



Alternate Compliance Program (ACP) Tactics, Techniques, and Procedures (TTP)



U.S. Coast Guard
Force Readiness Command
(FORCECOM)

CGTTP 3-72.9A
December 2019

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Homeland Security

United States
Coast Guard



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CGTTP 3-72.9A
30 December 2019

COAST GUARD TACTICS, TECHNIQUES, AND PROCEDURES, CGTTP 3-72.9A

Subj: ALTERNATE COMPLIANCE PROGRAM (ACP) TACTICS, TECHNIQUES, AND PROCEDURES (TTP)

- Ref.
- (a) Shipping, Title 46 Code of Federal Regulations (CFR)
 - (b) The Alternate Compliance Program (ACP), Navigation and Vessel Inspection Circular No. 02-95 (series)
 - (c) Coast Guard Certification and Inspection of Certain Categories or Existing Vessels, Navigation and Vessel Inspection Circular No. 10-81
 - (d) SOLAS: Consolidated Text of the International Convention for the Safety of Life at Sea, 1974, and its Protocol of 1988: Articles, Annexes and Certificates (Incorporating all amendments in effect from 1 July 2014), International Maritime Organization (IMO)
 - (e) The United States Coast Guard Marine Safety Manual, Volume III: Marine Industry Personnel, COMDTINST M16000.8 (series)
 - (f) Principles of Minimum Safe Manning, International Maritime Organization (IMO), Resolution A.1047 (27)
 - (g) Survey Guidelines Under the Harmonized System of Survey and Certification (HSSC), 2017, International Maritime Organization (IMO), Resolution A.1120 (30)
 - (h) The United States Coast Guard Marine Safety Manual, Volume II: Materiel Inspection, COMDTINST 16000.7 (series)
 - (i) Navigation and Navigable Waters: 33 CFR Part 96 – Rules For the Safe Operation of Vessels and Safety Management Systems
 - (j) IACS Procedures, Volume 3: IACS Quality System Certification Scheme (QSCS), International Association of Classification Societies (IACS) (series)
 - (k) Guidance for IACS Auditors to the ISM Code, International Association of Classification Societies (IACS) Recommendation, No. 41 (series)
 - (l) Reporting on Deficiencies Possibly Affecting the Implementation of the ISM Code On Board During Surveys, International Association of Classification Societies (IACS), Procedural Requirement, No. 17 (series)
 - (m) Procedure for Transfer of Class, International Association of Classification Societies (IACS) Procedural Requirement, PR1A (series)
 - (n) Technical Support and Oversight of Authorized Classification Societies, Marine Safety Center Technical Note (MTN), No. 04-03 (series)
 - (o) Code for Recognized Organizations (RO Code), Resolution MEPC.237(65).

1. PURPOSE. To consolidate, update, and standardize guidance for United States Coast Guard (USCG) personnel conducting Alternate Compliance Program (ACP) examinations with Coast Guard Tactics, Techniques, and Procedures (CGTTP). This tactics, techniques, and procedures (TTP) provides standardized guidance that enhances on-the-job-training (OJT), minimizes interpretation and promotes consistency.
2. ACTION. This CGTTP publication applies to marine inspectors (MIs) and oversight coordination officers conducting ACP examinations, inspections, and oversight activities. Internet release authorized.
3. CGTTP AFFECTED. None.
4. DISCUSSION. The ACP was established in 1992 as a regulatory reform initiative. The purpose of the reform is to enhance the competitive position of the United States (U.S.) fleet and reduce the regulatory burden of compliance by capitalizing statutory certification and services performed by recognized organizations (ROs).
5. DISCLAIMER. This TTP publication is not a substitute for applicable legal requirements, nor is it itself a rule. It is intended to provide guidance for Coast Guard personnel and is not intended to, nor does it, impose legally binding requirements on any party outside the Coast Guard.

6. CHANGES. This TTP publication uses Adobe Acrobat stamps to indicate revisions. Corrections to meet publication standards may result in a change to page numbering and formatting from previous versions. For each revision listed below, there is a stamp in the left margin next to the section containing a revision.
 1. Chapter 1: Introduction:
 - a) A.1 Background: Revised overview. Added multiple paragraphs.
 - b) A.5 Exclusions and Assumptions: Updated introduction.
 - c) A.6 Deviation: Updated wording
 2. Chapter 2: Enrollment and Initial Certification:
 - a) A. Added ACP Standard Section.
 - b) B. Added Statutory Certification and Services Retained by the Coast Guard Section.
 - c) C. Moved Enrollment Process to Section C.
 - d) D. Added Vessel Reflag Section.
 - e) E. Added Equivalencies Section.
 - f) F. Added Exemptions Sections.
 - g) G. Added Manning Evaluations Section.
 3. Chapter 5: Post Examination Activities:
 - a) Removed Case Work Procedures.
 - b) A. Added Vessel Inspection Activities Section.
 - c) B. Added Management Systems Oversight Activity Section.
 - d) C. Added Quality Case Section.
 4. Chapter 6: Special ACP Activities
 - a) Removed Risk assessment and Periodic Oversight Section.
 - b) Removed Authorized Classification Societies/Recognized Organizations.
7. DISTRIBUTION. U.S. Coast Guard Force Readiness Command (FORCECOM) Training Division (FC-T) posts an electronic version of this TTP publication to the CGTTP Library on CGPortal. In CGPortal, navigate to the CGTTP Library by selecting Training & Education, then select the TACTICS, TECHNIQUES, AND PROCEDURES link. FC-T does not provide paper distribution of this publication.

8. USCG FORMS. The USCG electronic forms referenced in this publication are available on the [CGPortal](#) website.
9. REQUEST FOR CHANGES. Field feedback regarding this TTP publication, or any other located in the CGTTP Library, may be provided via email to: D05-SG-M-FORCECOM-TPTC-PRODUCTFEEDBACK@uscg.mil

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Chapter 1: Introduction

Introduction This chapter overviews the contents of this tactics, techniques, and procedures (TTP) publication. It also defines the use of notes, cautions, and warnings in this TTP publication.

In This Chapter This chapter contains the following sections:

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Section A: Introduction

A.1. Background

The Alternate Compliance Program (ACP) was established in 1992 as a regulatory reform initiative. The purpose of the reform was to enhance the competitive position of the United States (U.S.) fleet and reduce the regulatory burden of compliance by capitalizing on the survey and certification functions performed by an Authorized Classification Society (ACS).

The ACP promotes flexibility in construction, reduces duplicative inspections/surveys, and is designed to maintain an equivalent level of safety.

NOTE:

Since domestic regulations predate the Recognized Organizations (RO) Code, for the purposes of this TTP, the term "RO", as defined in the RO Code, includes Authorized Classification Societies (ACS) as defined in 46 CFR 8.420, and where those same ROs are delegated authority under 33 CFR part 96, subpart D.

Under the ACP, the majority of vessel statutory certification and services are performed by Recognized Organizations (RO) on behalf of the Coast Guard. The Coast Guard performs oversight via a variety of verification and monitoring techniques, executed at different levels of the organization, to ensure the adequacy of the statutory certification and services performed by an RO on behalf of the Coast Guard.



Oversight means any Coast Guard activity carried out to assure an RO's service complies with IMO and national requirements of the United States. As the lead federal agency of the U.S. Flag Administration under IMO instruments, the Coast Guard is ultimately responsible to fully guarantee the completeness and efficiency of inspection and survey. Oversight generally consists of ship inspection, auditing, and monitoring activities completed at multiple levels of the Coast Guard. Examples include:



- The Marine Safety Center (MSC) oversees plan review and other technical work performed by ROs.
- Commandant (CG-CVC) maintains Key Performance Indicators (KPIs) for both the ACP fleet and ROs. These KPIs are used to: develop the Fleet Risk Index, make changes to the frequency and scope of Coast Guard oversight exams, and assess RO performance.
- The Traveling Inspection Staff (CG-5P-TI) attend periodic oversight exams on ACP vessels selected for additional oversight as part of the Fleet Risk Index. They also coordinate with COMDT (CG-CVC) to

attend document of compliance (DOC) and safety management certificate (SMC) verification audits.

- The OCMI ensures appropriately qualified MIs perform all required oversight exams in accordance with established program policies and related Mission Management System (MMS) Work Instructions and Procedures.

NOTE:

The ACP is not a performance-based program; rather it is an alternative to full compliance with reference (a), Title 46 CFR, Shipping.

**A.2.
Performance
Objectives**

This TTP provides United States Coast Guard (USCG) personnel with standardized guidance for conducting oversight activities on vessels, companies and ROs that participate in the ACP.

Standardized ACP guidance:

- Enhances on-the-job training (OJT).
- Minimizes need for interpretation by the marine inspector (MI).
- Promotes consistent program oversight.
- Promotes data integrity for trend analysis.
- Promotes accurate documentation.

A.3. Scope

The scope of this TTP publication begins when a vessel wishes to enroll in the ACP, and ends once the examination is completed. TTP guidance focuses on conducting, assessing, and documenting ACP examination, inspection, and oversight activities.

**A.4.
Target
Audience**

The primary target audience of this TTP publication are MIs and oversight coordination officers conducting ACP examinations, inspections, and oversight activities. However, it is recognized that the success of the ACP depends on appropriate involvement from other key stakeholders. The intent of this document is to serve as a reference and companion guide to supplement existing ACP policy.

**A.5. Exclusions
and
Assumptions**

This publication does not go into detail on the Marine Information for Safety and Law Enforcement (MISLE) System, instead, the reader is referred to the appropriate MISLE User Guide or MMS work instruction, as applicable.

- Officer in charge, marine inspections (OCMIs) are responsible for ensuring that MIs assigned to ACP oversight examinations hold the requisite competencies applicable to the vessel type under examination.



- The MI has a duty to act when a perceived unsafe condition or behavior can result in an inherently dangerous event. As such, the MI expands an examination, as necessary, when clear grounds are established that the vessel is not in compliance with ACP standards.. The MI then issues appropriate deficiencies, in accordance with CVC-PR-001 (series), regardless of vessel ACP status.
- This guidance does not limit the OCMI from taking appropriate actions to ensure the safety of persons, property, and the environment.

A.6. Deviation



This TTP publication may not cover every scenario that might arise during an ACP examination. You can deviate from the TTP as necessary to complete the task with greater safety, effectiveness, or efficiency. Deviations from this guidance should not be taken lightly. Temper any decision to deviate with maturity and a complete understanding of the mission, members' capabilities, risk, and condition of equipment. Whenever possible, consult your unit chain of command before deviating from this guidance. Requests for changes to this TTP can be reported per the "Request for Changes" paragraph located in the letter of promulgation above.

A.7. Economy of References

The titles of the following references have been abbreviated in this TTP publication.

- Reference (a), Shipping, Title 46 Code of Federal Regulations (CFR) is listed as:
 - Reference (a), Title 46 CFR, Shipping.
- Reference (b), The Alternate Compliance Program (ACP), Navigation and Vessel Inspection Circular No. 02-95 (series), is listed as:
 - Reference (b), NVIC 02-95 (series).
- Reference (c), Coast Guard Certification and Inspection of Certain Categories of Vessels, Navigation and Vessel Inspection Circular No. 10-81, is listed as:
 - Reference (c), NVIC 10-81.
- Reference (d), SOLAS: Consolidated Text of the International Convention for the Safety of Life at Sea, 1974, and its Protocol of 1988: Articles, Annexes and Certificate of Approval (Incorporating all amendments in effect from 1 July 2014), International Maritime Organization (IMO), is listed as:
 - Reference (d), SOLAS, 1974.
- Reference (e), The United States Coast Guard Marine Safety Manual, Volume III, Industry Personnel, COMDTINST M16000.8 (series), is listed as:
 - Reference (e), MSM, Volume III.

Section B: Notes, Cautions, and Warnings

B.1. Overview The following definitions apply to notes, cautions, and warnings found in this TTP publication.

NOTE: **An emphasized statement, procedure, or technique.**

CAUTION: **A procedure, technique, or process that, if not followed, could expose the Coast Guard to liability.**

WARNING: *A procedure, technique, or instruction that, if not followed, risks disciplinary action.*

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Chapter 2: Enrollment and Initial Certification

Introduction

This chapter discusses the ACP enrollment process and initial certification of new and existing vessels. It is recognized that not all processes in this chapter are directly completed or overseen by an OCMI. However, understanding the processes is necessary because; MIs and oversight coordination officers are generally involved in the enrollment, reflag (if applicable), and manning evaluation processes and are often requested to support the industry.

In This Chapter

This chapter contains the following sections:

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Section A: ACP Standards



A.1. ACP Standards

The ACP standard consists of applicable International Maritime Organization (IMO) instruments, RO rules, and an approved [U.S. Supplement](#) as specified in 46 CFR 8.430. The purpose of the U.S. Supplement is to capture critical standards and certain operational requirements in Coast Guard regulations that are not adequately addressed in the IMO instruments or the RO's rules, and to provide any additional Flag Administration interpretations where necessary.

As a condition of enrollment, ACP vessels must maintain compliance with the ACP Standard at all times, regardless of whether or not the vessel actually engages in international voyages.

Section B: Statutory Certification and Services Retained by the Coast Guard



B.1. Statutory Certification and Services Retained by the Coast Guard

While the ACP allows ROs to perform statutory certification and services on behalf of the Coast Guard, some certification and services are retained. The Coast Guard retains exclusive authority to issue, endorse, or approve the following:

- Certificate of Inspection (COI) which also serves as a Minimum Safe Manning Document
- All manning issues, to include the determination of eligibility for reduced manning based on automation systems approved by an RO
- Required international certificates for which an individual RO has not been granted authorization to issue on the Coast Guard's behalf
- Certificate of Documentation (COD)
- Continuous Synopsis Record (CSR)
- International Ship Security Certificate (ISSC)
- Approval of Ship Security Plans
- Shipboard Oil Pollution Emergency Plan (SOPEP)/ Shipboard Pollution Emergency Plan (SMPEP)
- Vessel Response Plans approved under 33 CFR 155
- Certificate of Financial Responsibility (COFR)
- Excursion Permits
- Permits to Proceed
- Exemptions (see section F)
- Equivalency determination (see section E)
- Alternate compliance with COLREGS
- Approval of a vessel's participation in the Under Water in Lieu of Drydocking (UWILD) program

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- Design Basis Agreement (DBA)
 - Major Conversion Determinations
 - Approval of marine equipment in accordance with 46 CFR 2.75
 - Documentary Evidence of Financial Security for the MLC, 2006
 - Marine casualty investigations and analysis
 - Drydock extensions beyond 90 days
 - Load line exemptions
 - Ballast water management compliance and enforcement
-



Section C: Enrollment Process

C.1. ACP Enrollment Overview

Vessels enrolling in the ACP fall into two categories:

- New construction/major modifications (provisional enrollment).
- Existing vessels (including vessels that were recently reflagged to U.S. flag and oversight coordination officers apply for ACP enrollment).

To assist MIs and oversight coordination officers with administrative procedures for conducting an ACP enrollment, go to the [Alternate Compliance Program](#) webpage on CGPortal. Once there, click on the **Job Aids** folder, then locate the ACP Enrollment Checklist under Shared Documents.

C.2. Vessel Eligibility

Vessels are eligible to enroll in the ACP if they are; U.S. flagged and certificated for international voyages, classed by a recognized classification society that is authorized by the Coast Guard to participate in the ACP, and whose vessel type is authorized to participate in the ACP.

Vessels with novel or especially complex designs or operations, and for which the RO has no rules and/or the Coast Guard has no regulations or policies developed, are generally not eligible to enroll in the ACP. However, Commandant (CG-CVC) may choose to enroll such vessels subject to a Design Basis Agreement (DBA) on a case-by-case basis.

C.3. Enrollment for New and Modified Vessels

Successful new construction and major conversion/modification projects demand effective project management techniques and skills.

A mutually agreed upon oversight plan, developed in collaboration with stakeholders, can be a useful tool in reducing confusion regarding responsibilities and expectations. [See Chapter 2: Enrollment and Initial Certification, Section C.5.: Developing an Oversight Plan.](#)

This plan is also an ideal vehicle to establish desired procedures for unique situations such as novel design determinations and potential waivers or exemptions, and can be used to target certain systems for oversight by the USCG.

C.4. Provisional ACP Enrollment

Provisional ACP enrollment is a temporary status granted to an ACP vessel while undergoing new construction or major conversions/modifications.

Since vessels do not have valid statutory certificates during this period, they are provisionally enrolled for the purpose of extending delegated plan review, survey, and certification to the involved RO. This also allows the RO to witness required tests and inspections on behalf of the Coast Guard.

C.4.a. Process
Steps

Provisional Enrollment Process:

1. Vessel owner or operator, or shipbuilder submits an Application for Inspection of U.S. Vessel (New Construction), Form CG-3752A to the OCMI. The [Alternate Compliance Program](#) webpage on CGPortal offers further guidance in the **Job Aids** folder.

NOTE:

If the prospective owner or operator creates the Application for Inspection of U.S. Vessel (New Construction), Form CG-3752A, it is advised that the form include an indication or a desire to enroll in the ACP. If the shipyard submits Form CG-3752A, the prospective owner or operator is advised to submit a letter indicating his or her intent to enroll the vessel in the ACP.

NOTE:

Since there is no specific block on Form CG-3752A for ACP, the owner or operator should include a parenthetical notation such as "ACP enrollment," in the vessel name or service block.

2. Vessel owner or operator provides a signed copy of the contractual agreement for classification services between the RO, shipyard, or owner, as applicable.
3. Vessel owner or operator or shipyard provides a detailed list of plans to be approved by the Marine Safety Center (MSC). Plans are submitted to MSC@uscg.mil.

NOTE:

There is a 10 megabyte (MB) limit on email submissions, multiple submissions are needed for larger plans.

4. The OCMI reviews the contractual agreement between shipbuilder, owner, operator (as applicable), and the RO to ensure the following basic elements are addressed:
 - Scope of services provided by the RO.
 - Plan review methodology/arrangement.
 - Adequate classification.
 - Statutory plan review.
 - Survey services arrangement.
5. The OCMI reviews Form CG-3752A for completeness/accuracy and verifies the vessel type is eligible for enrollment in the ACP.
6. The OCMI ensures that the RO has ACP delegation and an applicable/approved [U.S. supplement](#) is on file.

7. Per reference (b), NVIC 9-02 (series), the OCMI notifies Coast Guard Office of Commercial Vessel Compliance COMDT (CG-CVC) for vessels with “novel systems.”
8. The OCMI endorses each request for provisional enrollment using the Provisional ACP Enrollment Template located on the [Alternate Compliance Program](#) webpage on CGPortal in the **Job Aids** folder. Once complete, forward to: FlagStateControl@uscg.mil via the chain of command.
9. Upon approval by COMDT (CG-CVC-4), the vessel is issued an ACP Provisional Enrollment. An electronic copy of the letter will be added to the vessel in MISLE and the original mailed to the vessel representative.

NOTE:

The OCMI can verify successful provisional enrollment by confirming the appearance of the special group note, “*This vessel is provisionally enrolled in the ACP.*” in the vessels’ MISLE record. An RO cannot begin performing delegated ACP functions on behalf of the USCG until provisional enrollment is granted.

NOTE:

Following new construction and the handover survey, the OCMI issues a temporary Certificate of Inspection (COI) with corresponding ACP endorsement. After the final enrollment process is completed and the vessel is approved by COMDT (CG-CVC-4), the OCMI issues a full term COI.

NOTE:

Novel vessels cannot be enrolled in the ACP, however, vessels with novel systems can enroll in the ACP, on a case-by-case basis, with authorization from COMDT (CG-CVC-4). Per reference (b), NVIC 02-95 (series), the USCG retains inspection authority over novel system(s) and especially complex designs or operations until such time as oversight of such systems is specifically delegated in writing to the RO.

C.5. Developing an Oversight Plan

Following receipt of the Application for Inspection of U.S. Vessel (New Construction), Form CG-3752A, the OCMI schedules a kickoff meeting with key stakeholders. The goal of the meeting is to determine the scope and complexity of the project, and to develop the initial framework of the oversight plan. Details and scope of the oversight plan can vary based on several factors including:

- The type of vessel under construction.
- The complexity of the project.

- Prior experience with the builder and RO surveyor(s) involved.
- Prior experience with the owner or operator.

Consider the following topics when developing an oversight plan:

- Communications between stakeholders:
 - Contact information.
 - Meeting schedule.
 - Identified project milestones.
 - Overall project status reports.
 - Call out notifications, etc.
 - Plan review.
 - Material/equipment approvals.
 - Novel or especially complex systems.
 - Hull structure.
- Details of procedures that require qualification to an established standard (e.g., weld procedures, qualifications, non-destructive testing (NDT) test procedures, and technician qualifications).
- A schedule of key call-outs that require USCG oversight, including:
 - Lifesaving systems.
 - Firefighting/fire detection systems/structural fire protection.
 - Cargo/fuel oil transfer systems.
 - Bilge/ballast systems.
 - Pollution prevention.
 - Steering systems.
 - Propulsion/auxiliary/control systems, including; design verification testing (DVT).
 - Ships service and emergency electrical systems.
 - Other systems identified by the OCMI as crucial to the survival of the vessel, or protection of the persons onboard (e.g., boilers, periodic safety rest procedures (PSTP), novel systems, etc.).
 - Security systems/ship security alert systems (SSAS).
- Use of subcontractors (obtain a list along with the role of involved subcontractors).
- Procedures that are followed in the event of:
 - Errors/mistakes.
 - Unavailability of MI's for required tests.
 - Other non-conformities that can arise during the course of the project.
- The extent of USCG's involvement with sea trials and the scope/sequence of testing to be performed.

The RO and most shipyards understand this process through experience and sometimes have an established new construction or major modification oversight plan already in place. If so, they can modify the existing plan to accommodate additional projects. To access the ACP New

Construction Oversight Plan Template, go to the [Alternate Compliance Program](#) webpage on CGPortal. Once there, click on the **Job Aids** folder, then locate the New Construction Oversight Plan Template under Shared Documents.

NOTE:

OCMIs have discretion to tailor an oversight plan based on logistical needs. This is especially true in overseas locations.

C.6. Sea Trials and Preparing for Vessel Delivery and Initial Certification

As a routine for sea trials, the OCMI should observe the operation of each new vessel. This observation is to assess the operation of each new vessel once the vessel is complete, and before initial certification.

- For vessels anticipating enrollment in the ACP, the RO witnesses the sea trial on behalf of the USCG, although MIs are encouraged to attend.
- Specific regulations for trial trips are covered per Trial Trip Observance § 58.01-30, and Inspection During Trial Trip for Tank Vessels § 31.10-40 of reference (a), Title 46 CFR, Shipping.
- While vessels are not required to have a COI or a USCG issued certificate of documentation during a sea trial, the OCMI ensures the vessel is safe for the intended voyage.
- When the vessel is nearing delivery, the owner or operator, or shipyard completes a second Application for Inspection of U.S. Vessel (New Construction), Form CG-3752A to coordinate a handover checklist for final enrollment into the ACP upon delivery.

NOTE:

It is recommended that the owner or operator complete the MISLE load book and provide it to the OCMI. The OCMI is responsible for ensuring that relevant vessel details are loaded into MISLE. Alternatively, the OCMI can request the owner or operator and/or shipyard to provide the requested information. For further guidance, go to the [Alternate Compliance Program](#) webpage on CGPortal. Once there, click on the Job Aids folder, then locate the MISLE Information Loading Book under Shared Documents.

C.7. Initial Certification Process

Following receipt of the second Application for Inspection of U.S. Vessel (New Construction), Form CG-3752A, the OCMI verifies:

- All plans are stamped “approved” on behalf of the USCG, by the RO and MSC (as applicable). This is an important distinction that indicates that the form is class approved, and the systems or arrangements are verified to conform to U.S. standards (i.e., U.S Supplement) as well.

- Outstanding RO survey/technical comments have to be resolved to the satisfaction of all parties.
- Once verified, the MI and RO complete a handover survey. For further guidance on assisting the MI/surveyor, go to the [Alternate Compliance Program](#) webpage on CGPortal. Once there, click on the **Job Aids** folder, then locate the ACP Handover Checklist.
- Upon completion of a successful handover survey, the RO will issue all applicable statutory and classification certificates specific to the vessel, as authorized by their individual certificate delegations.
- Once the relevant statutory and classification certificates are obtained, the OCMI may issue the initial COI, International Ship Security Certificate (ISSC), and other required certificates, as applicable, to the vessel. . [See Chapter 3: Pre-Examination Activities for Enrolled Vessels, Section B: Review and Preparation of Statutory Certificates](#) for guidance on the preparation of statutory certificates.
- After the initial COI is issued, a final enrollment request is sent in Memo format via the chain of command to COMDT (CG-CVC-4) at FlagStateControl@uscg.mil
- Upon acceptance by the COMDT (CG-CVC-4), the vessel is issued an ACP Final Enrollment letter. An electronic copy of the letter will be added to the vessel file in MISLE and the original mailed to the vessel representative.

NOTE:

The OCMI can verify successful final ACP enrollment by confirming the appearance of the special group note, “This vessel is enrolled in the ACP.” in the vessel's MISLE record.

NOTE:

Manning proposals for new construction vessels are requested from the owner or operator early on in the construction project. [See Section G: Manning Evaluation](#) of this chapter.

C.7.a Completing the Handover Survey

The handover survey is completed jointly by the RO and the attending MI(s). The scope of the handover survey is similar to that of a COI inspection, and, at minimum, confirms compliance with any items identified in the applicable U.S. supplement, and include the relevant surveys necessary to issue/endorse the following certificates:

- The International Load Line Certificate (ILLC).
- Certificate of Vessel Classification (aka “Class Certificate”).

- Cargo Ship Safety Construction Certificate (SLC).
- Safety Equipment Certificate (SLE).
- Passenger Ship Safety Certificate (PSSC or SLP), if applicable.
- The International Oil Pollution Prevention (IOPP) certificate.

The amount of time necessary to complete a handover survey varies by the scope and complexity of the survey. In some cases, it might take up to three days to complete. Generally, cargo operations are not permitted during a handover survey, though sometimes the OCMI allows cargo operations if doing so does not interfere with the survey.

NOTE:

It is not necessary for the OCMI to conduct a complete handover survey in cases where MIs have been closely involved throughout the new construction or vessel conversion project. The OCMI may modify the scope of the handover survey to avoid redundancies identified during the delivery process or in the Oversight Plan.

NOTE:

If surveys are required for other certificates that are due for renewal or annual classification surveys, should be completed as part of the handover survey.

C.8. Enrollment for Existing Vessel

Existing eligible U.S. flag vessels can enroll in the ACP at any time using the following steps:

1. Vessel owner or operator submits an Application for Inspection of U.S. Vessel, Form CG-3752 to the OCMI.
2. The OCMI reviews the application for completeness and accuracy, then ensures the vessel is eligible. Eligible vessels include certificated vessels of the following types:
 - Passenger.
 - Cargo.
 - Tank.
 - Miscellaneous (freight and industrial).
 - Offshore supply.
 - Vessels built and inspected to the high speed craft (HSC) code.
 - Mobile offshore drilling units (MODUs).
 - Research vessels (Oceanographic Research Vessels inspected under 46 CFR Subchapter U).
3. The OCMI ensures the RO has ACP delegation and identify the applicable/approved [U.S. supplement](#).
4. The OCMI engages with COMDT (CG-CVC-4) for vessels with novel or especially complex systems or operation.”

5. The OCMI should coordinate a handover survey with the RO and notify COMDT (CG-CVC-4) of the results. Refer to [Section A.6.: Initial Certification Process](#) of this chapter for scope of the handover survey.
6. In the event an International Safety Management (ISM) Code Major Non-Conformity is discovered during the handover survey:
 - The vessel cannot be enrolled into the ACP until the major non-conformity is downgraded.
 - The major non-conformity can be downgraded once to RO and OCMI approve the applicable Corrective Action Plan. An additional Safety Management Certificate (SMC) verification is required to be conducted by the RO within 3 months to ensure effective corrective action is implemented. The OCMI is encouraged to attend the additional verification audit to ensure corrective action has been effectively implemented.
7. Following completion of the handover survey, the OCMI issues a temporary COI with the corresponding ACP endorsement. After the final enrollment process is completed and the vessel is approved by CG-CVC-4, the OCMI issues a full term COI.

C.9. Final Enrollment

The steps for final enrollment are:

1. The OCMI drafts the final enrollment memo and forwards to FlagStateControl@uscg.mil via the chain of command.
 - See [ACP job aids portal page](#) for an example
 2. COMDT (CG-CVC-4) will verify all requirements are met, and notify the vessel owner or operator and OCMI that the vessel has completed enrolled in the ACP.
 - To verify final enrollment OCMI's can search the vessel in MISLE, and view the "group notes" tab under "special notes."
 - Additionally, the ACP Final Enrollment Letter will be added to the vessel documents in MISLE.
-

Section D: Vessel Reflags



D.1. Vessel Reflags

The ACP is not a mechanism for reflagging a vessel. However, when a vessel is coming into U.S. flag and chooses to be part of the program, an ACP handover survey can be done concurrently as part of the initial certification for an existing vessel.

For any vessel that is reflagged from a foreign flag to the U.S. flag, the default is that it must be in compliance with the ACP standard (i.e. IMO conventions, RO rules, and provisions of the applicable U.S. supplement).

Section E: Equivalencies



E.1. Equivalencies

An equivalency is any approved alternate arrangement, fitting, material, appliance, apparatus, equipment, calculation, information, or test that is at least as effective as that required by an international convention, Coast Guard regulation, or RO rule.

ROs are not authorized to approve equivalencies on behalf of the Coast Guard. Requests for equivalency determinations for requirements of international conventions and Coast Guard regulations should be forwarded to MSC@uscg.mil for appropriate action.

ROs may approve equivalencies for requirements of RO rules without further Coast Guard authorization, provided the rule requirements are not also requirements of international conventions or Coast Guard regulations.

Any deviation from the ACP standard requires an equivalency determination. If an equivalency determination is needed, the process is:

1. Owner or operator applies through their RO, to the MSC to request an equivalency determination.
 2. The MSC reviews the equivalency request and forwards their determination to the vessel owner or operator and copies the RO and OCMI.
 3. If the vessel owner or operator disagrees with the MSC's decision, the vessel owner or operator can request reconsideration of the decision from the commanding officer (CO) of the MSC. If after reconsideration the MSC affirms its original decision, the vessel owner or operator appeals to Coast Guard Commercial Regulations and Standards Directorate COMDT (CG-5PS).
 - All determinations by the COMDT (CG-5PS) are final.
 - For more details, see reference (c), NVIC 10-81 series for vessel reflag standards.
-

Section F: Exemptions



F.1.
Exemptions

An exemption excludes a vessel from the applicability of a specific requirement of an international convention or Coast Guard regulation. Exemptions are typically based on limited routes or service; not the inability to comply with a requirement based on design or operational choices.

ROs are not authorized to grant exemptions on behalf of the Coast Guard. Exemption requests should be forwarded to COMDT (CG-CVC-4) at FlagStateControl@uscg.mil via the OCMI.



Section G: Manning Evaluation

G.1. Manning Evaluation and Determination Procedures

The administration of safe manning for certificated U.S. vessels is the distinct responsibility of the USCG. The administration's responsibility is internationally rooted in reference (d), SOLAS, 1974.

An inherent function of the OCMI is to establish the minimum number of mariners required for the safe operation of the vessel, and to assist the master of the vessel with establishing watch keeping arrangements that meet statutory and regulatory requirements. In carrying out this charge, a host of elements and variables need due consideration and coordination with the vessel owner or operator.

To maintain national consistency, the information contained in reference (e), MSM, Volume III, is structured to interlink various elements affecting safe manning and watch keeping on USCG certificated vessels and should be referenced before making any manning determinations.

Per reference (e), MIs are encouraged to use the minimum safe manning proposal (particularly for vessels following new construction), and safe manning verification check sheets to ensure vessels are appropriately manned.

Since ACP vessels maintain international certificates, in addition to reference (e), also refer to the principles and guidance in reference (f), Principles of Minimum Safe Manning, International Maritime Organization (IMO), Resolution A.1047 (27).

Chapter 3: Pre-Examination Activities for Enrolled Vessels

Introduction This chapter discusses pre-examination activities for enrolled vessels.

In This Chapter This chapter contains the following sections:

Section	Title	Page
A	Vessel Records Review	3-2
B	Review and Preparation of Statutory Certificates	3-5
C	Composition of Inspection Team	3-7

Section A: Vessel Records Review

- A.1. RO Records Review** Prior to conducting an examination, it is essential that MIs adequately prepare and verify the following:
- Validity and currency of required statutory certificates.
 - RO findings regarding:
 - Conditions of class.
 - Recommendations.
 - Observations.
 - Relevant class notations related to vessel automation, such as:
 - Automatic centralized control (ACC).
 - Automatic centralized control unmanned (ACCU).
 - Unattended machinery space (UMS), etc.
 - Recent attendance or survey reports, as necessary.
 - RO ISM Code observations (non-conformities, and major non-conformities).
 - All surveys/audits were completed within defined survey/audit window. See reference (g), Survey Guidelines Under the Harmonized System of Survey and Certification (HSSC), 2015, International Maritime Organization (IMO), Resolution A.1104 (29).
 - MISLE records including:
 - Outstanding deficiencies.
 - Special notes.
 - Lookouts, routes, and conditions.
 - Previous activity history (as applicable).
 - Any areas of concern are noted and addressed before or during the examination with the RO surveyor and/or vessel staff as necessary.
 - Vessel port state control (PSC) performance, as necessary, via Quality and Shipping Information Systems (EQUASIS).

NOTE:

It is ideal, but not required that RO surveys be completed in conjunction with, or immediately before USCG oversight activities.

A.1.a. RO
Database Access

Unit user accounts are established with the intent to share database information among users within one OCMI zone. However, new user accounts for individual users are not granted.

- Access to RO database is granted by COMDT (CG-CVC-4)
- COMDT (CG-CVC-4) establishes unit accounts for the American Bureau of Shipping (ABS) and Det Norske Veritas-Germanischer Lloyd (DNV-GL).
- Requests for RO records for vessels classed by Lloyd's Register (LR), Bureau Veritas (BV), RINA, and Nippon Kaiji Kyokai (ClassNK) can be made to FlagStateControl@uscg.mil prior to vessel attendance.
- Each database is structured differently and it is strongly recommended that MIs familiarize themselves with the layout and functionality of each.

**A.2.
Safety
Management
System (SMS)
Review**

An examination of a vessel for any purpose is an opportunity to evaluate the effectiveness of its Safety Management System (SMS).

MIs are responsible for reviewing RO records related to ISM Code audits including:

- Observations.
- Non-conformities, and major non-conformities.
- Taking note of the following in the last audit report

Any areas of concern are noted and addressed with the RO lead auditor and/or vessel staff before or during the examination.

NOTE:

MIS should review both the latest SMC audit report as well as the latest DOC audit report for a complete picture of the effectiveness of safety management system and safety culture within the company.

**A.3. Review
USCG Records
(MISLE)**

MIIs thoroughly review the vessel's MISLE record to adequately determine the last known condition of the vessel prior to attending the ACP oversight activity. Items the MIIs review:

- Recent and/or outstanding deficiencies.
- Special notes, routes and conditions.
- Previous activity history.

Any areas of concern are noted and addressed before or during the examination with the RO surveyor and/or vessel staff as necessary.

Section B: Review and Preparation of Statutory Certificates

B.1. Preparation of Statutory Certificates MIs ensure any certificates that need to be issued by the USCG (COI, ISSC, etc.) are accurately prepared and signed by the OCMI. It is preferred that certificates are issued upon completion of the examination (as applicable) and prior to departing the vessel.

B.1.a. Certificate of Inspection (COI) The COI for an ACP vessel is limited to these standard vessel details:

- Owner or operator, dimensions, etc.
- Manning requirements.
- Routes and conditions.
- Any conditions of cargo carriage.

NOTE:

To generate a COI in MISLE, follow guidance in the [MISLE Vessel Inspection User Guide](#) on CGPortal.

There is no need to list other items in MISLE that would traditionally be found on a COI such as:

- Dry-dock dates.
- Machinery equipment.
- Cargo tank details and inspection dates.
- Lifesaving details and inspection dates, etc.

ACP class societies maintain, track, and provide information on the data listed above upon request from the MI. As an alternative, the MI may also find this information by logging into the ROs database.

NOTE:

MI's are responsible for keeping MISLE up to date with pertinent vessel details (relevant date, etc.). The retention of data in MISLE is for historical purposes as well as data analysis. It can also be used to ease the transition if a vessel disenrolls from the ACP.

B.1.b. Review of Statutory Certificates During examinations, MIs verify the validity and currency of required statutory certificates. The RO issues all international certificates for which they have authorization, except those that the USCG cannot delegate (i.e., ISSC/Continuous Synopsis Record). Public vessels satisfy international convention certificate requirements with Statements of Voluntary Compliance issued by the RO.

The RO can extend the endorsement of international certificates up to 90 days from the last date required on a valid, full term certificate.

- Extensions of expired full term statutory certificates are not authorized.
- In extenuating circumstances, COMDT (CG-CVC-4) can consider approving a short-term certificate.

If a certificate expires, and the ship is not in a port where it can be surveyed, the Administration can extend the period of validity of a certificate. This extension is only granted for the purpose of allowing the ship to complete its voyage to the port where it is surveyed, and only in cases where it appears proper and reasonable to do so.

NOTE:

The Federal Communications Commission (FCC) is responsible for issuing the Safety Radio Certificate (SLR) and can choose to delegate that responsibility per reference (h), The United States Coast Marine Safety Manual, Volume II: Materiel Inspection, COMDTINST 16000.7 (series).

NOTE:

Documents of authorization for the carriage of grain can only be issued by the National Cargo Bureau (NCB) per Documentation of Authorization §172.015 of reference (a), Title 46 CFR, Shipping.

NOTE:

Engine International Air Pollution Prevention (EIAPP) certificates are exclusively issued by the Environmental Protection Agency (EPA).

Section C: Composition of Inspection Team

C.1. Composition of the Inspection Team

Per reference (h), The United States Coast Guard Marine Safety Manual, Volume II: Materiel Inspection, COMDTINST 16000.7 (series), the number and technical qualifications of inspectors necessary to conduct an adequate inspection or examination is at the discretion of the OCMI.

The inspection team for ACP oversight activity include appropriately qualified MIs (generally, two) possessing the requisite qualifications outlined in Table 3-1.

Commands lacking inspector capacity or minimum competency required are advised to contact their district prevention staff for guidance.

ACP Inspection Subchapter	Required Competencies
D/O	HT/MI/MS/DI; applicable.
I	HI/MI/MS/DI; as applicable.
IA	MU
H	HI/MI/DI; as applicable.
L	OI
U	HI/MI/DI; as applicable.

Table 3-1 ACP Inspection subchapter/qualification bridge

NOTE:

Per reference (h), for the inspection of large passenger cruise ships (e.g., PRIDE OF AMERICA), a Foreign Passenger Vessel Exam (FPVE) qualification can be substituted for, or used in combination with, appropriate domestic qualification as determined by the OCMI.

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Chapter 4: Examination Activities for Enrolled Vessels

Introduction This chapter discusses the examination activities for enrolled vessels.

In This Chapter This chapter contains the following sections:

Section	Title	Page
A	Examination Scopes	4-2
B	Documenting Deficiencies on Vessels Enrolled in the ACP	4-6
C	Vessel Safety Management System (SMS)	4-10

Section A: Examination Scopes

A.1. Annual Oversight Activity

Vessels enrolled in the ACP are subject to an annual Coast Guard examination comparable in scope to an annual Port State Control safety examination. This examination includes drills to assess the crew's proficiency in handling likely shipboard emergencies.

The ACP examination job aids are contained in the Resource section/MI Resource Page of the Office of Commercial Vessel Compliance (CG-CVC) webpage on [CGPortal](#). These job aids contain extensive lists of possible examination items; however, it is not the USCG's intention to inspect all items listed. The intent is to sample systems to verify substantial compliance and expand the exam as necessary to do so.

The MI verifies the vessel and its crew are in substantial compliance with international conventions, the RO's rules the applicable U.S. supplement, and any applicable U.S. regulations.

NOTE: **Title 46 CFR in large is not applicable to ACP vessels. However, ACP vessels are not exempted from other Titles of the CFR (i.e. Title 33 or Title 49) as applicable.**

MI's should examine the following items and expand the scope as necessary:

- Observe the vessel's overall condition and operation.
- The safety culture on-board, and expand into the SMS if necessary
- The vessel's equipment.
- Crew competency and certification.
- The following items, expanding as necessary:
 - Documentation examination.
 - Navigation safety checks.
 - Vessel's SMS.
 - Vessel's security system.
 - Deck walk and evaluate vessel's structure.

- Steering gear test.
- Witnessing testing of oily water separator and bilge monitor.
- Witnessing testing of fire detection system.
- Witnessing testing of main and emergency fire pump.
- Witnessing testing of emergency lighting.
- Witnessing fire and abandon ship drills (including lowering and release of lifeboat/rescue boat(s)).
 - If this is not possible due to port restrictions or vessel mooring arrangement, the MI can request objective evidence that the lifeboat/rescue boat(s) test satisfactorily per Chapter 3, Regulation 19 of reference (d), SOLAS, 1974.
 - If objective evidence cannot be provided or the MI determines there is sufficient cause to test the lifeboat, Vessel/Facility Inspection Requirements, Form CG-835 can be issued to demonstrate proper operation at a later date.
- Evaluating International Labour Organization (ILO-147) conditions.
- Evaluating compliance with ballast water regulations.
- Cargo and cargo systems, to include securing/transfer arrangements, associated documentation and manuals, etc.

NOTE:

Spot checks of shipboard automation systems are conducted at the discretion of the OCMI depending on the overall assessment regarding the condition of machinery.

A.2. Additional Examinations and Targeted Oversight

In addition to annual oversight activities, vessels enrolled in the ACP can undergo additional ACP periodic oversight exams or in-service inspections, as described below:

- COMDT (CG-CVC-4) conducts an annual risk assessment for vessels enrolled in the ACP based on multiple risk factors. See CVC-PR-010 (series), Alternate Compliance Program (ACP) and Maritime Security Program (MSP) Risk Assessment, for details.
 - Results of the risk assessments are maintained on the COMDT (CG-CVC-4) CGPortal page in the ACP and MSP Risk Assessment library.

NOTE: MIs and oversight coordination officers should set an alert for the Flag State Control Documents library to ensure up-to-date information is received.

NOTE: Document examinations conducted as a result of the annual risk assessment as periodic oversight exams in MISLE.

NOTE: If a MI attends a SMC or DOC verification audit as part of additional oversight, the activity should be documented in MISLE as a Management System Oversight (MSO) activity. See CVC-PR-004 (series), Management Systems Oversight (MSO), for details.

NOTE: Each vessel identified for ACP periodic oversight is denoted with the following MISLE lookout notation:

“This vessel has been selected for additional oversight based on the FY20XX ACP and MSP Risk Assessment. Please see CVC-PR-010 (series), Alternate Compliance Program (ACP) and Maritime Security Program (MSP) Risk Assessment, and the Flag State Control CGPortal page for additional information.

The OCMI might conduct in-service inspections if objective evidence or external factors provide cause for additional oversight. Examples of when additional in-service inspections are appropriate include:

- Upon receipt of specific guidance from COMDT (CG-CVC-4).
- PSC detentions.
- Major materiel condition deficiencies.
- Crew complaints.
- Anonymous tips.
- Indicators of fleet-wide deficiencies.
- Non-conformities, etc.

NOTE: Additional examinations conducted at the discretion of the OCMI should be documented as “in-service” examinations in MISLE.

**A.3. Dry Docks/
Underwater
Inspections in
Lieu of Dry-dock
(UWILD)**

It is not compulsory for the USCG to attend all dry docks, internal structural examinations, or Underwater Inspections in Lieu of Dry dock (UWILDs) for vessels enrolled in the ACP. Exceptions are for vessels that are identified under the annual risk assessment performed by COMDT (CG-CVC-4), or at the discretion of the OCMI based on objective evidence. Additional instructions can be found in the MMS procedure, CG-PR-010 (series), Alternate Compliance Program (ACP) and Maritime Security Program (MSP) Risk Assessment.

**A.4. Damage
Survey**

- Vessel owner or operator are required to report marine casualties per Marine Casualties and Investigations § 4.03-1 of reference (a), Title 46 CFR, Shipping.
 - RO repair recommendations can be taken into account and if accepted, any repairs can be witnessed by the RO. The OCMI retains final authority to review and approve repair proposals in cases where the damage to the vessel results in a pollution incident or poses a hazard to the safety of the vessel or crew.
 - OCMI can increase the scope and/or oversight of repair proposals for vessels identified during the COMDT (CG-CVC-4) annual risk assessment.
-

**A.5. Expanded
Examination**

An examination can be expanded for any of the following reasons:

- Substandard materiel condition.
- Substandard equipment condition.
- Master or crew not familiar with essential shipboard operations.

Additional details for expanding examinations can be found in the MMS Work Instruction, CVC-WI-003(series), USCG Oversight of Safety Management Systems on U.S. Flag Vessels.

Section B: Documenting Deficiencies on Vessels Enrolled in the ACP

B.1. Background For vessels enrolled in the ACP, primary vessel survey and certification functions rest with the RO including:

- Identification.
- Documentation.
- Tracking.
- Rectification of deficiencies and/or ISM Code non-conformities.

In cases where USCG MIs identify deficiencies, it is important to document the deficiency and track the RO follow-up action. This data is used to assess key performance indicators (KPIs) for vessel owner or operator and ROs who perform delegated functions.

NOTE:

All deficiencies should be issued in accordance with the MMS Procedure, CVC-PR-001(series), Documenting Deficiencies on U.S. Flag Vessels and OCS Floating Offshore Installations (FOIs).

**B.2.
When to Issue a
Vessel Inspection
Requirements,
Form CG-835V**

All deficiencies or worklist items issued to a vessel or floating offshore installation subject to Coast Guard inspection should be issued on form CG-835V, including those items corrected on the spot. This form has been specifically tailored and developed in conjunction with corresponding MISLE enhancements to more consistently and accurately document vessel deficiency data.

In certain circumstances, the OCMI can issue Form CG-835V to vessels enrolled in the ACP to grant dispensation and/or limit vessel operations/movement to satisfy flag state obligations and inform PSC authorities.

If the deficiency relates to a statutory certificate issued by an RO, a short-term certificate can be requested to accompany Form CG-835V until the deficiency is resolved to the satisfaction of the RO. Inform the appropriate PSC/port authority as necessary.

In addition, a statement that constitutes flag state permission for continued operation (as appropriate).

For example, all ships over 10,000 gross tonnage are required to have an Automatic Radar Plotting Aid (ARPA). On September 19, 2017 vessel reported that the ARPA was malfunctioning. No parts/technician was available in current port, vessel authorized to proceed to next port for repairs.

For data-tracking purposes, MIs record such deficiencies in MISLE as a deficiency and “clear” them once accepted by an RO as a “Condition of Class or Statutory Finding.” In most instances, deficiencies should be referred to the RO when the certificate covering the deficient item was issued by the RO. This provides the RO the opportunity to oversee the corrective action which impacts their certificate, and the MI the opportunity to provide oversight of the RO's services.

NOTE: **Once the deficiencies are entered into MISLE, they can be referred to the RO by generating a "Deficiency Referral Letter" in the activity and emailing it to the RO.**

NOTE: **Deficiencies can be cleared immediately in MISLE once the RO accepts the deficiency and provides a corresponding finding number.**

NOTE: **MIs verify if a deficiency has been accepted by the RO by way of a report provided by the RO or manual report from the RO database. These reports should indicate the corresponding RO finding number. The finding number is needed in MISLE to clear the deficiency.**

B.2.a. RO
Notification

In any case where deficiencies are discovered by the USCG during an oversight examination, notify the RO promptly (i.e., the same day). In cases where vessel movement and/or operation is restricted or any statutory certificate is withdrawn by the USCG, inform the RO immediately.

NOTE: **In any case where a vessel receives a Flag State Detention (i.e. code "30 - Ship detained), the CG-835V should be forwarded to the applicable District, Area, and COMDT (CG-CVC) at FlagStateControl@uscg.mil within 4 hours.**

B.3. How to Issue a Vessel Inspection Requirements, Form CG-835V

For deficiencies annotated on a Form CG-835V, the MI notes the description of the deficiency in a direct, succinct, quantifiable and use descriptive language when possible. Each statement should contain two important elements:

- A description of the standard the vessel does not meet.
- Specific objective evidence for why the standard is not met.

In addition:

- When drafting the vessel/facility inspection requirements using the Vessel/Facility Inspection Requirements, Form CG-835V, the MI lists the deficiencies in order of severity, those marked code "30 - Ship detained," or deficiencies restrictive in nature first.
- Ensure all deficiency descriptions are as specific and descriptive as possible using quantifiable language and include convention or regulatory cites for reference.
- The MI should assign a compliance date appropriate to the nature of each deficiency. In making the determination, the MI considers the following:
 - The nature and severity of the deficiency.
 - The time needed to correct such a deficiency.
 - The availability of resources to correct the deficiency.
 - The vessel's itinerary.

NOTE:

MIIs should ensure the appropriate boxes on the CG-835V are checked (i.e. SMS Related, Self-Reported, or Worklist Item). Details for when to check each box can be found in the MMS Procedure, CVC-PR-001(series), Documenting Deficiencies on U.S. Flag Vessels and OCS Floating Offshore Installations (FOIs).

B.4. Deficiency Referral Procedures and Deficiency Resolution

When a deficiency is identified and documented on the Form CG-835V, do the following:

- Provide a copy to the RO as soon as possible.
- The RO issues a finding that corresponds to the deficiency.
- The RO follows through until the deficiency is resolved or corrected.
- The MI verifies the deficiency is accepted as a finding, either through a report or, by checking the RO's database, and that it is rectified by the agreed upon date.

- The MI maintains communications with the attending RO until notified the deficiency is cleared.
 - The MI confirms that the deficiency is resolved via RO report or through verification in the RO database.
-

Section C: Vessel Safety Management System (SMS)

C.1. Oversight of Vessel Safety Management System (SMS)

ISM Code oversight occurs constantly as a part of many routine activities. Examination of a vessel for any purpose is an opportunity to judge the effectiveness of its SMS. ISM Code oversight is not always the primary purpose of an examination, therefore inspectors need to remain aware of the important role an SMS has in maintaining compliance with appropriate standards.

Any vessel examination should be looked at as an opportunity to evaluate the effectiveness of its SMS. When an inspection is performed for purposes other than verifying compliance with ISM Code, deficiencies noted are analyzed based on three criteria of the SMS:

- Prevention of the deficiency.
- Deficiency identification.
- Deficiency management.

At the outset of an inspection, the MIs review SMS records for any open non-conformities (internal or external) to gain insight regarding the status of corrective action.

Additionally, see CVC-WI-004 (series) U.S. Flag Interpretations on the ISM Code, and CVC-WI-003 (series) USCG Oversight of Safety Management Systems on U.S. Flag Vessels for more details.

For more detailed instruction on conducting examinations of the vessel/company SMS, including initiating SMC and DOC (Document of Compliance) verification, see MMS Work Instruction CVC-WI-003(series), USCG Oversight of Safety Management Systems on U.S. Flag Vessels.

C.2. International Safety Management (ISM) Code Review

Per reference (i), Rules for the Safe Operation of Vessels and Safety Management Systems, 33 CFR Part 96 Subpart C. ROs must perform specific requirements as recognized and authorized by COMDT (CG-CVC-4) on U.S. vessels:

- ISM Code audits.
- External verifications.
- Issuance of ISM Code certificates.

All ROs are designated to perform ISM Code responsibilities and shall apply the provisions of reference (i) and reference (j), IACS Procedures,

Volume 3: IACS Quality System Certification Scheme (QSCS),
International Association of Classification Societies (IACS) (series).

Although reference (k), Guidance for IACS Auditors to the ISM Code, International Association of Classification Societies (IACS) Recommendation, No. 41(series) is not required to be applied directly by the ROs under the International Association of Classification Societies Quality System Certification Scheme (IACS QSCS) (i.e., it is only guidance), the USCG reviewed the document and determined that the contents be applied to U.S. flag vessels subject to ISM Code. For more details, see MMS Work Instruction CVC-WI-004(series), U.S. Flag Interpretations on the ISM Code.

Chapter 5: Post Examination Activities

Introduction This chapter discusses post examination activities, focusing on case work procedures.

In This Chapter This chapter contains the following sections:

Section	Title	Page
A	Case Vessel Inspection Activities	5-2
B	Management Systems Oversight Activity	5-6
C	Quality Case	5-7

Section A: Case Vessel Inspection Activities

Revision

A.1. Examination Types

In MISLE, properly identify the examination type by selecting which examination is being conducted:

- ACP annual oversight.
- ACP COI oversight.
- ACP handover survey.
- ACP periodic oversight (assign this only if an examination was conducted as a result of an annual risk assessment).
- In-service inspections (assign this only if the examination was conducted at the OCMI's discretion/or specific direction from COMDT (CG-CVC-4) and is in addition to the regularly scheduled inspections).
- Management System Oversight (see Section B:)
- Damage survey.
- UWILD.
- Dry dock examination (DDX).
- Cargo tank internal structure examination.
- Internal structure examination.

NOTE:

Do not use “hull examination” drop-down in MISLE, rather select the specific examination title (e.g., DDX, internal structural examination, etc.).

To ensure MISLE properly tracks and accounts for the ACP oversight activity, the MI also selects:

- ◆ **Annual Inspection in addition to ACP annual oversight.**
- ◆ **Periodic inspection in addition to ACP periodic oversight.**
- ◆ **COI inspection in addition to ACP COI oversight.**

A.1.a. ACP MISLE Narrative

The MISLE narrative is a collection of statements regarding facts of a vessel inspection, examination, and the circumstances under which it occurred. The narrative serves as the log of the MIs activities and provides critical context to the additional information documented in other MISLE activity fields (e.g., inspection results).

While there is no one correct narrative format, facts need to be sufficiently detailed to allow other MIs or reviewing authorities to understand what was accomplished and conducted.

Recommended narrative format includes:

- Opening statement, this can include details of why the examination is conducted, (i.e., routine examination, targeted vessel, etc.).
- Hull inspection/examination.
- Machinery inspection/examination.
- Drills.
- Closing statement.

Recommended narrative content:

- Opening statement, include:
 - Date/time of attendance.
 - Specific location.
 - Mooring arrangement.
 - MIs/industry/vessel/RO representatives in attendance.
 - Type of examination being conducted (e.g., ACP annual, intermediate, DDX, etc).
 - Was examination descoped? If yes, why?

Any outstanding deficiencies, conditions of class, open ISM Code non-conformities, and relevant special notes are addressed (as applicable).

- Hull inspection and machinery inspection/examination:
 - Identify all areas inspected and document any tests witnessed. For example, *“tested overspeed trip on #1 SSDG – all found satisfactory.”*
 - Similarly, document if certain tests or inspections were not able to be conducted. For example, *“did not lower/release starboard lifeboat due to mooring arrangement. Verified lifeboat inventory and tested engine/steering.”*
- Drills:
 - Identify all drills completed with the location and scenario and other pertinent information.

- Closing statement:
 - Identify any specific items of concern found during the inspection, deficiencies issued, cleared, and/or remain outstanding.
 - Identify all certificates or documents endorsed and lead inspector's statement as to the vessel's suitability for route and service.
 - Close the narrative with "inspection complete" and MI Initials.
-

A.1.a.(1). MISLE
Activities and
Uploads

Upload to MISLE the following documents relevant to the inspection activity with an appropriate description:

- ACP annual oversight.
- ACP COI oversight.
- ACP handover survey.
- ACP periodic oversight.
- Construction oversight.

Follow the steps and actions below for MISLE activities and uploads (this list is not all-inclusive and merely contains helpful ACP MISLE hints):

1. The MI ensures all correspondence is scanned and loaded into the MISLE activity. Correspondence includes:
 - Requests for COI.
 - Applications for inspection.
 - Plan approval letters.
 - Provisional enrollment letter.
 - Waiver requests.
 - Oversight plan.
 - Reports.
 - Statutory documents.
 - International certificates and any documentation supporting the approval or denial of a request from industry.
2. Upon receipt of an application for inspection, the MI opens a MISLE case and creates a USCG vessel identification number if one was not previously created at MSC.
 - Forward the USCG number to the National Vessel Documentation Center (NVDC) to ensure duplicate vessels are not created in MISLE.

- Forward the USCG number to the shipbuilder and include the number in all future correspondence.
3. The MI then opens a MISLE activity, selects “construction oversight” as the sub-activity and starts a narrative. The activity needs to contain the basic information required by the unit’s Mission Management System (MMS) instruction/policy.
 4. The MI provides the ship builder, owner, and operator a MISLE load book after receiving the application for inspection.
 5. The MI ensures all the information from the unit’s MISLE load book and the unit’s MMS instruction/policy is uploaded to the database.
 6. The MI ensures all correspondence is scanned and loaded into the MISLE activity. Correspondence is defined in the [first](#) step in this set of steps.
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Section B: Management Systems Oversight Activity

B.1. Background The MSO MISLE activity was designed to capture Coast Guard oversight of SMSs and QMSs, as applicable, and integrates this information with the existing vessel inspection activities to facilitates active fleet management, risk-based decision making, and the development and monitoring of Key Performance Indicators (KPIs).

NOTE:

Details concerning MSO activities can be found in MMS Procedure CVC-PR-004(series), Management Systems Oversight.

Section C: Quality Case

C.1. Background A Quality Case is a mechanism to be used in situations where objective evidence indicates that a potential failure of an RO's Quality Management System (QMS) resulted in the failure to adequately perform delegated functions under mandatory IMO instruments or domestic authorities.



C.2. Quality Case Overview

In its capacity as the Flag Administration, the Coast Guard is ultimately responsible to guarantee the effectiveness of delegated functions performed on its behalf. The Coast Guard executes third party oversight through a combination of verification and monitoring techniques executed at multiple levels of the organization.

A "Quality Case" (QC) is a tool that the Coast Guard uses to request that an RO perform an internal investigation or root cause analysis when objective evidence indicates that a potential failure, or lack of effectiveness, of the RO's QMS resulted in the unsatisfactory execution of delegated function(s).

MIs that establish objective evidence of an RO QMS process failure shall initiate a QC recommendation to CG-CVC in accordance with the provisions of the MMS Work Instruction CVC-WI-005(series), Request for Recognized Organization (RO) Internal Quality Management Systems (QMS) Review - "Quality Case."

NOTE:

Details concerning Quality Cases can be found in the MMS Work Instruction, CVC-WI-005(series), Request for Recognized Organization (RO) Internal Quality Management Systems (QMS) Review - "Quality Case."

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Chapter 6: Special ACP Activities

Introduction

The USCG is responsible for verifying regulatory compliance of U.S. vessels, including those enrolled in the ACP. ACP policy development, performance monitoring, risk assessments, and determining a Fleet Risk Index are administered by COMDT (CG-CVC-4). These activities are intended to monitor the systematic effectiveness of the ACP. This chapter is intended to outline the procedures associated with additional oversight activities.

In This Chapter

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Section A: Concentrated Inspection Campaigns (CIC)

A.1. Overview Concentrated inspection campaigns (CIC) focus on specific inspection areas based on trend analysis or when new requirements have recently entered into force. COMDT (CG-CVC -4) determines when to initiate these campaigns as well as the frequency and duration thereof. CICs are typically combined with a regular inspection activities. Details of CICs will be provided to OCMI, Districts, and Areas by COMDT (CG-CVC).

Section B: Transfer of Vessel Classification

B.1. Transfer of Vessel Classification

Vessels enrolled in the ACP can transfer to another RO only after receiving approval from COMDT (CG-CVC-4). Since all current USCG recognized ROs are members of the IACS, the transfer needs to be completed as applicable to reference (m), Procedure for Transfer of Class, International Association of Classification Societies (IACS) Procedural Requirement (PR), PR1A (series). Steps to complete a transfer of class include:

1. Notification of intent to transfer class needs to be made to COMDT (CG-CVC-4) within three working days of the anticipated handover (i.e., “class entry survey”) survey.
2. Review the most recent “status of classification society recognition,” ACP participation, and authorizations delegated by the USCG in advance. The USCG can elect to attend the handover survey but it is not a requirement.
3. As part of the approval process, COMDT (CG-CVC-4), in consultation with the gaining RO and the vessel owner and operator, determines which U.S. supplement is applicable after the transfer and then documents accordingly with a MISLE special note.

NOTE:

If a vessel transfers ISM certification between ROs, the transfer must be completed as applicable to reference (M), Transfer of Safety and Security Management Systems Certification, IACS PR-1A(series).

Section C: Revocation of Certificates

C.1. Revocation of Certificates

As the flag administration, the USCG is generally the only entity that can revoke a vessel's statutory certificates. The steps for revoking a certificate are:

- Vessels in a state of advanced deterioration that cause constant system and structural failures, or are habitually non-compliant can have their COI revoked until a root cause and subsequent solution to the pattern can be found.
- The OCMI can revoke international certificates for significant or numerous deficiencies such as:
 - Lifesaving.
 - Firefighting.
 - Watertight integrity.
 - Pollution prevention material and equipment.

Revocation of a statutory certification is a major undertaking and is recommended only as a last resort.

Coordination with the RO, owner or operator, and COMDT (CG-CVC-4) is encouraged to help find the balance between safety of life, property, environment, and facilitating safe and secure commerce.

NOTE:

When it becomes necessary for an OCMI to place an operational control on a vessel, the preferred method to take action against the COI (i.e., Form CG-835, withdraw, suspend) versus a captain of the port (COTP) order.

NOTE:

Per reference (h), The United States Coast Guard Marine Safety Manual, Volume II: Materiel inspection, COMDTINST 16000.7 (series), only COMDT (CG-CVC) can revoke an ISM DOC.

Section D: Plan Review/Major Conversion

D.1. Plan Review Per reference (n), Technical Support and Oversight of Authorized Classification Societies, Marine Safety Center Technical Note (MTN), No. 04-03 (series), the OCMI can request targeted plan review oversight from the MSC with compliance.

The RO is responsible for informing the MSC of approved RO work items, or issued items including tonnage and load line assignments. Work items not marked approved on behalf of the USCG by the RO, including industrial systems or industrial packages, are brought to the attention of the MSC.

D.2. Major Conversion The OCMI consults with the MSC regarding any conversion or repairs considered major in nature. The MSC then provides actions, as necessary, to the OCMI.

Section E: Appeals/Interpretations/Equivalencies/Exemptions

E.1. OCMI Review/Appeals

- The OCMI can, as necessary, inform appropriate parties of the right to appeal per Organization, General Course and Methods Governing Marine Safety Functions Part 1 of reference (a), Title 46 CFR, Shipping.
 - The OCMI instructs appropriate parties to obtain interpretations of an equivalency determination for RO' class rules, USCG supplement, and International Codes and Conventions as directed per reference (b), NVIC 02-95 (series).
 - Per reference (b), the OCMI reviews all requests for appeals, equivalencies, and exemptions, and forwards to the appropriate office.
-

Section F: Disenrollment

F.1. Disenrollment Overview

A Company may voluntarily disenroll a vessel from the ACP at any time. Requests for disenrollment should be sent to FlagStateControl@uscg.mil. Following disenrollment, the Company may request to reenroll at any time. Reenrollments are normally conducted at the next regularly scheduled Coast Guard inspection.

Once a vessel is unenrolled, the vessel reverts to full inspection by the Coast Guard. However, the vessel may still be inspected to the ACP Standard by the Coast Guard, and the Company may have the RO continue to issue international certificates based on their individual certificate authorizations.

Vessels are not involuntarily disenrolled from the ACP.

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Appendix A: Glossary and Acronyms

ABS	American Bureau of Shipping.
ACC	Automatic centralized control.
ACCU	Automatic centralized control unmanned.
ACP	Alternate Compliance Program.
ACS	Authorized Classification Society.
ARPA	Automatic Radar Plotting Aid.
CFR	Code of Federal Regulations.
CGTTP	Coast Guard Tactics, Techniques, and Procedures.
CIC	Concentrated Inspection Campaign.
COI	Certificate of Inspection.
COMDT (CG-CVC)	Coast Guard Office of Commercial Vessel Compliance.
COMDT (CG-CVC-4)	Coast Guard Office of Commercial Vessel Compliance, Flag State Control Division
COMDT (CG-5PS)	Coast Guard Commercial Regulations and Standards Directorate.
COMDT (CG-5P-TI)	Coast Guard Traveling Inspection Staff.
CO	Commanding officer.
COTP	Captain of the port.

DDX	Dry-dock examination.
DI	Dry-dock inspector.
DOC	Document of Compliance.
DNV-GL	Det Norske Veritas-Germanischer Lloyd.
DVT	Design verification testing.
EIAPP	Engine International Air Pollution Prevention.
EPA	Environmental Protection Agency.
EQUASIS	Quality and Shipping Information Systems.
Examination	An activity associated with verifying the conditions of the Certificate of Inspection.
FCC	Federal Communications Commission.
FC-T	U.S. Coast Guard Force Readiness Command, Training Division.
FORCECOM	Force Readiness Command.
HI	Hull inspector.
HSC	High speed craft.
HSSC	Harmonized System of Survey and Certification.
HT	Hull tank ship.
IACS	International Association of Classification Societies.
IACS QSCS	International Association of Classification Societies Quality System Certification Scheme.

ILLC	International Load Line Certificate.
ILO	International Labour Organization.
IMO	International Marine Organization.
Inspection	An activity that results in issuance of the COI.
IOPP	International Oil Pollution Prevention.
ISSC	International Ships Security Certificate.
ISM	International Safety Management.
KPI	Key performance indicators.
LR	Lloyd's Register.
MB	Megabyte.
MI	Marine inspector.
MISLE	Marine Information for Safety and Law Enforcement.
MMS	Mission Management System.
MOA	Memorandum of agreement.
MODU	Mobile offshore drilling units.
MOU	Memorandum of understanding.
MSC	Marine Safety Center.
MS	Machinery inspector steam.
MTN	Marine safety center technical note.

NCB	National Cargo Bureau.
NCOE	Coast Guard National Centers of Expertise.
NDT	Non-destructive testing.
NK	Nippon Kaiji Kyokai.
NVDC	National Vessel Documentation Center.
OCMI	Officer in Charge, Marine Inspection.
OI	Offshore supply vessel inspector.
OJT	On-the-job-training.
Oversight	USCG activity to verify that a vessel is in substantial compliance with relevant certificates and/or delegated functions performed by an RO and are performed in accordance with the terms of applicable MOAs, MOUs, and program policies.
PR	Procedural Requirement.
PSC	Port state control.
PSSC (or SLP)	Passenger Ship Safety Certificate.
PSTP	Periodic safety test procedures.
RO	Recognized organization.
SLE	Safety Equipment Certificate.
SLC	Cargo Ship Safety Construction Certificate.
SLR	Safety Radio Certificate.
SMC	Safety Management Certificate.
SMS	Safety Management System.

SOLAS International Convention for the Safety of Life at Sea.

SSAS Ship security alert systems.

SSDG Ship service diesel generator.

TTP Tactics, techniques, and procedures.

UMS Unattended machinery space.

USCG United States Coast Guard.

UWILD Underwater Inspection in Lieu of Dry-dock.

