



USCG Office of Commercial Vessel Compliance (CG-CVC)
Mission Management System (MMS) Work Instruction (WI)



Category	Flag State Control				
Title	Third-Party Input to Mission Management System Corrective Action Request (CAR) Procedures				
Serial	CVC-WI-036(1)	Orig. Date	22MAY26	Rev. Date	N/A
Disclaimer:	This guidance is not a substitute for applicable legal requirements, nor is it itself a substantive regulation. It is not intended to nor does it impose legally-binding requirements on any part. It represents the Coast Guard’s current thinking on this topic and may assist industry, mariners, the public, and the Coast Guard, as well as other federal and state regulators, in applying statutory and regulatory requirements. If you want to discuss an alternative approach (you are not required to do so), you may contact the Coast Guard Office of Commercial Vessel Compliance (CG-CVC) at FlagStateControl@uscg.mil which is responsible for implementing this guidance.				
References:	<ul style="list-style-type: none"> (a) IMO Instruments Implementation Code (III Code) Resolution A.1070(28) (b) Mission Management System (MMS), COMDTINST 5200.4C (c) 46 Code of Federal Regulations Part 8 – Vessel Inspection Alternatives (d) Navigation & Vessel Inspection Circular (NVIC) 01-13, series – Maritime Security Program (MSP) (e) 46 Code of Federal Regulations Part 139 – Third-Party Organizations (f) 46 Code of Federal Regulations § 28.73 – Accepted organizations (g) 46 Code of Federal Regulation § 28.76 - Similarly qualified organizations (h) Mission Management System Internal Audit Tactics, Techniques, and Procedures, CGTTP 4-09.5 (series) (i) CVC-PR-021-CVC Corrective Action Request (CAR) Procedures 				
Change Summary:	N/A				
Enclosures:	(1) Examples of Properly Formatted Third-Party Inputs				

A. Purpose. The Coast Guard Commercial Vessel Compliance (CG-CVC) office is continually strengthening Flag State oversight of delegated parties to ensure the Coast Guard line of effort directed at completing and enhancing Third Party oversight is met in accordance with Ref. (a). The intent of this Work Instruction is to encourage continual process improvements by establishing a standardized process for the Coast Guard to receive and translate structured inputs from a “Third Party.”¹

This process is designed to improve system performance, leverage external expertise, and drive continuous process improvement across functions executed by a Third Party on behalf of the Coast Guard, encompassing all delegated inspections, surveys, and audits under statutory and international convention authorities. This process includes Alternative Inspection Programs (AIP) such as the Alternate Compliance Program (ACP), Maritime Security Program (MSP), Towing Safety Management System (TSMS), Streamlined Inspection Program (SIP), and Third-Party executed

¹ See the definition for Third Party in Section D of this Work Instruction.

functions explicitly governed by Coast Guard delegation agreements under 46 CFR Part 8, 46 CFR Part 139, and 46 CFR Part 28².

- B. Action. This work instruction applies to CG-CVC-4 personnel and a Third Party performing inspections, examinations or conducting services on U.S. or non-U.S. flag vessels. A Third Party may use this WI to structure submittals of Third-Party Inputs.³ The CG-CVC Mission Management System (MMS) Coordinator and other CG-CVC personnel will ensure compliance and consistency with application of this work instruction when receiving and documenting Third-Party Inputs⁴. If a Third Party desires to discuss an alternative approach to report oversight concerns, they may contact the Coast Guard Office of Commercial Vessel Compliance (CG-CVC) at FlagStateControl@uscg.mil.
- C. Background. The goal of the corrective action process is to address non-conformities and ensure they are not repeated, thereby improving the effectiveness of the Coast Guard 'Third-Party Delegations and Alternative Inspection Programs'⁵. The Coast Guard MMS and associated Corrective Action Request (CAR) process, as explained in References (b) and (h), provide the framework for handling inputs received from a Third Party. This WI defines how the Third Party that does work on behalf of the U.S. Coast Guard in accordance with References (c)-(g) may submit voluntary Third-Party Input. Furthermore, it outlines how the Coast Guard receives and processes these structured inputs, including the generation of an internal MMS CAR in accordance with References (h)-(i).
- D. Key Definitions.

Alternative Inspection Program (AIP) – Is a generic label for “(ACP, MSP, TSMS, SIP)” and may also cover accepted/similarly qualified organizations operating under 46 CFR Part 8, 46 CFR Part 139, and 46 CFR Part 28.⁶

Conformity - Fulfillment of a requirement.

Corrective Action - Action to eliminate the causes of detected nonconformity.

Corrective Action Request (CAR) – A Coast Guard internal process used to document nonconformities and their resolution by the Coast Guard using form CG-5200.1.

Nonconformity - Non-fulfillment of a requirement (nonconformance is common).

Oversight Nonconformity - Any non-conformity recognized by a CG-5P program element through auditing or any other methodology that requires a unit level corrective action.

Third Party (TP) - For the purposes of this Work Instruction, a Third Party is the term used for any non-Coast Guard organization that completes work on behalf of the Coast Guard, through an AIP, to ensure fulfillment of domestic and international marine safety, security, and environmental protection obligations. On all occasions in this WI these will be referred to as a “Third Party” (TP). TPs include, but are not limited to:

- Recognized Organizations (ROs) as defined in 46 CFR Part 8.
- Authorized Classification Society (ACS).

² Consistent with the IMO Instruments Implementation Code (III Code), the Coast Guard seeks to “stimulate a culture which provides opportunities for improvement of performance in maritime safety and environmental protection.” (III Code, A.28/Res.1070, para. 12).

³ This Work Instruction does not impose any additional requirements onto the TP; however, it does provide another structured avenue of communication to the Coast Guard regarding the interactions between the Coast Guard and TPs.

⁴ For CG-CVC personnel: compliance with MMS requirements is in accordance with COMDTINST 5200.4C.

⁵ As authorized under 46 CFR Parts 8, 139, and 28.

⁶ See 46 C.F.R. §§ 28.73, and 28.76.

- Third-Party Organizations (TPOs) approved under 46 CFR Part 139 for Towing Safety Management Systems (TSMS).
- Company as defined in 46 CFR 8.510.
- Certifying Entities (CEs) as defined in 33 CFR 96.120.
- Other Accepted/Similarly Qualified Organizations under regulations such as 46 CFR 28.73, and 46 CFR 28.76.

Third-Party Input - A structured submission from a TP containing: Nature, Objective Evidence, and Requirement explanations, which may trigger an internal Coast Guard CAR.

Unit Nonconformity - A nonconformity that is internal to a Coast Guard unit processes or procedures and can be addressed at the local level.

System Nonconformity - A nonconformity that is external to a Coast Guard unit's processes or procedures and must be addressed at a higher level, e.g. District, Area, HQ.

E. Applicability and Scope. This WI applies to inputs related to any function delegated to, or approved for, a Third Party, or enrolled entity to perform on behalf of or in conjunction with the Coast Guard. To ensure flag State obligations mandated by Ref. (a) this scope will include statutory certification, services, authorized inspection programs, and delegated functions under applicable federal regulations and international codes, it may be applied in the following manner:

- Vessels enrolled in ACP, MSP, SIP, or TSMS.
- Commercial Fishing vessels where accepted organizations or similarly qualified organizations are involved.
- TPs conducting statutory certification, services, and other delegated functions.⁷

However, this process **shall not** be used for the following:

1. **Appealing specific CG-835Vs or other enforcement actions.** The formal appeal process must be followed for such matters.⁸ While a Third-Party Input may be considered if it relates to an improper process that led to the enforcement action (e.g., failure to apply existing guidance), this input is strictly for internal Coast Guard Quality Management System (QMS) review. A Third-Party Input does not constitute an appeal, will not adjudicate the specific deficiency, and cannot be used to bypass, influence, or supplement the formal appeals process.

- Example:

An OCMI issues a CG-835V to a vessel based on a local policy's outdated regulatory interpretation. The vessel owner may choose to formally appeal that specific deficiency. Separately, the Recognized Organization (RO) identifies that the OCMI's local policy is in direct conflict with a recently published CG-CVC Policy Letter. The RO can submit a Third-Party Input under this WI.

Nature: *The OCMI is applying an outdated local policy.*

Objective Evidence: *The specific CG-835V and the conflicting local policy vs. the new CVC Policy Letter.*

⁷ "Delegated functions" is defined in 46 CFR § 8.100. For the purpose of this work instruction, "delegated functions" is synonymous with "statutory certification and services" as described in the RO Code and "approved functions" described in 46 CFR § 2.45-10 for non-U.S. flag vessels and 46 CFR § 139.115 for towing vessels subject to inspection under 46 CFR Subchapter M.

⁸ See 46 C.F.R. § 1.03.

Requirement: The new CVC Policy Letter that should be followed.

In this scenario, the Third-Party Input addresses the systemic issue (an outdated regulatory interpretation within a non-compliant local policy) to prevent future issuance on other vessels, while the vessel owner's formal appeal addresses the specific deficiency issued to them.

2. **Alleging Third Party Quality Management System (QMS) failures.** This process is not a mechanism for one TP to report or allege QMS non-conformities against another delegated entity. Recognized Organizations (ROs) making assertions regarding another RO must utilize the established PR17 process⁹. For all other entities, utilizing this Work Instruction to submit such allegations side-steps established oversight protocols and risks improperly removing the OCMI from a potential Quality Case assessment. Any allegations regarding a Third Party's QMS failure outside of the PR17 process must be directed to the cognizant OCMI and handled strictly through the established Coast Guard Quality Case process.¹⁰

- F. Discussion. Corrective actions are steps taken to prevent the recurrence of existing non-conformities by eliminating their causes. Issues that are detected through routine reviews of international convention, regulation, policy, or guidance used by a TP to help aid them in doing their work on the Coast Guards' behalf or instances where it is not clear applicable laws, regulations, policy, or guidance were followed by the Coast Guard may be sent to the Coast Guard via TP Input for assessment.

TP Inputs provide a method for a TP to document instances where it is unclear if applicable IMO instruments and conventions, U.S. laws and regulations, or Coast Guard policies, procedures, and other guidance were followed by the Coast Guard, or when discrepancies are found within these governing documents.

CG-CVC-4 will receive these inputs and, when valid and warranted, enter them into the internal CG MMS system to address non-conformities. Further discussion on this routing process is found in section H.

- G. Procedure for Submitting a Third-Party Input. After a TP has identified a Nonconformity, if the TP wishes to submit a Third-Party Input for review, the following actions should be taken:

1. Formatting a Third-Party Input. TPs may submit concerns to CG-CVC-4 in a simple email or letter. The **email or letter subject line** should follow this format;

TP Organization Name - Third-Party Input - AIP referenced if applicable.

To support timely and accurate processing, CVC-4 requests **the body of the submission clearly describe the Nature, Objective Evidence, and Requirement related to the concern.** Below is a description of 3 elements a voluntary submission must contain if TP wants to ensure CVC acceptance and review:

- i. Nature: Describe what the evidence shows. Include applicable information such as Vessel Name & Official/IMO#, Involved OCMI/Unit, etc. (*Do not provide specific MI names as this is Personally Identifiable Information and not necessary during CG review of Third-Party Input*).

⁹ See International Association of Classification Societies (IACS) PR 17 Reporting on deficiencies possibly affecting the implementation of the ISM Code on board.

¹⁰ See CVC-WI-005 (Series) - Request for Recognized Organization (RO) Internal Quality Management System (QMS) Review – “Quality Case.”

- ii. Objective Evidence: A concise summary of the circumstances, documents, or observations made by a TP indicating a gap, conflict, or unclear requirement.
 - iii. Requirement: The underlying regulation, international instrument, policy, or guidance that is contradictory, unclear, or may not have been followed appropriately. *(Every effort should be made to include specific citations and references to all pertinent requirements/policies/regulations/international conventions, etc.)*
2. Drafting a Third-Party Input. Enclosure (1) provides multiple examples of Third-Party Inputs that can be referenced by the TP to help with formatting and submission.
 3. Submitting the Third-Party Input. To fulfill flag State oversight obligations and ensure proper management of Coast Guard delegation agreements, a Third Party voluntarily submitting a Third-Party Input should route their correctly formatted submission directly to the office holding their approval authority;
 - i. Submissions regarding delegations under 46 CFR Part 8 and Part 28 should be sent to CG-CVC at USCG-FlagStateControl@uscg.mil.
 - ii. If the Third Party is an approved¹¹ TPO, the submission should be sent to both CVC-4 and the TVNCOE office at STL-SMB-TVNCOE@uscg.mil for TVNCOE review concurrent with CVC review.

H. CG-CVC-4 Procedure for Processing Third-Party Inputs.

1. The following outlines the receipt, review and processing of Third-Party Inputs.
 - i. Receipt: Third-Party Inputs are received directly from the TP primarily through USCG-FlagStateControl@uscg.mil and recorded within the internal CVC-4 Third-Party Input tracker. Upon receipt of the input CVC-4 will initiate processing and inform the TP that made the submittal their input has been received.
 - ii. Review: The designated CVC-4 personnel (and the TVNCOE, when applicable under 46 CFR Part 139) will review the Third-Party Input to determine if it contains the necessary Nature, Objective Evidence, and Requirements. This initial review merely formalizes the intake of feedback. If the input results in the generation of a System CAR that falls under the purview of a reviewing body, it will be routed to the appropriate Program Office. In accordance with ref (h) the receiving Program Office MMS Coordinator retains full authority to evaluate the submission and exercise an Accept or Decline Action. CVC-4 does not adjudicate non-conformities on behalf of other Coast Guard Program Offices.
 - If the information provided suggests a possible TP QMS issue, CVC-4 may initiate a separate Quality Case.
 - iii. Processing. Upon completion of the initial review CVC-4 will process the Third-Party Input in accordance with the guidance found in references (a, h, and i). To ensure proper coordination and that decisions are not made unilaterally on issues outside of CVC's remit, the input will be routed for review and adjudication via one of the following two paths:
 1. MMS CAR Generated: If the Third-Party Input warrants an MMS CAR, the original input and the draft CAR will be sent to the CVC Office Chief (or their delegated representative) for concurrence. Upon concurrence, the package is routed to the appropriate cognizant unit/office for further processing in accordance with ref (h).

¹¹ See 46 CFR § 139.

2. No MMS CAR Generated/Further Review Required: If the input will not be used to generate an MMS CAR, the original input will still be forwarded directly to the appropriate Program Office (or their delegated representative). This ensures the office responsible can review the submission and determine if any other non-CAR related actions or policy clarifications are necessary.

iv. Oversight and Notification.

As the Third-Party Input is being reviewed and processed, CVC-4 will act as the main point of contact with the TP submitter and maintain oversight of the Third-Party input. However, once an MMS CAR is generated and routed out of CVC to the cognizant Program Office for adjudication, CVC no longer maintains visibility on the timeline or status of that specific CAR. At that stage, the cognizant Program Office may reach out directly to the TP submitter to provide status updates, advise on the final result, or inform them if the input was accepted for action.

- I. Metrics. CVC will utilize internal processes to track metrics for Third-Party Inputs. This is essential to ensure this Work Instruction is functioning as intended and that CG-CVC is providing timely, consistent, and transparent service to TPs. The metrics will also provide Coast Guard leadership with objective evidence that TP concerns are taken seriously, are handled in a standardized manner, and are being used to strengthen Flag State oversight and overall system performance across ACP, MSP, TSMS, SIP, and other TP executed programs.

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By direction

Examples of Properly Formatted Third-Party Input

Example 1.

Email Subject Line: *TP RO Name - Third-Party Input - ACP*

Body of email:

Nature: TP notes that current Coast Guard ACP policies do not clearly allow liquid level gauging, instead of weighing, as a “reliable means” to verify CO₂ cylinder charge as permitted by MSC.1/Circ.1318/Rev.1, and suggests adding this option to the U.S. ACP Supplement.

Objective Evidence: RWG Statement 8 calls for alignment of firefighting inspection requirements with SOLAS/MS.C.1/Circ.1318, including liquid level gauging; NVIC 01-13 states "As an alternative, the owner or operator of U.S. flagged vessels subject to inspection may follow the hydrostatic testing requirements found in IMO MSC.1/Circ.1318/Rev.1 in lieu of 46 CFR 147.65 for high-pressure CO₂ cylinders associated with fixed gas firefighting systems.". Also, CG-ENG Policy Letter 02-23 references MSC.1/Circ.1318/Rev.1, Revised Guidelines for the Maintenance and Inspection of fixed Carbon Dioxide Fire-extinguishing Systems (25 May 2021) item 6.1 which allows weighing or other reliable means to confirm charge.

Requirement: The U.S. Supplement, together with IMO instruments and RO rules, must provide an equivalent level of safety to 46 CFR. The U.S. Supplement also provides Flag Administration interpretations necessary for ROs to perform their delegated statutory certification and services under the ACP. On the next revision to the U.S. Supplement the TP requests that a review and update, as needed, be conducted to address the above listed objective evidence reflecting MSC.1/Circ.1318/Rev.1 to allow liquid level gauging as an accepted method.

Note: While this example correctly demonstrates the submission format, its basis on a non-mandatory IMO Circular makes it a suggestion for policy review and not a formal non-conformity. Submissions of this nature will still be reviewed to determine the appropriate action.

Example 2.

Email Subject Line: *TP RO Name Here - Third-Party Input - MSP*

Body of email:

Nature: U.S. Coast Guard Marine Inspectors from MSU North Pole conducting an annual MSP inspection on the M/V LIGHTHOUSE IMO# 123456 did not use international convention requirements for the inspection pertaining to the statutory international certificates issued by us to the vessel.

Objective Evidence: This inspection led to four CG-835V's being issued, which are being appealed by the company using 46 CFR § 1.03 and this is separate from this Third-Party Input. The CG-835V's mentioned provided objective evidence on the incorrect use of 46 CFRs in lieu of international convention requirements.

Requirement: NVIC 01-13, Enclosures (3) and (4), section 1.9 (Deficiencies) requires compliance with the relevant convention or regulation. TP requests clarification and a review of this specific scenario to ensure future CG 835Vs are cited against the appropriate statutory certificate and convention requirements. Clarity should be made to this section to ensure future CG835Vs are

properly cited as appropriate to the statutory certificate the deficiency is being issued against.

Example 3.

Email Subject Line: *TP Name Here - Third-Party Input - SIP*

Body of email:

Nature: U.S. Coast Guard Marine Inspectors from Sector North Pole conducting an annual onboard SIP inspection of M/V LIGHTHOUSE O.N. 123456 on 01JAN2026 expanded the scope of their inspection beyond the guidance in NVIC 02-99 and conducted a traditional inspection, without providing any explanation or objective evidence to justify this expansion.

Objective Evidence: This annual SIP inspection lasted 8 hours and did not follow the VAP. Instead, the MIs conducted an in-depth inspection of all “essential/vital systems” without clear grounds for expanding the scope beyond what is normally required. No deficiencies were identified, and key SIP documents—Inspection Schedules, ISVs, and CRs—were neither requested nor reviewed; when offered, the inspectors declined, stating they were not needed for this inspection.

Requirement: The SIP inspection requirements in 46 CFR Part 8, as implemented by Coast Guard guidance, divide the annual SIP inspection into four elements: (1) administrative review, (2) SIP performance review, (3) material review, and (4) conclusion/recommendation. During this inspection, only the material review portion was addressed, and in an unusually expansive manner. The applicable guidance states: “Witness the testing of at least 3 subsystems; 1 lifesaving, 1 firefighting and 1 other essential/vital system. (USCG MI shall request the SIP Examiner demonstrate the inspection criteria for each of these subsystems.) Additional subsystem testing is subject to MI discretion.” Our understanding is that this means demonstrating the inspection criteria on representative items (e.g., a PFD, a portable fire extinguisher, and a bilge high-level alarm), not conducting a full, in-depth examination of all essential/vital systems. If a broader scope is now expected for SIP inspections, additional detail is needed so we can prepare appropriately.

Related SIP inspection guidance also states that “the USCG SIP Inspector will collect copies of all Inspection Schedule and Verification Forms (ISVs) and Correction Reports (CRs) they reviewed and include them in the record of the inspection activity within MISLE.” We were prepared to provide these documents, but the inspectors declined them, which caused confusion as to whether this requirement is still being applied.

Example 4.

Email Subject Line: *TPO/RO Name Here - Third Party-Input - TSMS*

Body of email:

Nature: The TP completed an external vessel audit on the vessel T/V SOUTH POLE O.N. 123456 and identified one major non-conformity on Aug 4th, 2025. As required by 46 CFR 138.410(f) the auditor notified the local OCMI and owner of this major non-conformity within 24 hours. The owner accepted the major non-conformity and took it for immediate action using their approved TSMS. Despite this, the vessel was detained, preventing use of a Permit to Proceed under 46 CFR 136.240(a). The TSMS, approved since 2018, contains step-by-step procedures to safely complete the Permit to Proceed trip for repairs. The detention has caused operational and commercial impacts and the OCMI failed to implement guidance within CG-CVC Policy Letter 17-10, dated Nov 28, 2017.

Objective Evidence: Once notified, the owner accepted the major nonconformity and initiated immediate corrective action under the approved TSMS. Despite this, the vessel was detained,

preventing use of a Permit to Proceed under 46 CFR 136.240(a). The TSMS, approved since 2018, contains step-by-step procedures to safely complete the trip for repairs. The detention has caused operational and commercial impacts. The OCMI has stated the detention is because the owner didn't notify them of the major non-conformity, which shows a failure of their TSMS. This detention has impacted the company's ability to move the vessel as allowed by 46 CFR 136.240(a) Permit to proceed to another port for immediate repairs IAW their approved TSMS.

Requirement: CG-CVC Policy Letter 17-10 dated November 28, 2017, Section 6. POLICY, part a. states the following: "As required by references (e) through (g), the owner, managing operator or TPO shall notify the local OCMI of any unsafe condition or major non-conformity and discuss procedures for correcting such an item in accordance with the approved TSMS. The OCMI shall document these conditions within MISLE as work list items." As required by 46 CFR 136.240(a)(1) the trip can be safely completed and the TSMS specifically spells out step-by-step how this trip is to be completed with this identified condition (major non-conformity).

The identification of the major non-conformity and the successful resolution of the condition, with the concurrence of the OCMI, demonstrate that the vessel's TSMS is functioning properly. Documentation of these conditions and the major non-conformities will not be displayed in the Coast Guard's public facing Port State Information Exchange (PSIX) vessel database." In that section reference (e) is part of Permit to Proceed and reference (g) is about external audits and identified major non-conformity. Understand that the OCMI may impose control actions, but in this case the company followed all the requirements for taking immediate actions using their approved TSMS, which addressed this specific major non-conformity with step-by-step procedures on how this trip is to be completed and completed safely for repairs. We also met the requirements for notifying the OCMI of this major non-conformity along with the company's procedures for correcting this item in accordance with their approved TSMS by 46 CFR 138.410(f) and PL 17-10. The company is appealing this CG835V and associated detention with the OCMI. TP requests a review of the current policy guidance for incorporation into the regulations for greater emphasis on OCMI compliance.