

## 5 Signs Your Corrective Action Process Is Broken

Common symptoms of a failing corrective action process — and exactly how to fix each one.

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Resource Guide | 2026 Edition

For Safety Directors, EHS Managers, and Compliance Leaders

# Introduction

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Every safety program generates corrective actions. The real question is whether those actions are actually being completed — or quietly accumulating in a backlog while the same hazards continue to expose your workers.

A broken corrective action process is one of the most dangerous conditions in a workplace safety program, precisely because it's invisible. On paper, the program looks active: inspections are happening, findings are being recorded, and corrective actions are being assigned. But below the surface, the loop isn't closing. Hazards stay open. Workers stop reporting. And when OSHA arrives or an incident occurs, the documented proof that your organization knew about a hazard and didn't fix it is already in the file.

**THE BASELINE:** A target of 90%+ of corrective actions closed by their assigned deadline is the performance threshold for high-functioning EHS programs. Most organizations are well below that — not because they lack resources, but because they have systems and accountability failures that compound quietly over time.

This guide identifies the five most common signs of a failing corrective action process, explains why each happens, shows what it looks like in practice, and gives you a direct fix for each one. If you recognize more than two of these signs in your current program, your process needs attention before your next inspection or your next incident.

#1

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# Your Overdue Backlog Only Gets Bigger

GROWING BACKLOG

## What You're Seeing

Every week, new corrective actions are assigned. Every week, some get completed. But the number of overdue items — actions past their deadline with no resolution — keeps climbing. You might have 10 overdue this week, 18 next week, 27 the week after. The backlog is a one-way valve.

A growing backlog is the single most reliable indicator of a broken corrective action system. It tells you that the rate at which hazards are being identified exceeds the organization's capacity to resolve them — and that gap is widening.

## Why It Happens

- No escalation system: When an action goes overdue, nothing happens automatically. No notification reaches the supervisor's manager. No one is tracking it.
- Unrealistic deadlines: Corrective actions were assigned with the same 30-day deadline regardless of severity, creating a pile-up of items that are "not urgent" until they're catastrophically overdue.
- No accountability consequence: Supervisors know that missing a corrective action deadline has no visible consequence. The backlog accumulates without friction.
- No leadership visibility: Senior leaders only see safety performance through lagging indicators (TRIR, EMR). The overdue backlog is invisible to the people who could create accountability.

### BROKEN PROCESS

- Overdue items sit until the next scheduled report
- Same 30-day deadline for all findings regardless of severity
- Safety manager manually tracks overdue through spreadsheet
- Leadership has no visibility until incident occurs

### WHAT GOOD LOOKS LIKE

- ✓ Automated Tier 1 escalation the day of deadline, Tier 2 at +48 hrs
- ✓ Severity-based SLAs: Critical 24 hrs, Serious 72 hrs, Minor 30 days
- ✓ Real-time dashboard showing overdue count by area and owner
- ✓ Monthly leadership scorecard includes overdue backlog as a KPI

**THE FIX:** If your overdue backlog is growing, start by establishing a zero-new-overdue rule: every new corrective action generated this week must be closed within its SLA. Work the existing backlog separately as a dedicated cleanup project. Separate the two problems — don't let the backlog define your baseline performance.

# #2 The Same Hazards Keep Appearing

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REPEAT FINDINGS

## What You're Seeing

Inspections keep finding the same types of hazards in the same areas. Housekeeping in Bay 3 is cited every month. The same electrical panel is flagged every quarter. The same worker behavior appears in corrective action after corrective action. You close the action, the hazard comes back.

Repeat findings are the most expensive failure mode in a corrective action system. They signal that your corrective actions are addressing symptoms rather than root causes — and every recurrence carries the same injury risk and citation exposure as the original finding.

## Why It Happens

- No root cause requirement: Corrective actions are assigned immediately without first identifying what caused the finding. The fix addresses the visible condition, not the system that produced it.
- Effectiveness not verified: Actions are marked closed when the physical fix is complete. No one checks whether the fix actually held over 30–60 days.
- Wrong control type: Administrative controls (procedures, signs, training) are applied to hazards that require engineering controls. Human behavior-dependent controls fail repeatedly.
- No repeat-finding tracking: No one is measuring the repeat findings rate. Each occurrence is treated as a new event rather than a pattern.

### BROKEN PROCESS

- Hazard found → action assigned → cleaned up → recurs next month
- Root cause field on the form is left blank or completed generically
- No 30-day effectiveness check after closure
- Repeat finding rate is not a tracked metric

### WHAT GOOD LOOKS LIKE

- ✓ 5-Why or fishbone analysis required before assignment for serious findings
- ✓ Both corrective action (fix it now) and preventive action (stop recurrence) assigned
- ✓ 30-day effectiveness verification required for all critical/serious findings
- ✓ Repeat findings rate tracked monthly; 3+ occurrences triggers systemic review

**THE FIX:** Any hazard that appears in three or more inspection cycles is a systemic issue. Stop assigning the same type of corrective action. Step up the hierarchy of controls — if the administrative approach failed twice, an engineering control is required. If that fails, consider elimination or substitution.

## #3

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## Nobody Knows Who Owns What

UNCLEAR OWNERSHIP

## What You're Seeing

Corrective actions are assigned to "the maintenance team," "operations," "all supervisors in Building B," or "EHS." When you follow up on an overdue action, everyone points to someone else. No one can tell you who specifically is responsible or what the current status is.

This is the most common root cause behind overdue backlogs. Shared responsibility becomes no responsibility. When any individual can reasonably assume someone else is handling it, no one handles it.

## Why It Happens

- Group assignments: The corrective action system allows assigning to a team, department, or role rather than a specific named individual.
- No named owner rule: The policy doesn't explicitly require one person to be accountable for completion and status updates.
- Cross-functional confusion: The finding involves both operations and maintenance, and neither department has claimed primary ownership.
- Paper-based tracking: A clipboard or spreadsheet can't enforce that a named individual is assigned before the form is submitted.

### BROKEN PROCESS

- "Assigned to: Maintenance Team" on 40% of corrective actions
- No consequence when no one from "the team" acts
- Status updates require contacting multiple people
- Unclear who to escalate to when deadline passes

### WHAT GOOD LOOKS LIKE

- ✓ One named individual required for every corrective action, no exceptions
- ✓ Owner receives automatic notifications at assignment, 48-hr warning, and deadline
- ✓ Owner is responsible for completing or coordinating — not the task, the outcome
- ✓ Escalation ladder tied to the named owner's direct supervisor automatically

**THE FIX:** Where a corrective action crosses departments, designate a lead owner who is accountable for final closure — even if they coordinate others to do the work. The lead owner's name appears on the action, their deadline applies, and their manager receives escalation notifications. One person, one accountability.

## #4

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## Near-Miss Reporting Has Dropped Off

DECLINING REPORTING

## What You're Seeing

Twelve months ago, workers submitted 8–10 near-miss reports per month. Now you're getting 2 or 3. Injury rates haven't changed much, but the leading indicator that predicted your safety posture has fallen off a cliff. Workers have stopped reporting — and a corrective action process that doesn't visibly close the loop is almost always why.

OSHA estimates that healthy near-miss reporting programs generate 5–10 reports for every recordable injury. When your ratio drops below that, it doesn't mean your workplace is safer — it means hazards are going unreported. And unreported hazards become incidents.

## Why It Happens

- Workers see no action on their reports: If someone reports a hazard and two weeks later the hazard is still there and nothing has been communicated, they stop reporting. The signal is clear: reporting doesn't change anything.
- No feedback loop: The corrective action system doesn't notify the original reporter when their finding is assigned, in progress, or closed.
- Perceived retaliation risk: Workers have seen or heard of colleagues who were blamed for incidents they reported. The anti-retaliation message exists in the policy but not in practice.
- Closure isn't visible: Actions are being completed, but workers in the field have no visibility. The loop closes on paper but not in the experience of the person who reported.

### BROKEN PROCESS

- Reporter submits finding and never hears about it again
- No feedback when findings are assigned or closed
- Corrective action status is only visible to safety staff
- Near-miss rate drop treated as good news rather than warning sign

### WHAT GOOD LOOKS LIKE

- ✓ Reporter notified automatically when finding is assigned and when it's closed
- ✓ Monthly all-hands update: "Here's what you reported. Here's what we did."
- ✓ Near-miss reporting rate is a leading indicator KPI on the leadership scorecard
- ✓ Falling report rate triggers an immediate investigation of cultural barriers

**THE FIX:** The fastest way to reverse a reporting decline is to make the feedback loop visible. Close an overdue item in a high-traffic area. Post a notice where workers gather: "You reported this. We fixed it." Do it consistently for 60 days. Reporting rates will recover when workers believe action follows their reports.

## #5

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## Corrective Actions Are Closed Without Evidence

PAPER CLOSURES

## What You're Seeing

Actions are being marked complete. The on-time closure rate looks healthy. But when you pull a sample and investigate, the closures are hollow: no photos, no verification, no evidence that anything actually changed. Supervisors are clicking "complete" on digital forms or checking boxes on paper to clear their queue — and the underlying hazards remain.

Paper closures are worse than open corrective actions, because they create false confidence. Leadership sees a 95% on-time closure rate and believes the program is working. Meanwhile, the hazards that were "closed" are still exposing workers, and when an incident occurs, the closed corrective action is proof that the organization was negligent rather than diligent.

## Why It Happens

- No evidence requirement: The closure process doesn't require any documentation of what was done. A checkbox or status change is all that's needed.
- No independent verification: The person who did the work also marks it complete. There's no separate verification step.
- Pressure to close: Supervisors are measured on closure rate, creating incentive to close quickly rather than close correctly.
- No effectiveness check: Even where physical fixes are documented, no one returns 30–60 days later to verify the fix held.

## BROKEN PROCESS

- "Mark complete" requires only a status change or checkbox
- Owner self-certifies that work is done with no documentation
- Closure rate is the only metric — quality of closure is never measured
- No follow-up to verify fix held over time

## WHAT GOOD LOOKS LIKE

- ✓ Photo evidence of corrected condition required before closure is accepted
- ✓ Independent verification by someone other than the action owner
- ✓ 30-day effectiveness check scheduled automatically at closure
- ✓ Closure quality audited quarterly: sample of closed actions re-inspected

**THE FIX:** Start with a closure audit: pull your last 30 days of closed corrective actions and physically verify 20% of them. If more than 25% can't be verified, you have a systemic paper-closure problem. Immediately institute photo evidence as a closure requirement — this single change raises closure quality more than any other intervention.

## The Diagnostic Summary

Use this table to assess which signs are present in your program today. Each sign you recognize is a specific, fixable problem with a direct solution.

#	Symptom	How to Diagnose	The Fix
#1	Growing overdue backlog	Check your current overdue count vs. 90 days ago	Severity-based SLAs + automated escalation
#2	Repeat findings	Calculate your repeat findings rate for the past 6 months	Root cause analysis + effectiveness verification
#3	No clear ownership	Pull 10 open corrective actions — can you name the owner of each?	One named owner rule, no group assignments
#4	Near-miss reports declining	Compare monthly near-miss submissions: last 3 months vs. prior year	Visible feedback loop + closed-loop communication
#5	Paper closures	Audit 20% of closed actions: verify 10 — how many have evidence?	Photo evidence required + independent verification

### How Many Signs Do You Have?

Score	What It Means
0–1 signs	Your process is functioning. Focus on continuous improvement and maintain current accountability structures.
2–3 signs	Your process has structural problems. Prioritize the two or three signs that scored highest and begin targeted fixes within 30 days.
4–5 signs	Your corrective action system is broken. Escalate to leadership, conduct a formal program audit, and begin a full process rebuild. Every day of delay increases your citation exposure and incident risk.

**BOTTOM LINE:** A corrective action system that closes the loop is the difference between a safety program that documents hazards and one that actually eliminates them. The five fixes in this guide — severity-based SLAs, root cause analysis, named ownership, visible feedback loops, and evidence-based closure — can be implemented in any organization within 90 days.

## Fix Your Corrective Action Process with OSHAlytics

OSHAlytics connects inspections, corrective actions, and document control in one platform — with named ownership, severity-based SLAs, automated escalation, photo-evidence closure, and real-time dashboards that give leadership visibility into every open action.

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