FOREIGN PASSENGER VESSEL EXAM SCORECARD

2024 Annual Report

Prepared by U.S. Coast Guard
Cruise Ship National Center of Expertise 8/6/2025

A. Introduction

The U.S. Coast Guard Cruise Ship National Center of Expertise (CSNCOE) is responsible for building and continuously improving the roadmap for the Foreign Passenger Vessel (FPV) compliance program in the USA. Our people, the Port State Control teams responsible for executing the mission around the nation, are our primary mission resource. The Scorecard is a knowledge management tool that scores each FPV examination to measure effectiveness of our mission resources.

The CSNCOE strives to enhance FPV compliance program governance by using Key Performance Indicators (KPI) to drive training and mission objectives. The three KPIs for FPV compliance program quality are impact, consistency, and validity. Port State Control team scores and deficiency validations inform the metrics used for KPI analysis. 2024 marked the second full year of FPV compliance examinations using the Scorecard. While 2023 served as the benchmark for KPI analysis, this year was the first complete year of data collection for all three KPIs.

Coast Guard Prevention leaders expect continuous program improvement oriented towards mission excellence, and cruise industry stakeholders expect high-quality service by our teams when executing our mission. This report provides a detailed summary of our Port State Control teams' performance in completing FPV examinations in 2024

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B. Background

The Scorecard is a knowledge management technology that ensures our Port State Control teams are executing the mission with a tool that is modernized, organized, and centralized. Automation built into the Scorecard provides an efficient solution to reduce manual research efforts and minimize reporting errors. Since all teams performing Certificate of Compliance (COC) examinations on FPVs utilize the Scorecard for recording Port State Control findings, it provides a centralized solution to ensure all local operational units are using the same tool and procedures, resulting in improved mission execution. The Scorecard tool is updated each year based on user feedback and procedural updates to drive Port State Control teams collectively toward mission excellence.

Mission excellence can be achieved if U.S. Coast Guard teams are routinely observed to consistently and accurately identify and record noncompliance in accordance with International and Domestic Port State Control policy. The 3 quality objectives that represent mission excellence are: 1) Identify noncompliance, 2) Consistently record noncompliance, and 3) Avoid writing invalid deficiencies. The FPV compliance program KPIs, 1) Impact, 2) Consistency, and 3) Validity, correspond to these 3 quality objectives. The development of these KPIs was initially presented in the 2023 Annual report, but further analysis is provided later in this report.

C. 2024 Highlights

U.S. Coast Guard Port State Control teams performed 323 FPV examinations in calendar year 2024. This represents a 4% increase in mission demand for Port State Control examinations on FPVs compared to 311 for calendar year 2023. Figure 1 shows the regional mission demand of FPV compliance examinations in each of the Coast Guard Districts.

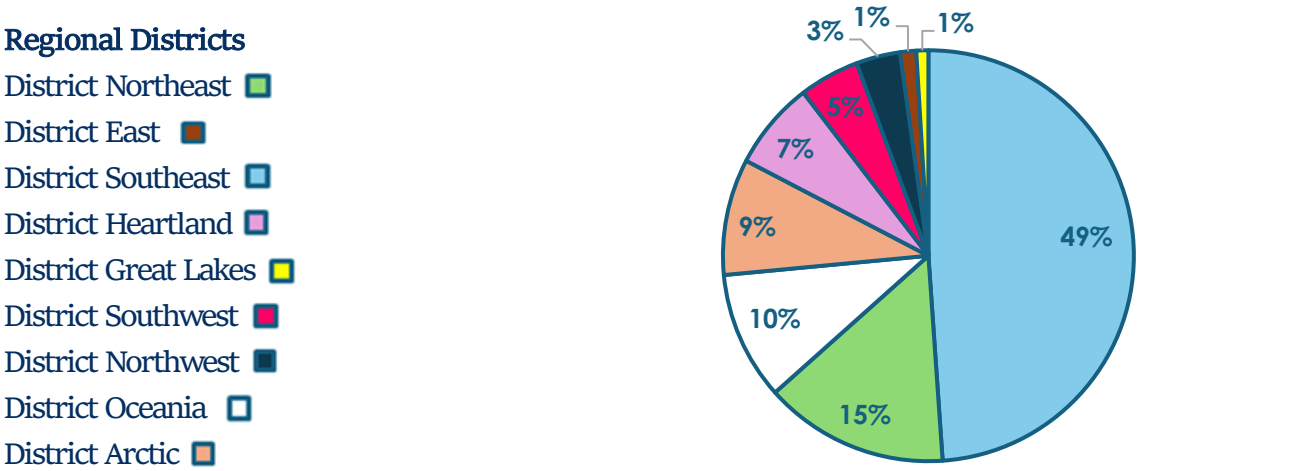


Figure 1. Regional distribution of COC examinations in 2024.

CSNCOE collaboration with FPV operators helped the Coast Guard execute this mission more effectively by scheduling COC examinations in locations where the operational units are more likely to achieve mission excellence and deliver high-quality service. This optimization of geographic mission demand allows the Coast Guard to focus FPV examination proficiency at Tier 1 units, while reducing FPV competency demand at other units so they may flexibly manage personnel to target competency development for the more routine compliance missions in their jurisdiction. In 2024, 78% of the COC examinations were performed by the ten Tier 1 units, while 12% were performed by Tier 2 units, and 10% performed by Tier 3 units. This is an improvement from the 74% Tier 1 exam ratio in 2023, but still highlights an opportunity to continue to collaborate with ship operators to increase examinations in Tier 1 ports.

In 2024, CSNCOE attended a total of 64 examinations, including 14% of the Tier 1 exams, 10% of the Tier 2 exams, and 81% of the Tier 3 exams. CSNCOE was unable to meet mission demand in attending all 31 exams performed in Tier 3 ports due to workforce capacity limitations. Table 1 shows the breakdown of CSNCOE attendance for COC examinations in 2024. CSNCOE attendance at 64 examinations represents a 42% increase from 2023, which shows the increased demand for mission assistance. Notably, CSNCOE assisted with 35 exams at Tier 1 units compared to 15 exams in the previous year. Additionally, CSNCOE only assisted with 4 exams at Tier 2 units compared to 13 exams in the previous year.

Tier 1 Units	**35**	**Tier 2 Units**	**4**	**Tier 3 Units**	**25**
Sector Miami	19	MSU St. Thomas	3	Sector Northern New England	5
Sector San Juan	8	Sector Western Alaska	1	Sector Guam	4
MSU Port Canaveral	3			Sector Charleston	3
Sector Boston	2			MSU Lake Worth	2
Sector Los Angeles/Long Beach	2			Sector Jacksonville	2
Sector Puget Sound	1			Sector Maryland-NCR	2
				Sector Northern Great Lakes	2
				Sector Virginia	2
				Sector Mobile	1
				MSU Cleveland	1
				Sector San Francisco	1

Table 1. CSNCOE Exam Attendance Summary

FPV compliance should also be considered over the time dimension to understand the seasonal mission demand on the Coast Guard. CSNCOE collaborates with ship operators and operational units to build a

mission forecast for smart resource planning and assignment. Figure 2 below shows the overall mission demand on Port State Control teams over the course of the year. The predictable peak spring and fall seasons are observed every year, although the peak month may shift right or left in any given year.

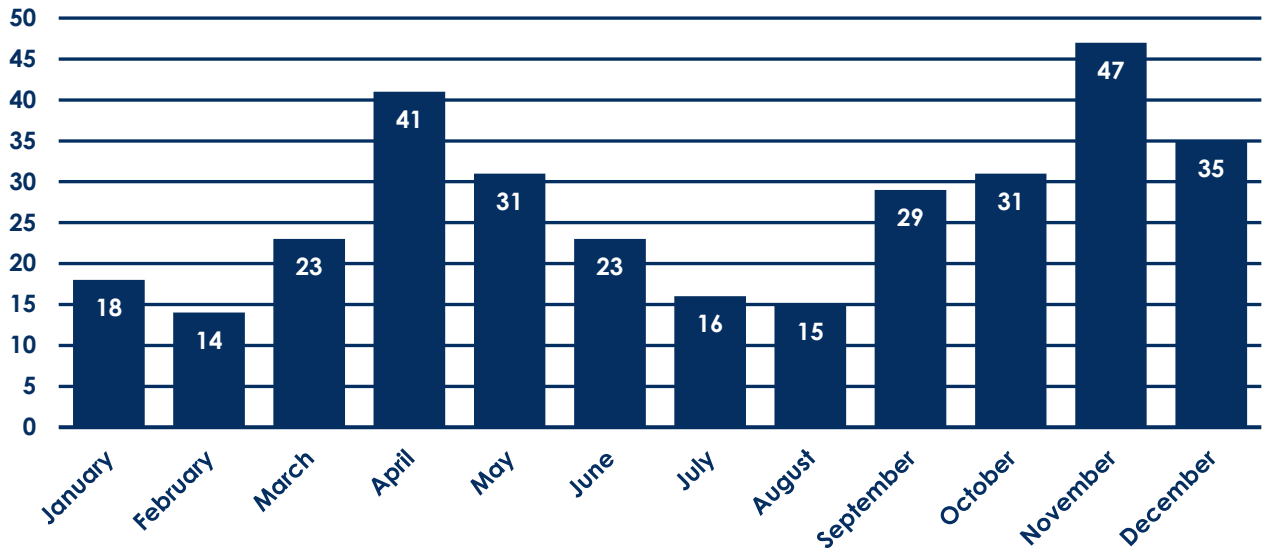


Figure 2. Monthly distribution of COC examinations in 2024.

D. Impact

U.S. Coast Guard teams must have an impact on the Maritime Transportation System by identifying noncompliance in safety, security, and environmental protection. The average score among the Port State Control teams performing the 323 COC examinations was 13.46 in calendar year 2024, which represents a 12% increase from 2023. The value 13.46 is a numeric risk reduction value representing the amount of noncompliance identified by the average Port State Control team performing an FPV compliance examination. Figure 3 below shows the distribution of Port State Control team scores for all exams in 2024.

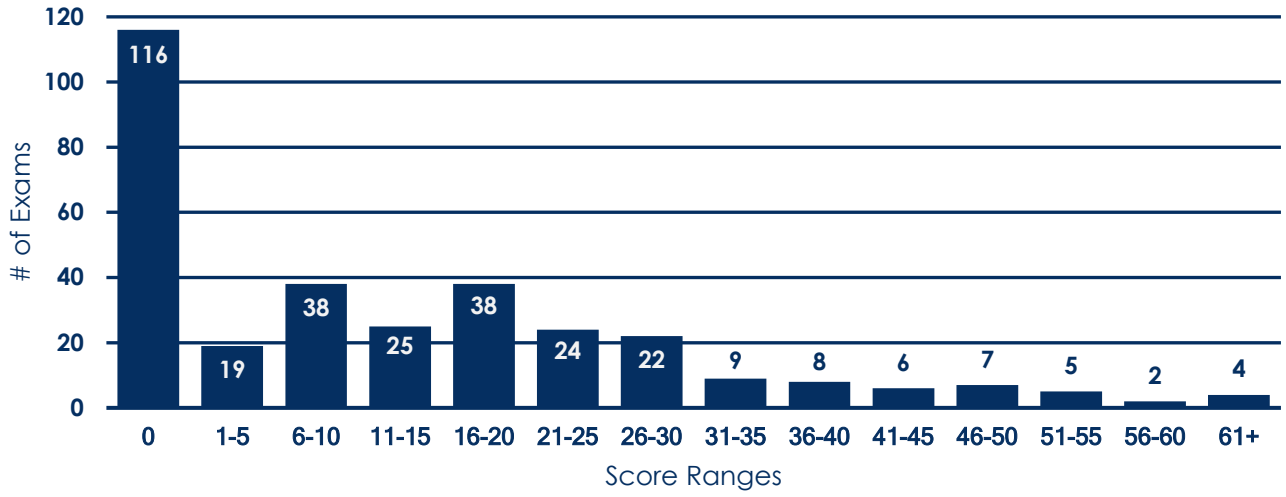
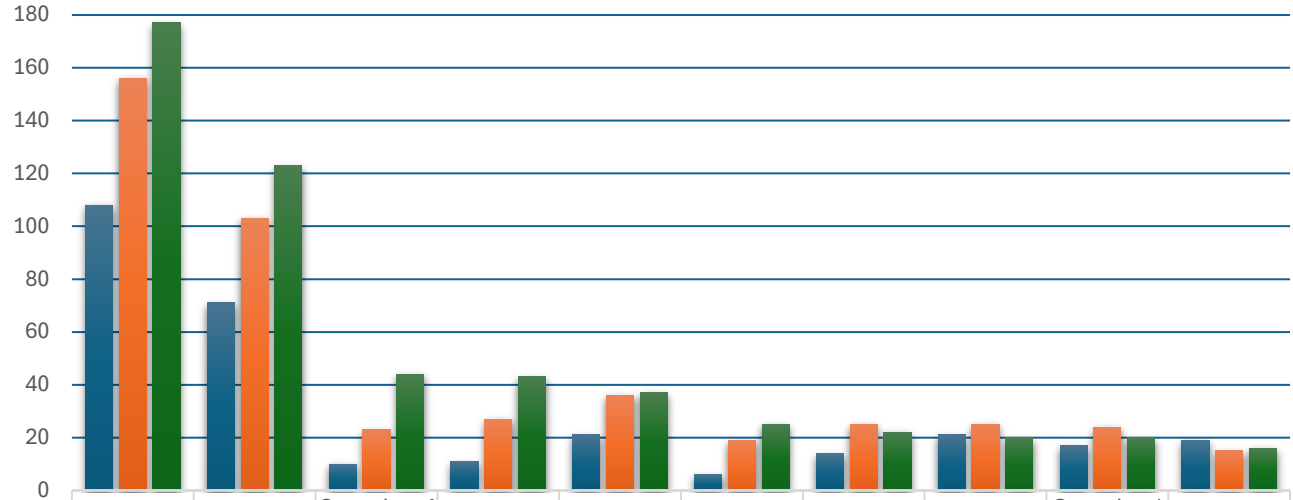


Figure 3. FPV Examination score distribution for 2023.

As seen in previous years, there remains a high percentage of examinations, 36% of the 323 exams, resulting in a score of zero. However, this figure has improved from 2023, indicating less of a chance that Coast Guard teams have no measurable impact on ship safety during the examination. The frequency in the remaining score ranges is generally consistent with that of previous years.

It is also important to consider what deficiencies are the biggest drivers in the examination scores. Table 2 below summarizes the top ten deficiencies issued by Port State Control teams nationally, including a 3-year trend. There is a notable annual increase in the most common deficiencies, but CSNCOE does not attribute this to worsening ship conditions, but rather improved performance of Port State Control teams in properly recording deficiencies.



	Fire Doors	Means of Escape	Operation of Fire Protection Systems	Fire Prevention - Space Cat.	Fire Safety - Waste Receptacles	Abandon Ship Drills	Fixed Fire Fighting Installations	Lifeboats	Operational Readiness of Lifesaving Appliances	Electrical
2022	108	71	10	11	21	6	14	21	17	19
2023	156	103	23	27	36	19	25	25	24	15
2024	177	123	44	43	37	25	22	20	20	16

Table 2. Top Ten Deficiencies 3-Year Trend

E. Consistency

U.S. Coast Guard teams must also adhere to their obligations as a Port State entity by reporting all identified deficiencies, and in a way that reflects professionalism and accountability. In 2023, the Consistency KPI among the three tier groups was 87%, indicating slight inconsistency. In 2024, this tier group consistency was 26%, which is considered an unacceptable degree of inconsistency. In 2023, the Consistency KPI among Tier 1 units was 60%, indicating notable inconsistency. In 2024, the Tier 1 units had a consistency value of 58%, also showing further decline in consistent performance. Table 3 on the following page summarizes the comparison between the 2023 and 2024 scores. Most notably, the average exam scores in the Tier 2 and Tier 3 groups increased from about 16 in 2023 to the range of 23-26 in 2024, while the Tier 1 average remained at 10. Additionally, most of the Tier 1 units showed substantial

change in average exam scores compared to the previous year. Resembling last year's data, Tier 2 and Tier 3 units are recording more noncompliance than Tier 1 units throughout the nation, which reveals a need for CSNCOE to ensure exam attendance with each Tier 1 unit at least once per year to promote consistency.

Tier 1 Units	No. of Exams	Average Score	Annual Change
Sector Miami	75	12.61	↑ 171%
Sector San Juan	36	12.24	↓ 15%
Marine Safety Unit Port Canaveral	27	5.84	↓ 57%
Sector New York	26	6.16	↓ 50%
Sector Honolulu	23	8.01	↓ 37%
Sector Boston	14	6.28	↑ 46%
Sector Southeast Alaska	14	25.79	↑ 1%
Marine Safety Unit Texas City	13	2.30	↓ 66%
Sector Los Angeles/ Long Beach	11	9.04	↓ 23%
Sector Puget Sound	11	10.38	↑ 83%
Tier Groups			
Tier 1 Units	252	10.34	↓ 1%
Tier 2 Units	40	23.21	↑ 41%
Tier 3 Units	31	26.22	↑ 56%
All Units	**323**	**13.46**	**↑ 10%**

Table 3. Scorecard averages for 2024.

F. Validity

U.S. Coast Guard teams typically have multiple findings during examinations, but some may be merely observations, while other are deficiencies. Observations shall not be written as deficiencies if they do not substantiate noncompliance with a statute. Conversely, all findings that do substantiate noncompliance with a statute should be documented in sufficient detail to secure the rectification of all deficiencies by the Flag Administration and the master.

CSNCOE first looked at the validity metric in 2023, but did not have a complete dataset until this year. Validity is determined by team review of each deficiency based on documented objective and subjective criteria rooted in U.S. Coast Guard Port State Control policy. Valid deficiencies are those that list an applicable standard, an observation that indicates noncompliance with that standard, and the correct

component code and cite for the finding. Invalid deficiencies can be defined as follows: 1) Unsubstantiated Finding, 2) Incorrect Cite, 3) Incorrect Component Code, or 4) Incorrect Cite and Code. Port State Control teams issued 780 deficiencies to FPVs during COC examinations in 2024. Recalling the deficiencies listed in Table 2, Table 4 is presented below to give an example of the deficiency dataset.

Top Ten Deficiencies	Validity %		Lowest Validity % Deficiencies	Validity %
07105 – Fire doors/openings in fire-resisting divisions	82%		09211 – Steam pipes & pressure pipes	0%
07120 – Means of Escape	85%		16103 – Ship security plan	0%
07123 – Operation of Fire Protection Systems	64%		02103 – Stability/strength/loading information & instruments	0%
07101 – Fire Prevention structural integrity	70%		11131 – On board training & instructions	23%
07199 – Other (fire safety)	62%		01108 – Load lines (including Exemption)	23%
04110 – Abandon Ship Drills	96%		07124 – Maintenance of fire protection systems	23%
07109 – Fixed fire extinguishing installation	68%		09207 – Obstruction/slipping, etc.	23%
11101 – Lifeboats	35%		13108 – Operation of machinery	40%
11129 – Operational Readiness of Lifesaving Appliances	75%		09209 - Electrical	50%
09209 – Electrical	50%		07108 – Ready availability of fire fighting equipment	50%

Table 4. Sample Deficiency Validity Summary

Validity is an important factor in evaluating overall compliance program excellence. In comparing the top ten deficiencies driving the Impact KPI to the validity of those same deficiencies, an inference can be made that impact values would be different if all deficiencies were valid. This is an interesting observation although CSNCOE makes no connection between the Impact KPI and Validity KPI. Instead, CSNCOE reviews the Validity KPI to inform unit coaching and training efforts. In some cases, low validity percentages on high frequency deficiencies will lead to a Recommended Practice to guide Port State Control teams in recording valid deficiencies. Referring to Table 2 and Table 4, the reader can see the increase in fire door, means of escape, and Abandon ship drills deficiencies, which can be attributed to the Recommended Practices published on these topics over the past few years. There are many nuances in the statutes for these topics, so the Recommended Practices are provided to make it easier to detect and accurately record Port State Control deficiencies. Overall, the national Validity KPI for 2024 was 72%, which indicates that there is room for CSNCOE improvement to provide guidance to Port State Control teams nationwide to improve performance. In CSNCOEs estimation, the success of the Recommended Practices starts to show up in the KPIs about 6-12 months after publication when teams are more familiar.

G. Summary

The FPV compliance program is an ever-evolving mission that provides opportunities for CSNCOE to learn, grow, and improve mission excellence nationwide. The regional distribution of examinations was not significantly different than that of previous years, with the majority of exams being conducted in the Southeast region, and 2nd most occurring in the Northeast. An end of year review gives CSNCOE insight on how to plan mission attendance the following year, with mission peaks taking place in the spring and fall seasons. However, the peak month has been observed to change from year to year in comparison with the 2022 and 2023 Annual Reports. CSNCOE forecasting collaboration with ship operators continues to enhance our understanding of industry movement trends to better prepare our Port State Control teams around the country.

CSNCOE attendance at COC examinations at different ports increased by 42% from 2023, which shows an increased demand for our services. This is particularly true with the Tier 1 units, where CSNCOE attended 35 examinations in 2024. Our team attended the majority of Tier 3 unit examinations, but much less with the Tier 2 examinations. Analysis from the 2023 report provided useful feedback for us to focus exam attendance efforts with certain Tier 1 ports, which has improved their KPI performance. Likewise, 2025 exam attendance will be guided by the feedback in this report.

The Impact KPI this year shows an increase in the national average, despite logging 116 examinations with a score of zero which represents 36% of the total examination population. In CSNCOE's experience, it is unlikely that one-third of the examinations revealed no noncompliance. Much like the scores in the 30+ range from Figure 3, scores should be less likely in the zero to 5 range with a more normal distribution centering on the mean. CSNCOE will continue to strategically attend examinations with units that have a higher ratio of examination scores of zero.

The Consistency KPI in 2024 showed an unacceptable trend with the Tier groups' consistency dropping to 26% and Tier 1 units' consistency dropping to 58%. The Tier groups consistency is easily understood by considering the large shift in high average examination scores by Tier 2 and Tier 3 examination teams, while the Tier 1 group remained level at about 10. The inconsistency observed among Tier 1 units is understood by considering the large annual swing in average score by individual units. CSNCOE does not yet fully understand the large annual score swing but will seek resolution to this inconsistency by attending an exam and providing FPV tailored training with each Tier 1 unit in 2025.

While the Scorecard has made it easier for Port State Control teams to find and record the appropriate statute and component code, it also clearly documents the observation in detail to substantiate noncompliance with the listed requirement. However, writing deficiencies is difficult due to the complexity of findings and various applicability dates. The Recommended Practices have greatly improved deficiency validity over the past year, so CSNCOE will continue to develop those tools to minimize invalid

deficiencies. The objective for the FPV compliance program is for all Port State Control teams to be proficient enough to document appeal-proof deficiencies.

In conclusion, CSNCOE continues to learn about the best ways to measure Port State Control team performance during FPV examinations. This year was a success story for CSNCOE because our team developed a process with criteria to effectively evaluate KPIs. This year also revealed some undesirable metrics, but they inform our targeted opportunities for improvement. This feedback provides CSNCOE with exam attendance priorities for 2025 and beyond.