
Standard Operating Procedures

Facts, Flaws, and Fallacies by G. M. Samaras, PhD, DSc, PE, CPE

Standard Operating Procedures (SOPs) can be the bane of one's existence. Intended to be a powerful management technique that standardizes the process, character and quality of work, it has instead become an annoyance to staff, a frustration to management, and a regulatory vulnerability. From staff's perspective, SOPs are often fine guidelines, but "everyone knows the work changes and no one is keeping up with the SOPs". From management's perspective, SOPs make excellent training materials in addition to establishing the manner in which the work should be accomplished and the achievements should be documented. From a regulatory perspective, it is better to have no SOP for a work function, than to have a SOP that is being violated (not being followed exactly).

The source of the problem is, in fact, the source of the SOPs. SOPs are supposed to reflect the optimum manner by which to accomplish the work. Too often, SOPs are generated by individuals who either have never done the work (or are no longer doing the work) that is addressed by the particular SOP. By default, they are judged by their work product, which causes SOP "bloat". This, in essence, puts the cart before the horse. The results are:

- (1) SOPs devolve to static or pseudo-static documents; they live in a file, somewhere, and as time passes they become increasingly uncorrelated with the actual work processes; and
- (2) Their static character encourages intelligent, motivated workers to devise clever means to circumvent them; others merely ignore them or follow them, without regard to how they will impact the work.

Put the horse before the cart; SOPs need not be onerous, high overhead endeavors:

- (1) SOPs should reflect the work as it is currently carried out; they should cause creation of simple, but appropriate, artifacts. Rational, reasonable people working in a structured, systematic manner accomplish this by default; these individuals should not be further burdened with tasks unrelated to adding value to the business.
- (2) SOPs should be created and maintained by the individuals actually doing the work. They should be simple, succinct, and to the point; they should be constrained to specific work activities, and not be all encompassing. They should be updated as the work changes, by the person doing the work, so that they codify the processes, character, and quality of the work endeavor as it is currently carried out. If multiple individuals are carrying out the same work endeavors, they should be in general agreement regarding how the work is conducted and how the SOP is documented.
- (3) The SOP *document* codifies how the work is carried out and what artifacts are generated. It does not tell you how the work **should be** done; it tells you how the work **is being** done! No SOP should be greater than a page in length, and often should be only a paragraph or two. Multiple SOPs may reside on a single page;

different authors should use different pages (only for simplicity). If there is a list of specific procedural steps, or a special form that creates an artifact, it should be attached or appropriately referenced. The SOP document should be under document and change control; if this is done electronically, it can be essentially transparent to the user.

- (4) Management should utilize SOPs to periodically review how work is accomplished and to identify potential means of improving work processes or products. Rather than checking to see whether the SOPs are being properly executed (the *deus ex machina* approach), management should utilize the (worker generated and maintained) SOPs to understand current work processes and endeavor to find improvements in effectiveness and efficiency.
- (5) Simple and succinct SOPs are difficult to violate, especially if they truly represent the way in which the work is carried out. They are easy for regulators to understand and will result in reduced time spent on inspections – a boon both for the company AND the regulator.

To summarize, SOPs need to reflect how the work is actually being done. They need to be generated and maintained by the experts – the people actually doing the work. They need to be used by management to improved processes and products. In this way, they will not become regulatory vulnerabilities.

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