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CG-CVC Policy Letter
15-01

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From: 
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To: Distribution

Subj: ENLISTED ASSISTANT MARINE INSPECTOR (EAMI) QUALIFICATION
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) Marine Safety Manual, Volume II, Material Inspection, COMDTINST M16000.7B
(e) Mandatory Use of the Training Management Tool, COMDTINST 5270.
(f) CG-543 Policy Letter 09-04, CH-1 Marine Inspector / Port State Control Officer
Certification Policy

1. **PURPOSE.** This policy letter establishes procedures for our Marine Safety enlisted workforce to obtain Assistant Marine Inspector competencies. An Enlisted Assistant Marine Inspector (EAMI) program will help optimize the Prevention workforce by earning qualifications that increase capacity and prepare enlisted members to assume the duties of a Marine Inspector upon selection as an Officer or Warrant Officer or upon hiring as a Civilian.

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). Qualifying enlisted members as EAMIs is recommended but NOT mandatory. Sector Commanders should reserve this training and qualification, as workload allows to those high performing enlisted members, E5 and above, who show the maturity and aptitude to eventually become a Marine Inspector. This policy does not affect the procedures for qualifying as a Port State Control Officer (PSCO) or using qualified enlisted PSCOs. Internet release is authorized.

3. **DIRECTIVES AFFECTED.** The reference (a) term "Assistant Marine Inspector" is hereby replaced with the new term "Enlisted Assistant Marine Inspector" (EAMI). 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 expected the policy guidance provided in those ALCOASTs is already included in Sector training programs. This policy letter will impact those programs as well as individual Sector Operating Procedure (SOP) guides. This policy will be incorporated into future updates to reference (d).

4. **BACKGROUND.** Reference (a) allows petty officers to serve as EAMIs but neither establishes the process to become an EAMI nor stipulates the duties an EAMI can perform during domestic vessel inspections. Effective 31JUL08, ALCOAST 202/08 specifically inactivated the Assistant Hull Inspector (FA) and Assistant Machinery Inspector (FB) qualifications.

5. **DISCUSSION.** Currently a Marine Inspector is defined in reference (a) as “an officer or civilian assigned to the inspection department to perform the field duties of the Commercial Vessel Safety Program.” The definition of Marine Inspector under 46 CFR 24.10-1states¹ “*Marine inspector or inspector* means any person from the civilian or military branch of the Coast Guard assigned under the direction of an Officer in Charge, Marine Inspection.” This definition and the notes for reference (a) provide the basis to establish the process for becoming an EAMI.

This policy facilitates the development of our enlisted Prevention workforce and thus bolsters the CWO Prevention career path by establishing a systemic means to earn EAMI qualification(s) for career development. This prepares enlisted candidates to assume the duties of a Marine Inspector and accelerates the progression of an Apprentice Marine Inspector towards qualification as a Journeyman Marine Inspector.

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 |

¹ The definition of *Marine Inspector* or *Inspector* provided mirrors language throughout all applicable 46 CFR Subparts pertaining to vessel inspections (see also 46CFR30.10-43).

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| | 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 marine inspections. |
| Enlisted Assistant Marine Inspector (EAMI) | A Coast Guard Petty Officer with the rank of E5 or above assigned under the superintendence and direction of an Officer in Charge, Marine Inspection who has successfully completed all the training and certification requirements and has received an endorsement by the Sector Commander (or designee) authorizing the member to perform inspection duties under the direct supervision of a certified/qualified Marine Inspectors. |

7. DOMESTIC VESSEL COMPETENCIES.

Petty Officers E5 and above, who have obtained the minimum *rating competency requirements** for E7 are eligible to obtain any of the established domestic vessel competencies as an EAMI. The list of current domestic vessel competencies shall not be considered all-inclusive; as other domestic vessel competencies are promulgated, enlisted members may qualify as EAMIs on these competencies. The Life Raft Inspector (ALR) competency has always been obtainable by enlisted members and may continue to be issued without the term "Assistant."

*Note: The MST rating currently requires MST Petty Officers to hold three of the eleven competencies available in order to advance to E7. Currently other enlisted ratings (MK, EM, DC) do not have mandated rating competencies required for advancement.

Domestic competencies obtained by a candidate will have the word "Assistant" preceding the competency and/or the letter "A" in front of the abbreviated name. For example, the competency/qualification letter a Marine Inspector receives to document a barge competency is "Barge Inspector (BI)," an EAMI competency/qualification letter would be documented as Assistant Barge Inspector (ABI). Table 1 is a current list of domestic vessel competencies and how they should be documented on the EAMI competency/qualification letter.

Table 1 Domestic Vessel Enlisted Assistant Marine Inspector Competencies

| | |
|---------------------------------------------------------|------------------------------------------|
| Assistant Machinery Inspector, Steam (AMS) | Assistant Hull Inspector (AHI) |
| Assistant Offshore Supply Vessel Inspector (AOI) | Assistant Drydock Inspector (ADI) |
| Assistant T-Boat Inspector (ATI) | Assistant Hull Inspector, Tankship (AHT) |
| Assistant K-Boat Inspector (AKI) | Assistant Machinery Inspector (AMI) |
| Assistant Barge Inspector (ABI) | |
| Assistant Mobile Offshore Drilling Unit Inspector (AMU) | |

Over the years, a limited number of enlisted members on a case-by-case basis have been granted a waiver to attend the Marine Inspector Course (MIC). Subsequently, based on completion of MIC, units have issued a Marine Inspector qualification(s) to those enlisted members. It is not the intent of this policy to undermine a candidate's previous accomplishment, but rather reiterate expectations that domestic inspections shall be carried out by a qualified Marine Inspector filling a Marine Inspector position. Therefore, enlisted members who have attended the Marine Inspector Course (MIC) and currently hold marine inspector qualification(s) may retain the qualifications as Marine Inspector competencies. Future qualification(s) received by these enlisted members will be as an EAMI in accordance with **Table 1** of this policy. Inspections

shall continue to be carried out by a qualified Marine Inspector filling a Marine Inspector position.

Units should be cognizant of particular vessel workloads to make sure there is enough activity on a particular vessel type to accommodate training EAMIs. The first priority is to train Marine Inspectors and to maintain qualification currency.

8. PROCEDURES.

a. Certification as EAMI

- (1) PQS Workbooks: EAMIs in training shall use the Marine Inspector Qualification Standard (PQS) workbooks to complete their certification of any of the domestic vessel competencies. These are the same workbooks used by Marine Inspectors in training and can be found on the Learning Management System (LMS) website under the Maritime Safety course catalog. It is imperative to use the most recent PQS workbook.
- (2) Completion of PQS Workbooks: A VO shall only sign a PQS task that 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 are very important aspects of training, it is vital that PQS task completion be activity based.
- (3) Deferred PQS Task Items: The "Training Prerequisite" to attend the MIC is deferred for all EAMI qualifications. If an enlisted member is promoted to a Marine Inspector position as outlined in paragraph 8.c below, the member may apply their EAMI qualification(s) for the issuance of a Marine Inspector qualification once the deferred task item(s) are completed.

On rare occasions waivers may be granted; however, enlisted members completing MIC are only eligible to receive EAMI competencies and designation. Enlisted members attending MIC are not required to re-attend MIC when selected to a Marine Inspector position as outlined in paragraph 8.c below. Enlisted members who appear at or above the predictor on MMSD/MSSE Chief Warrant Officer selection lists are not required to wait until they are actually commissioned in to apply and attend MIC. CWO selects are requested to submit their training request at the earliest opportunity in order to facilitate their progression to a Marine Inspector. Candidates completing MIC prior to advancing to an Officer rank cannot convert existing EAMI qualifications to Marine Inspector qualifications or conduct independent inspections as a Marine Inspector until they are promoted and meet all requirements as outlined in paragraph 8.c below.

On a limited basis, other 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 candidate for certification did not inspect any unfired pressure vessels while pursuing an Assistant T-boat Inspector certification and there are no T-boats in the AOR equipped with unfired pressure vessels, the PQS item may be deferred.

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

- (4) Additional Training Prerequisite: Members shall complete any other Training Prerequisite requirements for a particular competency including the online Introduction to Confined Space Entry and Shipyard Competent Person for Marine Inspection/Port State Control, course code 100028; Indoctrination to Marine Inspections, course code 100290; and appropriate Industry Indoctrination PQS enclosure.
- (5) Certification Board Prerequisites: For a candidate to undergo a certification board, they shall meet the following pre-requisites:
 - (a) Each PQS workbook shall be completed in its entirety and reviewed by the Marine Inspection Training Officer or unit Training Officer prior to requesting a certification board (see paragraph 8. a. (3) above for policy on deferring PQS task items).
 - (b) Act as team leader, under the direct supervision of a qualified VO, during a field practical verification inspection(s) (i.e., check ride). A sufficient number of verification inspections shall be performed for the VO to assess whether the candidate has the necessary judgment, knowledge and communications skills to successfully assist with this type of inspection. The VO should intervene only 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.
- (6) Certification Board Members: Certification board members shall be assigned by the Marine Inspection Training Officer or unit Training Officer and shall be listed in the member's 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) Certification: Candidates for certification as an EAMI shall successfully pass an oral certification board prior to the granting of an Assistant Marine Inspector competency. The board's purpose is to assess the knowledge, judgment, and decision-making skills of the individual. Boards should typically last about 2 hours using standard scenarios

to evaluate the individual's decision-making, general knowledge of regulations, policy, and industry standards. For members receiving their first or second EAMI certification, MISLE casework and unit safe work practices and policies should be discussed. Waivers for certification boards are not authorized.

b. Currency and Documentation

- (1) Currency: The currency requirements outlined in reference (f) are applicable to those persons assigned EAMI competencies. Those EAMIs who have not assisted with a particular inspection type during any twelve-month period will have lapsed in currency for that specific competency. This policy shall be used as it applies to any USCG Active Duty, Reserve or Civilian employee who holds an EAMI certification letter regardless of when it was issued.
- (2) 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 (e).

(a) Example TMT endorsement:

ASSISTANT T-BOAT INSPECTOR (ATI) QUAL LETTER ISSUED WITH THE FOLLOWING DEFERRED TASK ELEMENTS:

MI33 - CONDUCT EXAMINATION OF AUX/HEATING BOILER.

SD01-7, 10-14 & 17 - SECURITY ELEMENTS REQUIRED FOR T-BOAT IN INTERNATIONAL SERVICE.

DD08 - EXAMINE WOOD HULL FOR DAMAGE AND DEFECTS.

WI12 - EVALUATE WOOD HULLS AND ACCESSIBLE SPACES FOR DAMAGE

- (b) Enclosure (1) to reference (f) 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 reference (f) (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.

c. Advancement of an EAMI Qualification to a Marine Inspector Qualification

- (1) Individuals that hold EAMI qualifications and are selected to the rank of Officer, Warrant Officer, or hired as a Civilian and assigned to a Marine Inspector billet may use their EAMI qualifications to receive a Marine Inspector qualification provided the following items are met:
 1. Complete any deferred PQS requirements including the Required Training (RT) or Prerequisite Training for that particular competency. (i.e., Completion of the

Marine Inspector Course (MIC) or other "C" school/Correspondence/On-Line courses as required.) EAMIs with previously-assigned EAMI qualifications should receive priority in attending any requisite training.

Enlisted members who have previously attended MIC are not required to re-attend MIC when selected to the rank of Officer, Warrant Officer, or hired as a Civilian.

2. Marine Inspection Training Officers or unit Training Officers shall review all qualification documents for thoroughness and completion.
3. Complete an oral board and field practical verification inspection(s) (check ride) as outlined below.
4. Meet the currency requirements as outlined in reference (f).
5. The Marine Inspection Training Officer or unit Training Officer shall ensure the candidate has not only accomplished individual tasks for a competency but also has a broader understanding of the competency requirements than may have been required for the issuance of the EAMI qualification.
6. Complete field practical verification inspection(s) (i.e., check ride) with the candidate serving as the team leader under the direct supervision of a qualified VO. A sufficient number of verification inspections shall be performed for the VO to assess whether the candidate for certification has the necessary judgment, knowledge and communications skills to successfully complete this type of inspection independently. 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.
7. Successfully pass an oral certification board to the satisfaction of board members prior to a full Marine Inspector 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 full certification, MISLE casework and unit safe work practices and policies should also be discussed. Keeping in mind the candidate has passed a board and obtained the EAMI competency, boards should be of sufficient length to ensure the individual can perform the duties of a Marine Inspector and has an understanding of local OCMI policies and procedures. Waivers for certification boards are not authorized.

9. **RESPONSIBILITY AND AUTHORITY.** EAMIs are authorized to assist fully-qualified Marine Inspectors in conducting inspections on those specific vessel types for which qualifications are held. Examples of typical inspection work may include dry-dock internal and external exams, deficiency checks, lifesaving and firefighting equipment inspection, damage

surveys, and witnessing drills.

EAMIs work directly for fully-qualified Marine Inspectors. Marine Inspectors shall oversee and be knowledgeable on all aspects of the inspection work the EAMI is conducting on their behalf. The assistant may document vessel deficiencies but the Marine Inspector shall sign the Vessel/Facility Inspection Requirements (CG-835). Suspension or revocation of a COI shall be handled by the Marine Inspector. Authority shall not be given to an EAMI to issue or endorse a Certificate of Inspection attesting to the fitness of service of the vessel.

While supervision by a qualified Marine Inspector is required, it may at times be appropriate for an EAMI to perform inspection tasks without a Marine Inspector physically in attendance. In these cases, the EAMI should meticulously document their actions and make a report to the assigned Marine Inspector when the tasks are completed, consulting with the Marine Inspector as needed. Such times should be limited to clearing specific deficiencies which were documented during an inspection (e.g., witnessing third party tests, audits, surveys and inspections). Ultimate responsibility for each vessel inspection is with the assigned Marine Inspector and OCMI.