

UNITED STATES COAST GUARD

ANNUAL UPDATE SUPPLEMENT
TO THE
MARINE SAFETY
PERFORMANCE PLAN

FY 2009-2014



MARCH 2010

REAR ADMIRAL BRIAN M. SALERNO

Assistant Commandant for Marine Safety, Security and Stewardship

United States Coast Guard

In 2008, we published a comprehensive Marine Safety Performance Plan (MSPP) that identified improvements the Coast Guard needed to make in order to keep pace with the dynamic needs of our maritime industry partners and stakeholders. We started by clearly articulating our goals, objectives, and performance targets for the next five years, and then solicited and incorporated industry's feedback. Utilizing this transparent and collaborative approach, we created a shared vision on how best to "right our ship."

I also made a pledge that the MSPP would be a living document that would be updated annually and posted on the Coast Guard web. We have completed our yearly review and I am extremely pleased to present the first annual update to the MSPP which can be accessed, along with the MSPP, at: <http://www.uscg.mil/marinesafetyprogram/>. While this update highlights the significant progress we've made over the past year, everyone must recognize there is still much more work to be done. We've simply made the initial commitment and investment to rebuilding an infrastructure that will ensure greater competency and consistency from Coast Guard Marine Safety professionals. In essence, we have laid a strong foundation upon which to build. Now is not the time to rest on our laurels or declare victory and go home. There are still many challenges before us, but there is also evidence that some of the initiatives are already working. For example, we've created an anonymous, on-line customer satisfaction survey for those who directly receive Coast Guard services to tell us how we're doing and what needs improvement. That survey is available at: <http://homeport.uscg.mil/mycg/portal/ep/program/cgSafeNSecureSurvey.jsp?channelId=-33921>. Please take the time to answer this short survey if you have had any recent interactions with Marine Safety personnel in the field.

It is important to note that the Coast Guard cannot achieve its goals alone. I would be remiss if I didn't acknowledge the terrific support we've received so far from senior officials in the Department of Homeland Security, the Administration, and our Congressional leadership. There has also been an outburst of support from various industry partners eager to assist with ship-riding programs, industry training, and establishing our National Centers of Expertise. I am firmly convinced we are on the right track. Of course, we still need your validation and feedback, so I highly encourage everyone to carefully read this progress report and please tell us what you think. Any input or comments to the annual MSPP update will be accepted at: MSPerformancePlan@uscg.mil.

Thank you for your feedback and continued interest.



Brian M. Salerno

Rear Admiral, U.S. Coast Guard

TABLE OF CONTENTS

Letter of Promulgation.....	1
Table of Contents.....	2
Executive Summary.....	3
Performance Initiatives	
Superior Workforce.....	4-a-1
Superb Service Delivery.....	4-b-1
Quality Management.....	4-c-1
Boat Safe.....	4-d-1
Tow Safe.....	4-e-1
Fish Safe.....	4-f-1
Appendix A: Performance Results: Updated Metrics.....	A-1
Appendix B: Homeland Security Institute Independent Evaluation Summary and USCG Actions.....	B-1
Appendix C: Marine Safety Guidance.....	C-1

EXECUTIVE SUMMARY

The Marine Safety Performance Plan (MSPP) was published in December 2008 outlining goals, objectives, and performance initiatives over the next five years to meet the challenges associated with effectively regulating a dynamic and ever-growing maritime industry. The Coast Guard launched six major initiatives: improving the capacity and competency of our personnel to ensure a superior workforce; improving service delivery to our stakeholders; improving management practices; improving recreational vessel safety; addressing towing vessel safety; and reducing the risks associated with commercial fishing. Each initiative was designed to support specific goals and objectives also described in the MSPP. This annual update supplement reports on the progress of these six initiatives achieved during 2009. While there were many successful accomplishments, there are no quick or easy fixes and there is still work to be done.

Superior Workforce: Workforce capacity was increased with the addition of 310 Marine Safety billets in 2009 and an additional 68 positions authorized for 2010. Within the total, 138 are civilian positions to provide greater consistency. The annual number of officer commissions from maritime academies has nearly doubled compared to 2007 and appears to be holding steady around 30 per year. The establishment of 18 “Feeder Ports” overhauled the training regimen for Marine Inspectors and provides a renewed framework for the program’s professional development. The Marine Safety School at Training Center Yorktown increased student throughput by 23% and the number of officers sent to graduate school fulltime increased by 54% in 2009. Only one fulltime, one-year Industry Training billet was authorized and utilized, while three officers completed six-month programs in 2009. A comprehensive Prevention Human Capital Plan is now being initiated to further strengthen Marine Safety career paths. There still needs to be a long range plan for developing information technology tools to enhance job performance, effectiveness, and efficiency.

Superb Service Delivery: Five more National Centers of Expertise were established in 2009 making a total of seven key venues for professional development and exchange between industry and Coast Guard personnel. Overall, the rulemaking program showed improvement last year with the backlog reduced from 97 to 73 projects. The National Maritime Center made great strides in improving merchant mariner credentialing by eliminating a backlog of over 6800 applications and reducing net processing time from 55 to 21 days. An independent evaluation showed that the Coast Guard’s Prevention programs are generally effective noting deaths and injuries decreasing over the long term with the number/volume of oil/chemical spills also decreasing significantly. That report contains 78 specific recommendations with many of them already being addressed through the MSPP.

Quality Management: An Activity-Based Costing initiative is being prototyped to help senior leaders better prioritize, allocate, and plan Marine Safety activities. A Quality Management System, known as the Mission Management System (MMS) is being expanded to include Prevention field activities and was fully funded for the first time in the FY2010 budget. A balanced scorecard for Marine Safety still needs to be developed.

Additional Performance Initiatives **Boat Safe**, **Tow Safe**, and **Fish Safe** set out to reduce the risk within targeted areas and provided several noteworthy achievements toward that end.

Performance Results: the overall performance of Prevention programs proved largely successful in 2009 with decreasing numbers in deaths and injuries for commercial mariner, commercial passengers, and recreational boaters. The number of oil spills >100 gallons also decreased last year.

Superior Workforce

The December 2008 MSPP set forth the following goals to improve the Marine Safety workforce's capacity, competence, and consistency.

- *Increase marine inspector and investigator capacity*
- *Strengthen marine inspection and investigation consistency positions*
- *Continually improve tools available to improve productivity and effectiveness*
- *Increase accessions from the U.S. Coast Guard Academy, U.S. Merchant Marine Academy and other maritime institutions*
- *Strengthen Marine Safety career paths*
- *Expand professional Marine Safety training and education*
- *Expand opportunities for maritime industry training*
- *Enhance engineering expertise for plan review, policy, and standards development*

The following progress was made toward meeting these goals during 2009.

Increase marine inspector and investigator capacity

The Coast Guard added 310 military and civilian positions in 2009. These were distributed among the specialties and position titles as listed in the following tables using two different methods. In the first table, the billets are broken out by Specialty, referring to the qualification required for the billet. In the second table, the billets are broken out by Position Title, referring to the billet's job description.

FY2009	SPECIALTY						Total
	ENG	MI	IO	PSC	T/V	Other	
Officer	6	11	8	0	17	5	47
Enlisted	0	0	1	50	60	2	113
CWO	0	0	18	0	24	0	42
Civilian	12	43	21	0	14	18	108
Total	18	54	48	50	115	25	310

CWO = Chief Warrant Officer ENG = Engineer Qualification MI = Marine Inspector Qualification IO = Investigating Officer Qualification PSC = Port State Control Officer Qualification T/V = Tow Vessel Inspector Qualification Other= Other Qualification non-specific to Marine Safety
--

	POSITION TITLE						Total
	NCOE	AP MI	TRNG	PL/OV	IO	Other	
Officer	10	0	6	11	5	15	47
Enlisted	0	0	1	1	1	110	113
CWO	0	0	1	0	18	23	42
Civilian	19	13	3	25	20	28	108
Total	29	13	11	37	44	176	310

CWO = Chief Warrant Officer
 NCOE = National Center of Expertise Position
 AP MI = Apprentice Marine Inspector Position
 TRNG = Training Position
 PL/OV = Planning, Oversight or Policy Position
 IO = Investigating Officer Position
 Other = Other Marine Inspection Positions

The Fiscal Year 2010 budget provided 68 additional positions for Marine Safety. The following tables show those positions using the same methods described above.

	SPECIALTY						Total
	ENG	MI	IO	PSC	T/V	Other	
Officer	5	20	12	0	0	0	37
Enlisted	0	0	0	0	0	0	0
CWO	0	1	0	0	0	0	1
Civilian	0	23	6	0	0	1	30
Total	5	44	18	0	0	1	68

CWO = Chief Warrant Officer
 ENG = Engineer Qualification
 MI = Marine Inspector Qualification
 IO = Investigating Officer Qualification
 PSC = Port State Control Officer Qualification
 T/V = Tow Vessel Inspector Qualification
 Other MI = Other Marine Inspection Positions

	POSITION TITLE						Total
	NCOE	AP MI	TRNG	PL/OV	IO	Other	
Officer	6	15	0	5	10	1	37
Enlisted	0	0	0	0	0	0	0
CWO	1	0	0	0	0	0	1
Civilian	10	10	7	1	2	0	30
Total	17	25	7	6	12	1	68

CWO = Chief Warrant Officer
 NCOE = National Center of Expertise Position
 AP MI = Apprentice Marine Inspector Position
 TRNG = Training Position
 PL/OV = Planning, Oversight or Policy Position
 IO = Investigating Officer Position
 Other = Other Marine Inspection Positions

During 2009, the Coast Guard Office of Shore Forces (CG-741) completed a major phase in the development of a Sector Staffing Model. This model will ensure a transparent, repeatable, and scalable process to perform measurements and properly staff Sectors with the appropriate numbers of personnel including marine inspectors and investigators, and the number of engineers needed to support their efforts. The Coast Guard will continue to assess Marine Safety personnel requirements through future model refinements. Based on this staffing model, Sector personnel numbers will be re-leveled and requests for additional billets and positions will be submitted accordingly.

Strengthen marine inspection and investigation consistency positions

The Coast Guard's Office of Civilian Personnel (CG-121) launched a major recruiting effort focused on filling the new 108 civilian positions in 2009.

- This effort included focused outreach to specific candidate sources which previously had not been approached such as federal and state maritime academies, marine industry associations, naval architecture and engineering programs at universities, and minority serving institutions.
- All the civilian recruiting tools were fully utilized to attract and hire the most competitive candidates.
- As of December 2009, 105 of these 108 new positions have either been filled, had job offers made, or were being advertised (in some cases, re-advertised). The remaining three positions are awaiting approval to be advertised pending Coast Guard organizational changes and/or human resource policy decisions.
- Thirteen career ladder positions (GS-7/9/11) were established for entry level civilians designed to enhance workforce retention by providing greater career opportunities. This ultimately optimizes organizational efficiency, productivity, and effectiveness while enhancing employee motivation and job satisfaction through planned professional development.
- Maritime academies were targeted for these positions using augmented standard hiring processes plus the Federal Career Intern Program (FCIP) process (<http://www.opm.gov/careerintern/>).
- All 13 career ladder positions were filled in 2009 from the 72 applications received.
- Ten additional career ladder positions were received in 2010 with recruitment already underway.
- In establishing Feeder Ports to enhance training, 18 dedicated civilian (GS-13) Senior Marine Inspector/Training Officer positions have been created. See section titled *Expand professional Marine Safety training and education* below for details on Feeder Ports.

Continually improve tools available to improve productivity and effectiveness

Many opportunities still exist to improve the tools being used by field personnel on a daily basis, mainly related to capturing data and managing information. There is no significant progress to report in this area with the Coast Guard still needing to create a long range plan for developing information technology tools to enhance job performance, effectiveness, and efficiency.

Increase accessions from the U.S. Coast Guard Academy, U.S. Merchant Marine Academy and other maritime institutions

Three new Marine Safety positions (two Lieutenant Commanders and one civilian professor) were created at the Coast Guard Academy along with one Marine Safety position (Lieutenant) at Officer Candidate School (OCS)/Leadership Development Center (LDC) in 2009. A second LDC position is proposed for 2012. In addition to the full time Coast Guard Liaison Officer position at the U.S. Merchant Marine Academy, another full time Liaison Officer (Lieutenant) was added at the California Maritime Academy. Future plans call for additional Liaison Officers at other maritime academies. Serving as instructors and working closely with maritime academy cadets, the Coast Guard has successfully leveraged these positions, along with those at the

Coast Guard Academy and the LDC, to provide direct insight and greater opportunities to learn about a career in Marine Safety.

Maritime academy appointments to military commissions have increased in recent years:

- 2007: 16
- 2008: 31
- 2009: 29
- 2010: 30 (projected)

The Coast Guard's Office of Civilian Personnel (CG-121) actively recruited at each of the maritime academies where interest was high. As previously mentioned, 13 career ladder positions were easily filled from a strong, deep candidate pool.

Strengthen Marine Safety career paths

A comprehensive Prevention Human Capital Plan (which includes Marine Safety) is being developed that will:

- adjust the rank structure pyramid in accordance with the Coast Guard's Personnel Management Directorate (CG-12) recommendations;
- outline accession plans for military and civilian Marine Safety experts;
- incorporate the Sector staffing standards; and
- revamp career guidance.

The Coast Guard's Future Force Project Staff (CG-1B1) has worked extensively over the past several years to create an Officer Specialty Management System (OSMS) that will better align all officers with our mission requirements and be responsive to present and future workforce needs. Under this system and within the core specialty of Operations Ashore- Prevention, all billets and officers will be coded with subspecialties for: Vessel Inspections; Marine Investigations; Port and Facility Safety and Security; Marine Safety Engineering; Waterways Operations and Management; and Auxiliary Operations Coordination. The result is a clearer picture of what is required of each specific position and what capabilities each officer possesses such as competencies, education, career history, training, certifications, licenses, etc. With specialty and competency requirements accurately articulated for every position, officers will be better informed on career path options, as well as how each specialty (and subspecialty) supports mission accomplishment. This means that officers charting their career will have a better understanding of the opportunities, implications, and limitations potentially associated with their assignment decisions. The Coast Guard is currently running an OSMS pilot project with the goal of service-wide implementation in 2011. Our desired end state is an integrated human resources system that will allow the Coast Guard to frame manpower requirements as well as recruit, train, distribute, and professionally mature our officers based on a defined specialty framework.

In addition, the Coast Guard is currently seeking the authority needed to implement an Enhanced Status Quo (ESQ) system; a process for promotion of a limited number of officers by specialty based on the needs of the service while maintaining the tenets of a best qualified promotion system. This means future promotion boards could be given guidance and direction relating to a need for a particular specialty, such as Marine Safety, to use in their decision-making criteria to select officers for promotion. This will help the Coast Guard sustain needed levels of expertise, especially as required for more senior, technically oriented positions. Provisions for the ESQ system are pending in the current version of the Coast Guard Authorization Bill. This system is also dependent upon a fully functioning OSMS.

Expand professional Marine Safety training and education

In 2009, the Coast Guard took action to implement the Feeder Port concept in concert with an Apprentice/Journeyman/Expert training model.

- A Feeder Port is a Coast Guard Sector or Marine Safety Unit with a diverse workload of sufficient volume, for unit members to have the opportunity to earn at least four of the 17 Marine Inspection/Port State Control qualifications.
- Eighteen ports have been designated as Feeder Ports based on a workload review conducted in 2007. Those ports are: Boston; New York; Delaware Bay; Hampton Roads; Jacksonville; San Juan; Mobile; New Orleans; Houma; Morgan City; Houston; Port Arthur; Galveston; Corpus Christi; San Francisco Bay; Los Angeles/Long Beach; Seattle; and Honolulu.
- Entry-level (apprentice) training for Marine Safety professionals will be conducted at these ports. Apprentice positions can be military or civilian career ladder. To support the training effort, 11 Feeder Ports have already been provided with civilian Senior Marine Inspectors/Training Officers (SMI/TO) (expert-level). The remaining Feeder Ports will receive their dedicated SMI/TO in 2010.
- Using the Apprentice/Journeyman/Expert training model for marine inspectors, units will have personnel levels evaluated and adjusted as needed to create an appropriate ratio of Journeyman to Apprentices. [This effort will be supported by the Sector Staffing Model previously mentioned.]
- Feeder Ports will be staffed with a sufficient number of Journeymen to address the required workload independent of any training responsibilities.
- Feeder Ports are further described in the Coast Guard message ALCOAST 089-09: Marine Safety Feeder Ports, <http://www.uscg.mil/announcements/alcoast/alcoast089.09.txt>, and is included in Appendix C to this supplement.

Responding to the needs of an expanded workforce, the Marine Safety Training Branch at Coast Guard Training Center Yorktown, VA has successfully increased throughput for basic Marine Safety courses (*i.e.*, Investigations, Suspension & Revocation, Port State Control, Marine Inspections, Plan Review, and Commercial Fishing Vessel Safety). Much needed infrastructure improvements, the addition of seven instructor positions, and the innovative use of larger classroom spaces have resulted in significantly increased Marine Safety student throughput at Training Center Yorktown as follows:

- 2007: 417
- 2008: 417
- 2009: 514
- 2010: 636 (projected)

Similarly, the training budget for the Marine Safety Training Branch has realized recent growth with base funding levels steadily rising. Combined with the additional funding indicated below, this demonstrates a strong commitment to providing the Marine Safety workforce with high quality training.

FY	Initial Funding	Additional Funding	Total for FY	Comments
2007	\$201,789	\$441,146	\$642,935	Purchased & installed <i>M/V Yorktown Lady</i> training aid
2008	\$226,690	\$155,595	\$382,235	
2009	\$312,085	\$1,092,875	\$1,404,960	Funding for new training aids and space renovation
2010	\$421,116	\$562,500	\$983,616	Addition of \$750K recurring (funded at 75% first year)

The Coast Guard's Office of Vessel Activities (CG-543) issued Policy Letter 09-04: *Marine Inspector/Port State Control Officer Certification Policy*. The purpose of this policy letter was to enhance the Marine Safety Training and Qualification system and to provide clarification and updated requirements for Marine Inspector (MI)/Port State Control Officer (PSCO) certification and currency. The entire letter can be found at <http://homeport.uscg.mil> then Library > Policy > Policy Letters > Inspection, and is included in Appendix C to this Supplement.

The Coast Guard routinely assigns Marine Safety officers to graduate school to receive advanced degrees and further hone their technical expertise in the following disciplines: Marine Engineering; Fire Protection Engineering; Chemical Engineering; Marine Engineering Technology; Environmental Management; and Transportation Management. We've recently increased the number of Training Allowance Billets (TABs) dedicated to this effort as follows:

- 2007: 9
- 2008: 11
- 2009: 17
- 2010: 21 (projected)

Expand opportunities for maritime industry training

An approved Mutual Training Memorandum of Understanding template has been distributed to Sectors and Marine Safety Units allowing them to expand and enhance training opportunities with their local marine industry partners. (A copy of the template is included in Appendix C to this Supplement.) In 2009, six newly commissioned officers got underway on commercial vessels as part of a shiprider program designed to provide apprentice level personnel with their initial exposure to the maritime industry.

- The entire Merchant Marine Industry Training (MMIT) program was revisited to consider long-term (one-year), mid-term (3-6 months), and short-term (less than 1 month) professional development opportunities within the industry.
- The goal is to have six, one-year MMIT Training Allowance Billets (TABs). Only one was authorized and utilized in 2009. Three officers completed six month programs in 2009.
- The Coast Guard is attempting to maximize the number of authorized industry training billets each year to the greatest extent possible.
- SMI/TOs and the National Centers of Expertise began to coordinate short term, local mutual training opportunities with industry partners.

Enhance engineering expertise for plan review, policy, and standards development

As previously noted, 18 engineer positions were added throughout the Coast Guard in 2009. These were distributed among the Coast Guard Academy and Leadership Development Center instructor staffs, the Commercial Regulations and Standards Directorate (CG-52), and the Marine Safety Center. This added capacity will provide subject matter experts for rulemakings and policy development, plan review, currency with emerging technologies, oversight of third parties, and leadership in maritime committees.

Superb Service Delivery

The December 2008 MSPP set the following goals to enhance Marine Safety's ability to deliver services:

- *Establish Centers of Expertise*
- *Improve information technology systems*
- *Improve rulemaking process to expedite regulatory implementation*
- *Improve mariner credentialing through greater efficiency, transparency, and capacity*
- *Independent Evaluation*

The following progress was made toward meeting these goals during 2009.

Establish Centers of Expertise

In addition to the two National Centers of Expertise (NCOEs) established in 2008 (Cruise Ships in Miami, FL and Suspension & Revocation in Martinsburg, WV), the initial group of personnel were assigned and arrived to staff the next five NCOEs during 2009. These five NCOEs are for: Towing Vessels in Paducah, KY; Liquefied Gas Carriers in Port Arthur, TX; Outer Continental Shelf in Morgan City, LA; Investigations in New Orleans, LA; and Vintage Vessels in Duluth, MN.

The NCOEs' civilian/military personnel mix is a little over half civilian. While it remains vital to the overall health of Marine Safety to have military positions at our NCOEs, the civilian employees will be counted on to provide the needed stability, consistency, and industry knowledge for long-term success. Maintaining this personnel mix means we can better train our military workforce while simultaneously providing a high level of service to the industry.

Officers assigned are in the ranks of Commander, Lieutenant Commander, Lieutenant, and Chief Warrant Officer. The civilians range from GS-12 to GS-14. Nearly all the 2009 civilian positions have been filled with only two positions currently being re-advertised. To date, nearly 100 years of combined industry experience has been hired into these key civilian positions. An additional 17 positions have been approved and will be added in 2010 bringing the NCOEs to their full operating capabilities.

Three civilian GS-12 Curriculum Specialists are being assigned to work out of Coast Guard Training Center Yorktown, VA with the primary duty of supporting all NCOE formal training responsibilities.

The NCOEs will:

- revitalize the Coast Guard's technical competency and expertise to keep pace with the growth and complexity of the maritime industry;
- provide key venues for professional development and exchange between industry and Coast Guard personnel;
- enhance Coast Guard inspector and investigator capabilities while promoting nationwide consistency;
- become a repository of Coast Guard expertise and best practices within their respective maritime industry sector;
- assist in the standardization of techniques and processes across the Coast Guard;
- establish and cultivate enhanced working relationships and partnerships with public and private industry stakeholders to include professional training exchanges and joint training initiatives;

- provide consultation concerning unique design, examination, and operational situations and development of regulations, policy, and doctrine, as requested;
- monitor field activities and procedures to ensure uniform application of regulations, policy, and doctrine, and;
- develop curriculum for both exportable and resident training courses.

The Cruise Ship and Suspension & Revocation NCOEs are already operational. As of December 2009, the rest are establishing their worksites, developing their capabilities, and are just starting to complete their mission. While assigned military personnel arrived in 2009 and began the civilian hiring process, NCOEs, for the most part, remain a work in progress.

For additional information, please see Coast Guard message ALCOAST 131-09: *National Centers of Expertise (NCOES)* (link: www.uscg.mil/announcements/alcoast/ALCOAST13109.txt) or in Appendix C to this Supplement.

Improve information technology systems

The use of Homeport (<http://homeport.uscg.mil/>) provides Coast Guard and industry alike an enterprise internet portal that combines secure information dissemination, advanced collaboration, and a public-facing interface for internal Coast Guard processes. The ability for Homeport users to access information, collaborate through communities, review and publish documents, and search for users, vessels, and facilities has certainly increased productivity. Similarly, CG Portal provides Coast Guard users with the same functionality. Enhancing these web-based portals is an ongoing initiative. As previously mentioned, the Coast Guard still needs to create a long range plan for developing information technology tools and systems to enhance job performance, effectiveness, and efficiency

Improve rulemaking process to expedite regulatory implementation

The Coast Guard continued to make progress toward reforming its rulemaking program and reducing its backlog of rulemaking projects. The Coast Guard rulemaking program has shown substantial improvement and return on investment for the capacity increases received over the past two years (31 positions) and an extensive internal review and reform effort.

Under the leadership of the Marine Safety & Security Council (MSSC), the Coast Guard has undertaken a comprehensive review of its rulemaking program with the goal of processing rulemaking projects in a more efficient, effective, and timely manner. This year the Coast Guard is poised to institutionalize effective project measurement and continual improvement mechanisms. Key areas of improvement include communication, rulemaking project process, project team roles, use of information technology, and management. Key actions taken are as follows:

- Set, and initiated monitoring of, strategic goals for the fiscal year;
- Revised three Coast Guard rulemaking directives to memorialize updated best practices for preparation, processing, and promulgating rulemakings;
- Deployed a beta version of Electronic Program Management Office (“ePMO”), a state of the art knowledge management system, to effectively and efficiently plan and track rulemaking progress, effort, and communications among stakeholders;

- Began updating of the Regulatory Development Program (“RDP”) Mission Management System to capture ideal, standardized procedures for communication, training and professional development, rulemaking project process, project team roles, use of information technology, and management; and
- Improved outreach to the stakeholders within DHS, the Legislative and Executive Branches and the private sector.

Looking at all 97 projects in 2009 as a whole, 30 projects (31% of the total) remained on schedule, with another 44 projects (45% of the total) advancing. In short, with the additional 31 positions added in 2008 and 2009, progress was made on 76% of all regulatory projects. All top 50 projects achieved progress in 2009; nearly twice the number advanced in prior years. The number of Coast Guard rulemaking documents published in FY09 exceeded the five-year average by 33 percent.

Overall in 2009, the backlog was reduced from 97 projects to 73 projects. Seventeen new projects were added, bringing the total project list for the start of 2010 to 90 projects.

FY09 Publications – In FY09, 27 rulemaking documents were published (as compared to 23 in FY08). Some highlights from the FY09 publications are: Merchant Mariner Credentials (Final Rule (FR)), Ballast Water Discharge Standards (Notice of Proposed Rulemaking (NPRM)), Non-Tank Vessel Response Plans (NPRM), Oil Spill Removal Equipment Requirements (often referred to as Oil Recovery Capacity or “Caps”) (FR), and Salvage and Marine Firefighting Requirements (FR).

Improve mariner credentialing through greater efficiency, transparency, and capacity

During 2009, the Coast Guard and the National Maritime Center (NMC):

- completed centralization of the nationwide program on schedule;
- established fully-staffed medical evaluation branch which was needed to fully implement Navigation and Vessel Inspection Circular (NVIC) 04-08; Medical and Physical Evaluation Guidelines For Merchant Mariner Credentials;
- eliminated a backlog of over 6,800 merchant mariner credential applications by surging resources from the NMC and Regional Examination Centers (RECs);
- decreased net processing time of credentials from 55 days in June 2009 to 21 days in November 2009 (stated goal is 30 days);
- designed and launched an entirely new consolidated passport-style Merchant Mariner Credential;
- established a full service customer service center to improve responsiveness to mariners/marine employers needs;
- bolstered its leadership position in the maritime community by hosting events that included tours by Congressional Members and their staffs, formal advisory council meetings, and round tables of Maritime Academy Presidents;
- launched a redesigned website that is now the Coast Guard’s most popular receiving more than 68,000 monthly visits (<http://www.uscg.mil/nmc/>);
- posted monthly reports at http://www.uscg.mil/nmc/monthly_reports.asp;
- introduced sending email notifications to the mariners as their applications pass through the various states of the processing; and
- started email submissions of credential applications to the RECs.

The following is planned for 2010:

- Sustain the current net processing time of less than 30 days, improve customer service, and ensure consistency in the delivery of products and services.
- Fill existing vacant NMC medical billets with permanent GS medical professionals.
- Reprogram existing Coast Guard long term vacant civilian positions, which are already appropriated, to reduce NMC's OE costs, build inherently governmental core competencies, and improve internal program support potentially saving the CG approximately \$5.5 million per fiscal year.
- Reprogram existing Coast Guard long term vacant civilian positions to improve regulatory and policy development efforts at HQ, including medical billets to support appeals and the Merchant Mariners' Medical Advisory Council (MMMAC).
- Conduct comprehensive testing of a "Mariner Credentialing Agent Program" with maritime industry organizations to leverage industry expertise in assisting mariners with preparing credential applications in order to improve the quality of applications received by the Coast Guard.
- Identify lower cost ways of producing mariner credentials.
- Maintain the quality of product/service at NMC through regularly scheduled audits and management reviews of the MCP's mission management system.
- Capitalize on the results of the MITRE study on key program business processes and efficiencies to move from conceptual discussion to actionable steps to implement an electronic web-based application process.
- Simplify the regulations governing the program.
- Update policy directives to ensure they are consistent with regulations, relevant to centralized credentialing operations, and current.

Independent Evaluation

In 2009, the Coast Guard underwent a comprehensive independent evaluation of the Marine Safety and Marine Environmental Protection Missions. Key elements in the evaluation include identifying program customers and stakeholders, verifying their needs and expectations, validating program purpose and design, evaluating performance—particularly satisfaction with service levels—and identifying additional improvement opportunities.

The final report is posted at http://www.uscg.mil/hq/cg5/cg54/ms_mepeval.asp along with an opportunity to provide comments. Appendix B of this update contains a discussion of the recommendations generated by that report.

Quality Management

The December 2008 MSPP set the following goals to improve Marine Safety's management practices:

- *Improve Management Accountability*
- *Develop a Balanced Scorecard*
- *Implement a Quality Management System*

The following progress was made toward meeting these goals during 2009.

Improve Management Accountability

The Prevention Policy Directorate (CG-54) at Coast Guard Headquarters is prototyping an Activity-Based Costing (ABC) methodology focused on quantifying resources consumed while performing processes or activities that produce outputs as opposed to just dollars spent. Through the development of an ABC model to record and manage the costs of various activities carried out by Marine Safety personnel, senior leaders will be able to better prioritize, allocate, and plan activities. Prototype testing is currently underway at four Sectors.

Developing a well understood program of objectives and outcomes is a lengthy process, but is also part of the Mission Performance Plan process. Measures need to be continuously evaluated and refined to ensure they are meaningful internally and externally and at local, intermediate, and national levels. Monitoring these measures takes place over time and only as our Mission Performance Plan matures will we be able to demonstrate improved accountability.

Develop a Balanced Scorecard:

There is no significant progress to report on this initiative. The data we've started to gather as a result of the Marine Safety Performance Plan will provide a solid foundation, but the Coast Guard still needs to develop a balanced scorecard for Marine Safety.

Implement a Quality Management System

In 2009, substantive changes took place in the development of our quality management system, the Mission Management System (MMS). Deployment, or "Rollout" visits to Sectors were initiated and a new Commandant Instruction was drafted to set policy for the ongoing development, implementation, and improvement of the MMS.

- The MMS is an ISO 9001:2008-based quality management system (QMS) to ensure fulfillment of domestic and international obligations for marine safety and security. Examples include the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW) 1995 and the International Maritime Organization (IMO) Voluntary Member State Audit Scheme (VMSAS). (Note: IMO voted recently at their 26th Assembly to make the VMSAS mandatory starting in 2014.)
- The system goals are to achieve quality assurance, consistency in mission execution, customer focus, and continual improvement. The MMS is currently deployed in three areas: Maritime Licensing and Documentation (MLD); Regulatory Development Program (RDP); and Marine Inspection,

Investigation, Port Safety & Security (MPS). Expansion into additional areas within Marine Safety and other missions is anticipated.

- The National Maritime Center took ownership of the MMS in this past year and assigned personnel to carry out system duties making contractor support no longer necessary.
- Sector Audits were initiated as part of a successful Consolidated Assessment at Sector Buffalo.
- Five MMS “Rollout” visits were completed (Sectors New York, Houston-Galveston (2), and New Orleans (2)). To date, 10 of 37 MMS Rollouts visits have been completed.
- An MMS Newsletter was created to help promote system implementation. A copy is included in Appendix C.
- An intranet MMS website was established in CG Portal as the repository for all MMS documentation and further enhancing information and idea exchange:
<http://cgportal/lotus/myquickr/u.s.-coast-guard-mission-management-system/mms-welcome>
- There were five Quality Management System Lead Auditor courses held in 2009 with 71 graduates. To date, there have been 19 courses held throughout the Coast Guard with 179 graduates receiving Lead Auditor certification.
- For the first time, the Coast Guard’s FY10 budget contained a recurring line item to fully fund implementation of the MMS. This will ensure long-term stability and sustainability for the MMS.

Boat Safe

The December 2008 MSPP described how the Coast Guard will aggressively implement a strategic plan, developed in consultation with the National Boating Safety Advisory Council, to improve recreational boating safety. The Elements of this strategic plan address:

- *Assess Effectiveness of Boating Education*
- *Improve Safety Communications*
- *Increase Carriage of Safety Equipment*
- *Increase Compliance with Navigation Rules*
- *Increase Life Jacket Wear Rates*
- *Assess Effectiveness of Boating-Under-the-Influence (BUI) Efforts*
- *Increase Manufacturer Compliance Efforts*

The following progress was made toward meeting these goals during 2009, followed by what is ongoing and/or planned for 2010.

Assess Effectiveness of Boating Education

- The National Association of Boating Law Administrators (NASBLA) developed an officer survey to determine most common Recreational Boating Safety violations for Limited English Proficiency (LEP) populations.
- Two grants were awarded to study and develop effective methods for on-water and advanced boater education.
- A template designed for Boating Safety Education for LEP populations will be placed into circulation.

Improve Safety Communications

- The USCG Boating Safety Resource Center website was redesigned, including the incorporation of boating safety messages via social marketing techniques (You-Tube, Facebook, Twitter, etc). [<http://www.uscgboating.org>] The venues for the Recreational Boating Safety (RBS) messages will be increased.
- Public Service Announcements (PSAs) were developed with Captain Keith Colburn of *F/V Wizard* from the Discovery Channel's show "Deadliest Catch." The distribution of Captain Colburn's PSAs will be expanded. Also developed and distributed earlier were PSAs and print media targeted to the angler, hunter, and young adult market segments using other key personalities.

Increase Carriage of Safety Equipment

- Redesigned the publication: *Federal Requirements and Safety Tips for Recreational Boats* for distribution.
- A grant was awarded to the BoatU.S. Foundation for online placement of federal carriage requirements for recreational boats.
- Emphasis will continue on carriage requirements in Marine Patrol Officers Course.

Increase Compliance with Navigation Rules

- Grants were completed on the development of Navigation Rules Course for Marine Patrol Officers and on the development of Spanish language Navigation Rules decal.
- A grant was awarded to compile data on navigation rules violations to determine trends of compliance with Navigation Rules.
- A grant was awarded to NASBLA to develop education and outreach methods for increasing compliance with Navigation Rules.
- Redesigned and enhanced the publication, U.S. Aids to Navigation System (What You Need to Know About the Markers on the Water).
- Violation trends will continue to be studied.

Increase Life Jacket Wear Rates

- The US Army Corps of Engineers (USACE) is conducting a test project for mandatory personal flotation device wearing for all occupants on boats less than 26 feet in length in four lakes in Northern Mississippi and for all occupants on boats less than 16 feet in length in two lakes in SW Pennsylvania.
- The USACE is considering expanding this test project to two additional locations. The Coast Guard has partnered with the USACE on this project and will support the expansion of this joint effort.
- The Coast Guard's Office of Auxiliary and Boating Safety (CG-542) is participating in the North American Safe Boating Campaign – **Wear-IT**. (<http://www.safeboatingcampaign.com/>) This campaign is a unified effort supported by every state and territory, NASBLA, the National Safe Boating Council, the Coast Guard's Office of Auxiliary and Boating Safety, the Coast Guard Auxiliary, the U.S. Power Squadrons and many additional federal and marine industry partners. The campaign goal is to increase the number of recreational boaters who consistently wear a life jacket while on the water. This national effort has been supported by funding provided by the Sport Fish Restoration and Boating Trust Fund.
- Continue to provide financial assistance to the **National Monitoring of Life Jacket Use while Boating** study conducted by the John Snow, Inc. (JSI). JSI has conducted wear rate observational study in a sample of 30 states each year since 1998.

Assess Effectiveness of Boating-Under-the-Influence (BUI) Efforts

- The Coast Guard's Office of Auxiliary and Boating Safety (CG-542) supported NASBLA's national BUI enforcement effort Operation Dry Water.
- Awarded grant for development of on-water Standardized Field Sobriety Tests (SFST) (Phase 3).
- The Coast Guard will continue to ensure that the Recreational Boating Safety Law Enforcement and Education Programs are adequate and sufficient in order to receive Coast Guard grant funds.

Increase Manufacturer Compliance Efforts

- The Coast Guard will continue to visit recreational boat manufacturers to provide education and ensure compliance with Federal requirements. Boat inspections resulted in a 20% decrease in non-compliance discrepancies from the previous year.
- The Coast Guard continues to perform flotation tests on recreational boats to ensure compliance with Federal requirements.

Tow Safe

The December 2008 MSPP set the following goals to improve towing vessel safety.

- ***Develop and phase in inspection regulations for towing vessels, including a safety management system requirement***
- ***Institute a robust, risk-based maritime safety oversight program that includes the use of qualified, Coast Guard-approved third parties***
- ***Increase outreach and strengthen partnership efforts; promote risk reduction***

The following progress was made toward meeting these goals during 2009.

Develop and phase in inspection regulations for towing vessels, including a safety management system requirement

Pursuant to the Coast Guard and Maritime Transportation Act of 2004, Pub. L. 108-293 of August 9, 2004, a significant regulatory project is underway that would subject commercial towing vessels to inspection. Regulations developed for these vessels will be published in Title 46 Code of Federal Regulations (CFR) Subchapter M.

- This major regulatory project could add more than 5000 towing vessels to the fleet of vessels subject to Coast Guard inspection (bringing the approximate total of inspected U.S. flagged vessels to 12,500).
- The Coast Guard continued to work closely with the Towing Safety Advisory Committee (TSAC) which provided a comprehensive set of recommendations for Coast Guard consideration while drafting the proposed rule.
- The Coast Guard is working diligently to develop its NPRM and provide industry and the public with an opportunity to comment on the proposed regulations.

Institute a robust, risk-based maritime safety oversight program that includes the use of qualified, Coast Guard-approved third parties

The Coast Guard's Office of Vessel Activities (CG-543) initiated the Towing Vessel Bridging Program (TVBP) to ease the transition from an un-inspected to an inspected vessel safety regime by ensuring that both the Coast Guard and the towing vessel industry were informed and prepared to meet the new requirements to be finalized in Subchapter M.

This program included enhancing, improving, and increasing Coast Guard interactions with the towing vessel industry, and by acclimating all involved with the procedures, policy, requirements and administration of existing and, as implementation draws closer, new Subchapter M regulations. To further these ends during this period of transition, the Coast Guard conducted extensive industry outreach, initiated additional programs to properly train Coast Guard inspectors and examiners.

The Coast Guard's Office of Vessel Activities (CG-543), in consultation with representatives of the towing industry and Coast Guard Atlantic and Pacific Area Commands, developed a five-pronged framework for the bridging program. They are: industry outreach; education and qualification; industry initiated exams; risk-based targeted exams; law enforcement boardings, and surge operations.

The following actions were conducted during 2009:

- Over 100 officers, civilian, and enlisted members were assigned to fill 115 newly created towing vessel examiner billets.
- Work groups around the country, comprised of Coast Guard and industry personnel, developed UTV Personnel Qualification Standards (PQS), examination forms, and other tools and documents to provide necessary skill and knowledge requirements to conduct UTV outreach and examination activity. These documents were highlighted in the TVBP Coast Guard message R 121639Z JUNE 09: *Coast Guard Towing Vessel Bridging Program (TVBP)* and the Office of Vessel Activities Memo dated June 12, 2009. Both documents are provided in Appendix C.
- The newly established Towing Vessel National Center of Expertise (TVNCOE) in Paducah, KY started to play a critical role in the bridging program, including serving as a key reference and point of contact for the towing vessel industry and Coast Guard field units alike. As the TVNCOE continues to mature, it will also play a central role in training and monitoring the progress of the TVBP.
- The three-phase implementation program started during the summer of 2009.
 - Phase 1 commenced during the summer of 2009 with an anticipated duration of up to 18 months, but will be scaled based on progress in meeting industry demand for examinations. The initial focus of Phase 1 was on industry outreach, and Coast Guard personnel education and qualification. The PQS booklet, exam forms, and workbooks for the TVBP were finalized and published in June 2009. As Phase 1 continues to progress, the focus will shift to conducting industry initiated examinations after Coast Guard personnel are trained and qualified to perform towing vessel examinations. A risk assessment tool will be developed and disseminated for beta testing at selected ports.
 - During Phase 2, the focus will be on Risk-Based Targeted Examinations. Concurrently, the TVNCOE and Coast Guard Training Center Yorktown, VA will develop and deliver training in preparation for Towing Vessel Inspections that will occur in Phase 3. The risk-based tool developed in Phase 1 will be employed to determine towing vessel examination priority. Data relevant to towing vessel operations will be analyzed periodically and adjustments will be made to the tool to enhance the risk-based decision-making process. Phase 2 activities will occur after the industry has been given the opportunity to participate in, and the Coast Guard has satisfactorily conducted, industry initiated examinations and will continue until Subchapter M implementation.
 - Phase 3 will commence with the implementation of the new Subchapter M towing vessel inspection regulations and the issuance of Certificates of Inspection (COI). We anticipate the risk-based tool developed in Phase 1 and employed in Phase 2, or an enhanced version, will be used to determine priorities for issuing COIs. The TVNCOE and Training Center Yorktown will continue to develop and deliver formal towing vessel inspections training during this phase.

Increase outreach and strengthen partnership efforts; promote risk reduction

As previously mentioned, the Coast Guard continued its close work with the TSAC which provided a comprehensive set of recommendations for Coast Guard consideration while drafting proposed towing vessel regulations. Initiation of the TVBP, also developed with representatives from the towing industry, will be used to ease the transition from an un-inspected to an inspected vessel safety regime and ensure the towing vessel industry is ready for new safety regulations. During this period of transition, the Coast Guard will continue extensive outreach with the industry.

Fish Safe

The December 2008 MSPP set the following goals to improve commercial fishing vessel safety.

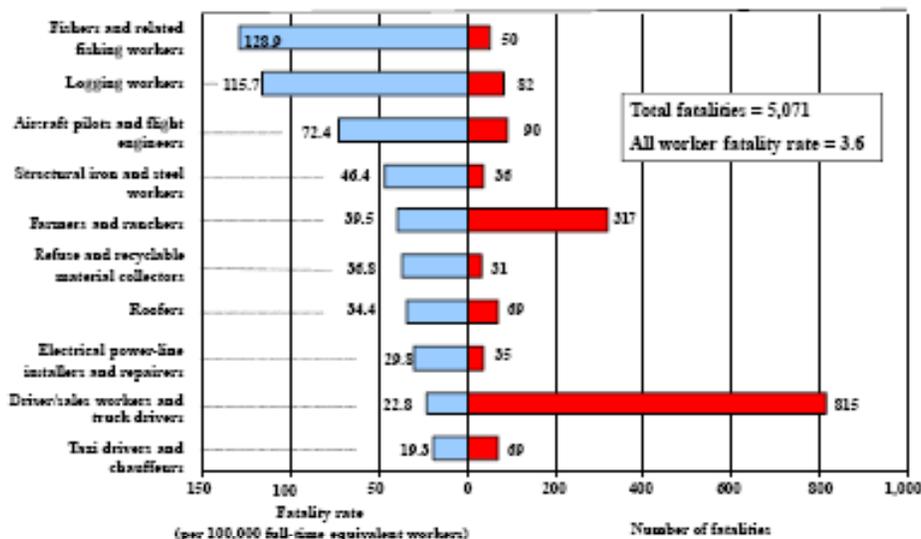
- *Seek Additional Authority to Improve Fishing Vessel Safety Standards*
- *Increase Outreach and Communication*
- *Expand Partnerships*
- *Increase Maritime Law Enforcement*
- *Increase Fishing Vessel Examiner Workforce*

The following progress was made toward meeting these goals during 2009.

Seek Additional Authority to Improve Fishing Vessel Safety Standards

- A significant regulatory project is in development to enhance the safety standards of commercial fishing vessels. As of December 2009, the Coast Guard is working diligently to develop its Notice of Proposed Rule Making (NPRM) and provide industry and the public with an opportunity to comment on the proposed regulations.
- During 2009, the CFVS Program Manager briefed Congressional staff on the status of safety requirements and authorities, and what is needed to improve safety to reduce the number of vessels lost and the number of fatalities in the industry. According to the Bureau of Labor Statistics and data compiled from 2008, commercial fishing remains the most hazardous occupation in the United States. (See extract below.) Recognizing this, the pending Coast Guard Authorization Act includes provisions to require additional fishing vessel safety equipment and crew training requirements that would expand the Coast Guard's authority in these areas.

Selected occupations with high fatality rates, 2008*



*Data for 2008 are preliminary.

NOTE: In 2008, BLS implemented a new methodology, using hours worked for fatality rate calculations rather than employment. For additional information on the fatality rate methodology change, please see <http://www.bls.gov/tif/oshnotice10.htm>.

SOURCE: U.S. Bureau of Labor Statistics, U.S. Department of Labor, 2009.

- The National Transportation Safety Board's (NTSB) investigation report on the sinking of the *F/V Alaska Ranger* included a safety recommendation that the Coast Guard continue to seek authority to require the inspection of commercial fishing vessels. The Coast Guard concurred with the recommendation and plans to review and update the 1992 Report to Congress for the Inspection of Commercial Fishing Industry Vessels. The Coast Guard plans to submit the revised report along with a legislative change proposal to Congress asking for authority to implement an inspection and certification scheme for commercial fishing vessels.

Increase Outreach and Communication

- The Coast Guard continues to seek improvement in outreach and communication with the commercial fishing industry. A training support contract is in place to provide no-cost crew safety and survival awareness, public cold water safety and survival awareness, drill conductor, marine safety instructor, and vessel stability classes primarily in Alaska, but also is being expanded to other areas of the country. Local training programs are supported and provided by Coast Guard units to marine industry personnel. The programs stress maintenance, testing, and proper use of required safety and survival equipment, as well as safe operations and basic vessel stability. The Coast Guard also supports and participates in safety training programs for National Marine Fisheries Service (NMFS) observers.
- The Coast Guard provides information to the industry through Safety Alerts (<http://marineinvestigations.us>), informational newsletters, articles in national publications for fishermen (*National Fisherman*), and web sites (www.fishsafe.info). These are provided by both Headquarters and Districts. This information is also routinely distributed to fishermen by examiners when visiting vessels, marinas and port terminals, and industry organization offices.
- The Coast Guard routinely participates in industry conferences and trade shows to promote safety. The Pacific Marine Exposition is one of the major trade shows where fishing vessel safety information is offered through an exhibitor's booth staffed by safety examiners and program coordinators. Other smaller scale shows and conferences on a regional level have been continuously supported by the Coast Guard.

Expand Partnerships

- The Coast Guard is the sponsor for the Commercial Fishing Industry Vessel Safety Advisory Committee (CFIVSAC). An annual meeting is conducted; the last one in Jacksonville, Florida in March 2009. The committee provides recommendations to the Coast Guard on safety initiatives and other concerns for the industry. Most recently, recommendations were made on risk assessment for specific fisheries, ways to improve outreach and communication with the industry, and a request to consider establishing useful life periods for survival equipment. Periodic telephonic conferences are held to provide information to the committee on recent Coast Guard actions.
- The Coast Guard continues to work with the Fisheries Management Councils and the NMFS to promote safety in their policy decisions and proposals. While the Coast Guard is represented at council meetings and can provide comments, they have no vote in the proceedings. The CFVS Program has been advocating that a District coordinator attend all such meetings to assist in addressing safety issues and concerns regarding management plans. Similar participation is provided to state fisheries planning bodies.
- A partnership with the [National Institute for Occupational Safety and Health](http://www.niosh.gov) (NIOSH) in the study of fishing industry injuries and fatalities is ongoing. The Coast Guard works closely with the regional office in Anchorage, Alaska that is spearheading this effort. Casualty data is shared and study reports

are presented to Coast Guard personnel and the CFIVSAC. Information provided by NIOSH is invaluable in helping identify high risk fisheries and vessel types engaged in those fisheries. Safety recommendations are often provided as a result of these studies.

Increase Maritime Law Enforcement

- Dockside safety examinations performed by local examiners are generally voluntary and no-fault, except where an exam is required on those vessels subject to NMFS Observer carriage. For enforcement of the safety and survival equipment requirements on board commercial fishing vessels, the CFVS Program relies on Coast Guard personnel to check for compliance during at-sea boardings. There were 7371 such boardings conducted in 2009, primarily for fisheries enforcement, but including checks on required equipment. (There were 7639 compliance boardings in 2008.) Those vessels successfully completing a dockside safety exam and issued a safety decal are not boarded at sea exclusively for safety checks, and need only a cursory safety check if boarded for fisheries enforcement unless a discrepancy is discovered. During any boarding where there may be questions about safety or equipment requirements, the boarding officer is encouraged to contact the local examiner at the Sector or the District coordinator for clarification and guidance.
- When vessels are boarded and hazardous conditions are found that place the individuals onboard at risk, the vessel's voyage may be terminated. Any vessel required to return to a safe mooring must remain there until the hazardous condition is corrected. As a condition for returning to sea, the vessel must pass a dockside examination and be issued a safety decal. In 2009, there were 253 vessels that had their voyages terminated, compared to 272 such actions in 2008.
- Compliance actions are also pursued through special safety operations. For fisheries that have been identified as high risk, such as the Dungeness crab in the Pacific Northwest, the Coast Guard has advertised and conducted safety examinations on as many vessels as possible prior to the opening of the season. Owners/operators are advised that completing an examination to ensure compliance with all safety and survival equipment requirements will reduce the likelihood that their vessel will be boarded at sea and face a possible voyage termination if there are equipment discrepancies. Similar safety initiatives are conducted throughout the country in those areas and with those fisheries where casualty rates have indicated a higher risk than in other fisheries.

Increase Fishing Vessel Examiner Workforce

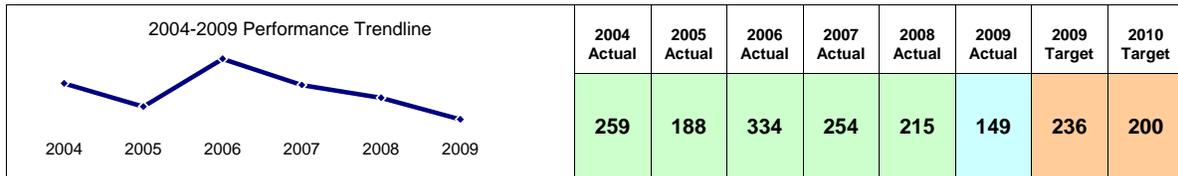
- Three new positions have been added within the program, specifically to support examinations and coordination of the vessels in the Alternate Compliance Safety Agreement (ACSA) program. This program was established working with industry to address safety and vessel construction standards in an aging fleet of vessels that have moved into processing activities, but cannot meet the stricter requirements for such vessel operations.
- A proposal is being submitted to add 70 new examiner and coordinator positions in the CFVS Program for FY 2012. The need for additional examiners is critical as the NMFS observer program is expanded and more vessels will be required to complete a dockside safety exam and receive a safety decal. Also, the period for which a decal is valid is being shortened to one year versus two years. The goal is to also increase the number of examinations by 25%.
- Coast Guard Auxiliary personnel are an integral part of the CFVS Program. They provide outreach to the industry and have conducted 20-30% of the dockside safety examinations in some areas. While seeking to expand the number of Auxiliary examiners, success has been limited, increasing the need for civilian and active duty examiners at local units.

FY 2009 Commercial Passenger Safety Performance Results

Federal regulations apply and require notification of any loss of life or injury requiring professional medical treatment beyond first aid of commercial passengers. The Coast Guard uses deaths and injuries as a measure of commercial passenger safety and the 5-year average as an indicator of long-term performance for this community.

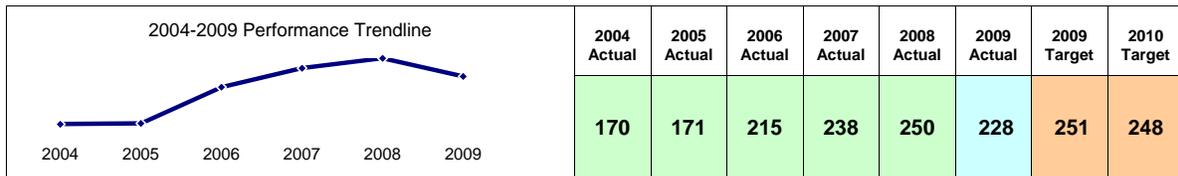
Commercial passenger deaths and injuries have varied significantly from one year to the next. Passenger deaths remained consistent in FY 2009, injuries dropped significantly from 192 to 127, and the combined total was nearly a 30% improvement from FY 2008.

Annual Commercial Passenger Deaths & Injuries



The five-year average number of commercial passenger deaths and injuries was 228 in FY 2009, an improvement of nearly 9% from the five-year average of 250 in FY 2008.

5-year Average Commercial Passenger Deaths & Injuries



With regard to the reduction of passenger deaths and injuries, other than the SEN. JOHN J. MARCHI ferry fire in New York, where 13 passengers had minor injuries, there were no mass casualties involving six or more passengers this past fiscal year. Mass casualties have a significant impact on performance statistics, as evidenced by the cruise ship steering casualty outside of Miami, reflected in the FY 2006 increase.

Note: Some reports are delayed in reaching the Coast Guard and results are therefore likely to be revised upwards—the greatest impact affecting recent quarters.

FY 2009 Recreational Boating Safety Performance Results

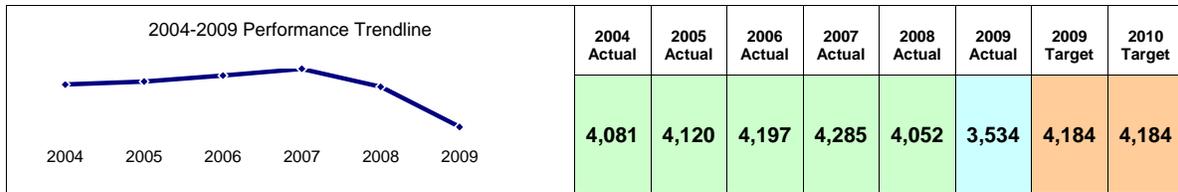
Federal regulations require operators or owners of vessels used for recreational purposes to file a Boating Accident Report when a person dies or disappears from the vessel under circumstances that indicate death or injury, or a person is injured and requires medical treatment beyond first aid, or damage to vessels and other property totals \$2,000 or more, or there is a complete loss of any vessel. The Coast Guard uses deaths and injuries as a measure of marine safety for the recreational boating segment of the American maritime community, and a five-year average of these as an indicator of long-term performance trends.

The Coast Guard received reports of 763 deaths and 2,771 injuries for a combined total of 3,534 recreational boating casualties as of the end of FY 2009 as compared to the 4,052 deaths and injuries

Appendix A: Performance Results: Updated Metrics

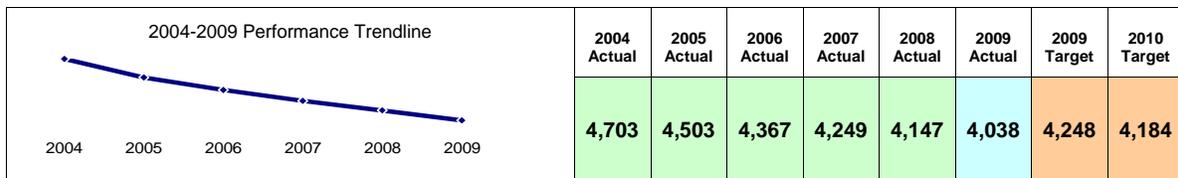
reported the previous year. As noted below, however, the Coast Guard expects to receive additional casualty reports for a few months after the fiscal year has ended.

Annual Recreational Boating Deaths & Injuries



The 5-year average number of recreational boating deaths and injuries has shown a small but steady decline for the past five years.

5-year Average Recreational Boating Deaths & Injuries



The Coast Guard’s Boating Safety Division attempts to prevent boating casualties through the implementation of the Strategic Plan of the National Recreational Boating Safety Program. Three critical objectives of the program include increasing the number of boaters who have completed a boating safety class, increasing life jacket wear rates, and decreasing boaters operating under the influence. Issues which safety education seeks to address — operator inattention, not maintaining a proper lookout, carelessness, reckless operation, and excessive speed — are primary contributing factors in all reported accidents.

Alcohol use is a significant contributor in over 20% of boating fatalities. From 26-28 June, the Coast Guard participated in Operation Dry Water. This was an intensified effort, in 49 states and U.S. territories, to detect intoxicated boaters and enforce Boating Under the Influence (BUI) laws. As a result of this coordinated effort, local and federal law enforcement agencies contacted over 35,000 boaters and issued 280 BUI citations and 5205 warnings.

Note: Reported numbers are subject to change. FY 2009 actual results are based on reports submitted by State authorities that require validation. The Coast Guard expects further review of these reports, as well as the receipt of additional casualty reports after the fiscal year has ended, will reveal a decrease in deaths and an increase in injuries, resulting in a probable net increase in the 2009 Actual Number.

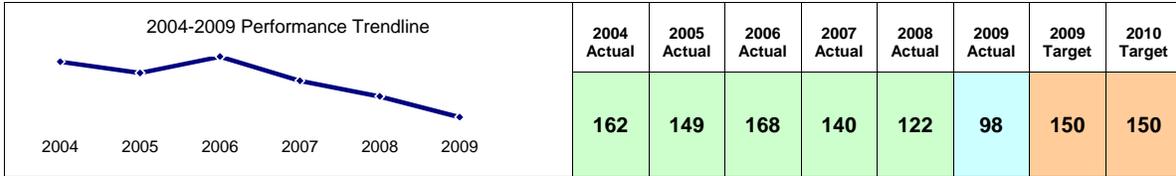
FY 2009 Marine Environmental Protection Performance Results

Federal regulation requires vessel or facility operators to report the discharge of any hazardous substance that equals or exceeds reportable quantities and requires the reporting of any discharge of oil or oil products that cause a sheen, discoloration, sludge or emulsion on or below the surface of any navigable waterway of the United States. The Coast Guard uses the number of chemical discharge incidents and the number of oil spills greater than 100 gallons as proxy indicators of marine environmental protection, and normalizes 5-year averages of these as indicators of long-term trends.

Appendix A: Performance Results: Updated Metrics

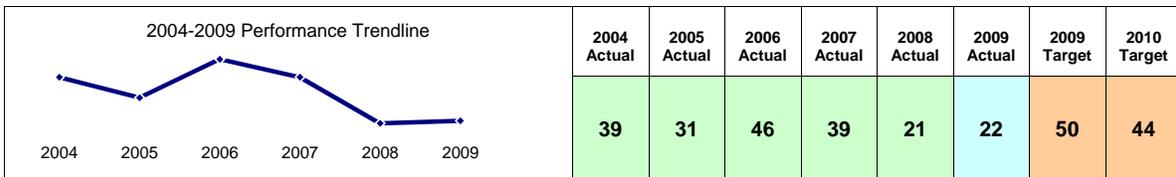
There were 98 oil spills greater than 100 gallons documented by the end of FY 2009, about 20% fewer than the 122 reported for FY 2008.

Annual Number of Oil Spills >100 Gallons



The annual number of chemical discharge incidents remained low in FY 2009; only 22 chemical discharge incidents were recorded.

Annual Number of Chemical Discharge Incidents



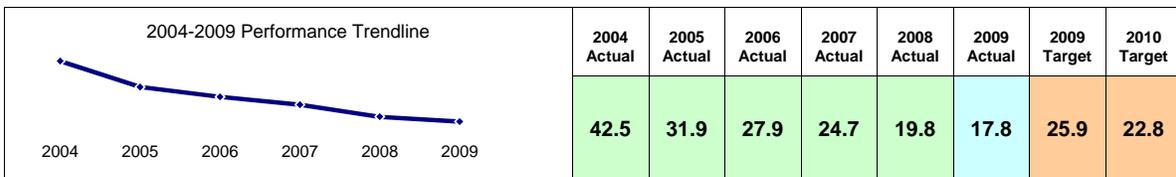
The five-year average number of oil spills greater than 100 gallons has shown a consistent but slowing decline since 2003. The five-year average of 11.8 spills per 100 million short tons of oil and oil products shipped is about a 10% improvement over the 13.2 recorded in FY 2008.

Five-Year Average Number of Oil Spills >100 Gallons per 100 Million Short Tons Shipped



The five-year average number of chemical discharge incidents continued a trend of improvement in 2009. The five-year average discharge incidents per 100 million short tons of chemicals shipped was 17.8 in 2009 as compared to 19.8 in 2008.

Five-Year Average Number of Chemical Discharge Incidents per 100 Million Short Tons Shipped



Shore facilities remain the primary source of spills, accounting for nearly 30% of the five-year average of chemical spills and oil spills greater than 100 gallons. Approximately 90% of chemical spills and 60% of oils spills greater than 100 gallons are accounted for by situations where the initial event is a pollution incident (e.g. a spill occurring during fuel transfer operation) while the remainder occur following an initial event like a vessel collision, allision, grounding, loss of steering, material failure, sinking, flooding, fire or explosion.

Appendix A: Performance Results: Updated Metrics

Note: Current results are subject to change due to delays in receiving some reports and the time required to complete some investigations, with the greatest impact affecting recent quarters. Shipping statistics from the Army Corps of Engineers are used to calculate the normalized five-year averages. This data is not generally available until December following the calendar year and current values are a projection from five years of past data.

Appendix B: Homeland Security Institute Independent Evaluation Summary and Related USCG Actions

In July 2008, the U.S. Coast Guard (USCG), Office of Performance Management and Assessment (CG-512), tasked the Homeland Security Institute (HSI) to independently evaluate the USCG Prevention Program. HSI's evaluation was submitted to the Coast Guard in August 2009.

The scope of the assessment included marine safety (including recreational boating), marine environmental protection, mariner credentialing, engineering plan review, and regulation development.

The research and data collection for HSI's evaluation was conducted during the fall of 2008. The multi-year Marine Safety Enhancement initiatives implementation started in earnest in early 2009. Many of HSI's recommendations were completed or in progress when the report was submitted to the Coast Guard in August 2009.

The full report is available on line at: http://www.uscg.mil/marinesafetyprogram/ms_mepeval.asp.

The HSI Evaluation Report included a summary table of its specific recommendations, which has been included below. The fourth column, "Ongoing or Completed Action," summarizes related actions taken by the Coast Guard during 2009 that address each of the HSI recommendations.

HSI's Legend for Recommendations:

GEN - General	PAR - Partner Relationships
REG - Standards and Regulations	IND - Industry and Public Outreach
CMP - Compliance	INV - Investigations and Casualty Analysis
WRK - Workforce	FSH - Commercial Fishing
ORG - Organizational Leadership	RB - Recreational Boating

Report Section	Rec. No. <i>*HSI High Priority</i>	HSI Recommendation Summary	US Coast Guard Ongoing or Completed Action
Performance Assessment	GEN-1	Establish a Center of Expertise for spill response and cleanup.	Recommendation forwarded to the Response Policy Directorate (CG-53) for their consideration.
Standards and Regulations Development	REG-1	Develop a separate priority list for Prevention program regulations.	Recommendation forwarded to the Marine Safety & Security Council (MSSC) for their consideration.
Standards and Regulations Development	REG-2	Institute transparency during metric development (<i>i.e.</i> , timelines, delays, projections, and critical paths for regulation development).	Recommendation forwarded to the MSSC for their consideration recognizing regulation development is a very lengthy, complex process involving reviews and input from various other government agencies.
Standards and Regulations Development (Towing Regulations)	REG-3*	Provide stakeholders with transparency into towing regulation development so that the towing industry can gauge its readiness to comply with new regulations.	The Administrative Procedures Act (APA) governs the development of Coast Guard regulations. Process described on Homeport.uscg.mil (Domestic VsIs > Uninspected > Towing Vessels).

Report Section	Rec. No. *HSI High Priority	HSI Recommendation Summary	US Coast Guard Ongoing or Completed Action
Standards and Regulations Development (Towing Regulations)	REG-4*	Work assertively in consultation with the Towing Safety Advisory Council (TSAC) toward implementation of new towing regulations within the next two years.	Ongoing. The Administrative Procedures Act (APA) governs the development of Coast Guard regulations. Resources added and regulatory development processes are being streamlined.
Standards and Regulations Development (Boating Safety Regulations)	REG-5*	Provide stakeholders transparency into boating safety regulation development.	Ongoing. The Administrative Procedures Act (APA) governs the development of Coast Guard regulations.
Standards and Regulations Development (Boating Safety Regulations)	REG-6*	Move assertively to implement boating safety regulations in consultation with the National Boating Safety Advisory Council (NBSAC) over the next 2-3 years.	Ongoing. The Administrative Procedures Act (APA) governs the development of Coast Guard regulations. Resources added and regulatory development processes are being streamlined.
Standards and Regulations Development (Outer Continental Shelf)	REG-7*	Re-engage National Offshore Safety Advisory Council (NOSAC) to ensure proposed Sub-chapter N regulations (Outer Continental Shelf Activities) are current and implement these regulations within the next 2-3 years.	Ongoing. The Administrative Procedures Act (APA) governs the development of Coast Guard regulations. Resources added and regulatory development processes are being streamlined.
Standards and Regulations Development (Outdated Regulations)	REG-8	Develop a process to systematically review and update regulations with opportunities for input and feedback from the maritime industry.	Recommendation forwarded to the MSSC for their consideration.
Standards and Regulations Development (Outdated Regulations)	REG-9	Evaluate the \$25,000 damage threshold for initiating marine investigations and consider raising it to a more appropriate level.	Ongoing. The Office of Investigations & Analysis (CG-545) plans to evaluate this threshold and modify the regulations accordingly.
Compliance Verification and Enforcement (Competencies)	CMP-1	Assess and forecast the number of civilian personnel needed in the future to provide continuity, training, skills, knowledge, and local expertise for CG units.	Significant progress is being made. Working with the Workforce Forecasting and Analysis Staff (CG-12A) to develop appropriate models. Currently raising civilian Marine Inspector and Investigating Officer workforce to 33% (up from 16% in 2007.)
Compliance Verification and Enforcement (Capacity)	CMP-2	Develop a process to periodically update the Sector Staffing Study to ensure that the CG has sufficient personnel to carry out its missions.	Office of Shore Forces (CG-741) is continuing development and refinement of the Sector Staffing Model.

Report Section	Rec. No. *HSI High Priority	HSI Recommendation Summary	US Coast Guard Ongoing or Completed Action
Compliance Verification and Enforcement (Capacity)	CMP-3*	Ensure that sufficient infrastructure exists to support new staff assignments.	Ongoing. Deputy Commandant for Operations (Resources) (DCO-R) and Office of Shore Forces (CG-741) are working with Coast Guard Civil Engineering Units to ensure infrastructure for the new staff meets requirements.
Compliance Verification and Enforcement (Workload Issues)	CMP-4	Review the Prevention workload and prioritize based on risk.	Ongoing. The Office of Vessel Activities (CG-543) has initiated a risk based study on domestic vessel compliance resource requirements that will be measured against the Sector Staffing Model being completed by the Office of Shore Forces (CG-741).
Compliance Verification and Enforcement (Workload Issues)	CMP-5	Revisit requirement to inspect all tug and barge groundings in Western Rivers.	The Marine Safety Manual, Vol. V defines four levels of investigations. These incidents could be classified as Data Capture investigations, thus not requiring the attendance of a Coast Guard Investigating Officer.
Compliance Verification and Enforcement (Workload Issues)	CMP-6	Prevention leadership should provide input into senior Coast Guard and national risk discussions and models so that the high-probability risks associated with prevention issues are recognized and incorporated into national discussions and risk models on equal footing with security and low probability/high consequence issues, such as Weapons of Mass Destruction preparedness.	Ongoing. This is already occurring through DHS's adoption of the Maritime Security Risk Assessment Model (MSRAM) which addresses an All Hazards Risk Profile and Maritime Domain Awareness Global Supply Chain Risk Profile. Also, Commandant Instruction 16000.28, Recovery Of The Marine Transportation System for Resumption of Commerce, specifies managing risk across the entire MTS as a fundamental objective.
Workforce Issues	WRK-1	Determine marine safety and general prevention capacity for determining a standard measure of true capacity and track as an indicator of prevention outcomes.	Ongoing. This issue is being addressed through the Office of Shore Forces (CG-741) continuing its development and refinement of the Sector Staffing Model and the Prevention Human Capital Plan.
Workforce (Standards)	WRK-2*	Develop realistic expected timeframes for members to achieve their qualifications.	Ongoing. New Feeder Ports and their civilian Training Officers will address this for Marine Inspectors and assist in developing a new chapter on training/qualifications in Sector Organization Manual managed by the Office of Shore Forces (CG-741). This will also be addressed by the Prevention Human Capital Plan.

Report Section	Rec. No. *HSI High Priority	HSI Recommendation Summary	US Coast Guard Ongoing or Completed Action
Workforce (Standards)	WRK-3	Develop realistic capability standards for inspectors and investigators – determine how many activities (and how well) they can be expected to perform annually within a given port.	Ongoing. This issue is being addressed through the Office of Shore Forces (CG-741) development and refinement of the Sector Staffing Model.
Workforce (Standards)	WRK-4*	Build in flexibility, where appropriate, from standard practices. Take into consideration the location of ports, the industries there, and the length of the maritime season (for example, “recency” requirement for Alaska).	Ongoing. The Office of Vessel Activities (CG-543) released Policy Letter 09-04: Marine Inspector/Port State Control Officer Certification Policy in 2009 with updated guidance on recency requirements.
Workforce (Standards)	WRK-5	Develop and employ a Prevention-wide personnel time tracking tool to capture the time spent on Prevention activities.	Under development. The Prevention Policy Directorate (CG-54) is working with the Office of Information Management (CG-631) to develop a MISLE time capture tool to track these activities.
Workforce (ID Personnel requirements based on workload)	WRK-6	Monitor the prevention workload and workforce capabilities to identify and close workload gaps. Develop a predictive “What if?” tool to determine in advance the workload implications of new or revised regulations, trends in industry, new technologies, and changes in staffing levels.	Under development. The Prevention Policy Directorate (CG-54) has launched an Activity-Based Costing (ABS) pilot project aimed at addressing this issue. It is also envisioned that this functionality will be incorporated in future versions of the Sector Staffing Model.
Workforce (ID Personnel requirements based on workload)	WRK-7*	Fix the Personnel Allowance List to accurately reflect the <i>de facto</i> levels, types, quantities, and locations of Prevention people needed across the Coast Guard.	Ongoing. The Office of Shore Forces’ (CG-741) Sector Staffing Model will provide guidance and standards to address this issue.
Workforce (Training)	TRG-1*	Ensure that training infrastructure is sufficient to accommodate current and anticipated Prevention training requirements.	Ongoing. The Prevention Policy Directorate (CG-54) is working closely with FORCECOM’s Training and Education Branch (FC-51) to ensure all current and future training requirements are met.
Workforce (Training)	TRG-2	Explore partnering with other organizations to provide surge training to meet training requirements.	Ongoing. The Prevention Policy Directorate (CG-54) is working closely with FORCECOM’s Training and Education Branch (FC-51) to ensure all current and future training requirements are met.

Report Section	Rec. No. <i>*HSI High Priority</i>	HSI Recommendation Summary	US Coast Guard Ongoing or Completed Action
Workforce (Training)	TRG-3*	Establish training and qualification standards for Prevention personnel and create a sufficient Prevention training budget.	Ongoing. The Office of Vessel Activities (CG-543), the Office of Shore Forces (CG-741) and the Force Readiness Command (FC-511) have begun drafting a Commandant Instruction to create comprehensive training and qualification standards for Prevention personnel. The Prevention training budget has risen steadily over the past few years and recently received an additional \$750K recurring annually more than doubling historic base funding levels.
Workforce (Training)	TRG-4	Develop a response policy or plan that permits temporary duty assignments of personnel to Districts/Sectors when needed for surge or technical inspection needs.	Completed. Commandant Instruction 1330.3, Short-Term Personnel Support for Operational and Support Units, addresses this issue.
Workforce (Training)	TRG-5*	Establish and fill an O-5 billet and possibly related staff positions in a FORCECOM that will be responsible and accountable for CG-wide Prevention training standards, consistency, and quality control.	Ongoing. The billet has been established and will be filled in Assignment Year (AY) 2010.
Workforce (Training)	TRG-6	Maximize technology to provide informal job resources, including immediate consultation capability with experienced personnel such as Twitter or Job Help Desk.	Ongoing. This is being staffed by the Office of Vessel Activities (CG-543) through a CG intranet CGPortal Domestic Inspection Homepage. The Traveling Inspectors & Centers of Expertise (CG-54-TI) are available to provide immediate consultation and technical guidance.
Workforce (Training)	WRK-7*	Once the Sector study is completed, adjust the Workforce Projection model for the workforce required to perform the Prevention mission, and conduct an analysis for workforce management and prioritization of work to be accomplished or deferred.	Ongoing. Once the Office of Shore Forces' (CG-741) Sector Staffing Model is complete, coordination with the Workforce Forecasting and Analysis Staff (CG-12A) will address this issue.
Workforce (Tour Lengths)	WRK-8*	Extend Prevention officer tour lengths to four years, with reasonable exceptions.	Ongoing. Prevention tour lengths are being studied and modeled by the Workforce Forecasting and Analysis Staff (CG-12A).
Workforce (Career Paths)	WRK-9*	Study, develop, identify, and communicate viable career paths to prevention personnel.	Ongoing. This will be addressed in the Prevention Human Capital Plan.

Report Section	Rec. No. *HSI High Priority	HSI Recommendation Summary	US Coast Guard Ongoing or Completed Action
Workforce (Career Paths)	WRK-10	Investigate the value of the Civil Engineering Yellow Book concept for conveying career path and assignment information to the prevention community.	Ongoing. This will be addressed in the Prevention Human Capital Plan.
Workforce (Career Paths)	WRK-11	Incorporate introductory information for Prevention career paths into OCS and CG Academy training curricula.	Ongoing. Three new Marine Safety billets were filled in 2009 at the CG Academy and one billet at the Officer Candidate School (OCS)/ Leadership Development Center (LDC) to ensure this occurs. Curriculums are being updated.
Workforce (Workforce Mgt)	WRK-12*	Designate or create a new Prevention Workforce Management office or role within Prevention programs with responsibility and accountability for Prevention workforce management and liaison, similar to the former G-MRP function.	This function is currently within the purview of the Office of Shore Forces (CG-741). Implementing this recommendation would require significant reorganization within the Deputy Commandant for Operations (DCO) organization or additional resources.
Workforce (Workforce Mgt)	WRK-13*	Establish and communicate standard expectations for entry-level Prevention personnel at Feeder Ports regarding qualification attainment.	Ongoing. The Office of Shore Forces' (CG-741) Sector Organization Manual will provide guidance and standards in its training/qualifications chapter.
Workforce (Workforce Mgt)	WRK-14*	Eliminate O-2 investigating officer billets, and fill O-3 positions with qualified investigating officers.	In December 2008, 76% of all O-2 IO positions were converted to become O-3 IO positions. Converting the remaining IO billets to O-3 and filling them all with qualified IOs remains an ongoing effort.
Workforce (Workforce Mgt)	WRK-15	Significantly reduce or eliminate LTJG Prevention staff positions, which do not provide the technical foundation for developing Prevention professionals.	Ongoing effort with yearly resource proposal developments in concert with the Workforce Forecasting and Analysis Staff (CG-12A) and the Junior Officer First Tour Assignment (JOFTA) Policy. Potential area of focus for the Prevention Human Capital Plan.
Workforce (Workforce Mgt)	WRK-16*	Do not assign first tour Prevention personnel to small ports.	Completed. Specific direction issued in ALCOAST 089-09: Marine Safety Feeder Ports.

Report Section	Rec. No. *HSI High Priority	HSI Recommendation Summary	US Coast Guard Ongoing or Completed Action
Workforce (Workforce Mgt)	WRK-17	Explore increasing incentives to help fill civilian Prevention positions with professional marine industry members.	Ongoing. The Office of Civilian Personnel (CG-121) developed a successful recruiting campaign in 2009 and will continue use in 2010 for new civilian hires. Noteworthy success with National Centers of Expertise.
Workforce (Workforce Mgt)	WRK-18	Review and consider re-establishing the Direct Commission Officer (DCO) program for licensed Merchant Marine Officers.	Ongoing. This recommendation has been shared with the Workforce Forecasting and Analysis Staff (CG-12A) for possible inclusion in the agenda at the next Officer Accession Natural Work Group meeting.
Workforce (Workforce Mgt)	WRK-19*	Complete the Sector Staffing study and determine the workload gap for each Sector. Assignment officers work with Sector Commands to fill personnel gaps through the annual transfer process to meet the <i>collective requirements of the Sector</i> through the <i>combined skill sets of the incoming transferees</i> .	Ongoing. This is included in the multi-year Sector Staffing Model development/refinement process.
Organization and Leadership (Headquarters)	ORG-1*	Establish an office solely responsible and accountable for coordinating and integrating Prevention policy, planning, workload analysis, and budgeting in order to improve the overall effectiveness and efficiency of the Prevention program.	This function is currently within the purview of the Office of Shore Forces (CG-741). Implementing this recommendation would require significant reorganization within the Deputy Commandant for Operations (DCO) organization or additional resources.
Organization and Leadership (Headquarters)	ORG-2	Use office names followed by office numbers when communicating with Coast Guard partners, industry, and other stakeholders. Include publicly accessible contact information for the Coast Guard Offices involved in public outreach activities.	Completed. This information is posted at: www.homeport.uscg.mil
Organization and Leadership (Sectors)	ORG-3*	Re-examine the Sector construct with regard to MEP response.	Ongoing. This is under review by the Office of Shore Forces (CG-741).
Organization and Leadership (Sectors)	ORG-4*	“Right-size” the Sector staffs with response and prevention personnel redistributed to billets that better match their skill sets and experience based on the analysis from the Sector Staffing Study.	Ongoing. This is under review by the Office of Shore Forces (CG-741).
Organization and Leadership (Sectors)	ORG-5	Add Marine Safety to Operations Specialist Training.	Ongoing. This recommendation has been shared with the Operations Specialist Rating Force Manager for consideration.

Report Section	Rec. No. <i>*HSI High Priority</i>	HSI Recommendation Summary	US Coast Guard Ongoing or Completed Action
Organization and Leadership (Sectors)	ORG-6*	Properly size the Sector staffs with personnel working in their areas of expertise, and reinstate four-year tour lengths for junior officers to resolve staffing issues at this level.	Ongoing. Prevention tour lengths are being studied and modeled by the Workforce Forecasting and Analysis Staff (CG-12A) and the Office of Shore Forces (CG-741) is continuing development and refinement of the Sector Staffing Model.
Organization and Leadership (Sectors)	ORG-7	Build and communicate viable career paths for developing professional Chiefs of Prevention, Response, and Logistics.	Ongoing. This will be addressed in the Prevention Human Capital Plan.
Organization and Leadership (Sectors)	ORG-8	Establish an informal advice network as a resource for Sector Commanders when confronted with unclear situations.	Ongoing. This already occurs to some degree at the annual Sector Commanders Conference hosted by the Office of Shore Forces (CG-741).
Organization and Leadership (Sectors)	ORG-9	Identify Sector “best/proven” practices, and establish a formal way to share this information with all Sector command cadres. Assign a single point of contact or staff element to coordinate sharing and implementation of these practices.	Ongoing. This function is currently within the purview of the Office of Shore Forces (CG-741). This already occurs to some degree at the annual Sector Commanders Conference. There are also several ongoing initiatives such as the CG Portal intranet.
Partner Relations (Establish Networks)	PAR-1	Coordinate (with partners) performance measures development and tracking in the areas of boating safety (boater deaths, primarily; and injuries, secondarily) and marine pollution incidents, in order to collectively identify trends and therefore determine the resources necessary to address common safety and pollution issues.	Ongoing. The Marine Safety Performance Plan and the Strategic Plan of the National Recreational Boating Safety Program provide the framework for this coordination.
Partner Relations (Establish Networks)	PAR-2*	Identify and share best practices nationwide, and collect and share knowledge that can benefit MS/MEP outcomes. One opportunity would be to return to publishing annual casualty reviews in the Coast Guard’s Proceedings Magazine, similar to the UK’s Marine Accident Information Board (MAIB).	Ongoing. Recommendation on Proceedings forwarded to the Marine Safety & Security Council (MSSC) for their consideration.
Partner Relations (Establish Networks)	PAR-3	Attempt to coordinate marine safety inspections and examinations with Coast Guard security boardings and other boardings (such as CPB).	Ongoing. The establishment of interagency operational centers for port security, as called for in the SAFE Port ACT, will help facilitate this type of initiative.
Partner Relations (Share Costs)	PAR-4	Assess the ideal mix of Coast Guard and non-Coast Guard participation in Prevention activities and determine a long-term roadmap to ensure that the ideal mix is realized.	Ongoing. The Office of Vessel Activities (CG-543) is conducting a Risk-Based Decision Making analysis on Domestic Vessel Compliance.

Report Section	Rec. No. <i>*HSI High Priority</i>	HSI Recommendation Summary	US Coast Guard Ongoing or Completed Action
Partner Relations (Fill Gaps in USCG Prevention Program)	PAR-5*	Provide industry with frequent updates on progress in Coast Guard/industry coordination efforts for a towing vessel inspection regime.	The Administrative Procedures Act (APA) governs the development of Coast Guard regulations. Process described on Homeport.uscg.mil (Domestic VsIs > Uninspected > Towing Vessels).
Industry and Public Outreach (Mariner Credentials)	IND-1*	We strongly recommend that the Coast Guard fix the credentialing crisis as one of its very top priorities. State clearly and provide to industry universally timelines necessary for submission of paperwork and the specific information necessary for submission of health-related issues (including additional paperwork, as necessary.)	Significant outreach has been conducted with related Federal Advisory Committees, maritime academies, congress, and professional and trade associations. See http://www.uscg.mil/nmc/
Industry and Public Outreach (Mariner Credentials)	IND-2*	When the Coast Guard fails to meet publically issued deadlines, a predetermined risk-based analysis should inform a decision to immediately extend the expiration deadlines of current mariners' credentials so that mariners are not unduly punished due to the Coast Guard's capacity or expertise issues.	The National Maritime Center does not have the authority to extend the duration of a credential. Their current policy is to expedite processing on a case by case basis for mariners facing expiration due to a Coast Guard delay.
Industry and Public Outreach (Mariner Credentials)	IND-3*	NMC should increase its medical staff and include doctors and medical personnel who can not only make timely decisions, but also educate mariners.	Completed. Medical Evaluation Branch is now fully-staffed which was needed to implement Navigation and Vessel Inspection Circular (NVIC) 04-08: Medical and Physical Evaluation Guidelines for Merchant Mariner Credentials.
Industry and Public Outreach (Operational, Compliance, and Enforcement Consistency)	IND-4*	The Coast Guard should take appropriate steps to provide more consistent interpretations and enforcement regulations and policy.	Ongoing. Implementation of the Mission Management System (MMS) will address this need. Additionally, Chief, Inspection Dept and Chief of Prevention conferences have been recently convened with future plans for these groups to meet regularly.
Industry and Public Outreach	IND-5	Increase Proceedings article availability by including Proceedings on Homeport, and by including Proceedings articles within the appropriate subject areas on Homeport. Include "Top Ten" lists for types of casualties in Proceedings articles and/or post on Homeport.	Proceedings articles are posted on CGMarineSafety.blogspot.com, and other information is posted on http://www.uscg.mil/proceedings/about.asp

Report Section	Rec. No. <i>*HSI High Priority</i>	HSI Recommendation Summary	US Coast Guard Ongoing or Completed Action
Industry and Public Outreach (Best Practices)	IND-6	Expand the Cooperative Boarding Program by either implementing nationally, or encouraging COTPs to institute regionally, a day or week of non-attribution inspections/examinations where vessel owners/operators could have inspections made without penalty for deficiencies, if they make corrections within a reasonable time period.	Many programs of this nature already exist throughout the Coast Guard allowing District and Sector Commanders to exercise their discretion and manage risk at the regional or local level. Implementing a national program of this nature could have unintended consequences.
Industry and Public Outreach	IND-7	Examine and implement ways to make the Homeport website more accessible and easier to use for industry and other stakeholders.	Ongoing. The Coast Guard is evaluating alternatives to the BroadVision portal technology currently employed by Homeport.
Investigations and Casualty Analysis	INV-1*	Implement a feedback mechanism so that lessons learned from investigations can be shared with industry in a timely manner, informally and formally, and acted upon by industry, other stakeholders, and the Coast Guard.	Ongoing. Safety Alerts and Lessons Learned documents are sent to over 3000 individuals/organizations.
Investigations and Casualty Analysis	INV-2	CG and NTSB should develop a feedback loop to include pertinent investigation information that can contribute to Prevention program effectiveness.	Ongoing. There are joint monthly staff meetings with the Office of Investigations and Analysis (CG-545) and National Transportation Safety Board (NTSB) Marine Safety personnel. A joint Executive Steering Committee is operationalizing the CG/NTSB Memorandum of Understanding.
Investigations and Casualty Analysis	INV-3	Assess whether the Coast Guard's investigation activities have negative consequences (related to prosecution) that impede the gathering of information for safety and other Prevention purposes. Depending on findings, determine an effective approach to overcome such a conflict while meeting both investigation and prevention goals.	Ongoing. The Suspension and Revocation (S&R) National Center of Expertise (NCOE) and Investigations NCOE are providing subject matter expert (SME) support to field units.
Investigations and Casualty Analysis	INV-4	If not currently done, conduct and distribute an annual casualty review to industry to raise the awareness of the root causes of recent casualties.	Casualty data is routinely shared with industry stakeholders. Examples include the Passenger Vessel Association, American Waterway Operators, Lake Carriers Association, American Pilots' Association, and Advisory Committees.
Investigations and Casualty Analysis	INV-5*	Determine the cause of deep draft propulsion failures off the California coast, and develop and implement corrective actions.	Ongoing. This issue is being studied and policy guidance for investigating loss of propulsion incidents has been distributed.

Report Section	Rec. No. *HSI High Priority	HSI Recommendation Summary	US Coast Guard Ongoing or Completed Action
Non/Semi-Regulated Maritime Industries (Commercial Fishing)	FSH-1*	Coordinate fishing vessel safety requirements (between Districts 13 and 17) and clearly communicate those requirements to those operating in D17 waters with sufficient notice so that fishing vessels can be properly prepared in advance and operate without unnecessary interruptions.	Ongoing. Commercial Fishing Vessel Safety Coordinators in Districts 13 and 17 are in constant communication. Information is provided to fishing vessels through websites, newsletters, and direct notifications.
Non/Semi-Regulated Maritime Industries (Commercial Fishing)	FSH-2*	CG and NTSB should develop a feedback loop to include pertinent investigation information that can contribute to prevention program effectiveness.	Completed through monthly CG Office of Investigations and Analysis (CG-545)/ NTSB meetings.
Non/Semi-Regulated Maritime Industries (Commercial Fishing)	FSH-3	Undertake or contract for a study to determine the relationship between economic viability of fishing operations and marine casualties. If a positive correlation exists, develop appropriate leading indicators with input from the commercial fishing industry and partners (such as NMFS and state fishing agencies) and implement effective mitigation strategies.	Ongoing. The CG Office of Investigations and Analysis (CG-545) published a comprehensive <i>Analysis of Fishing Vessel Casualties: A Review of Lost Fishing Vessels and Crew Fatalities, 1992 – 2007</i> in October 2008 which is available on Homeport. A partnership exists with the National Institute for Occupational Safety and Health (NIOSH) who are also working to identify high risk fisheries and the factors that contribute to marine casualties. Studying the relationship between casualty data and economic viability has not yet occurred.
Non/Semi-Regulated Maritime Industries (Commercial Fishing)	FSH-4	Investigate (with partners) ways in which the commercial fishing fleet could be recapitalized and improve its safety without economic jeopardy.	Ongoing. Plans are to seek partnership with other agencies such as National Ocean and Atmospheric Administration (NOAA)/National Marine Fisheries Service (NMFS) to address this issue.
Non/Semi-Regulated Maritime Industries (Recreational Boating)	RB-1*	Continue to give its strong support for implementation of the comprehensive Strategic Plan of the National Recreational Boating Safety Program.	Ongoing. See MSPP Annual Update Supplement for progress made during 2009 on the Boat Safe initiative.
Non/Semi-Regulated Maritime Industries (Recreational Boating)	RB-2*	Continue to seek Statutory Authority to require that boat operators, on waters subject to the jurisdiction of the United States, possess a certificate showing completion of a recreational boating safety course or test that conforms to National Boating Education Standards and as recognized by USCG.	Ongoing. A Legislative Change Proposal has been drafted and is being evaluated.

Report Section	Rec. No. <i>*HSI High Priority</i>	HSI Recommendation Summary	US Coast Guard Ongoing or Completed Action
Non/Semi-Regulated Maritime Industries (Recreational Boating)	RB-3	Resources permitting, consider reviewing/comparing the effectiveness of its entire boating safety grant programs where it has the flexibility to redirect grants to more effective programs.	Ongoing. Cost/effect measurements are being gathered and assessed.
Non/Semi-Regulated Maritime Industries (Recreational Boating)	RB-4*	Coast Guard should review navigational lighting configurations (such as dredge piping and tall vessels) from the perspective of a recreational boat operating near the water surface at night for safety concerns, and take appropriate action as necessary.	The Recreational Boating Safety (RBS) Division (CG-5422) has completed their input on this item, and has forwarded it to the Towing Vessel Safety Advisory Council (TSAC) and to the Navigation Safety Advisory Council (NAVSAC) for further development.
Conclusions (Coordinating Implementation of Recommendations)	GEN-2*	A single individual or staff element at Coast Guard Headquarters be responsible for overseeing and coordinating the specific and detailed recommendations identified within this evaluation. That individual or staff element should have sufficient resources, authority, and accountability to see those recommendations through to completion.	The Prevention Policy Directorate (CG-54) is completing this action.

APPENDIX C: MARINE SAFETY GUIDANCE

ALCOAST 089-09: *Marine Safety Feeder Ports*

Office of Vessel Activities (CG-543) Policy Letter 09-04: *Marine Inspector/Port State Control Officer Certification Policy*

Coast Guard-Marine Industry Mutual Training Agreement: 1 August 2009 Edition

ALCOAST 131-09: *National Centers of Expertise (NCOES)*

Mission Management System Newsletter: Vol. 1, No. 1

Coast Guard message R 121639Z JUNE 09: *Coast Guard Towing Vessel Bridging Program (TVBP)*

Office of Vessel Activities (CG-543) memo 16710 dated June 12, 2009

ALCOAST 089/09
COMDTNOTE 16700

SUBJ: COAST GUARD MARINE SAFETY FEEDER PORTS

- A. COMDT COGARD WASHINGTON DC 021523Z OCT 08/ALCOAST 486/08
- B. COMDT COGARD WASHINGTON DC R171741Z NOV 08/ALCOAST 568/08
- C. COMCOGARD PERSCOM ARLINGTON VA R250057Z MAR 08/ ALCGOFF 037/08
1. REFS A AND B PROVIDED UPDATES ON ACTIONS ACCOMPLISHED IN IMPLEMENTING THE MARINE SAFETY ENHANCEMENT PLAN INCLUDING THE ANNOUNCEMENT OF FEEDER PORTS IN REF A. THIS ALCOAST PROVIDES INFORMATION ON MARINE SAFETY FEEDER PORTS.
2. A FEEDER PORT IS A SECTOR OR MARINE SAFETY UNIT (MSU) WITH A DIVERSE WORKLOAD AND WITH SUFFICIENT VOLUME TO ALLOW FOR TRAINING IN AT LEAST FOUR OF THE 17 MARINE INSPECTION (MI) AND PORT STATE CONTROL EXAMINATION (PSCE) COMPETENCIES. FEEDER PORTS WILL BE STAFFED TO TRAIN AND THEN PROVIDE QUALIFIED INSPECTORS TO FILL MI POSITIONS THROUGHOUT THE COAST GUARD.
3. THE FOLLOWING UNITS ARE DESIGNATED FEEDER PORTS:
 - A. SECTOR BOSTON
 - B. SECTOR NEW YORK
 - C. SECTOR DELAWARE BAY
 - D. SECTOR HAMPTON ROADS
 - E. SECTOR JACKSONVILLE
 - F. SECTOR SAN JUAN
 - G. SECTOR MOBILE
 - H. SECTOR NEW ORLEANS
 - I. MSU HOUMA
 - J. MSU MORGAN CITY
 - K. SECTOR HOUSTON
 - L. MSU PORT ARTHUR
 - M. MSU GALVESTON
 - N. SECTOR CORPUS CHRISTI
 - O. SECTOR SAN FRANCISCO BAY
 - P. SECTOR LA/LB
 - Q. SECTOR SEATTLE
 - R. SECTOR HONOLULU
4. A KEY COMPONENT OF THE FEEDER PORT CONCEPT IS THE USE OF AN APPRENTICE-JOURNEYMAN-SENIOR MARINE INSPECTOR/TRAINING OFFICER OR MASTER BILLET STRUCTURE AND CAREER PATH. APPRENTICE TRAINING WILL BE EXPECTED TO EMPHASIZE TRAINING IN BOTH DOMESTIC VESSEL INSPECTIONS AND FOREIGN VESSEL EXAMINATIONS. THE SPECIFIC CRITERIA FOR THESE LEVELS OF EXPERTISE FOR A BLENDED PROFESSIONAL WORKFORCE OF MILITARY AND CIVILIAN MARINE INSPECTORS ARE CURRENTLY BEING DEVELOPED AND WILL BE PROMULGATED AT A LATER DATE.
5. WHILE THE CONCEPT OF A FEEDER PORT IS SIMILAR TO THE PREVIOUS TRAINING PORT MODEL WHICH WAS DISESTABLISHED IN 2007, IT IS CRITICALLY DIFFERENT IN THE SHEER MAGNITUDE OF DEDICATED APPRENTICE AND JOURNEYMAN BILLETS AND THE COMMITMENT TO QUALIFICATIONS EXPECTED OF EACH.
6. TRAINING WILL CONTINUE TO BE CONDUCTED AT NON-FEEDER PORTS AS IT IS BEING DONE TODAY. OUR LONG TERM GOAL IS THAT NON-FEEDER PORTS WILL NOT HAVE THE RESPONSIBILITY OF TRAINING THOSE NEWLY ENTERING THE MARINE INSPECTION FIELD.
7. SUCCESSFULLY COMPLETING AN APPRENTICE TOUR AT A FEEDER PORT WILL BE A PRE-REQUISITE FOR BECOMING AN INVESTIGATING OFFICER (IO). SPECIFIC INFORMATION ON IO TRAINING REQUIREMENTS WILL BE PROVIDED AT A LATER DATE.
8. TO SUPPORT THIS LEVEL OF COMMITMENT TO IMPROVING COMPETENCY,

FEEDER PORTS WILL RECEIVE ADDITIONAL BILLETS WHICH INCLUDE GS-13 CIVILIAN TRAINING OFFICER/SENIOR MARINE INSPECTORS(TO/SMI). EIGHT FEEDER PORTS RECEIVED TO/SMIS IN FY08, 3 MORE TO/SMIS WILL FOLLOW IN FY09, AND THE REMAINING TO/SMIS POSITIONS HAVE BEEN REQUESTED FOR FY10. OUR LONG TERM GOAL OVER THE NEXT FEW YEARS AS WE MOVE FORWARD IN ESTABLISHING FEEDER PORTS AS EFFECTIVE TRAINING ENVIRONMENTS IS TO ENSURE AN APPRENTICE IS ASSIGNED FOR EACH JOURNEYMAN INSPECTOR BILLET. THE NUMBER OF JOURNEYMEN, SMI/TOS, MASTER INSPECTORS ASSIGNED TO A PORT WILL BE BASED ON THAT PORTS WORKLOAD, IN ACCORDANCE WITH UPCOMING SECTOR STAFFING STANDARDS.

9. THE VAST MAJORITY OF OFFICERS ASSIGNED TO APPRENTICE BILLETS WILL BE EXPECTED TO FOLLOW THEIR INITIAL TOUR WITH A FOLLOW ON ASSIGNMENT AS A MI OR IO PRIOR TO A STAFF ASSIGNMENT. THIS SIGNIFICANT COMMITMENT MARKS THE NEW VISION OF A PROFESSIONAL INSPECTION CORPS AND IS CONSISTENT WITH THE MARINE SAFETY ENHANCEMENT PLAN. ALTHOUGH JOURNEYMAN MIS AND IOS MAY BROADEN THEIR EXPERIENCE BY PARTICIPATING IN OTHER ASSIGNMENTS, AND AS PREVIOUSLY STATED IN REF E, PERSONNEL ASSIGNED TO APPRENTICE BILLETS MAY NOT BE REASSIGNED TO OTHER PRIMARY DUTIES OUTSIDE THE INSPECTIONS DIVISION BY THEIR COMMAND WITHOUT THE CONSENT OF CGPC-OPM. THIS IS NOT MEANT TO RESTRICT APPRENTICES FROM PARTICIPATING IN COLLATERALS SUCH AS CFC OR MORALE POSITIONS; RATHER, IT IS INTENDED TO FOCUS THE INDIVIDUAL ON MARINE INSPECTOR QUALIFICATIONS CONSISTENT WITH THE ASSIGNED BILLET.

10. MISSION ACCOMPLISHMENT DICTATES THAT WE ADHERE TO THE "BROADENED SPECIALIST" CONCEPT OUTLINED IN FLAG VOICE 312 TO ENSURE PROPER FOCUS ON COMPETENCY ENHANCEMENT.

11. APPRENTICE MIS WILL NOT BE PQS VERIFYING OFFICERS. ONLY JOURNEYMAN MIS IN THEIR SECOND TOUR OR BEYOND, OR CIVILIAN JOURNEYMAN INSPECTORS AND INVESTIGATORS ARE TO BE DESIGNATED BY THE COMMAND AS PQS VERIFYING OFFICERS.

12. BACKGROUND AND CLARIFICATIONS CAN BE RECEIVED FROM CAPT ERIC CHRISTENSEN COMDT (CG-543) AND CDR BYRON BLACK COMDT (CG-7411).

13. RADM WAYNE L. JUSTICE, ASSISTANT COMMANDANT FOR CAPABILITY, AND RDML JAMES A. WATSON, DIRECTOR, PREVENTION POLICY, SEND.

14. INTERNET RELEASE AUTHORIZED.



3500
CG-543 Policy Letter
09-04, CH-1

DEC 29 2009

From: Eric. P. Christensen, CAPT
COMDT (CG-543)

To: Distribution

Subj: MARINE INSPECTOR / PORT STATE CONTROL OFFICER CERTIFICATION
POLICY

Ref: (a) Marine Safety Manual, Volume I, Administration and Management,
COMDTINST M16000.6
(b) U. S. Coast Guard Sector Organization Manual, COMDTINST M5401.6
(c) The Coast Guard Directives System, COMDTINST M5215.5E
(d) Mandatory Use of the Training Management Tool, COMDTINST 5270.

1. PURPOSE. The purpose of this policy letter is to enhance the Marine Safety Training and Qualification system and provide clarification and updated requirements for Marine Inspector (MI) / Port State Control Officer (PSCO) certification and currency.
2. ACTION. Sector Commanders shall ensure compliance with the provisions of this policy letter and incorporate the applicable parts into unit training plans and training and qualification programs per references (a) and (b). Internet release is authorized.
3. DIRECTIVES AFFECTED. Sectors are reminded that the Sector Training and Performance Support SITREPS, specifically ALCOASTs 483/06, 387/07, 519/07 and 202/08 expired as CG directives one year after their release per reference (c). It is anticipated that the policy guidance provided in the ALCOASTs is already included in Sector training programs. This policy letter will therefore impact those programs as well as individual Sector Operating Procedure (SOP) Guides. This policy will be incorporated into the Sector Training and Qualification manual, currently in development.
4. BACKGROUND. ALCOAST 519/07 established certification requirements for MIs and PSCOs with a goal of setting baseline standards to ensure field personnel maintain adequate proficiency to perform the Coast Guard's Commercial Vessel Safety (CVS) mission. This policy incorporates parts of the ALCOAST with recent field input and other published guidance into one document in an effort to help field units develop effective training programs pending promulgation of the Sector Training and Qualification Manual.
5. DISCUSSION. Our personnel learn and develop throughout their careers. As maritime professionals working in a constantly changing environment, it is paramount that our personnel keep abreast of new regulations, latest industry trends and technological advances. The training and development of our MIs and PSCOs is viewed as a continual process. Continuing education

coupled with a certain level of professional “currency” is extremely important in maintaining the necessary level of proficiency and certification to perform our missions effectively. There is always more to be learned and there is always room for improvement. As new National Centers of Expertise (NCOE) and Feeder Ports are established, units are encouraged to reach out to obtain additional training or training materials and utilize the knowledge and experience these resources offer.

In order to help evaluate the impact of ALCOAST 519/07, CG-543 sent surveys to every field unit that performs the CVS mission. The most widespread concerns raised were the inability for units to effectively maintain certifications due to “seasonality” (cyclical exams of certain types of vessels in specific geographic regions) and low traffic volume. This policy letter offers alternatives to help address these concerns.

6. TERMS OF REFERENCE.

Term	Definition
Competency	A collection of tasks with the associated skills, knowledge and abilities (tools, methods, information, doctrine, procedures, materials, etc.) needed to perform the tasks to a predetermined, measurable, performance standard.
Certification	An endorsement by the Commanding Officer or Officer in Charge Marine Inspection, that specified standards of knowledge and performance have been met, and/or are being maintained for a particular competency.
Currency	Maintenance of proficiency and knowledge associated with a particular certification usually by performing an inspection / examination within a specific timeframe.
Letter of Certification	A letter issued to a member who has successfully completed all the training and certification requirements for a particular competency. (Also referred to as a qualification or designation letter)
Marine Inspection Training Officer	Individual designated by the Commanding Officer as being responsible for administering a unit’s Inspection Division Training Program. The position may be a primary or a collateral duty and should be a person who has a high level of experience with the applicable certifications and/or competencies required at the unit.
PQS Verifying Officer (VO)	An experienced MI/ PSCO designated by the OCMI who has demonstrated the ability to instruct and verify a candidate for certification’s ability to correctly perform the tasks in the applicable PQS workbook. The VOs are the only personnel authorized to sign off PQS tasks and must be certified in the competency for the PQS workbook they are endorsing.
Sector	The term “Sector” in this policy includes any command, detachment or detached duty station that performs the CVS mission.

7. PROCEDURES

a. Certification

- (1) PQS Workbooks: It is imperative that the most recent Performance Qualification Standard (PQS) Workbook be utilized by MIs / PSCOs in training. The most recent editions of these PQS workbooks are available at the Coast Guard e-learning portal.
- (2) Verifying Officer Performance: Sectors shall ensure VOs demonstrate superior conduct, professionalism, skills and knowledge in the training of MIs / PSCOs. VOs shall be experienced and certified personnel that have demonstrated the ability to instruct, observe and evaluate candidates for certification in the performance of PQS-related tasks. Marine Inspection Training Officers shall ensure VOs carry out their duties in a consistent and correct manner.
- (3) Completion of PQS Workbooks: PQS tasks are only to be signed by a VO when the specific PQS task has been performed in its entirety. Candidates for certification are encouraged to seek out a variety of certified personnel to help broaden their knowledge. Although discussions of hypothetical scenarios (coaching/direction) are very important aspects of training, it is vital that PQS task completion be activity based.
- (4) Certification Boards: Candidates for certification shall successfully pass an oral certification board to the satisfaction of board members prior to a competency being granted. The board's purpose is to assess the knowledge, judgment and decision making skills of the individual. Standard scenarios should be posed to evaluate the individual's decision making skills and their general knowledge of regulations, policy and industry standards. For members receiving their first or second certification, MISLE casework should also be discussed. Boards should typically last 2-3 hours. Waivers for certification boards are not authorized.
- (5) Certification Board Prerequisites: In order for a candidate for certification to undergo a certification board they shall meet the following pre-requisites:
 - (a) Candidates for certification shall have each PQS Workbook completed in its entirety and reviewed by the Marine Inspection Training Officer prior to requesting a certification board (see paragraph 7. a. (7) below for policy on deferring PQS task items).
 - (b) Field practical verification inspection / examination (check ride) shall be conducted with the candidate for certification as the team leader under the direct supervision of a VO. The VO shall assess whether the candidate for certification has the necessary judgment, knowledge and communications skills to successfully conduct the inspection / examination. The VO should

only intervene if absolutely necessary. Ideally, multiple candidates for certification should not be evaluated during the same vessel activity with the exception of U. S. flag deep draft vessels that require both a Hull and Machinery Inspector.

- (c) Additionally, efforts shall be made on the part of the Marine Inspection Training Officer to ensure that the candidate for certification has not only accomplished individual tasks for a competency but has a broader understanding of the competency requirements and can readily access and interpret regulations and policy. Methods such as a written test or pre-board will prove useful in this determination.
- (6) Certification Board Members: Certification board members shall be assigned by the Marine Inspection Training Officer and shall be listed in the members PQS workbook. The board should consist of at least three persons: an applicable Branch or Division Chief and two designated VOs for the applicable competency. If two VOs are not assigned to the unit, one VO may be used and the board can be reduced to two members.
- (7) Deferred PQS Task Items: On a limited basis, PQS task items may be deferred by the Sector Commander or designee. **However, no PQS task items pertaining to confined space entry in any competency PQS workbook can be deferred.** PQS items shall only be deferred if the particular task cannot be adequately performed in the Sector's AOR due to local constraints and/or limitations associated with types of vessels, routes, cargo operations, repair facilities, etc. If a task is deferred, the reason for deferment shall be clearly articulated in the space provided in the PQS workbook and the deferred item shall be annotated in the certification letter. For example, if a MI candidate for certification did not inspect any unfired pressure vessels while pursuing a T-boat Inspector certification and there are T-boats in the AOR equipped with unfired pressure vessels, the PQS item may not be deferred.

If a PQS task is deferred, the MI / PSCO is still considered fully certified, however, the member is not authorized to inspect / examine or perform functions affiliated with the deferred task unless he/she is supervised by another certified member that does not have this item deferred.

- (8) Revoked Certifications: The scope of the certification process should be determined based on the circumstances surrounding the revocation. At a minimum, a field practical inspection / examination and a certification board in accordance with paragraph 7. a. (4) shall be conducted.
- (9) Newly reported MIs / PSCOs with existing certifications: These members are required to be certified at their new unit before being authorized to lead vessel inspection / examination activities. Each new member shall have their training records (PQS workbooks, Letters of Certification, certification documents) reviewed and have an

interview conducted by the applicable Branch or Division Chief to decide the best process to certify the competencies the OCMI has determined are required to be maintained. With the recommendation of the Training Officer, the Division Chief will decide if a certification board is required. If deferred PQS items are applicable at the new unit, those tasks must be completed and documented in the member's PQS workbook before certification is granted. Any local Sector-specific PQS tasks should also be completed. A "field practical inspection/examination" under the supervision of a designated VO is considered good practice and is highly recommended.

b. Currency

- (1) General Applicability: This policy applies to any USCG Active Duty, Reserve or Civilian employee who holds a MI or PSCO certification letter regardless of when it was issued (see list below of applicable competencies). The currency requirements outlined in this policy letter are only applicable to those persons assigned competencies that the OCMI has determined are required to meet mission objectives. For example, if a member has the Mobile Offshore Drilling Unit (MU) and Machinery Steam (MS) competencies and is currently assigned to a unit where the OCMI has determined those competencies are not needed, the member is not required to remain certified and therefore the currency requirements are not applicable. In these cases, the member will still hold the competency but will no longer be certified and will therefore not be authorized to conduct activities where the competency is required. Personnel assigned Department Head or Division Chief Positions that do not routinely conduct field activities are strongly encouraged to maintain certified competencies. Spending time in the field helps supervisors evaluate the training program's effectiveness, helps maintain proficiency in the missions they are responsible for and emphasizes the importance of being certified.

NOTE: A unit is not expected to maintain certification for anyone at the unit if there are normally no inspection / examination opportunities in any 12 month period for a particular competency. If an unexpected inspection / examination arises, units shall follow the alternative measures outlined in 7.b (5) below.

- (2) Twelve Month Currency Requirement: To remain certified, MIs / PSCOs shall conduct at least one inspection / examination every twelve months for each competency required by the OCMI. This can be accomplished as the team leader, lead inspector or as a team member. The following are competencies listed with the activities that are acceptable towards meeting the twelve month currency requirement:

(a) Domestic Competencies:

1. Life Raft Inspector: Completion of a life raft servicing inspection.
2. T-Boat Inspector (TI): Completion of a COI or annual inspection of a U.S small passenger vessel regulated under subchapter T or subchapter K.

3. K-Boat Inspector (KI): Completion of a COI or annual inspection of a U.S. small passenger vessel regulated under subchapter K.
4. Barge Inspector (BI): Completion of a COI, annual, or periodic inspection of a U.S. barge regulated under subchapter D, I, or O.
5. Offshore Supply Vessel Inspector (OI): Completion of a COI, annual, or periodic inspection of a U.S. offshore supply vessel regulated under subchapter L.
6. Hull Inspector (HI): Completion of the Hull Inspection tasks for a COI, annual, or periodic inspection of a U.S. deep draft vessel regulated under subchapter H, I, R, or U.
7. Hull Inspector, Tankship (HT): Completion of the Hull Inspection tasks for a COI, annual, or periodic inspection of a U.S. deep draft vessel regulated under subchapter D or O.
8. Machinery Inspector (MI): Completion of the Machinery Inspection tasks for a COI, annual, or periodic inspection of a U. S. deep draft vessel regulated under subchapter D, H, I, O, R, or U.
9. Machinery Inspector, Steam (MS): Completion of the Machinery Inspection tasks for a COI, annual, or periodic inspection of a U.S. steam propelled deep draft vessel regulated under subchapter D, H, I, O, R, or U.
10. Mobile Offshore Drilling Unit Inspector (MU): Completion of a COI, annual, or periodic inspection of a U.S. mobile offshore drilling unit regulated under subchapter I-A.
11. Drydock Inspector (DI): Completion of a dry-dock inspection, internal structural exam, or cargo tank internal exam of a U.S. vessel of 100 gross tons or more.

Note: Completion of Streamlined Inspection Program, Alternate Compliance Program, or Maritime Security Program audits and oversight inspections conducted in lieu of traditional regulatory inspections satisfy certification requirements for applicable Marine Inspector competencies.

(b) Port State Competencies:

1. Port State Control Examiner (PSCE): Completion of a PI, PII, Random Safety, COC-Annual, COC-Renewal, or COC-Quarterly examination on any foreign commercial vessel type. This competency is also considered

certified if any other Foreign Vessel Examiner competency is maintained certified.

2. Foreign Freight Vessel Examiner (FFVE): Completion of a PI, PII, or Random Safety examination on a foreign freight vessel.
 3. Foreign Tank Vessel Examiner (FTVE): Completion of a PI, PII, COC-TVE Annual, or COC-TVE Renewal examination on a foreign petroleum tank vessel.
 4. Foreign Chemical Tanker Examiner (FCTE): Completion of a PI, PII, COC-Chem Annual, or COC-Chem Renewal examination on a foreign chemical carrier.
 5. Foreign Gas Carrier Examiner (FGCE): Completion of a PI, PII, COC-Gas Annual, or COC-Gas Renewal examination on a foreign gas carrier.
 6. Foreign Passenger Vessel Examiner (FPVE): Completion of a PI, PII, COC-CVE Initial, COC-CVE Annual, or COC-CVE Quarterly examination on a foreign passenger vessel.
- (3) Lapse of Twelve Month Currency Requirement: Those MIs / PSCOs who have not performed a particular inspection / examination type during any twelve month period will have lapsed in currency for that specific competency. They are therefore no longer certified and are not authorized to lead foreign vessel exams or domestic vessel inspections for the applicable vessel / activity type as outlined in paragraph 7.b.(2). Members with lapsed currency can only be recertified by completing a field practical in accordance with paragraph 7. a. (5) (b). If necessary a certification board may also be conducted.
- (4) Documentation: All Letters of Certification and certification endorsements shall be documented in writing by the OCMI with appropriate entries made in TMT in accordance with reference (d). Using the form included as enclosure (1) is recommended for endorsements, however in lieu of using the form, the OCMI may issue a memo endorsement to the member's original Letter of Certification. A sample memo endorsement is included in enclosure (2). Previously deferred items that have been satisfactorily demonstrated shall be clearly documented on the form and/or endorsement as they are no longer considered deferred. A copy of the form or endorsement shall be kept in the individual's training record.
- (5) Alternatives if Units Cannot Comply with Certification Requirements: In instances where a unit could not fully comply with the certification requirements and an activity needs to be conducted by a certified MI/PSCO, one of the following alternatives should be used:

- (a) Deferral: If possible, in accordance with existing policy/ regulation, defer the activity to the next U.S. port.
- (b) Request for Forces: The OCMI should send a Request for Forces to their cognizant District to request assistance for a certified MI or PSCO.
- (c) Competency Specific Refresher Training: The OCMI shall ensure robust refresher training is conducted covering the applicable competency and the specific inspection / examination activity scheduled. The training should be conducted by the most competent and experienced member at the unit that holds the applicable competency provided the member has been certified for the competency within the last five years.

Units are encouraged to network with other units, Feeder Ports and applicable NCOEs to obtain training materials to maximize the effectiveness and ensure consistency with national standards. In general, the training should focus on topics specific to the activity type, vessel type, cargo handling/hazards, equipment tests, documentation, changes in U. S. and international regulations and CG Policy updates. Marine Inspection Training Officers shall document the refresher training as a task capture in TMT.

If the OCMI determines there is no one available that can adequately conduct the refresher training or no one has held the competency within the last five years; a Request for Forces should be used.

- (6) Port State Control Certification Tracking Cube: In order to ease the administrative burden for units to track and manage the foreign vessel twelve month currency requirement, a certification cube in CG Central has been established for units to use at their discretion. The cube can be accessed via the CG Analytics tab > CGBI Cubes & Reports > All Cubes & Reports > PSC Examiner Qualification Recency.
 - a) This cube is directly linked to the Team Member Function in MISLE; therefore, it is imperative that units enter all team member information in MISLE in accordance with existing policy (see “MISLE Data Entry Requirements for Foreign Vessel Arrivals, Examinations and Operational Controls” work instruction). In addition, the Team Leader should also be entered into the Team Member Function for the cube to accurately reflect participation. To ensure personnel remain certified units should periodically run the cube.
 - b) In the certification column on the cube report, an “x” will be displayed next to the competency if the unit has properly certified the individual for that particular competency in TMT. This feature eliminates the need to check TMT to determine which PSC competencies the individual is required to keep up to date.

- c) To utilize the “Certified” column in the cube, units will need to assign and certify those individuals grandfathered with the old PSC competencies (issued prior to March 31, 2008) with the current competency, i.e. assign and certify someone who has the FV competency to the corresponding FFVE competency in TMT.
- (7) A Domestic Vessel Inspection Certification Tracking Cube is not currently available. Until one is developed, Marine Inspection Training Officers should closely monitor MI currency and forecast potential gaps due to area specific challenges.

#

U.S. Department of
Homeland Security

United States
Coast Guard



Commander
United States Coast Guard
Sector XYZ

Address:
Phone:
Fax:

3500

MEMORANDUM

From: A. J. Squaredaway, Capt
CG Sector XYZ

Reply to
Attn of:

To: CWO I. B. Goode, EMPLID # 1234567

Subj: CERTIFICATION ENDORSEMENT FOR PORT STATE CONTROL OFFICER AND
MARINE INSPECTOR COMPETENCIES

Ref: CG-543 Policy Letter 09-04

1) In accordance with reference (a), you have successfully completed all applicable certification requirements and are hereby certified to carry out the responsibilities of a Port State Control Officer and / or Marine Inspector for those competencies indicated in enclosure (1). You will be guided in the performance of your duties by the Marine Safety Manual, U.S. Code of Federal Regulations, and related Commandant, District, and Sector directives.

2) This / these certification endorsement(s) are based on your previously issued Letter of Certification(s). In order to maintain certification for each competency you shall comply with all applicable requirements contained in reference (a). Failure to maintain certification for a particular competency will result in you not being authorized to perform duties where that competency is required. This / these certifications will expire upon your PCS or if otherwise revoked.

3) This letter shall be maintained as part of your permanent training record. The Marine Inspection Training Officer will ensure appropriate TMT entry(s) is/are made.

#

Copy: Marine Inspection Training Officer

Enclosure (2)

COAST GUARD-MARINE INDUSTRY MUTUAL TRAINING AGREEMENT

1. The parties to this agreement are the United States Coast Guard (Coast Guard) and (insert Company/Organization name).
2. The purpose of this agreement is to memorialize how both parties intend to educate and inform each other regarding their rules, regulations, policy, and procedures that are of mutual interest so that the Coast Guard becomes more aware of the impact of its rules, regulations, policies and procedures on the operations of (insert Company/Organization name) and so that (insert Company/Organization name) becomes more aware of what mandates are placed on the Coast Guard and how the Coast Guard executes its mandates.
3. This agreement is not a binding contract.
4. Both parties agree that, to help meet their fundamental goals, it might be equally beneficial to both parties for the Coast Guard to assign one or more of its personnel to perform his or her official Coast Guard duties at a facility or aboard a vessel that is owned or operated by (insert Company/Organization name).
5. The Coast Guard has the authority to assign its personnel to such duty pursuant to 14 U.S.C. 93(a)(7).
6. Both parties agree that such assigned Coast Guard personnel do not become employees or agents of, or consultants to, (insert Company/Organization name) for any purpose but, instead, that such assigned Coast Guard personnel remain federal officials for all legal and ethics purposes who are required to act in the interests of the United States.
7. Both parties agree that (insert Company/Organization name) cannot provide any compensation to any assigned Coast Guard personnel.

8. Both parties agree that because this is an equally mutually beneficial agreement, (insert Company/Organization name) is permitted to, but is not required to, provide travel, including but not limited to, shipboard travel, to assigned Coast Guard personnel at its expense when that travel will benefit the purpose of this agreement. Both parties also agree that providing such travel (including transportation, meals, lodging, and berthing) does not constitute a gift from (insert Company/Organization name) to the assigned Coast Guard personnel or to the Coast Guard - because this agreement is a non-quantifiable but equally mutually beneficial agreement that is based upon a fundamental quid pro quo concept. .

9. Both parties agree that (insert Company/Organization name) will provide suitable office space and office equipment for use by assigned Coast Guard personnel on a non-reimbursable basis.

10. Both parties agree that this agreement becomes effective when last signed by the parties below.

11. Both parties agree that this agreement remains in effect until terminated for any reason upon the express written mutual consent of both parties - or by the unilateral termination action of either party, for any reason, upon 60 days advance written notice to the other party, except that the Coast Guard can unilaterally terminate this agreement at any time with no advance notice should Coast Guard mission requirements necessitate that termination.

12. Both parties agree that this agreement can be amended at any time by the written mutual consent of both parties.

13. Both parties agree that this agreement is not intended to create, and shall not be construed to create, any agency, servant, employee, partnership, or joint venture relationship between the parties or between any assigned Coast Guard personnel and (insert Company/Organization name).

14. Both parties agree that there will be no exchange of funds between the parties in connection with this agreement.

15. Both parties agree that this agreement is not intended to, and shall not be construed to, impose any financial obligation between the parties.

16. Both parties agree that the persons signing this agreement below have the authority to enter the parties into this agreement:

For the Coast Guard

BRIAN M. SALERNO
Rear Admiral, U. S. Coast Guard
Assistant Commandant for Marine Safety,
Security and Stewardship

Date: _____

For (insert Company/Organization name)

Date: _____

1 August 2009 Edition

ALCOAST 131/09
COMDTNOTE 16700

SUBJ: NATIONAL CENTERS OF EXPERTISE (NCOE)

A. R 282326Z FEB 08 FM COMDT COGARD WASHINGTON DC - ALCOAST 109/08

B. R 021523Z OCT 08 FM COMDT COGARD WASHINGTON DC - ALCOAST 486/08

1. REF A STATED PLANS FOR MARINE SAFETY ENHANCEMENT EFFORTS INCLUDING THE CREATION OF CENTERS OF EXPERTISE. REF B HIGHLIGHTED CENTERS OF EXPERTISE AS THE MOST VISIBLE COMPONENT OF OUR EFFORT TO INCREASE COMPETENCY IN THE MARINE INSPECTION AND INVESTIGATION DISCIPLINES. THE PURPOSE OF THIS ALCOAST IS TO PROVIDE INFORMATION ON THE DUTIES, ORGANIZATION, AND EXPECTATIONS FOR NATIONAL CENTERS OF EXPERTISE (NCOE).

2. INDEPENDENT ANALYSIS RECOGNIZED THE NEED FOR A TARGETED REVITALIZATION OF TECHNICAL COMPETENCY AND EXPERTISE WITHIN MARINE SAFETY TO KEEP PACE WITH EVER-INCREASING GROWTH AND COMPLEXITY IN THE MARITIME INDUSTRY. CREATING NCOES WILL PROVIDE KEY VENUES FOR PROFESSIONAL DEVELOPMENT AND EXCHANGE BETWEEN INDUSTRY AND COAST GUARD PERSONNEL. BY FOCUSING ON SPECIALIZED AREAS OF INDUSTRY AND ENHANCING COAST GUARD CAPABILITIES, NCOES WILL IMPROVE INSPECTOR AND INVESTIGATOR COMPETENCIES WHILE PROMOTING NATIONWIDE CONSISTENCY. IN ADDITION TO THE NCOES FORMALLY ESTABLISHED 30SEP08 FOR CRUISE SHIPS AND SUSPENSION AND REVOCATION, THE FOLLOWING FIVE NCOES WILL BE ESTABLISHED BY 30SEP09:

A. TOWING VESSEL - PADUCAH, KY

B. LIQUEFIED GAS CARRIER - PORT ARTHUR, TX C. OUTER CONTINENTAL SHELF - MORGAN CITY, LA D. INVESTIGATIONS - NEW ORLEANS, LA E. VINTAGE VESSEL (E.G. STEAM PROPULSION OR RIVETED HULL) - DULUTH, MN

3. DEPENDENT UPON FUTURE FUNDING, ADDITIONAL NCOES ARE TENTATIVELY BEING PLANNED.

4. NCOES WILL OPERATE INITIALLY AS DETACHMENTS UNDER COMDT CG-546 (OFFICE OF QUALITY ASSURANCE AND TRAVELING INSPECTORS) WITH FUTURE PLANS TO INTEGRATE INTO FORCECOM.

AT INITIAL OPERATING CONDITION (IOC), NCOES WILL BECOME THE REPOSITORY OF COAST GUARD EXPERTISE AND BEST PRACTICES IN THEIR PARTICULAR FIELD. THEIR ACTIVITIES WILL INCLUDE:

A. PROVIDING CONSULTATION CONCERNING UNIQUE DESIGN, EXAMINATION, AND OPERATIONAL SITUATIONS AND THE DEVELOPMENT OF REGULATIONS, POLICY, DOCTRINE, AND/OR TTP AS REQUESTED.

B. ESTABLISHING AND CULTIVATING ENHANCED WORKING RELATIONSHIPS AND PARTNERSHIPS WITH PUBLIC AND PRIVATE INDUSTRY STAKEHOLDERS TO INCLUDE PROFESSIONAL TRAINING EXCHANGES AND JOINT TRAINING INITIATIVES.

C. WORKING WITH STAKEHOLDERS TO SEEK OUT, DEVELOP, AND IMPLEMENT NON-REGULATORY SOLUTIONS AIMED AT ACHIEVING OUTCOMES DESCRIBED IN THE MARINE SAFETY PERFORMANCE PLAN.

D. MONITORING FIELD ACTIVITIES AND PROCEDURES TO ENSURE UNIFORM APPLICATION OF REGULATIONS, POLICY, DOCTRINE, AND TTP.

E. ESTABLISHING SERVICE LEVEL AGREEMENTS WITH THEIR COLLOCATED SECTOR/MSU TO BEGIN SHARING THE WORKLOAD IN THEIR AREA OF EXPERTISE.

F. DEVELOPING CURRICULUM FOR BOTH EXPORTABLE AND RESIDENT TRAINING COURSES.

G. IDENTIFYING, COORDINATING AND SUPERVISING OJT OPPORTUNITIES.

H. SERVING AS PQS VERIFYING OFFICERS FOR THE COGNIZANT OFFICER IN CHARGE, MARINE INSPECTION (OCMI).

5. UPON ACHIEVING FOC, NCOES WILL CONTINUE TO DEVELOP AND EXPAND UPON ALL FACETS OF THEIR CAPABILITIES LISTED IN PARAGRAPH 4 AS WELL

AS PROVIDE ON-SCENE INSPECTION/INVESTIGATION ASSISTANCE TO OTHER COMMANDS.

PROCEDURES FOR REQUESTING NCOE ON-SCENE ASSISTANCE WILL BE PROMULGATED AT A LATER DATE.

6. PERSONNEL: WHILE SLIGHT DIFFERENCES IN NCOE BILLET STRUCTURES EXIST, THEY WILL BE SUPERVISED BY AN O5 AND STAFFED WITH AN O4 ASSISTANT SUPERVISOR AND AT LEAST THREE CIVILIAN GS-12/13S.

(VINTAGE VESSELS AND SUSPENSION AND REVOCATION DEVIATE FROM THIS MODEL.) DURING FY09, A TOTAL OF 23 CIVILIAN POSITIONS WILL BE HIRED TO POPULATE NCOES.

OUR HIRING EFFORTS WILL INCLUDE A NATIONWIDE RECRUITING DRIVE TARGETING THE COMMERCIAL MARITIME SPECIALTY EACH NCOE ENCOMPASSES. THESE POSITIONS WILL BE FILLED BY SEASONED CAREER SPECIALISTS AS OPPOSED TO LADDERED TRAINEES.

7. ADDITIONAL BACKGROUND INFORMATION AND CLARIFICATION CAN BE RECEIVED FROM MY POC: CAPT GORDON LOEBL (COMDT CG-546)
TEL: 202.372.1190.

8. RDML JAMES A. WATSON, DIRECTOR OF PREVENTION POLICY SENDS.

9. INTERNET RELEASE AUTHORIZED.



Implement Your MMS

Congratulations on implementing the MMS at your unit! You've finished your orientation training and reviewed your unit MMS procedures. Now what?

Use and improve your MMS!

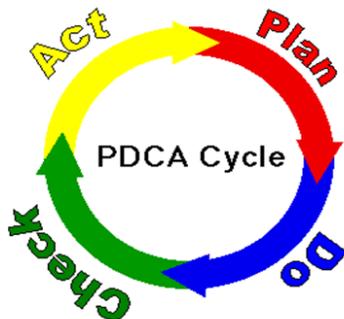
Here are a few suggestions...

- ✓ Follow your documented procedures and work instructions. All team members in your unit should be using the MMS processes, following the documented procedures and work instructions, and complying with the MMS requirements.
- ✓ Make improvements to the processes. Some of your procedures may be new or have changed significantly over time. When you actually use the procedures, you will most likely find areas that can be improved. Make improvements using the Corrective and Preventive Action process and the document revision process.
- ✓ Conduct your own Internal Audits. To instill confidence in your MMS, it is necessary to demonstrate that it is effective. During an

Continued on page 2

When MMS is implemented:

- Well defined and documented procedures improve the consistency of output.
- Procedures ensure corrective action is taken whenever defects occur.
- Defect rates decrease.
- Defects are caught earlier and are corrected at a lower cost.
- Defining procedures identifies current practices that are obsolete or inefficient.
- Documented procedures are easier for new team members to follow.



Preparing for your Internal Audits

If you have never conducted your own internal audit before, there are some things you'll want to keep in mind before you start. In most cases, if you have been following your documented procedures you will always be "ready" for an audit. But here are a few tips to help you get started.

Before you conduct your own internal audit at your unit, you will want to make sure that all your team members know that the audit will be taking place, as well as the purpose of the audit. This will help them understand how to respond to the auditors' questions. You want your team members to respond openly and honestly to the auditor. They should not try to minimize or hide anything that they think might not be in accordance with your procedures. Remember, the auditor is looking for evidence of compliance with the requirements of your MMS. Your team members are the ones that will be providing that evidence so preparing them to answer the auditors questions will make the audit go more smoothly.

Remind the team members that the audit is **not a test**. Rather, the audit is a "snapshot" of your operation at the time of the audit. The auditor is not looking to find fault or lay blame. Instead, the auditor is looking to verify that the system is working as it's supposed to. This will help you to identify areas that can be improved.

Remember, when they auditors ask a question, they are looking for information on how your process works. Questions like...Do your procedures provide information? If the information is not in a procedure, where does the team member go next, do they ask a supervisor?

Make sure documents are available at the point of use.

Check bulletin boards, counters, cupboards, and drawers for uncontrolled documents (i.e.outdated CFRs or cancelled policy letters), un-calibrated measuring and monitoring instruments and unidentified parts or supplies.

Continued on page 2

internal audit you will compare what you are doing against the requirements of the standard. Make a note of your findings. Allow yourself enough time to take corrective action on any findings. You can select a group of internal auditors from within your unit to perform the audits. You will want to have enough auditors trained so that the **auditors will not audit their own work.**

- ✓ Review results of Internal Audits, Corrective and Preventive Action and results of measuring and monitoring of the MMS. Initiate corrective actions and preventive actions to fix problems and make improvements to the MMS.
- ✓ Keep records. External auditors will be looking for evidence that you are complying with the requirements of your MMS. In most cases, this evidence is in the form of records that you have created. Run your system continuously and make sure you maintain sufficient records for auditors to evaluate.

Still have questions? Contact the FC-75, Det 1 Staff at mmm@uscg.mil or 202-372-1191

Have a copy of your MMS manual and your procedures available for the auditor. If you have any local modifications to a procedure (such as a clarifying work instruction), have a copy of the document available also.

Assign someone to escort the Auditor to show them where different areas and departments are. Coach this person to let employees answer the auditor's questions and not answer the questions themselves unless the question is directed to them.

Why MMS?

After implementing MMS you should begin to see increased productivity resulting from the evaluation and improvement of your processes.

You should also begin to see better documentation and control of processes that will lead you to consistency in performance with less scrap and rework.

You should experience fewer "troubleshooting" calls as team members gain more information for resolving problems on their own.

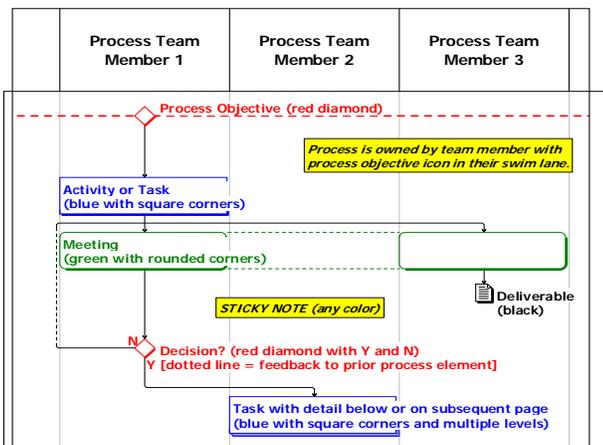
Since goals and objectives are adjusted based on the information gained, your unit should become more customer-driven. Remember, customers include both internal and external customers to your organization. Do you provide something that someone else needs to do their work? Then they are your customer. The Sector Command Center, HQ Program Managers, and T-Boat operators are all examples of customers.

Customer satisfaction improvement is seen as Goals and Objectives that take the customer needs into account. Customer needs are better understood as customer feedback is sought, received and analyzed.

As goals focus on the customer, the organization spends less time focusing on individual goals of departments and more time working together to meet customer needs.

All of this leads to unit and individual efficiency... your reward for your hard work and investment in the Mission Management System. 

Understanding MMS Deployment Flowcharts



The process objective defines the Process Owner. Team members with process elements in their swimlane are involved in the element. The source of an arrow (i.e. tail of the arrow) indicates responsibility for initiating process elements. The tip of an arrow indicates the team member responsible for completing receiving the process element.

R 121639Z JUNE 09
FM COMDT COGARD WASHINGTON DC//CG-54//
TO COMLANTAREA COGARD PORTSMOUTH VA//A//
COMPACAREA COGARD ALAMEDA CA//P//
INFO COMDT COGARD WASHINGTON DC//CG-1/CG-5/CG-6/CG-7/CG-543//
BT

UNCLAS //N16710//

SUBJ: COAST GUARD TOWING VESSEL BRIDGING PROGRAM (TVBP)

A. LANTAREAINST 16710.1, COMMERCIAL UNINSPECTED TOWING VESSEL EXAMINATION PROGRAM

B. TOWING VESSEL BRIDGING PROGRAM POLICY MEMO, DATED 12JUN09.

1. A SIGNIFICANT REGULATORY PROJECT IS UNDERWAY THAT WILL SUBJECT THE MAJORITY OF COMMERCIAL TOWING VESSELS (5,200+) TO INSPECTIONS FOR CERTIFICATION. IN THE PERIOD BETWEEN THE CURRENT AND FUTURE STATE OF TOWING VESSEL SAFETY OVERSIGHT, WE NEED TO EASE THE TRANSITION TO ENSURE THAT THE COAST GUARD AND THE TOWING VESSEL INDUSTRY ARE INFORMED AND PREPARED TO MEET THE NEW REQUIREMENTS TO BE FINALIZED IN SUBCHAPTER M. THIS GOAL WILL BE ACCOMPLISHED BY CARRYING OUT A ROBUST TOWING VESSEL BRIDGING PROGRAM (TVBP) THAT ENHANCES AND INCREASES COAST GUARD INTERACTIONS WITH THE TOWING INDUSTRY AND ACCLIMATES ALL INVOLVED WITH THE PROCEDURES, POLICY, REQUIREMENTS OF EXISTING AND, WHEN APPROPRIATE, NEW SUBCHAPTER M REGULATIONS. THE TVBP WILL INVOLVE EXTENSIVE INDUSTRY OUTREACH, QUALIFICATION OF CG MEMBERS TO A NATIONAL STANDARD, AND EXAMINATION OF EVERY UNINSPECTED TOWING VESSEL (UTV) THAT WILL BE INSPECTED UNDER SUBCHAPTER M.

2. ELEMENTS OF THE PROGRAM: CG OFFICE OF VESSEL ACTIVITIES, DOMESTIC COMPLIANCE DIVISION (CG-5431), IN CONSULTATION WITH REPRESENTATIVES OF THE TOWING INDUSTRY AND CG LANTAREA AND PACAREA, HAS DEVELOPED THE FRAMEWORK FOR THE TVBP THAT IS COMPRISED OF THREE (03) PHASES WITH FIVE (05) CRITICAL ELEMENTS (OUTLINED BELOW).

2.A. PHASE 1, COMMENCING DURING THE SUMMER OF 2009 WITH AN ANTICIPATED DURATION OF UP TO 18 MONTHS, WILL BE SCALED BASED ON PROGRESS IN MEETING INDUSTRY'S DEMAND FOR EXAMS.

2.A.1. OUTREACH. ALL LEVELS OF COMMAND ARE EXPECTED TO CONDUCT EXTENSIVE OUTREACH WITH INDUSTRY, DISCUSSING THE TVBP, STRONGLY ENCOURAGING PARTICIPATION IN THE INDUSTRY INITIATED EXAMS (DESCRIBED IN 2.A.3), AND, AFTER PUBLICATION OF THE SUBCHAPTER M NOTICE OF PROPOSED RULEMAKING, COMMUNICATING DETAILS OF THE PROPOSED REGULATIONS AND ENCOURAGING COMMENT.

2.A.2. EDUCATION AND QUALIFICATION. PERSONNEL THAT WILL BE CONDUCTING TOWING VESSEL EXAMS WILL BE REQUIRED TO COMPLETE A TOWING VESSEL EXAM INDOCTRINATION AND QUALIFICATION PROCESS, WHICH IS CURRENTLY BEING DEVELOPED BY JOINT INDUSTRY/CG WORK GROUPS. THE PQS AND ASSOCIATED INDUSTRY INDOCTRINATION PACKAGE WILL BE DISTRIBUTED TO THE FIELD IN JUNE 2009 AS DISCUSSED IN PARAGRAPH 4.

2.A.3. INDUSTRY INITIATED EXAMS. THE EXAM PROGRAM PROMULGATED BY LANTAREA, REF (A), WILL BE EXPANDED AND IMPLEMENTED CG-WIDE. TWO KEY FEATURES OF THE INDUSTRY INITIATED EXAM INITIATIVE ARE: (1)

INDUSTRY INITIATES A REQUEST TO A LOCAL COTP/OCMI TO SCHEDULE A TOWING VESSEL EXAM; AND (2) A CG DECAL IS ISSUED TO THOSE VESSELS DEEMED TO BE IN COMPLIANCE WITH EXISTING REGULATIONS.

2.B. PHASE 2 WILL COMMENCE AFTER THE INDUSTRY HAS BEEN GIVEN THE OPPORTUNITY TO PARTICIPATE IN AND THE CG HAS SATISFACTORILY CONDUCTED REQUESTED INDUSTRY INITIATED EXAMS, AND CONTINUES UNTIL SUBCHAPTER M IMPLEMENTATION (PHASE 3).

2.B.1. RISK-BASED TARGETED EXAMS. SECTORS AND SUBORDINATE MSU'S AND MSD'S WILL IMPLEMENT A RISK-BASED TARGETING TOOL (TBD BY THE TVNCOE), CONCEPTUALLY SIMILAR TO THE METHODOLOGY USED FOR PORT STATE CONTROL EXAMS, WHICH FOCUSES ON VESSELS THAT DO NOT HAVE A VALID DECAL. THE COTP/OCMI WILL DETERMINE THE PRIORITY OF EXAMS BASED ON RISK FOR THOSE VESSELS THAT OPERATE IN HIS/HER AOR.

2.C. LE BOARDINGS AND SURGE OPERATIONS. THROUGHOUT PHASES 1 AND 2, OPERATIONAL COMMANDERS WILL HAVE WIDE DISCRETION TO PLAN AND EXECUTE LE BOARDINGS AND SURGE OPS AS RESOURCES PERMIT; THE LEVEL OF PARTICIPATION IN THE INDUSTRY INITIATED EXAM INITIATIVE SHOULD SERVE AS A FACTOR FOR DETERMINING THE FOCUS AND TEMPO OF UNDERWAY BOARDINGS.

3. CG PERSONNEL AND PROGRAM EXECUTION. COTPS/OCMIS WILL HAVE THE FLEXIBILITY TO EMPLOY PERSONNEL ASSIGNED TO TOWING VESSEL INSPECTION BILLETS OR OTHERS THAT THEY JUDGE QUALIFIED TO ACCOMPLISH THIS MISSION. HOWEVER, AT A MINIMUM, THE NEW TOWING VESSEL INSPECTOR BILLETS ASSIGNED SHALL BE EMPLOYED IN CONDUCTING TOWING VESSEL TRAINING, OUTREACH, AND EXAMINATIONS.

4. EXAMS. THE EXPECTATION IS THAT INDUSTRY INITIATED EXAMS WILL COMMENCE DURING THE SUMMER OF 2009; HOWEVER, THIS DOES NOT PRECLUDE UNITS ALREADY CONDUCTING UTV EXAMS IN ACCORDANCE WITH REF (A) FROM CONTINUING THEIR ACTIVITIES. ALL UTVS THAT WILL BE INSPECTED UNDER SUBCHAPTER M SHOULD AT LEAST UNDERGO ONE (01) EXAM (INDUSTRY INITIATED OR RISK-BASED TARGETED) BY AUG 2012.

5. COMMUNICATIONS. TRANSPARENCY WILL BE A HALLMARK OF THIS PROGRAM. MORE DETAILS OF THE PROGRAM ARE DESCRIBED IN REF (B) (ATTACHED TO THIS MSG). CG-5431 WILL COMMUNICATE TVBP STATUS UPDATES VIA MESSAGE AND WILL POST RELEVANT TVBP DOCUMENTS FOR INTERNAL CG USE ON CG PORTAL AT CG COLLABORATION-PUBLIC PLACES-DOMESTIC VESSEL INSPECTIONS-POLICY-[TOWING VESSELS](#). PUBLIC DOCUMENTS WILL BE POSTED ON CG HOMEPORT AT [HTTP://HOMEPORT.USCG.MIL-DOMESTIC VESSELES-TOWING VESSELES](http://homeport.uscg.mil-domestic-vesseles-towing-vesseles).

6. AS THE TOWING VESSEL NATIONAL CENTER OF EXPERTISE (TVNCOE) STANDS UP IN PADUCAH, KENTUCKY, CG-5431 WILL HELP TRANSITION ELEMENTS OF THE TVBP TO APPROPRIATE OFFICES FOR FURTHER DEVELOPMENT AND MAINTENANCE. ONCE ESTABLISHED, THE TVNCOE WILL PLAY A CRITICAL ROLE IN ALL ASPECTS OF THE BRIDGING PROGRAM, INCLUDING SERVING AS THE KEY REFERENCE AND POINT OF CONTACT FOR TOWING VESSEL SAFETY, SECURITY, AND ENVIRONMENTAL PROTECTION ISSUES. THE TVNCOE WILL ALSO PLAY A CENTRAL ROLE IN TOWING VESSEL EXAMINATION TRAINING, AND IN MONITORING THE PROGRESS OF THE TVBP, RECOMMENDING ANY NECESSARY COURSE CORRECTIONS TO CG-5431. IN THE INTERIM, CG-5431 WILL MANAGE THE PROGRAM, AND ENSURE ALL ORGANIZATIONAL ELEMENTS ARE ENGAGED AND REPRESENTED.

7. THE POINT OF CONTACT FOR THE TOWING VESSEL BRIDGING PROGRAM IS CDR GREGORY HOWARD UNTIL 01JUL09. HE MAY BE REACHED AT [GREGORY.A.HOWARD\(AT\)USCG.MIL](mailto:GREGORY.A.HOWARD(AT)USCG.MIL) OR AT (502) 552-3369. AFTER 1JUL09, CONTACT MR. PATRICK LEE AT [PATRICK.J.LEE\(AT\)USCG.MIL](mailto:PATRICK.J.LEE(AT)USCG.MIL) OR AT (202) 372-1135.

8. RDML JAMES WATSON, DIRECTOR OF PREVENTION POLICY, SENDS.

BT



16710
12 June 2009

MEMORANDUM

From: E. P. Christensen, CAPT
COMDT (CG-543)

A handwritten signature in blue ink, appearing to be "E. P. Christensen".

Reply to CDR G. L. Boone
Attn of: (202) 372-1215

To: CG LANTAREA (Ap)
CG PACAREA (Pp)

Subj: COAST GUARD TOWING VESSEL BRIDGING PROGRAM (TVBP)

Ref: (a) COMDT COGARD Washington DC 121639Z June 09
(b) LANTAREAINST 16710.1, Commercial Uninspected Towing Vessel
Examination Program
(c) U.S. Coast Guard Requirements for Uninspected Towing Vessels, Ch-1, Mar09

1. The intent of this memorandum is to provide policy and additional details on the information on the program outlined in reference (a). As this message states, pursuant to the Coast Guard and Maritime Transportation Act of 2004, Pub. L. 108-293 of August 9, 2004, a significant regulatory project is underway that would subject the majority of commercial towing vessels to Inspection. In the period between the current and future state of towing vessel safety oversight, a Towing Vessel Bridging Program (TVBP) has been initiated to ease the transition and ensure that both the Coast Guard and the towing vessel industry are informed and prepared to meet the new requirements to be finalized in Subchapter M. This goal will be accomplished by enhancing, improving, and increasing Coast Guard interactions with the towing vessel industry, and by acclimating all involved with the procedures, policy, requirements and administration of existing and, as implementation draws closer, new Subchapter M regulations. To further these ends, during this period of transition the Coast Guard will conduct extensive industry outreach, properly train our people, and will examine every uninspected towing vessel (UTV) that will be inspected under Subchapter M.
2. **Elements of the Program**: The Coast Guard Office of Vessel Activities, Domestic Compliance Division (CG-5431), in consultation with representatives of the towing industry and LANTAREA and PACAREA, has developed the framework for the TVBP that is comprised of five (05) critical elements. They are: Industry Outreach; Education and Qualification; Industry Initiated Exams; Risk-Based Targeted Exams; and LE Boardings and Surge Operations.
 - a. **Industry Outreach**.
 - (1) Particular emphasis will be placed on outreach, whereby Coast Guard and Industry representatives discuss the TVBP and strongly encourage widespread industry participation in the Industry Initiated Examinations (described in 2.c.). To support the outreach effort, CG-5431, Areas, and Districts shall communicate with advisory committees and industry groups, respond to their questions and help them get the

word out to their stakeholders and members. Sectors and their subordinate commands are to engage owners, operators, and charterers in their areas of responsibility. A variety of venues--such as Industry Days, Harbor Safety Committees, and Navigation Safety Committees--and methods, including Marine Safety Information Bulletins and Coast Guard Homeport postings, should be used to communicate details and promote the scheduling of examinations. Additional emphasis should be placed on direct Coast Guard - Industry interaction during indoctrination sessions outlined in 2.b.(1).

- (2) After the Subchapter M Notice of Proposed Rulemaking (NPRM) is published in the Federal Register, all levels of the Coast Guard shall vigorously conduct outreach with the Industry to communicate details of the proposed regulations and encourage comment.

b. Education and Qualification.

- (1) This spring, CG-5431 formed several joint Industry/Coast Guard work groups to develop comprehensive education and qualification programs. One Workgroup (WG1) is addressing Industry Orientation and Indoctrination, and the second (WG2) is addressing Towing Vessel Examination Training and Qualification. The intent is to ensure personnel assigned to Towing Vessel Inspection billets have a solid understanding of the industry and that they have the knowledge, skills, and abilities to competently and professionally conduct towing vessel examinations evaluating compliance with current regulations (Subchapter B and C). CG-5431 will distribute the materials developed by these workgroups to the field in June 2009.
- (2) As we progress toward Subchapter M implementation, appropriate elements resulting from modernization initiatives will develop a more formal training and qualification program to ensure all personnel assigned to conduct towing vessel inspections have the knowledge, skills, and abilities to fulfill mission requirements.

c. Industry Initiated Exams.

- (1) The third element of the TVBP is Industry Initiated Exams, which are focused on improving Coast Guard-Industry interactions, acclimating industry to an inspection-like process, and ensuring compliance with existing Subchapter B and C requirements. The examination program promulgated by LANTAREA, reference (b), will serve as the foundation of the Industry Initiated Exam initiative and will be expanded for use Coast Guard-wide. A key feature of the Industry Initiated Exam initiative is that Industry initiates a request to a local COTP/OCMI to schedule a towing vessel exam at a mutually agreeable time and location. Once deemed to be in compliance with applicable regulations, the vessel would receive a Coast Guard Towing Vessel Exam decal that is valid for three (03) years. Operational Commanders should consider the presence of (or lack thereof) a valid decal when determining the scope of subsequent Law Enforcement Boardings and Surge Operations activities involving towing vessels.

- (2) Industry Initiated Exams are to focus initially on verification of compliance with existing requirements, including Subchapter B and C standards. However, when the new Subchapter M regulations are finalized and the implementation date approaches, Coast Guard personnel conducting exams shall educate Industry personnel on new regulatory requirements. (Note: Decal issuance will only be based on compliance with the regulations in effect at the time of the examination.)
- (3) Operational commanders shall ensure that all towing vessel examinations (Industry Initiated and Risk-Based Targeted, described in 2.d.) are documented in MISLE. CG-5431 has formed a third Workgroup (WG3) to review MISLE content, recommend upgrades, and develop a MISLE Job Aid for Towing Vessel Examinations.

d. Risk-Based Targeted Examinations.

- (1) The fourth element of the TVBP is a risk-based targeting examination program, that is conceptually similar to the methodology used for Port State Control examinations. Targeted examinations will focus on vessels that have not participated in an Industry Initiated Examination or do not have a valid decal. Vessels that participated in the Industry Initiated Examination but did not take action to meet all the requirements to earn a decal should be screened as if they did not get an exam. When the tool is available, COTP/OCMIs will then determine the priority of examinations based on risk for those vessels that operate in his/her AOR.
- (2) CG-5431 is coordinating a Risk-Based Targeting Examination Workgroup (WG4) that includes Coast Guard and Industry representatives. WG4 is charged with developing risk assessment factors that be used to create a tool that will aid the COTP's/OCMI's decision-making process. WG4 is also tasked with addressing the issue of determining COTP/OCMI fleets of responsibility for vessels that operate in more than one AOR, identifying program measures of success, and identifying and/or developing data capture tools for those measures.

e. LE Boardings and Surge Operations.

- (1) Throughout the period of transition, operational commanders will have wide discretion to plan and execute the fifth element of the TVBP, LE boardings and surge operations as resources permit.
- (2) The effectiveness of the Industry Initiated Examination initiative should drive the operational commander's decisions concerning the focus and tempo of underway boardings. Operational Commanders should consider towing vessels with valid decals as lower risk vessels when planning these operations. If boardings of towing vessels with valid decals are conducted, those boardings should generally be limited in scope except in cases where unusual safety or security risks are apparent.

3. **Implementation:** The program will be implemented in three (03) phases.

- a. Phase 1. The initial focus of Phase 1 will be on industry outreach and CG personnel education, and qualification. The focus will shift to conducting Industry Initiated Examinations after CG personnel are trained and qualified to perform towing vessel examinations. Also during Phase 1, the Towing Vessel National Center of Expertise (TVNCOE) will develop a risk assessment tool, referred to in 2.d.(2). CG-5431 will disseminate the tool for beta testing at selected ports. Phase 1 will commence during the summer of 2009 with an anticipated duration of up to 18 months, but will be scaled based on progress in meeting industry demand for exams.
- b. Phase 2. During Phase 2, the focus will be on Risk-Based Targeted Examinations described in 2.d. In addition, the TVNCOE and TRACEN Yorktown will develop and deliver training in preparation for Towing Vessel Inspections that will occur later in Phase 3. The risk-based tool developed in Phase 1 will be employed to determine towing vessel examination priority. Data relevant to towing vessel operations will be analyzed periodically and adjustments will be made to the tool to enhance the risk-based decision-making process. Phase 2 activities will occur after the industry has been given the opportunity to participate in and the Coast Guard has satisfactorily time to conduct Industry Initiated Examinations, and will continue until Subchapter M implementation.
- c. Phase 3. Phase 3 will commence with the implementation of the new Subchapter M towing vessel inspection regulations and issuance of Certificates of Inspection (COI). We anticipate that the risk-based tool developed and employed in Phase 2, or an enhanced version, will be used to determine priorities for issuing COIs. The TVNCOE and TRACEN Yorktown will continue to develop and deliver formal towing vessel inspections training during this phase.

4. **Amplifying Information:**

- a. Guiding Principles. Coast Guard personnel shall engage the towing vessel industry in the spirit of partnership during this transition to inspection and certification. Again, the purpose of this program is to ease the towing vessel industry's transition from an uninspected to an inspected regime. In all encounters with the towing industry our approach must be measured, professional, and, to the greatest degree possible, in the spirit of cooperation, while ultimately ensuring compliance with applicable safety, security, and environmental protection regulations.
- b. Examinations. The expectation is that Industry Initiated Exams will commence during the summer of 2009; however, this does not preclude units already conducting UTV examinations in accordance with reference (b) from continuing their activities. All UTVs should at least undergo one exam (Industry Initiated or Risk-Based Targeted) by August 2012.
- c. Compliance and Enforcement. During Phase 1 and Phase 2 deficiencies will be issued for non-compliance with current standards and regulations. A decal will not be issued until the deficiencies have been cleared. No civil penalty actions should be taken for failure of owners, operators, or masters to resolve deficiencies found during dockside exams.

However, they should be advised that a UTV is subject to civil penalties for any safety violations observed when the UTV is underway.

If an Examiner discovers a hazardous condition posing a threat to the vessel, its crew or the environment, the Examiner shall immediately notify the Captain of the Port (COTP) to request vessel movement controls and/or assistance from a qualified Marine Inspector (MI). Definition of hazardous condition and examples of those conditions may be found in 33 CFR 160.204 and reference (c).

- d. Workgroups. The four (04) workgroups described in paragraph 2 that are involved in building the TVBP (i.e., WG1—Industry Outreach and Education; WG2—Towing Vessel Examination Training and Qualification; WG3—MISLE; and WG4—Risk-Based Targeting and Measurement) are comprised of CG and Towing Vessel Industry representatives. The WGs have been tasked with providing deliverables to CG-5431 by June 2009. Their work products will be disseminated to the field prior to the commencement of Phase 1.
- e. CG Personnel (Training, Qualification, and Program Execution).
 - (1) Operational commanders shall ensure that all personnel assigned to Towing Vessel Examination duties are trained and qualified, and that they conduct towing vessel outreach and examinations in accordance with the requirements outlined in this program. For those units that lack an existing Towing Vessel Examination program, newly assigned Towing Vessel Inspections billets shall be used to stand up a program. For those units that have an existing Towing Vessel Examination program in place, newly assigned billets shall supplement their program. At any rate, the Towing Vessel Inspector billets assigned shall be employed in conducting towing vessel training, outreach, and examinations.
 - (2) Petty officers, chief petty officers, and officers are eligible for designation as a Towing Vessel Examiner after completing training and qualification requirements, which are currently being developed. Once qualified, they will be eligible to conduct examinations outlined in Phase 1 and 2 of this program. Sector commanders may continue to allow Coast Guard petty officers and officers already qualified as UTV examiners to continue to conduct UTV Examinations. New personnel (those not already qualified by 1 June 2009) shall meet the new national performance qualification standard, soon to be published.
 - (3) The Coast Guard Auxiliary has in the past and will continue to play an important role and serve as a significant force multiplier in the towing vessel safety program; this is especially true in areas with high concentrations of smaller towing vessels. Auxiliary members may continue to use the Coast Guard Auxiliary Towing Vessel Examiner PQS (Revision Date: 15 November 2008) to qualify as UTV Examiners; however, they may only conduct unaccompanied exams on towing vessels < 26 feet and assistance towing vessels. COTPS/OCMIs should also consider employing qualified CG Auxiliarists as assistant examiners for exams on towing vessels ≥ 26 feet.

f. Communications.

- (1) Transparency will be a hallmark of this program, both internally (inside the CG) and externally (with stakeholders). CG-5431 will periodically communicate TVBP status updates via message. Also, CG-5431 will post relevant TVBP documents for internal CG use on CG Portal at CG Collaboration > Public Places > Domestic Vessel Inspections > Policy > Towing Vessels. Public documents will be posted on CG Homeport at <http://homeport.uscg.mil> > Domestic Vessels > Towing Vessels. In addition, a Towing Vessel Bridging Community has been established in CG Homeport to serve as the collaboration tool for TVBP Workgroups (WG1-WG4); WG participants may access the latest information and materials via the following web link: <https://homeport.uscg.mil/community/towingvessel>.
- (2) Throughout the transition period, operational commanders are strongly encouraged to maintain an open dialogue with their industry partners and other stakeholders.

g. Role of CG-5431. CG-5431 will also act as the bridge for the TVBP during this time of transition from our current organization to a modernized Coast Guard. As modernization progresses and the TVNCOE becomes established, elements of the TVBP will be moved to appropriate offices for further development and maintenance. In the interim, CG-5431 will manage the program, but will ensure that new elements established through modernization are engaged and represented.

5. Until 1 July 2009, the point of contact for the Towing Vessel Bridging Program is CDR Gregory Howard. He may be reached at gregory.a.howard@uscg.mil or at (502) 552-3369. After 1 July 2009, contact Mr. Patrick Lee at patrick.j.lee@uscg.mil or at (202) 372-1135.

#

Copy: CG-54
CG-546
CG-741
CG-132
CG-635