

Uninspected Passenger Vessel (UPV) Safety Program Management

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REFERENCES

- (a) UPV Examination Program, LANT/PACAREAINST 16710.2
- (b) USCG Uninspected Passenger Vessel Examiner (UPV) Performance Qualification Standard (PQS)
- (c) USCG Auxiliary Manual, COMDINST M16790 (series)
- (d) USCG Auxiliary Operations Policy Manual M16798.3 (series)

PURPOSE

PURPOSE. The purpose of this letter is to provide guidance to: District Commercial Vessel Safety Coordinators; Officers-In-Charge, Marine Inspection (OCMIs)/Sector Commanders; unit Uninspected Passenger Vessel (UPV) Examiners; and Coast Guard Auxiliary members responsible for management of and/or participation in the UPV Program. In particular, this letter details expectations, requirements, and responsibilities for Coast Guard Auxiliary UPV Examiner training, qualification, documentation, funding, and support.

BASIC PRINCIPLES

- All Auxiliary Commercial Vessel Programs are authorized by the Commandant of the Coast Guard and administered by Coast Guard Headquarters.
- The Auxiliary Prevention Directorate provides operational administration and review of approved Auxiliary Commercial Vessel programs on behalf of the Coast Guard, but may not make modifications to the programs.

BASIC PRINCIPLES

- Current Guidance for the UPV Program is provided in reference (a), Reference (a) promulgates the official UPV Booklet, Requirements for Uninspected Vessels (Revised: August 2017), as well as the official examination form. No other booklet or form is authorized.
- The Auxiliary Prevention Directorate, under direction of Coast Guard Headquarters, maintains reference (b). No other workbook (PQS) is authorized.

BASIC PRINCIPLES

- All Auxiliary commercial vessel programs are Sector specific. Individual Sector Commanders may add requirements for Auxiliary UPV Examiners. These requirements shall be in writing, with copies provided to the UPV examiners, trainees, and the USCGAUX Prevention directorate.
- All UPV Letters of Designation (LOD) shall be signed by the Sector Commander (or his/her representative) and are valid only for that Sector. A separate LOD is required if moving to another Sector, or if exams will be done in two or more Sectors.

BASIC PRINCIPLES

- Only Auxiliary members holding a current and valid Sector UPV Letter of Designation may issue UPV decals upon successful completion of an examination.
- All UPV examinations shall be entered into MISLE in a timely manner, preferably 30 days or less.
- Only the approved examination form found in reference (a) will be scanned into MISLE. Local forms are not authorized.

BASIC PRINCIPLES

- Auxiliary UPV examiners are not authorized to audit Chemical Testing Programs used by UPV owners/operators, though they may assist appropriately qualified Coast Guard personnel in such audits.
- Auxiliary UPV examiners are not authorized to provide specific advice concerning Chemical Testing consortia, or to provide any information that could be construed as legal advice or counsel. Sector/District Designated Drug and Alcohol Program Coordinators are available to owner/operators if questions or problems arise.

BASIC PRINCIPLES

- UPVs may also be involved in commercial fishing activities. If UPV operators sell any catch, they are considered a commercial fishing vessel (CFV) and must meet all CFV requirements in addition to the requirements for a UPV. Vessels compliant with both UPV and CFV requirements will display two separate decals issued by appropriately qualified Auxiliarists or Coast Guard personnel.

NOTE

- Properly trained and qualified Coast Guard Auxiliary personnel are authorized to conduct both voluntary and mandatory dockside safety exams with the owner's consent. Members of the Coast Guard Auxiliary serve as a reliable and creditable source of observation, evaluation, and recommendation, but **shall not engage in law enforcement activities or the appearance of such.**

DISCUSSION

- This Policy Letter does not limit Auxiliarists only to performing dockside exams and outreach duties. Host OCMI may direct Auxiliarists to provide support in any other areas appropriate to references (b) and (c).
- Being a UPV Examiner demands a high degree of professional knowledge and responsibility; stringent standards must be met to attain and retain this qualification
- An Examiner is a person responsible for physically going aboard a vessel and conducting a safety examination to determine whether a vessel is in full compliance with applicable regulations.

DISCUSSION

- If a vessel is not in compliance, the examiner will issue a work list to the owner/operator with a copy to Sector. The operator must make corrections before a decal can be issued.
- Training is accomplished in the field by on-the-job training (OJT) and on-the-job qualification (OJT).
 - Coordinated by District/Sector personnel;
 - All PQS requirements must be met in accordance with reference (b);
 - Host OCMI must issue a Letter of Designation;
 - Minimum annual standards must be met to retain qualification.

DISCUSSION

- All examinations shall be recorded in MISLE, both successful and failing. Appropriate AUXDATA entries must be made, and there should be a high correlation between MISLE and AUXDATA regarding UPV examinations.
- Auxiliary members **must** notify the OCMI when UPV examinations are being conducted.
 - Auxiliarists conducting UPV exams, UPV outreach activities, and attending unit approved training are entitled to reimbursement for travel and expenses.
 - Reimbursable orders are required **prior to** any reimbursed activity.
 - No cost orders or “assignment to duty” may also be used.

DISCUSSION

- CLOTHING
 - Civilian clothes that bear a USCGAUX logo
 - Auxiliary uniforms in accordance with section 10.A.1 and 10.A.2 of reference (c)
 - Other work type clothing issued or prescribed by the host OCMI or District Coordinator
- Standard Coast Guard Auxiliary life jackets may be appropriate for some exams and should be worn.
- Normally at least two Auxiliarists should participate in an exam. Both need not be UPV examiners.

IMPLEMENTATION

- Qualification Process
 - Screening interview
 - Initial training
 - On-the-job vessel examinations (OJT)
 - Mentor and Verifying Officer sign-offs (OJQ)
 - Unit Oral Board
 - Review by Sector
 - Issuance of Letter of Designation

IMPLEMENTATION

- The screening interview should cover all aspects of the program mission, prerequisites, physical requirements, time involved, travel, training requirements.
- Factors considered by the screening team:
 - Understanding of the UPV program
 - Ability to relate to industry personnel
 - Experience working independently
 - Ability to work under variable environmental conditions
 - Ability to communicate effectively
 - Ability to work with Coast Guard personnel
 - Dedication and responsibility

IMPLEMENTATION

- A candidate must complete 40 hours with qualified examiners in training, walking the docks, studying job aids, witnessing and assisting with dockside safety exams, observing MISLE data retrieval and entry, and completing the UPV PQS and required examinations.
- Mentors will be assigned by the host OCMI.
- The Oral Qualification Board should be held within one year of starting the UPV training program.
- Oral Board composition will be determined by the host OCMI.

IMPLEMENTATION

- If the Oral Board is not completed within one year, the host OCM I must decide whether to extend the OJQ time frame or discontinue the candidate's involvement in the program. Documentation is required.
- Passing the Oral Board comprises a recommendation to the Sector Commander that the candidate be designated as a qualified UPV Examiner.
- A Letter of Designation (LOD) will be issued by the Sector. The letter will include:
 - Competency level (examination activity, types of vessels)
 - Requirements to maintain qualification (annual refresher, minimum vessel safety employment hours, minimum number of examination)

IMPLEMENTATION

- The original LOD, along with the completed PQS and supporting documentation, will be sent to the member. The newly qualified UPV examiner must forward a copy of the LOD to the DSO-MS, Flotilla IS officer, and the USCGAUX Prevention Directorate. Sector will forward a copy of the LOD to the District UPV Safety Coordinator and DIRAUX.
- A UPV Examiner LOD can be revoked at any time by the District Commercial Vessel Coordinator or host OCMI/Sector Commander for failure to comply with any requirements outlined in the Policy Letter.

IMPLEMENTATION

- Qualified UPV Examiners must fulfill all requirements outlined in their LOD, to include any required refresher training.
- Should circumstances prohibit a UPV Examiner from completing required activities (e.g., medical issues, family issues), the host OCMCI will evaluate the circumstances and make a recommendation. Documentation is required.
- Failure to meet requirements may result in suspension of the LOD or removal from the UPV program.

IMPLEMENTATION

- Auxiliary members who fail to meet requirements outlined in the Policy Letter, but who wish to continue in the program, may be placed in a probationary status for one year at the discretion of the host OCMI.
- A conditional LOD should require the member to complete all requirements determined by the OCMI. Special circumstances may be taken into consideration.
- If the member fails to meet the conditions of the probationary LOD, UPV certification may be revoked.

IMPLEMENTATION

- Prior to revocation of the probationary LOD, the host OCMI will:
 - Develop documentation that requirements were not met;
 - Cancel all active and pending orders, thereby prohibiting any further dockside exams;
 - Notify the Auxiliary member in writing that he/she is prohibited from performing any UPV duties.
 - An appeal may be made, but the host OCMI/Sector Commander's decision will be final.
 - Paperwork will be forwarded for action. DIRAUX will remove the member's qualification in AUXDATA.

IMPLEMENTATION

- A member who has had his/her LOD revoked may reapply and complete the entire training and qualification process to the satisfaction of the host OCMI.
- Whenever an Auxiliary UPV Examiner has his/her membership suspended or is subject of Auxiliary administrative disciplinary action, the host OCMI/Sector Commander must be notified of the action by the DIRAUX or District Commodore.

ACTION

- District Commanders and local OCMI's shall ensure these guidelines are followed in the oversight of Coast Guard auxiliary members involved in the UPV program.

REFERENCES

- UPV Examination Program, LAN/PACAREAINST 16710.2
- USCG Uninspected Passenger Vessel Examiner (UPV) Performance Qualification Standard (PQS)
- ALCOAST 206/10, National Guidance for Uninspected Passenger Vessel (UPV) Compliance, Enforcement, and Outreach Operations

QUESTIONS?



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