



16711
G-PCV Policy Letter 06-04

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To: Distribution

Subj: UNINSPECTED COMMERCIAL VESSEL SAFETY PROGRAM MANAGEMENT;
USCG AUXILIARY EXAMINER AND DOCKWALKING AUGMENTATION

Ref: (a) Implementation of the CFV Regulations, COMDTINST 16711.13 (series)
(b) CFVS Safety Training and Qualification, COMDTINST 16711.14 (series)
(c) Auxiliary Manual, COMDTINST M16790.1 (series)
(d) Navigation and Vessel Inspection Circular No. 4-82

1. Purpose. This letter provides guidance to: District Uninspected Commercial Vessel Safety and Commercial Fishing Vessel Safety (CFVS) Coordinators; Officers-In-Charge, Marine Inspection (OCMI)/Sector Commanders; unit CFVS Examiners, Uninspected Towing Vessel (UTV), and Uninspected Passenger Vessel (UPV) Examiners; and Coast Guard Auxiliary members responsible for management of the Commercial Vessel Safety Program. In particular, this letter details requirements and responsibilities for Coast Guard Auxiliary Commercial Vessel Examiner and Dockwalker training, qualification, documentation, funding and support.

2. Directives Affected. None.

3. Applicability. District Commanders and local OCMI/Sector Commanders shall ensure these guidelines are followed in the augmentation and oversight of Coast Guard Auxiliary members in the Uninspected Commercial Vessel (UPV, UTV, and CFVS) Safety Programs.

4. Background. The Uninspected Commercial Vessel Safety Programs focus on ways to achieve safety improvements in the industry. One of the key elements of these programs is the voluntary dockside vessel examination that is "no-fault" and "non-adversarial." Members of the Coast Guard Auxiliary may, under the direction of the host OCMI/Sector Commander and/or District Coordinators, provide direct critical support augmenting and enhancing these Coast Guard efforts both dockside and at the unit.

5. Discussion. The requirements for Auxiliary augmentation in and their responsibilities to the UPV, UTV, and CFVS programs are similar. Any particular differences will be addressed where and when appropriate. This Policy Letter is not intended to limit Auxiliary support to only the CFVS, UPV, and UTV programs. There may be other areas where an Auxiliarist can lend support as deemed appropriate by the host OCMI/Sector Commander, including but not limited to; IT support, data entry, records maintenance, Investigating Officer support, casualty analysis and tracking, and administrative support.

- a. Because of the high level of professional knowledge and responsibility associated with an examiner qualification, stringent standards must be met to attain and retain status as a CFVS, UPV, or UTV Examiner. An "examiner" is an individual who actually goes aboard a vessel and conducts a safety survey of the vessel. The examiner will determine

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if the vessel is in full compliance with all applicable regulations. If the vessel is not in compliance, the examiner will note deficiencies and issue a worklist for the owner or operator to complete before a CFVS Examination decal can be issued for the vessel.

- b. Several formal training courses are provided at Training Center (TC) Yorktown based on standard course curricula by subject matter experts on the interpretation of applicable laws, regulations, and policies regarding uninspected commercial vessels. Due to the limited number of classes at TC Yorktown and availability of quotas, the training for Auxiliary examiners is more often accomplished in the field through on-the-job training (OJT) and on-the-job qualification (OJQ) through the District Coordinators, host OCMI/Sector Commander, and local Examiners. Training and qualification standards and additional local requirements must be met for an Auxiliarist to qualify as a specific type vessel examiner. The Auxiliarist must receive certification/designation as an examiner from the host OCMI/Sector Commander prior to conducting dockwalking and dockside safety examinations independently. Minimum annual job performance standards must be achieved to retain certification as a qualified examiner with the host OCMI/Sector Commander.
- c. Dockwalking is an integral part of the overall safety programs. A "dockwalker" is an individual who meets with vessel owners, operators and crews performing outreach and safety education initiatives. A dockwalker also solicits to conduct a safety examination on the vessel. Completing training for and qualification as a dockwalker are part of the requirements for becoming an examiner. Auxiliarists may receive certification/designation to perform dockwalking, but not necessarily to conduct dockside safety examinations as determined by their availability and level of support to the programs and the needs or desires of the host OCMI/Sector Commander.
- d. It is essential that all examinations or other contacts with commercial vessels by Auxiliarists are properly documented in MISLE. The Auxiliarist must ensure that all examinations and hours dedicated to program activities are also recorded in AUXDATA. The effectiveness of Auxiliary augmentation in the CFVS, UPV, and UTV programs can then be measured utilizing information in the respective databases.
- e. Auxiliarists conducting dockwalking activities, dockside safety observations and outreach, and dockside safety examinations are entitled to reimbursement for travel and out-of-pocket expenses as provided in 14 USC 831. A member of the Auxiliary assigned to such duty, pursuant to regulations issued by the Secretary, will be paid actual necessary traveling expenses, including a per diem allowance, in conformity with Joint Travel Regulations in lieu of subsistence, while traveling and while on duty away from his/her home. Auxiliarists must be in receipt of orders from the host OCMI/Sector Commander prior to performing dockside activities, to ensure reimbursement for expenses, and for legal protection purposes.
- f. Other safety program support activities may be performed by Auxiliarists who may not have qualified as a dockwalker or examiner. As deemed appropriate by the host OCMI/Sector Commander and considering the knowledge, skills, and capabilities of the Auxiliarist, he/she may augment at the unit by providing IT support, data entry, records maintenance, Investigating Officer support, casualty analysis and tracking, and administrative support. It is recommended that blanket orders authorizing support activities be issued to augmenting Auxiliarists, with an endorsement whether or not travel to and from the unit will be reimbursable.

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6. Implementation.

- a. Prospective dockwalkers and examiners shall complete the necessary training and meet the Personal Qualification Standards (PQS) in order to qualify and annually recertify to perform those duties.
 - (1) Host OCMI/Sector Commands should submit an Electronic Training Request (ETR) in accordance with local procedures and COMDNOTE 1540 for Auxiliarists desiring to attend formal training. The District CFVS Program Coordinator will assist G-PCV-3 with assignment priority for each class. Formal training is not required for dockwalking or examiner qualification, but it is highly recommended. Initial dockwalking and examiner training will be accomplished in the field through OJT. The Auxiliarist's OJT shall reflect topics covered at TC Yorktown, encompassing all federal safety regulations that apply to uninspected commercial vessels. Dockwalking and the type of vessels an individual is certified to examine and all local concerns will govern the depth of training required. This determination rests with the host OCMI/Sector Commander. Upon completion of a training program and meeting the PQS requirements, the Auxiliarist will be issued a Letter of Designation (LOD) as a dockwalker and/or an examiner. The Auxiliarist must recertify annually and receive a Letter of Recertification (LOR) or endorsement on the LOD.
 - (2) Augmenting personnel shall attend annual refresher training provided or sponsored by the host OCMI/Sector Commander or District Coordinator. Addressing regulations and policies directly associated with uninspected commercial vessel examinations, the annual training shall be completed prior to the anniversary date of the LOD.
 - (a) A training certification memorandum or letter shall be issued for each qualifying person indicating that the individual:
 1. Understands and can employ available job aids and all appropriate forms;
 2. Understands and can refer to all current policies; and
 3. Possesses the ability to interact with the industry, be able to discuss safety and lifesaving equipment requirements, and explain the intent of the dockside examination program.
 - (b) The original training certification memorandum or letter will be given to the Auxiliarist and a copy will be forwarded to the respective District Coordinator. The Auxiliarist will ensure that an additional copy is also sent to the Auxiliary Branch Chief CVE Division (BC-MV), District Staff Officer Marine Safety (DSO-MS), and Director of Auxiliary (DIRAUX) for the respective region.
- b. To attain a dockwalker and/or examiner LOD, an Auxiliarist must undergo a screening interview, meet all assigned prerequisites, participate in and complete an interim and OJT/OJQ program, and successfully display competency during an oral board.
 - (1) The screening interview should cover the program mission, prerequisites, man-hours each member must contribute, and training requirements to maintain status as a dockwalker or examiner after qualification is attained. A written list of requirements and expectations will serve all parties well. The prospective dockwalker/examiner

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should be queried to determine: commitment and intentions regarding the safety programs; some notion of ability to relate to industry personnel; interpersonal skills of the member; experience working independently in sometimes unfriendly and unfamiliar surroundings; the ability to make cold calls to industry stakeholders; and the level of support expected and needed – self starters preferred. Effort should be made to include a qualified Auxiliary examiner as part of the interview team.

- (2) The following prerequisites/competencies are desired in individuals seeking vessel examiner qualifications:
 - (a) Auxiliary Vessel Safety Examiner experience of at least three (03) years;
 - (b) Auxiliary Program Visitor qualification; and
 - (c) Dockwalker qualified with at least one (01) year experience.

Professional training and/or experience in the marine industries, or similar expertise such as holding a merchant mariner's license issued by the Coast Guard or being qualified as a Boating Safety Instructor, may readily substitute for some of the above competencies at the discretion of the host OCMI/ Sector Commander.

- (3) Prior to OJT/OJQ, the Auxiliarist must, at a minimum, complete 40 hours, or equivalent time in drills, working with the host OCMI/Sector Command in the vessel safety program. All facets of the dockwalker and examiner programs shall be introduced, including, but not limited to, dockside safety observations, reconciling data in MISLE, and use of available job aids and referencing pertinent guidance. This period is also the time to introduce the individual to and begin work on the PQS associated with ultimate qualification as an Uninspected Vessel Safety Examiner.
- (4) Following successful completion of this interim period, examiner candidates will be assigned an examiner-qualified mentor to assist and supervise their OJQ efforts. OJQ includes a trainee performing a vessel safety task under supervision of a qualified examiner. This will include the trainee assisting or taking the lead in completing a certain number of examinations assigned by the host OCMI/Sector Commander. Each OCMI/Sector Commander must ensure the information and guidance found in the references are incorporated into the PQS/OJQ program. Region-specific subject matter or requirements may be included in the PQS/OJQ program as deemed appropriate by the host OCMI/Sector Commander.
- (5) After the PQS has been successfully signed-off and the mentor is comfortable with the knowledge base and OJQ performance of the examiner candidate, a qualification board should be scheduled. The format of each board will be at the discretion of the host OCMI/Sector Commander. However, it should include and should be led by an experienced examiner. The candidate is expected to stand before a qualification board within one year of entering the Vessel Safety Program. The OCMI/Sector Commander should assemble a qualification board at the earliest opportunity after a candidate has completed OJQ requirements. Flexibility is intended in all program elements, but do not discourage prospective examiners by delaying completion of the final stage of the qualification process.

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- (a) If the candidate does not stand before a qualification board within one year, or fails to pass the evaluation, the host OCMI/Sector Commander must decide either to extend the OJQ time frame or discontinue the candidate's involvement in the program. Documentation of the OCMI/Sector Commander's action will be forwarded to the District CFVS Coordinator and the Auxiliary Division Chief.
- (b) If the candidate passes the board evaluation, a recommendation will be forwarded to the host OCMI/Sector Commander that the candidate be designated a qualified dockwalker and/or examiner. A qualified dockwalker is certified to provide outreach to the industry and vessel personnel, conduct dockside safety observations, and recruit vessels for dockside safety examinations. In addition to dockwalking activities, a qualified examiner is certified to conduct dockside examinations independently or unaccompanied within the limits or restrictions in the Letter of Designation (LOD).

An example of a CFVE certification is included in enclosure (1) of reference (b). This sample certification may be modified for issuance to individuals who qualify for examining UTVs and UPVs, or will only be performing dockwalking activities.

1. The LOD will include:

- a. Competency level - the extent of dockwalking activities that may be conducted, or the types of vessels on which examinations may be conducted;
- b. Requirements to maintain dockwalker and/or examiner qualification/certification - annual training, minimum vessel safety employment hours and required number of examinations per year; and
- c. Anniversary date to establish the time limit for meeting vessel safety employment hours, annual training and vessel examination requirements for recertification.

2. The original LOD will be sent to the individual. It is the responsibility of the qualified Auxiliarist to forward a copy of their LOD to the Auxiliary Branch Chief CVE Division (BC-MV), Division Staff Officer Marine Safety (DSO-MS), Division Chief CVE Division (DVC-MV), and DIRAUX. The host OCMI/ Sector Commander shall forward a copy to the District Coordinator.

(6) Augmenting examiners must maintain their status as a qualified examiner in order to be recertified on an annual basis.

(a) A Letter of Recertification (LOR) confirms that the examiner has:

1. Completed annual refresher training and the minimum number of employment hours/drills/examinations agreed upon during the initial interview process and set forth by the host OCMI/Sector Commander; and
2. Completed at least 80 uninspected commercial vessel safety employment hours to meet Auxiliary program requirements.

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- (b) Should special circumstances arise that prevents an examiner from completing the required training or minimum number of program hours (such as medical conditions, family issues, etc.), the host OCMI/Sector Commander will evaluate the circumstances and may assign alternate activities for the examiner to remain current and involved in the program. The circumstances will be documented in a memorandum and considered during the evaluation for recertification.
- (7) Augmenting dockwalkers must also maintain their status as set forth in their LOD in order to be recertified on an annual basis. An LOR will confirm completion of the minimum number of program employment hours, training activities, drills, and dockside visits. Special circumstances may also apply for not meeting dockwalker status requirements and must be evaluated by the host OCMI/Sector Commander. The circumstances will be documented in a memorandum and considered during the evaluation for recertification.
- (8) Annually, but not later than 15 January of each year, the host OCMI/Sector Commander will review and evaluate the field activities and number of vessel safety program hours performed by all Auxiliarists currently active in their programs. The results of the "audit" will be forwarded to the District Coordinator and Auxiliary Division Chief (MV) for review.
 - (a) If the audit shows any Auxiliarist failed to meet the minimum requirements to maintain their active status established by the host OCMI/Sector Commander, and the member wishes to continue participation in the program, the member may be placed in a probationary status and issued a conditional LOR for up to one year.
 - (b) The conditional LOR should require the member meet the annual training and minimum number of program hours for the current year and make up the number of hours not met the prior year. Special circumstances should be taken into consideration when listing the requirements in the conditional LOR.

(AUXDATA must reflect the qualification status of the individual, as well as the Required Examinations per Year (REYR) and the Re-Work Required (RWKR).)

- (c) If the member fails to meet the training and time requirements during the probationary period, the host OCMI/Sector Commander shall ensure that:
 - 1. Proper documentation states the requirements not met by the member and whether or not the member will be retained in or removed from the program;
 - 2. A copy of the documentation is forwarded to the District Coordinator and the Auxiliary Division Chief (MV);
 - 3. The Auxiliarist's orders are cancelled and he/she is prohibited from conducting any further dockside activities and/or examinations; and
 - 4. The Auxiliarist is notified in writing that he/she is no longer qualified as a dockwalker or examiner and that he/she shall not represent him/herself or conduct activities as such. An appeal may be submitted, but the host OCMI/Sector Commander's decision will be final.

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5. If accepted to be reinstated into the Uninspected Vessel Safety Program, the Auxiliarist will be required to requalify subject to the satisfaction of the host OCMI/Sector Commander to attain an LOD.
- c. Records must document an Auxiliarist's work in the field, i.e. MISLE data, and program hours in AUXDATA. It is critical that data regarding dockside safety observations, regular dockside examinations, follow-up visits, 4100F boarding follow-up exams, and post-termination exams be fully documented and entered into MISLE. Accurate data in the systems will provide an effective tool for measurement of program activities, show level of effort, and provide a record of man-hours dedicated to programs by Auxiliary personnel.
- (1) Each Auxiliary dockwalker/examiner may, at the discretion of the host OCMI/ Sector Commander, be given access to a Workstation III and set up with a MISLE account. The host OCMI/Sector Commander will determine if the member is to enter the activity data in MISLE or submit a copy of the Examination Booklet or other such activity documentation to the unit for subsequent data entry. After a safety examination is conducted, the examiner is responsible for:
 - (a) Ensuring the data is entered into MISLE, the MISLE entry ownership and control is forwarded to his/her supervisor at the Sector, and that individual is notified by e-mail or other means of the Activity Number; or
 - (b) Submitting a copy of the Examination Booklet or activity documentation to the designated individual at the Sector within three (03) working days of completing the exam or activity; and
 - (c) Completing AUXDATA entries within three (03) days of the activity and maintaining copies of all paperwork and documentation.

The Auxiliarist should retain a copy of each Examination Booklet or activity documentation he/she has completed. Auxiliary Form 7030 is used to record program support hours and missions such as dockwalking. Auxiliary Form 7038 is used to record examinations and hours. Auxiliary Form 7029 is used to record OJT hours.

- (2) The person entering the examination or activity data into MISLE will enter the examiner's information in two separate locations. This person shall ensure the "Activity Title/ Description" data field and the narrative in the "Comments Section" indicates who actually conducted the exam and their status. The following designations are available:

AD = activity duty mil/civ
RS = reservist
AUX = auxiliary

TRB = tribal
3P = Third Party Examiner

The designation is followed by the first initial and last name of the examiner. Any information the examiner or data entry individual finds useful, such as the type of examination, should be entered as well. As an example: "AUX JStout, Post-Termination Exam."

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- (3) Dockside safety observations should also be entered into MISLE in a similar manner. The case should be created in the MISLE Sub-Activity "Safety Check." Because the activity is not an actual dockside examination, any deficiencies observed must be listed in the narrative only. When all information has been entered, the case should be closed by choosing "Closed Administratively." The following is an example of a narrative for documenting a Dockside Safety Observation in MISLE.

"On Date , Name conducted a Dockside Safety Observation of this vessel. The owner/operator/master was/was not present and a safety examination was not conducted. During the dockside visit, it was observed that the vessel list any discrepancies. The vessel was rigged as a type of vessel and targets type of fish. A Dockside Safety Observation letter or notice was left on the vessel for the owner/operator/master to call this office for details of the discrepancies observed, and to request a Voluntary Dockside Examination."

Note: Consideration should be given before targeting a vessel for boarding based on a dockside safety observation where deficiencies were noted by an Auxiliarist. The dockside safety program is promoted as non-adversarial in nature. Resultant enforcement boardings and violation reports after dockside observations may compromise the member's reputation and relationship with industry personnel, and even potentially put the member at risk while on the waterfront.

- d. An Auxiliarist is not authorized to conduct Uninspected Commercial Vessel Safety Program activities on behalf of the host OCMI/Sector Commander without the assignment of orders. The host OCMI/Sector Commander shall issue monthly/quarterly/annual orders to ensure entitlements and legal protection for the Auxiliarist while performing duties for the Coast Guard. Reimbursement for the Auxiliarist's travel to, from, and during officially assigned duty will be consistent with the prevailing mileage or per diem rates authorized in the Joint Travel Regulations. When conducting activities for the host OCMI/Sector Commander under orders, the Auxiliarist is authorized use of a government vehicle, if available and preferred by the unit.
- (1) An endorsement that the augmenting Auxiliarist is to be reimbursed for travel and out-of-pocket expenses incurred while conducting examinations or other designated program activities shall be included in the orders. The host OCMI/Sector Commander is responsible for funding the orders. Support may be requested from the District CFVS Coordinator and provided if available.
- (2) The Auxiliarist will submit requests for reimbursement in a timely manner using designated forms, or in a format as determined by the host OCMI/Sector Commander. The member's supervisor at the unit will assist with the reimbursement process as needed. The examiner's travel voucher should be processed for reimbursement within 5 days of submitting a claim. The member should maintain a copy of each travel voucher submitted for his/her records.
- (3) If reimbursement is not received within 30 days, the Auxiliarist should advise his/her supervisor and the Auxiliary Branch Chief CVE Division (BC-MV) or Division Chief CVE Division (DVC-MV). The supervisor will ensure the problem is researched and the status of the claim determined and advise the member and Auxiliary Branch Chief or Division Chief of action taken or that is needed.

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- (4) A copy of the Auxiliarist's LOD/LOR must be attached to a copy of his/her orders when submitting a travel voucher. The host OCMI/Sector Commander shall ensure the LOD/LOR will be valid through the time period covered by the orders.
- e. While aggressively promoting the safety program, but not appearing to be a law enforcement activity, dockwalkers and examiners, particularly in the CFVS Program, may wear an alternate uniform or work clothing when conducting a dockside examination. Individuals must be able to perform their dockside walks and examinations safely. The augmenting Auxiliarist will be afforded the same safety equipment as an active duty vessel inspector or CFVS examiner.
- (1) All CFVS personnel, when engaged in dockside activities or any other public function where the primary activity is CFVS-related, are to wear an alternate uniform that will display the CFVS program logo or other similar program markings. These alternate uniform items will be prescribed and provided by the host OCMI/Sector Commander or the District CFVS Coordinator. CFVS Program funds are provided to the Districts as part of their annual budget and may be used to purchase alternate uniform items.
- (2) The host OCMI/Sector Commander is responsible for providing the Auxiliary examiner with the same safety gear and training as other examiners including safety shoes/boots, hard hats, gloves, safety goggles/glasses, hearing protection, coveralls, float coats/vests, flashlights, air monitoring equipment, and respirators as may be needed for the type of activity being conducted.
- (3) As valued members of the Coast Guard Team, Auxiliarists deserve the same attention to being prepared as others at the command. This includes, but is not limited to, being provided required reference materials, tools, safety equipment, policy and procedures documents, computer access, vehicle access, and access to training and training materials.
- f. Prior to departing for and conducting commercial vessel-related field activities as directed/requested and pursuant to his/her orders, the Auxiliarist shall contact the host Sector's Command or Operations Center to document his/her destination and planned activities. Likewise, upon completion of the activity, the Command/Operations Center shall be notified.

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Dist: COMDT (G-PCX)
CG LANTAREA (Ap)
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All CGD (dpi), (dpa)
All CG OCMI/Sectors, MSFOs, and MSUs
CG Auxiliary: DC-M, DVC-MV, BC-MV, DSO-MS, NADCO-OMS, DIRAUX