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CG-543 Policy Letter
09-04, CH-1

DEC 29 2009

From: Eric P. Christensen, CAPT
COMDT (CG-543)

To: Distribution

Subj: MARINE INSPECTOR / PORT STATE CONTROL OFFICER CERTIFICATION
POLICY

Ref: (a) Marine Safety Manual, Volume I, Administration and Management,
COMDTINST M16000.6
(b) U. S. Coast Guard Sector Organization Manual, COMDTINST M5401.6
(c) The Coast Guard Directives System, COMDTINST M5215.5E
(d) Mandatory Use of the Training Management Tool, COMDTINST 5270.

1. PURPOSE. The purpose of this policy letter is to enhance the Marine Safety Training and Qualification system and provide clarification and updated requirements for Marine Inspector (MI) / Port State Control Officer (PSCO) certification and currency.

2. ACTION. Sector Commanders shall ensure compliance with the provisions of this policy letter and incorporate the applicable parts into unit training plans and training and qualification programs per references (a) and (b). Internet release is authorized.

3. DIRECTIVES AFFECTED. Sectors are reminded that the Sector Training and Performance Support SITREPS, specifically ALCOASTs 483/06, 387/07, 519/07 and 202/08 expired as CG directives one year after their release per reference (c). It is anticipated that the policy guidance provided in the ALCOASTs is already included in Sector training programs. This policy letter will therefore impact those programs as well as individual Sector Operating Procedure (SOP) Guides. This policy will be incorporated into the Sector Training and Qualification manual, currently in development.

4. BACKGROUND. ALCOAST 519/07 established certification requirements for MIs and PSCOs with a goal of setting baseline standards to ensure field personnel maintain adequate proficiency to perform the Coast Guard's Commercial Vessel Safety (CVS) mission. This policy incorporates parts of the ALCOAST with recent field input and other published guidance into one document in an effort to help field units develop effective training programs pending promulgation of the Sector Training and Qualification Manual.

5. DISCUSSION. Our personnel learn and develop throughout their careers. As maritime professionals working in a constantly changing environment, it is paramount that our personnel keep abreast of new regulations, latest industry trends and technological advances. The training and development of our MIs and PSCOs is viewed as a continual process. Continuing education

coupled with a certain level of professional “currency” is extremely important in maintaining the necessary level of proficiency and certification to perform our missions effectively. There is always more to be learned and there is always room for improvement. As new National Centers of Expertise (NCOE) and Feeder Ports are established, units are encouraged to reach out to obtain additional training or training materials and utilize the knowledge and experience these resources offer.

In order to help evaluate the impact of ALCOAST 519/07, CG-543 sent surveys to every field unit that performs the CVS mission. The most widespread concerns raised were the inability for units to effectively maintain certifications due to “seasonality” (cyclical exams of certain types of vessels in specific geographic regions) and low traffic volume. This policy letter offers alternatives to help address these concerns.

6. TERMS OF REFERENCE.

Term	Definition
Competency	A collection of tasks with the associated skills, knowledge and abilities (tools, methods, information, doctrine, procedures, materials, etc.) needed to perform the tasks to a predetermined, measurable, performance standard.
Certification	An endorsement by the Commanding Officer or Officer in Charge Marine Inspection, that specified standards of knowledge and performance have been met, and/or are being maintained for a particular competency.
Currency	Maintenance of proficiency and knowledge associated with a particular certification usually by performing an inspection / examination within a specific timeframe.
Letter of Certification	A letter issued to a member who has successfully completed all the training and certification requirements for a particular competency. (Also referred to as a qualification or designation letter)
Marine Inspection Training Officer	Individual designated by the Commanding Officer as being responsible for administering a unit’s Inspection Division Training Program. The position may be a primary or a collateral duty and should be a person who has a high level of experience with the applicable certifications and/or competencies required at the unit.
PQS Verifying Officer (VO)	An experienced MI/ PSCO designated by the OCMI who has demonstrated the ability to instruct and verify a candidate for certification ’s ability to correctly perform the tasks in the applicable PQS workbook. The VOs are the only personnel authorized to sign off PQS tasks and must be certified in the competency for the PQS workbook they are endorsing.
Sector	The term “Sector” in this policy includes any command, detachment or detached duty station that performs the CVS mission.

7. PROCEDURES

a. Certification

- (1) PQS Workbooks: It is imperative that the most recent Performance Qualification Standard (PQS) Workbook be utilized by MIs / PSCOs in training. The most recent editions of these PQS workbooks are available at the Coast Guard e-learning portal.
- (2) Verifying Officer Performance: Sectors shall ensure VOs demonstrate superior conduct, professionalism, skills and knowledge in the training of MIs / PSCOs. VOs shall be experienced and certified personnel that have demonstrated the ability to instruct, observe and evaluate candidates for certification in the performance of PQS-related tasks. Marine Inspection Training Officers shall ensure VOs carry out their duties in a consistent and correct manner.
- (3) Completion of PQS Workbooks: PQS tasks are only to be signed by a VO when the specific PQS task has been performed in its entirety. Candidates for certification are encouraged to seek out a variety of certified personnel to help broaden their knowledge. Although discussions of hypothetical scenarios (coaching/direction) are very important aspects of training, it is vital that PQS task completion be activity based.
- (4) Certification Boards: Candidates for certification shall successfully pass an oral certification board to the satisfaction of board members prior to a competency being granted. The board's purpose is to assess the knowledge, judgment and decision making skills of the individual. Standard scenarios should be posed to evaluate the individual's decision making skills and their general knowledge of regulations, policy and industry standards. For members receiving their first or second certification, MISLE casework should also be discussed. Boards should typically last 2-3 hours. Waivers for certification boards are not authorized.
- (5) Certification Board Prerequisites: In order for a candidate for certification to undergo a certification board they shall meet the following pre-requisites:
 - (a) Candidates for certification shall have each PQS Workbook completed in its entirety and reviewed by the Marine Inspection Training Officer prior to requesting a certification board (see paragraph 7. a. (7) below for policy on deferring PQS task items).
 - (b) Field practical verification inspection / examination (check ride) shall be conducted with the candidate for certification as the team leader under the direct supervision of a VO. The VO shall assess whether the candidate for certification has the necessary judgment, knowledge and communications skills to successfully conduct the inspection / examination. The VO should

only intervene if absolutely necessary. Ideally, multiple candidates for certification should not be evaluated during the same vessel activity with the exception of U. S. flag deep draft vessels that require both a Hull and Machinery Inspector.

- (c) Additionally, efforts shall be made on the part of the Marine Inspection Training Officer to ensure that the candidate for certification has not only accomplished individual tasks for a competency but has a broader understanding of the competency requirements and can readily access and interpret regulations and policy. Methods such as a written test or pre-board will prove useful in this determination.
- (6) Certification Board Members: Certification board members shall be assigned by the Marine Inspection Training Officer and shall be listed in the members PQS workbook. The board should consist of at least three persons: an applicable Branch or Division Chief and two designated VOs for the applicable competency. If two VOs are not assigned to the unit, one VO may be used and the board can be reduced to two members.
- (7) Deferred PQS Task Items: On a limited basis, PQS task items may be deferred by the Sector Commander or designee. **However, no PQS task items pertaining to confined space entry in any competency PQS workbook can be deferred.** PQS items shall only be deferred if the particular task cannot be adequately performed in the Sector's AOR due to local constraints and/or limitations associated with types of vessels, routes, cargo operations, repair facilities, etc. If a task is deferred, the reason for deferment shall be clearly articulated in the space provided in the PQS workbook and the deferred item shall be annotated in the certification letter. For example, if a MI candidate for certification did not inspect any unfired pressure vessels while pursuing a T-boat Inspector certification and there are T-boats in the AOR equipped with unfired pressure vessels, the PQS item may not be deferred.

If a PQS task is deferred, the MI / PSCO is still considered fully certified, however, the member is not authorized to inspect / examine or perform functions affiliated with the deferred task unless he/she is supervised by another certified member that does not have this item deferred.

- (8) Revoked Certifications: The scope of the certification process should be determined based on the circumstances surrounding the revocation. At a minimum, a field practical inspection / examination and a certification board in accordance with paragraph 7. a. (4) shall be conducted.
- (9) Newly reported MIs / PSCOs with existing certifications: These members are required to be certified at their new unit before being authorized to lead vessel inspection / examination activities. Each new member shall have their training records (PQS workbooks, Letters of Certification, certification documents) reviewed and have an

interview conducted by the applicable Branch or Division Chief to decide the best process to certify the competencies the OCMI has determined are required to be maintained. With the recommendation of the Training Officer, the Division Chief will decide if a certification board is required. If deferred PQS items are applicable at the new unit, those tasks must be completed and documented in the member's PQS workbook before certification is granted. Any local Sector-specific PQS tasks should also be completed. A "field practical inspection/examination" under the supervision of a designated VO is considered good practice and is highly recommended.

b. Currency

- (1) General Applicability: This policy applies to any USCG Active Duty, Reserve or Civilian employee who holds a MI or PSCO certification letter regardless of when it was issued (see list below of applicable competencies). The currency requirements outlined in this policy letter are only applicable to those persons assigned competencies that the OCMI has determined are required to meet mission objectives. For example, if a member has the Mobile Offshore Drilling Unit (MU) and Machinery Steam (MS) competencies and is currently assigned to a unit where the OCMI has determined those competencies are not needed, the member is not required to remain certified and therefore the currency requirements are not applicable. In these cases, the member will still hold the competency but will no longer be certified and will therefore not be authorized to conduct activities where the competency is required. Personnel assigned Department Head or Division Chief Positions that do not routinely conduct field activities are strongly encouraged to maintain certified competencies. Spending time in the field helps supervisors evaluate the training program's effectiveness, helps maintain proficiency in the missions they are responsible for and emphasizes the importance of being certified.

NOTE: A unit is not expected to maintain certification for anyone at the unit if there are normally no inspection / examination opportunities in any 12 month period for a particular competency. If an unexpected inspection / examination arises, units shall follow the alternative measures outlined in 7.b (5) below.

- (2) Twelve Month Currency Requirement: To remain certified, MIs / PSCOs shall conduct at least one inspection / examination every twelve months for each competency required by the OCMI. This can be accomplished as the team leader, lead inspector or as a team member. The following are competencies listed with the activities that are acceptable towards meeting the twelve month currency requirement:

(a) Domestic Competencies:

1. Life Raft Inspector: Completion of a life raft servicing inspection.
2. T-Boat Inspector (TI): Completion of a COI or annual inspection of a U.S small passenger vessel regulated under subchapter T or subchapter K.

3. K-Boat Inspector (KI): Completion of a COI or annual inspection of a U.S. small passenger vessel regulated under subchapter K.
4. Barge Inspector (BI): Completion of a COI, annual, or periodic inspection of a U.S. barge regulated under subchapter D, I, or O.
5. Offshore Supply Vessel Inspector (OI): Completion of a COI, annual, or periodic inspection of a U.S. offshore supply vessel regulated under subchapter L.
6. Hull Inspector (HI): Completion of the Hull Inspection tasks for a COI, annual, or periodic inspection of a U.S. deep draft vessel regulated under subchapter H, I, R, or U.
7. Hull Inspector, Tankship (HT): Completion of the Hull Inspection tasks for a COI, annual, or periodic inspection of a U.S. deep draft vessel regulated under subchapter D or O.
8. Machinery Inspector (MI): Completion of the Machinery Inspection tasks for a COI, annual, or periodic inspection of a U. S. deep draft vessel regulated under subchapter D, H, I, O, R, or U.
9. Machinery Inspector, Steam (MS): Completion of the Machinery Inspection tasks for a COI, annual, or periodic inspection of a U.S. steam propelled deep draft vessel regulated under subchapter D, H, I, O, R, or U.
10. Mobile Offshore Drilling Unit Inspector (MU): Completion of a COI, annual, or periodic inspection of a U.S. mobile offshore drilling unit regulated under subchapter I-A.
11. Drydock Inspector (DI): Completion of a dry-dock inspection, internal structural exam, or cargo tank internal exam of a U.S. vessel of 100 gross tons or more.

Note: Completion of Streamlined Inspection Program, Alternate Compliance Program, or Maritime Security Program audits and oversight inspections conducted in lieu of traditional regulatory inspections satisfy certification requirements for applicable Marine Inspector competencies.

(b) Port State Competencies:

1. Port State Control Examiner (PSCE): Completion of a PI, PII, Random Safety, COC-Annual, COC-Renewal, or COC-Quarterly examination on any foreign commercial vessel type. This competency is also considered

certified if any other Foreign Vessel Examiner competency is maintained certified.

2. Foreign Freight Vessel Examiner (FFVE): Completion of a PI, PII, or Random Safety examination on a foreign freight vessel.
 3. Foreign Tank Vessel Examiner (FTVE): Completion of a PI, PII, COC-TVE Annual, or COC-TVE Renewal examination on a foreign petroleum tank vessel.
 4. Foreign Chemical Tanker Examiner (FCTE): Completion of a PI, PII, COC-Chem Annual, or COC-Chem Renewal examination on a foreign chemical carrier.
 5. Foreign Gas Carrier Examiner (FGCE): Completion of a PI, PII, COC-Gas Annual, or COC-Gas Renewal examination on a foreign gas carrier.
 6. Foreign Passenger Vessel Examiner (FPVE): Completion of a PI, PII, COC-CVE Initial, COC-CVE Annual, or COC-CVE Quarterly examination on a foreign passenger vessel.
- (3) Lapse of Twelve Month Currency Requirement: Those MIs / PSCOs who have not performed a particular inspection / examination type during any twelve month period will have lapsed in currency for that specific competency. They are therefore no longer certified and are not authorized to lead foreign vessel exams or domestic vessel inspections for the applicable vessel / activity type as outlined in paragraph 7.b.(2). Members with lapsed currency can only be recertified by completing a field practical in accordance with paragraph 7. a. (5) (b). If necessary a certification board may also be conducted.
- (4) Documentation: All Letters of Certification and certification endorsements shall be documented in writing by the OCMI with appropriate entries made in TMT in accordance with reference (d). Using the form included as enclosure (1) is recommended for endorsements, however in lieu of using the form, the OCMI may issue a memo endorsement to the member's original Letter of Certification. A sample memo endorsement is included in enclosure (2). Previously deferred items that have been satisfactorily demonstrated shall be clearly documented on the form and/or endorsement as they are no longer considered deferred. A copy of the form or endorsement shall be kept in the individual's training record.
- (5) Alternatives if Units Cannot Comply with Certification Requirements: In instances where a unit could not fully comply with the certification requirements and an activity needs to be conducted by a certified MI/PSCO, one of the following alternatives should be used:

- (a) Deferral: If possible, in accordance with existing policy/ regulation, defer the activity to the next U.S. port.
- (b) Request for Forces: The OCMI should send a Request for Forces to their cognizant District to request assistance for a certified MI or PSCO.
- (c) Competency Specific Refresher Training: The OCMI shall ensure robust refresher training is conducted covering the applicable competency and the specific inspection / examination activity scheduled. The training should be conducted by the most competent and experienced member at the unit that holds the applicable competency provided the member has been certified for the competency within the last five years.

Units are encouraged to network with other units, Feeder Ports and applicable NCOEs to obtain training materials to maximize the effectiveness and ensure consistency with national standards. In general, the training should focus on topics specific to the activity type, vessel type, cargo handling/hazards, equipment tests, documentation, changes in U. S. and international regulations and CG Policy updates. Marine Inspection Training Officers shall document the refresher training as a task capture in TMT.

If the OCMI determines there is no one available that can adequately conduct the refresher training or no one has held the competency within the last five years; a Request for Forces should be used.

- (6) Port State Control Certification Tracking Cube: In order to ease the administrative burden for units to track and manage the foreign vessel twelve month currency requirement, a certification cube in CG Central has been established for units to use at their discretion. The cube can be accessed via the CG Analytics tab > CGBI Cubes & Reports > All Cubes & Reports > PSC Examiner Qualification Recency.
 - a) This cube is directly linked to the Team Member Function in MISLE; therefore, it is imperative that units enter all team member information in MISLE in accordance with existing policy (see "MISLE Data Entry Requirements for Foreign Vessel Arrivals, Examinations and Operational Controls" work instruction). In addition, the Team Leader should also be entered into the Team Member Function for the cube to accurately reflect participation. To ensure personnel remain certified units should periodically run the cube.
 - b) In the certification column on the cube report, an "x" will be displayed next to the competency if the unit has properly certified the individual for that particular competency in TMT. This feature eliminates the need to check TMT to determine which PSC competencies the individual is required to keep up to date.

- c) To utilize the "Certified" column in the cube, units will need to assign and certify those individuals grandfathered with the old PSC competencies (issued prior to March 31, 2008) with the current competency, i.e. assign and certify someone who has the FV competency to the corresponding FFVE competency in TMT.
- (7) A Domestic Vessel Inspection Certification Tracking Cube is not currently available. Until one is developed, Marine Inspection Training Officers should closely monitor MI currency and forecast potential gaps due to area specific challenges.

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<u>PSCO / MI Competency</u>	Action Required for member to be certified (Certification Endorsement) (Board &/or Check Ride) (Include Date Completed)	Marine Inspection Training Officer Approval (Date w/Initials)	Chief, Prevention Approval (Date w/Initials)	OCMI Approval (Date Certified w/Initials)	Unit where certification endorsement received	Unit where Ltr of Certification was originally issued	Date Certification Originally Received
PSCE	5/16/09 / JAK, SWB	5/19/09 / ADP	5/20/09 / ACE	5/22/09 / BOS	Sec New York	Sec Seattle	8/22/05
FFVE							
FTVE							
TI							
KI							
BI							

U.S. Department of
Homeland Security

United States
Coast Guard



Commander
United States Coast Guard
Sector XYZ

Address:
Phone:
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3500

MEMORANDUM

From: A. J. Squaredaway, Capt
CG Sector XYZ

Reply to
Attn of:

To: CWO I. B. Goode, EMPLID # 1234567

Subj: CERTIFICATION ENDORSEMENT FOR PORT STATE CONTROL OFFICER AND
MARINE INSPECTOR COMPETENCIES

Ref: CG-543 Policy Letter 09-04

1) In accordance with reference (a), you have successfully completed all applicable certification requirements and are hereby certified to carry out the responsibilities of a Port State Control Officer and / or Marine Inspector for those competencies indicated in enclosure (1). You will be guided in the performance of your duties by the Marine Safety Manual, U.S. Code of Federal Regulations, and related Commandant, District, and Sector directives.

2) This / these certification endorsement(s) are based on your previously issued Letter of Certification(s). In order to maintain certification for each competency you shall comply with all applicable requirements contained in reference (a). Failure to maintain certification for a particular competency will result in you not being authorized to perform duties where that competency is required. This / these certifications will expire upon your PCS or if otherwise revoked.

3) This letter shall be maintained as part of your permanent training record. The Marine Inspection Training Officer will ensure appropriate TMT entry(s) is/are made.

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Copy: Marine Inspection Training Officer

Enclosure (2)