformance
 - Provide a corrective / preventive action plan to prevent recurrence
 - Determining the implementation date when the action plan will be completed
 - Ensuring the approved corrective action plan is completed by the indicated implementation date
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3. SCOPE / APPLICABILITY:

This procedure shall apply to potential and confirmed process nonconformances or repetitive NCRs within the PMO and its consultants operations.

4. REFERENCES:

- [QM-08](#) *Quality Audit* procedure

5. DEFINITIONS & ACRONYMS

- 5.1 **Corrective Action** - Actions taken to correct and eliminate recurrence of root causes for deficiencies and/or ineffective controls from specified requirements
- 5.2 **Preventive Action** - Actions taken to eliminate the causes of potential deficiencies from specified requirements and/or risks not yet addressed
- 5.3 **Internal Audit Findings** – CAR / PAR as a result of audit findings in accordance with *QM-08 Quality Audit procedure* or other observances of process, or procedural noncompliance within the PMO or its consultants.
- 5.4 **External Audit Findings** – CAR / PAR resulting from audits that have conducted on behalf of the PMO / NTTA.

6. PROCEDURES:

In cases where the PMO Quality Team designates process oversight / management (see step 6.2) to an External Oversight Person (EOP), they shall have responsibility to complete all the actions specified for the Quality Team, with the exceptions of steps 6.2 and 6.7. In no case shall the designated individual close the CAR / PAR.

6.1 Potential Corrective / Preventive Action Request Submittals

- 6.1.1 **Observed Process / Procedural** – Based upon observed process / procedural nonconformance within PMO operations or that of its consultants.

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- 6.1.2 **Internal / External Audit Findings** – Auditors will submit requests for CAR / PAR based on the findings that have resulted from audits that have been conducted.
- 6.1.3 **Trends** - Quality Management may generate a CAR / PAR when PMO activities indicate systemic failure, or when repetitive NCRs are observed
- 6.1.4 **Customer Complaints or Feedback** - Quality Management may generate CAR / PAR as a result of customer complaints or other customer feedback to address serious or repetitive customer concerns.

Originators shall:

- 6.1.4.1 Clearly describe the problem / issue
- 6.1.4.2 Make reference to failed sections of stated requirements
- 6.1.4.3 Make a recommendation for the individual who will be assigned as the Responsible Party
- 6.1.4.4 Activate a potential Corrective or Preventive Action Request (CAR or PAR).

6.2 Review of Potential Corrective / Preventative Action Requests

Within 5 days of receiving a CAR / PAR request the Quality Team shall determine if the request is valid. The criteria to be used in determining the validity of a request will be based on the provided supporting data/evidence and its relevance to failed requirements related to procedures and processes used in the PMO Quality Management System or other provided documentation.

- 6.2.1 When the Quality team finds that a CAR / PAR request is not valid they may:
 - 6.2.1.1 Close the request and notify the Originator.
 - 6.2.1.2 Request clarification from the Originator.
- 6.2.2 When the Quality Team finds that a CAR / PAR request is valid:
 - 6.2.2.1 The Quality Team shall determine if the CAR/ PAR request will be assigned to an external person for oversight who will act and manage the process on behalf of the Quality Team in steps 6.3 through 6.6
 - 6.2.2.2 The Quality Team shall Assign the Responsible Party (owner)
 - 6.2.2.3 Ensure that the Responsible Party and EOP have access to EPDS to perform their assigned task.
 - 6.2.2.4 Notify the Responsible Party that a CAR / PAR have been assigned to them.
 - 6.2.2.5 Ensure that the Responsible Party is aware that a response is due 10 business days after the CAR / PAR has been assigned.
 - 6.2.2.6 Notify the Responsible Party and the EOP that subsequent communication shall be addressed to the EOP for steps 6.3 through 6.6.

6.3 Response to CAR / PAR

Upon receipt of a CAR / PAR the Responsible Party shall:

- Determine the root cause of the nonconformance to achieve the aim of preventing recurrence.
- Establish the actions needed that will correct the nonconformance and prevent future recurrence

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- Submit the action plan to the Quality Team / EOP with the date upon which the corrective action will be implemented
- The Responsible Party shall be given 5 working days to correct the issues on rejections

6.4 Response Review

Upon receipt of the CAR / PAR response, the Quality Team / EOP shall evaluate the root cause and corrective action plan provided. This evaluation will conclude if the true root cause or causes has been identified, and if the proposed action plan is sufficient to prevent recurrence of the nonconformance. The Quality Team / EOP shall:

- 6.4.1 If approved, forward the approved CAR / PAR to the Responsible Party for implementation of the action plan.
- 6.4.1.1 Quality Team shall enter the actual date of the provided response into the "validation" field in EPDS to allow calculation of the Response Time metric.
- 6.4.2 Reject and suspend the CAR / PAR back to the Responsible Party when the evaluation determines:
- The root cause or causes has not been correctly identified
 - The action plan is not sufficient to prevent recurrence

6.5 Implementation of the Corrective / Preventative Action Plan

Upon receipt of an approved CAR / PAR (or resubmission) the Responsible Party shall execute the approved action plan by the submitted implementation date. Any problems or issues that could cause a delay in the implementation of the CAR / PAR shall be reported to the Quality Team / EOP as soon as they are identified to request an extension. Once the action plans in the CAR / PAR are completed the Responsible Party shall contact the Quality Team / EOP to schedule review and verification activities.

6.6 Implementation Review / Verification

Upon notification by the Responsible Party that a CAR / PAR has been completed, the Quality Team / EOP shall review and verify the implementation of the action plan. The Quality Team / EOP shall:

- 6.6.1 Confirm the action plan has been completed by the indicated date.
- 6.6.2 Verify the actions identified in the plan have been implemented. Any changes to the action plan should be noted as part of the verification.
- 6.6.3 Recommend CAR / PAR for closure.
- 6.6.4 Determine and schedule follow up when additional time is needed to generate objective evidence.
- 6.6.5 Reject the CAR / PAR to the Responsible Party for revision when the approved action plan has not been implemented correctly (see 6.5)
- 6.6.5.1 The Responsible Party shall be given 5 working days to correct the issues.
- 6.6.6 When the action plan has not achieved the intended results of eliminating the identified root cause it shall be rejected to the Responsible Party to determine a new action plan (see 6.3).

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6.7 Validation / Closure

The Quality Team shall validate and close all CAR / PAR after verification of the actions has been completed. The Quality Team shall:

6.7.1 Validate that the actions implemented have achieved the intended results of eliminating the identified root cause.

6.7.1.1 Schedule follow-up, when advised by the Quality Manager, to determine long term effectiveness of the action taken.

6.7.2 Close the CAR / PAR and notify the Responsible Party.

6.7.3 Reject the CAR / PAR to the Responsible Party for revision (see step 6.3) when the action plan has not achieved the intended results of eliminating the identified root cause.

6.7.3.1 Notify the EOP when assigned for oversight.

6.8 Escalation

The Quality Team may escalate any issues to PMO management when users do not adhere to the requirements of this processes.

7. REGULATORY REQUIREMENTS:

N/A

8. RELATED BOARD POLICY:

N/A

9. COMPONENT DOCUMENTS:

- [QM-10-A1](#) Corrective and Preventive Action Reference Card

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10. REVISION HISTORY:

Revision	Revised by:	Date Issued	DRN	Reason for Revision
0	Micki Ellis	06/05/2008		Original Issue
1	Troy Federspiel	05/12/2009	10004	Global changes to procedures Added Table 1 Added flowchart
2	Troy Federspiel	09/25/2009	10025	6.0 Procedure Updated to reflect the designation of the individual to oversee CAR / PAR 6.6 Implementation Review / Verification Updated and clarified actions 6.7 Validation / Closure Section added to clarify process 6.8 Escalation Updated for clarification 9 Changed to "FORMS" 11 Flowchart Updated to reflect process changes
3	Troy Federspiel	11/20/2009	10063	New release of: QM-10-A1 Corrective Action Reference Card Revision of QM-10 Corrective and Preventive Action. Adding QM-10-A1 attachment to the Section 9.0 Component Documents
4	Troy Federspiel	05/19/2010	10152	5.2 Updated Definitions & Acronyms 6.2.3 Deleted Table 1
5	Troy Federspiel	07/14/2010	10204	6.4.1 updated to direct Quality Team to enter the response submittal date into proper field in EPDS

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11. FLOWCHART:

QM-10 CAR / PAR Flow Chart

