

Evaluation of Repetitive/Programmatic Issues

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Enforcement Coordinator's Handbook Definitions

- **Programmatic Problem:** Generally involves some weakness in administrative or management controls, or their implementation, to such a degree that a broader management or process control problem exists.
 - Can be extremely subjective.
 - Term systemic is often used in describing programmatic failures.

- **Repetitive Problems:** Two or more different events or conditions separated in time with comparable causes/circumstances and which involve substantially similar work activities, locations, equipment, or individuals where it would be reasonable to assume that the contractor's corrective actions for the first occurrence should have prevented the subsequent event/condition.
 - Two? What conditions would have to exist to declare two events Repetitive.
 - How long before the clock resets, or does it ever reset.



Programmatic Noncompliances

- Issue(s) or noncompliance(s) related to one specific program or subject area. Key factors to consider:
 - Are there a significant number or occurrences of a noncompliance related to one program or subject area?
 - Are the noncompliance's spread across multiple departments, divisions, or directorships.
 - Do the noncompliance's represent a moderate to high risk to the organization?
 - Is there a broad range of issues across the totality of a specific program or topic area that indicates programmatic breakdown?
- Many times it comes down to a judgment call, does it feel like a programmatic issue?

Repetitive Noncompliance

- Issues that display a non-improving trend or the rate of occurrence has stabilized at an unacceptable level. Key factors to consider are:
 - Do the events or conditions represent an unacceptable risk?
 - Are the events symptomatic of a larger corporate or programmatic issue, which, if left unchecked, represents an unacceptable risk of a serious event?
 - Are the events or conditions minor in nature, but frequent enough to have a serious impact on facility operations, budgets, or schedules?
 - Are the events or conditions indicative of a failure of a corrective or compensatory actions from previous events, which, if left unchecked, represent and unacceptable risk of a serious event?
- Requires analysis of data to understand the potential for repetitive/recurring.



Bottom Line

- Use the definitions in the Handbook as a starting point.
- Establish a framework for your site and identify the attributes to further define the classification of issue(s) or noncompliance(s).
 - Procedure
 - Guide
 - Flowchart
- Use the process and adjust as necessary.