

SUBJ: USCG SECTOR BOSTON; COVID-19 INTERIM POLICY – SPV INSPECTIONS

Good day all;

We at the Sector Boston Inspections Division are hoping you, your families, and crews are all safe and managing through these unprecedented times. We are doing our best to keep our personnel safe by following CDC social distancing guidelines and evolving Coast Guard Headquarters policies as we strive to serve you with as little disruption to your business as possible.

Officers in Charge of Marine Inspections (OCMI) around the country have been given authority to exercise prudence and flexibility in scheduling and performing vessel inspections. We are continually assessing the operational risks to our personnel as we evaluate each vessel's statutory and regulatory requirements on a case-by-case basis. We kindly ask for your patience and cooperation as we move forward into what is normally our busiest time of year.

To best maintain our continuity of operations, Sector Boston is implementing a Remote/Deferred Inspections Policy. Many vessels will qualify under this policy, though some will not. We ask that you carefully evaluate your current and projected operations for the near future to assist us in prioritizing our scheduling of inspection activities.

If, due to the severity of the pandemic's impact on your operations you do not believe that you will conduct passenger operations in the foreseeable future, please contact us to discuss options for maintaining your regulatory compliance. This could include placing the vessel in "Laid-up" status to temporarily suspend inspection requirements.

To meet **Annual and COI Renewal inspection** requirements, we will prioritize our scheduling in the following order:

1. Vessels in continuing operation,
2. Vessels with a delayed season and plans to operate when able,
3. Vessels whose season has been cancelled.

Remember, there is a 90-day window before and after the anniversary date of the COI for completing an annual inspection. If you have time and can hold off on calling our office to schedule an annual inspection to allow for the current situation to settle down, please do so. Of course, anniversary date refers to the date of issue of the COI located in the upper right corner of the front page.

There are three options to accomplish **Annual and COI Renewal** inspections for the time being:

**Remote Inspection:** The vessel will be credited for completing its Annual or COI Renewal Inspection based upon objective evidence submitted to the marine inspector.

The operator shall provide electronic copies of applicable documents listed in the Remote Inspection Checklist (attached to this email).

Objective evidence for visual inspection and operational test items listed in the Remote Inspection Checklist shall be provided through either FaceTime/Skype/other live video service, recorded videos, or photos.

Drills will be waived with a CG-835V worklist item issued to document the waiver (a work list item is not available for public knowledge).

Once this objective evidence has been received, reviewed, and the inspection has been deemed successful, a new COI will be issued or an amended COI will be generated to document the annual inspection and sent to the vessel's representative since the inspector will not be onboard to endorse the first page of the COI as typically done.

**Deferred Inspection:** Annual or COI Renewal Inspections may be deferred for up to 90 days beyond the last day of the 90-day period following the anniversary date of the COI. This can be done at the vessel representative's request and at the discretion of the OCMI for vessels that are not eligible for a remote inspection. These include:

1. Wood vessels
2. Vessels with minor outstanding deficiencies that require the presence of a marine inspector

A CG-835V worklist item will be issued to document the deferral.

**CG-835V Worklist No-Sail:** If an operator is unsure of future operation and does not want to commit to any of the other options, a CG-835V work list item may be issued requiring that a COI Renewal or Annual inspection be completed prior to carrying passengers. This option may be used for vessels that do not qualify for a remote inspection and do not plan to operate this season.

To meet **Dry dock and Hull inspection** requirements, there are four options:

**Partially Remote, Credit Hull Exam:** Objective evidence will be accepted to satisfy most of the examination. A Marine Inspector will still attend the vessel while hauled out to conduct an external visual inspection of the hull. Objective evidence of the following items shall be provided through photos, videos, etc.:

1. Operation of all through-hull valves 6" above the waterline and below
2. Watertight bulkhead penetrations
3. Deck openings (scuttles, hatches, etc.)
4. Any other important structural members, specific to the vessel.

Hull Exam credit will only be granted for 1 year. An amended COI will be generated and sent to the vessel's representative as usual.

**Remote, Dry dock Extension:** Objective evidence, as listed above for a Partially Remote Hull Exam, will be accepted to credit an Internal Structural Exam. A Marine Inspector will conduct a review of objective evidence of the vessel's internal structure via FaceTime/Skype/other live video service, recorded videos, or photos.

The extension of the next credit hull exam due date may be granted for up to one year, at the discretion of the OCMI. A Dry dock Extension letter will be issued to document the approval.

**Deferred Inspection:** Similar to Annual and COI Renewal inspections, the hull exam due date may be deferred for up to 90 days. This option is for vessels that do not qualify for a remote exam or dry dock extension and that intend to operate this season.

A CG-835V work list item will be issued to document the deferral.

**CG-835V Worklist No-Sail:** If an operator is unsure of future operation and does not want to commit to any of the other options, a CG-835V work list item may be issued requiring that a credit hull exam be completed prior to carrying passengers. This option may be used for vessels that do not qualify for a remote exam/extension and do not plan to operate this season.

Any part of this policy is subject to change as the situation develops. If you have questions, please call the Inspection Division at 617-223-3020. Since most of our personnel are working remotely at this time, please be patient as we will respond to your call as soon as practicable.