



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



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

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

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), 2015, International Maritime Organization (IMO), Resolution A.1104 (29)
 - (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)

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) 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 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).
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. DISTRIBUTION. U.S. Coast Guard Force Readiness Command (FORCECOM) Training Division (FC-T), TTP Section, posts an electronic version of this TTP publication to the CGTTP Library on CGPortal. In CGPortal, navigate to the CGTTP Library by selecting **References**, then select the **TACTICS, TECHNIQUES, AND PROCEDURES LIBRARY** link. FC-T, TTP Section, does not provide paper distribution of this publication.
7. USCG FORMS. The USCG electronic forms referenced in this publication are available on the [CGPortal](#) website.
8. REQUEST FOR CHANGES. Submit recommendations for TTP improvements or corrections through the TTP Request webpage on CGPortal. In CGPortal, navigate to the TTP Request webpage by selecting **References**, then selecting the **TTP Requests** link.

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By Direction of Commander,
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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:

Section	Title	Page
A	Introduction	1-2
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Section A: Introduction

A.1. Background and Performance Objectives

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:

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

This TTP provides United States Coast Guard (USCG) personnel updated and standardized guidance for conducting activities on vessels enrolled in the ACP.

Standardized ACP guidance:

- Enhances on-the-job training (OJT).
- Minimizes need for interpretation by the marine inspector (MI).
- Promotes examination consistency.
- Promotes effective documentation.

A.2. Scope

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

A.3. Target Audience

The primary target audience of this TTP publication is MIs 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 for:

- ACP program managers.
- Coast Guard Traveling Inspection Staff COMDT (CG-5P-TI).

- Coast Guard National Centers of Expertise (NCOE).
 - ACS surveyors.
 - Recognized organizations (ROs).
 - Vessel owner/operators (O/O).
-

A.4. 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 located on the [MISLE](#) CGPortal site for guidance.

- 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 regardless of vessel ACP status.
 - These guidelines do not limit the OCMI from taking appropriate actions to ensure the safety of persons, property, and the environment.
-

A.5. Deviation

This TTP publication cannot cover every ACP examination scenario that might arise. Such cases might result in the need to deviate from guidance in this publication. You can deviate from the TTP as necessary to complete the task with greater safety, effectiveness, or efficiency. Do not take such deviations lightly. Temper any decision to deviate with maturity and a complete understanding of the mission, members' capabilities, and equipment. Whenever possible, consult your unit chain of command before deviation. Report TTP adjustment needs per the Request for Changes paragraph located in the letter of promulgation.

A.6. 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 or Existing 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 Certificates (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: Marine 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, because MIs are generally involved throughout enrollment, reflag (if applicable), and manning evaluation processes, they are sometimes called upon to support the industry, so it is important to understand the processes.

In This Chapter

This chapter contains the following sections:

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B	Vessel Reflags	2-11
C	Manning Evaluation	2-12

Section A: Enrollment Process

A.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 apply for ACP enrollment).

To assist MIs 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.

A.2. Enrollment for New and Modified Vessels

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

A mutually agreed upon oversight plan jointly developed by all interested parties is useful in reducing confusion regarding responsibilities and expectations. [See Chapter 2: Enrollment and Initial Certification, Section A.4.: 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.

A.3. 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 ACS.

A.3.a. Process Steps

Provisional Enrollment Process:

1. Vessel O/O, 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, include a parenthetical notation such as “ACP enrollment,” in the vessel name or service block.

2. Vessel O/O provides a signed copy of the contractual agreement for classification services between the ACS, shipyard, or owner, as applicable.
3. Vessel O/O or shipyard provides a detailed list of plans to be approved by the Marine Safety Center (MSC). Submit plans 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 ACS to ensure the following basic elements are addressed:
 - Scope of services provided by the ACS.
 - 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 ACS 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-1) 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: CG-CVC-1@uscg.mil via the chain of command.
9. Upon approval by COMDT (CG-CVC-1), the vessel is provisionally enrolled in the ACP.

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 ACS 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-1), 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-1). Per reference (b), NVIC 02-95 (series), the USCG retains inspection authority over novel system(s) until such time as oversight of such systems is specifically delegated in writing to the ACS.

A.4. 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 ACS surveyor(s) involved.
- The prospective O/O.

Consider the following topics when developing an oversight plan:

- Communications between stakeholders:
 - Contact information.
 - Meeting schedule.
 - Reporting of project milestones.
 - Overall project status reports.
 - Call out notifications, etc.
 - Plan review.
 - Material/equipment approvals.
 - Novel 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 (provide 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 ACS 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.

A.5. Sea Trials and Preparing for Vessel Delivery and Initial Certification

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

- For vessels anticipating enrollment in the ACP, the ACS 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 O/O, 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 O/Os 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 O/O 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.

A.6. 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 ACS 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., Supplement) as well.
- Outstanding ACS survey/technical comments have to be resolved to the satisfaction of all parties.
- Once verified, the MI and ACS 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 ACS issues all applicable statutory and classification certificates specific to the vessel, as authorized by their individual certificate delegations.
- The OCMI issues the initial COI and International Ships Security Certificate (ISSC) to the vessel, after obtaining copies of the relevant statutory and classification certificates. [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-1) at CG-CVC-1@uscg.mil.
- Upon acceptance by the COMDT (CG-CVC-1), the vessel is issued its ACP Final Enrollment letter.

NOTE:

Manning proposals for new construction vessels are requested from the O/O early on in the construction project. [See Section C: Manning Evaluation](#) of this chapter.

A.6.a. Completing the Handover Survey

The handover survey is completed jointly by the ACS and attending MI. The scope is similar to a COI 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 has taken 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 intended that the OCMI conducts a complete handover survey in cases where MIs have been closely involved during a new construction or vessel conversion project. The OMCI can modify the scope of the handover survey to avoid redundancies already identified during the delivery process.

NOTE:

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

A.7. Enrollment for Existing Vessel

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

1. Vessel O/O 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 ACS has ACP delegation and there is an applicable/approved [U.S. supplement](#).
 4. The OCMI notifies COMDT (CG-CVC-1) for vessels with “novel systems.”
 5. Coordinate a handover survey with the ACS and notify COMDT (CG-CVC-1) of the results. Refer to [Section A.6.: Initial Certification Process](#) of this chapter for scope of the handover survey.
 6. If International Safety Management (ISM) Code major non-conformities are discovered during the handover survey:
 - The vessel cannot be enrolled into the ACP until the major non-conformity is downgraded.
 - The ACS conducts a follow-up audit after the major non-conformity is rectified, and the OCMI attends the ACS’s follow-up audit. An additional Safety Management Certificate (SMC) verification is conducted by the RO within 3 months to ensure effective corrective action is implemented.
 7. Following completion of the handover survey, the OCMI issues a temporary COI with corresponding ACP endorsement. After the final enrollment process is completed and the vessel is approved by CG-CVC-1, the OCMI issues a full term COI.
-

A.8. Final Enrollment

The steps for final enrollment are:

1. OCMI drafts final enrollment memo and forwards to CG-CVC-1@uscg.mil via the chain of command.
 - See [Appendix B: Sample Final Enrollment Memo](#) for an example.
 2. COMDT (CG-CVC-1) verifies all requirements are met, and notifies the vessel O/Os and OCMI that the vessel is enrolled in the ACP.
 - To verify final enrollment OCMI's search the vessel in MISLE, and view the "group notes" tab under "special notes."
-

Section B: Vessel Reflags

B.1. Vessel Reflags

The ACP is not a reflag mechanism. 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 foreign flag to U.S. flag, the default is that it has to be in compliance with the ACP standard (IMO conventions, ACS rules, and provisions of the applicable U.S. supplement). Any deviation from the ACP standard requires an equivalency determination. If an equivalency determination is needed, the process is:

1. O/O applies through their ACS, to the MSC to request an equivalency determination.
2. The MSC reviews the equivalency request and forwards their determination to the vessel O/O and copies the ACS and OCMI.
3. If the vessel O/O disagrees with the MSC's decision, the vessel O/O 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 O/O 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.

Section C: Manning Evaluation

C.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 O/O.

To maintain national consistency, the information contained in reference (e), MSM, Volume III, is structured to interlink various elements affecting safe manning and watchkeeping on USCG certificated vessels and is to 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:

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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. ACS/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.
- ACS 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 ACS surveyor and/or vessel staff as necessary.
- Vessel port state control (PSC) performance, as necessary, via Quality and Shipping Information Systems (EQUASIS).

NOTE:

Per reference (b), NVIC 02-95 (series), it is ideal, but not required that ACS surveys be completed in conjunction with, or immediately before USCG oversight activities.

**A.1.a. ACS
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 ACS database is granted by COMDT (CG-CVC-1).
- COMDT (CG-CVC-1) establishes unit accounts for the American Bureau of Shipping (ABS) and Det Norske Veritas-Germanischer Lloyd (DNV-GL).
- Request ACS records for vessels classed by Lloyd's Register (LR) and Nippon Kaiji Kyokai (ClassNK) through CG-CVC-1@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). 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. For additional information on the ISM Code, go to the [Alternate Compliance Program](#) webpage on CGPortal and open the **Job Aids** folder.

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

- Observations.
- Non-conformities, and major non-conformities.

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

**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 ACS 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 be 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:

- O/O, 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 to the MI.

NOTE:

MIs 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 and 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 ACS 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 ACS.

The ACS 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-1) 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

Enrolled vessels are subject to an annual USCG examination comparable to foreign flag vessel examinations. The examination is similar in scope to an annual oversight activity under the Port State Control Program and includes drills to assess the crew's proficiency in handling likely shipboard emergencies.

The 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 MI verifies the vessel and its crew are in substantial compliance with international conventions, the requirements of the ACP class society's rules, U.S. supplement, and any applicable U.S. regulations. Examine the following items and expand the scope as necessary:

- The MI's observation of the vessel.
- 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 activity or in-service inspections, as described below:

- COMDT (CG-CVC-1) conducts an annual risk assessment for vessels enrolled in the ACP based on multiple risk factors.
 - Results of the risk assessments are released at least once annually via message (also posted to [CG-CVC-1 Domestic Vessel Inspections](#) webpage on CGPortal) and include specific instructions detailing additional periodic oversight requirements.

NOTE:

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

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

NOTE:

“This vessel has been targeted under the FY20XX ACP Risk Assessment and Targeting Protocol. Please visit CG-CVC-1 Announcements page on CGPortal for additional information.”

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

- Upon receipt of specific guidance from COMDT (CG-CVC-1).
- PSC detentions.
- Major materiel condition deficiencies.
- Crew complaints.
- Anonymous tips.
- Indicators of fleet-wide deficiencies.
- Non-conformities, etc.

NOTE:

Document additional examinations conducted at the discretion of the OCMI 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-1), or at the discretion of the OCMI based on objective evidence. Additional instructions are included in the annual risk assessment message which is written by COMDT (CG-CVC-1) and generally released annually.

A.4. Damage Survey

- Vessel O/Os are required to report marine casualties per Marine Casualties and Investigations § 4.03-1 of reference (a), Title 46 CFR, Shipping.
- ACS repair recommendations can be taken into account and if accepted, any repairs can be witnessed by the ACS. 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's can increase the scope and/or oversight of repair proposals for vessels identified during the COMDT (CG-CVC-1) 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 the expanded examinations can be found on the [Alternate Compliance Program](#) webpage on CGPortal in the Job Aids folder.

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 ACS/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 ACS/RO follow-up action. This data is used to assess key performance indicators (KPIs) for vessel O/Os and ACS/ROs who perform delegated functions.

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

The following guidance is provided as it relates to issuing deficiencies to vessels enrolled in the ACP. MIs issue a Vessel/Facility Inspection Requirements, Form CG-835 to the vessel in the following situations:

- The ACS is not present for the examination.
- The ACS is unwilling to accept the deficiency as a class/statutory finding (i.e. “Condition of Class”).
- If the deficiency presents a serious threat to life, property, or to the marine environment, or if the vessel is determined to be unsafe to proceed to sea.
- If the OCMI requests an external ISM Code verification for cases where the deficiencies constitute objective evidence of non-conformities under the ISM Code.
- If the deficiency is related to specific vessel operations or systems that are retained by the USCG.

NOTE:

In these circumstances, verify that Form CG-835 contains, the elements listed in [Section B.3.: How to Issue a Vessel/Facility Inspection Requirements, Form CG-835](#) of this chapter.

In certain circumstances, the OCMI can issue Form CG-835 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 ACS/RO, a short-term certificate can be requested to accompany Form CG-835 until the deficiency is resolved to the satisfaction of the ACS/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 ACS as a finding/ “Condition of Class.”

NOTE: Deficiencies can be cleared immediately in MISLE if the ACS is present for, or immediately accept the deficiency.

NOTE: With proper access to the [MISLE](#) on CG Portal, MIs can record minor deficiencies “to the satisfaction of the ACS surveyor.”

NOTE: MIs verify if a deficiency is accepted as a condition of class through a report provided by the ACS or manual report from the ACS database. These reports indicate the corresponding ACS finding number.

B.2.a. ACS/RO
Notification

In any case where deficiencies are discovered by the USCG during an oversight examination, notify the ACS 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 ACS/RO immediately.

NOTE: Report no-sail deficiencies to CG-CVC-1 in accordance with reference (h), The United States Coast Guard Marine Safety Manual, Volume II: Materiel Inspection COMDTINST 16000.7 (series).

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

For deficiencies annotated on a Form CG-835, the MI notes the description of the deficiency in a direct and concise statement that contains 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-835, the MI lists the deficiencies in order of severity, listing “No-sail,” 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 assigns 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.
- It needs to be evident that the deficiency can be cleared to the satisfaction of the attending ACS surveyor.
 - A report issued by the ACS can be accepted as prima facie evidence that the deficiency is corrected and as the basis for clearing the deficiency in MISLE.
 - If the ACS report satisfies the deficiency, enter a statement to that effect in the deficiency correction section in MISLE with a comment included in the inspection narrative.

B.4. Deficiency Transfer Procedures and Deficiency Resolution

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

- Provide a copy to the ACS as soon as possible.
- The ACS issues a condition of class that corresponds to the deficiency.
- The ACS follows through until the deficiency is resolved or corrected.
- The MI verifies the deficiency is accepted as a condition of class in the ACS database and is rectified by the agreed upon date.

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

For more detailed instruction on conducting examinations of the vessel/company SMS, including initiating SMC and DOC (Document of Compliance) verification, go to the [Alternate Compliance Program](#) webpage on CGPortal and open the **Job Aids** folder.

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-1) 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.

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 Work Procedures	5-2

Section A: Case Work Procedures

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-1) and is in addition to the regularly scheduled inspections).
- 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/ACS 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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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 vessel targeting are administered by COMDT (CG-CVC-1). These activities are intended to monitor the systematic effectiveness of the ACP. This chapter is intended to outline the procedures associated with the oversight activities.

In This Chapter

This chapter contains the following sections:

Section	Title	Page
A	Concentrated Inspection Campaigns (CIC)	6-2
B	Risk Assessment and Periodic Oversight	6-3
C	Authorized Classification Societies/Recognized Organizations	6-4
D	Transfer of Vessel Classification	6-6
E	Revocation of Certificates	6-7
F	Plan Review/Major Conversion	6-8
G	Appeals/Interpretations/Equivalencies/Exemptions	6-9
H	Disenrollment	6-10
I	Post-Disenrollment Standards	6-11

Section A: Concentrated Inspection Campaigns (CIC)

A.1. Overview Concentrated inspection campaigns (CIC) focus on specific areas based on trend analysis or when new requirements have recently entered into force. COMDT (CG-CVC -1) determines when to initiate campaigns, the frequency and duration thereof. CICs are typically combined with a regular inspection.

Section B: Risk Assessment and Periodic Oversight

B.1. Risk-Based Performance Monitoring Protocol

Risk assessment, performance monitoring, and on-board verification are inherent to all USCG compliance activities. As the administration responsible for overall registry performance, an essential element of the ACP hinges on the ability to efficiently manage an effective and sustainable risk-based oversight and monitoring scheme for enrolled vessels.

The performance monitoring protocol is comprised of two parts:

- A targeting scheme administered by COMDT (CG-CVC-1).
- Prioritized oversight verification.

Vessels selected for additional oversight based on the performance monitoring protocol are published annually on a list and are assigned a MISLE “lookout” identifying the vessel for additional oversight. Although the oversight is provided annually, MIs can receive additional instructions via a message from COMDT (CG-CVC-1).

Section C: Authorized Classification Societies/Recognized Organizations

C.1. Initiating an ACS Quality Case/Internal Review

All USCG ACSs are required to implement and maintain a quality management system per Minimum Standards for a Recognized Classification Society § 8.230 (a) (15) of reference (a), Title 46 CFR, Shipping. Further, under the terms of the applicable memorandum of agreement, agreements or specific authorizations extended by the USCG, ACS's agree to require vessel O/Os compliance with applicable U.S. laws and regulations and USCG policies, interpretations, and instructions related to international conventions.

In addition, the USCG, functioning as the flag administration, conducts verification and monitoring, under provision of the RO code, on ACSs and ROs. This monitoring can occur any time the USCG performs examinations or oversight activities on a vessel enrolled in the ACP.

During the course of an oversight activity, if objective evidence indicates an ACS or RO failed to follow applicable procedures or requirements, a quality case (internal review) of the ACS can be recommended by the OCMI.

Examples of objective evidence that is grounds for a quality case include:

- Substandard condition on a vessel that was not reasonably detected, identified, or otherwise addressed by an ACS or RO (pay particular attention to those substandard conditions that are identified within three months of a related survey or audit).

NOTE:

ACSs and ROs are not enforcement agencies or flag administrations and thus cannot directly detain or otherwise restrict the operations or movement of a vessel without consulting the flag administration prior to taking action. Control action on vessel movement or operation is separate and distinct regarding actions that are taken by the ACS regarding class notations regarding material deficiencies.

- Failure to:
 - Recognize survey findings or materiel condition can be indicative of a failure in, or implementation of, the SMS as directed in reference (1), 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).

- Apply the requirements of the international conventions, ACS rules, and U.S. supplement.
- Notify the USCG immediately upon becoming aware of a situation involving a major deficiency or serious safety-related issue normally considered sufficient to detain a ship from proceeding to sea pending correction.
- Notify the USCG immediately upon becoming aware of a situation aboard ship or within a company involving a major non-conformity, as defined in the guidelines on the ISM Code by Administrations.
- MIs can make recommendations for a quality case via a written standard memo format addressed from the OCMI to COMDT (CG-CVC-1) and routed via the chain of command. The recommendation includes objective evidence of a specific procedure or requirement that was not followed.

NOTE:

More detailed information is provided on CG Portal in the [Alternate Compliance Program](#) webpage.

Section D: Transfer of Vessel Classification

D.1. Transfer of Vessel Classification

Vessels enrolled in the ACP can transfer to another ACS only after receiving approval from COMDT (CG-CVC-1). Since all current USCG recognized ACSs 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, 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-1) 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-1), in consultation with the gaining ACS 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.
-

Section E: Revocation of Certificates

E.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 ACS, RO, O/O, and COMDT (CG-CVC-1) 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-1) can revoke an ISM DOC.

Section F: Plan Review/Major Conversion

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

F.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 G: Appeals/Interpretations/Equivalencies/Exemptions

G.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 ACS' 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 H: Disenrollment

H.1. Voluntary The vessel owner/operator informs the local OCMI, in writing, of his or her intent to remove a vessel from the ACP.

H.2. Involuntary Vessels not maintained per applicable rules, regulations, or policies are subject to be involuntarily disenrolled from the ACP. COMDT (CG-CVC-1) makes all involuntary disenrollment determinations.

Examples that can lead to disenrollment include:

- Removal from class.
 - A recommendation from the ACS or the OCMI to disenroll the vessel.
 - Invalidation or revocation of one or more International Convention Certificates (ICC).
 - Invalidation or revocation of the COI.
 - A pattern of two or more foreign detentions and/or USCG control actions within a 12 month period.
-

**H.3. Post
Disenrollment
Eligibility**

Disenrolled vessels may re-enroll following this schedule:

- Following the first year anniversary of voluntary disenrollment, the vessel owner can re-enroll their vessel.
- Vessels involuntarily disenrolled from the ACS are ineligible to re-enroll for 5 years.

The OCMI informs COMDT (CG-CVC-1) of all re-enrollment requests and schedules the re-enrollment examination to ensure certificate harmonization.

Section I: Post-Disenrollment Standards

I.1. Post-Disenrollment Standards

Once a vessel is disenrolled, the vessel reverts to full inspection by the USCG, rather than reduced oversight. The ACP inspection standard remains the same:

- ACS rules.
- International conventions.
- Applicable U.S. supplement.

The ACS can continue issuing international certificates based on their delegations extended under reference (a), Title 46 CFR, Shipping.

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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-1)	Coast Guard Office of Commercial Vessel Compliance, Domestic Compliance 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.
O/O	Owner/operator.
Oversight	USCG activity to verify that a vessel is in substantial compliance with relevant certificates and/or delegated functions performed by an ACS/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.

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Appendix B: Sample Final Enrollment Memo

U.S. Department of
Homeland Security

United States
Coast Guard



Commanding Officer
United States Coast Guard
Marine Safety Unit Houma

123 Coast Guard St. Ste. 456
Houma, LA 70360-4805
Staff Symbol: MSU Houma
Phone: (985) 850-XXXX
Fax: (985) 850-XXXX

16711
DD MM YYY

MEMORANDUM

From: J. D. Doe, CDR, USCG
MSU Houma

Reply to: I.M. Sailor, HSC
Attn of: LT Doe

To: COMDT (CG-CVC-1)

Subj: NEVERSAIL ALTERNATE COMPLIANCE PROGRAM (ACP) ENROLLMENT

Ref: (a) NVIC 2-95, change-2

1. Please finalize the enrollment for the NEVERSAIL (O.N. *****, CG*****), which was requested provisional enrollment into ACP on DD MM YYYY. COMDT Provisional Enrollment letter could not be located in unit files. As per reference (a), a joint handover survey was completed by a Coast Guard Marine Inspector and an ABS surveyor on DD MM YYYY. American Bureau of Shipping issued Class identification number 00000000.

#

Enclosure: (1) Application for Inspection hull *** dtd DD MM YYYY
(2) Request for ACP Enrollment for hull ***
(3) ACP Provisional Enrollment for hull *** dtd DD MM YYYY

