Notes From The Field
The Auditors’ Perspective

MITAGS – PMI
September 26 – 27, 2019

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Auditor’s Role

✓ Prepare for audit
✓ Perform audit
✓ Verify compliance
  ✓ Reports
  ✓ Documents
  ✓ Records
  ✓ Objective evidence
✓ Report findings
46 CFR 136.110 - Definitions

Audit means a systematic, independent, and documented examination to determine whether activities and related results comply with...achieve stated objectives.

(1) The audit may include, but is not limited to:
   (i) Examining records;
   (ii) Asking responsible persons how they accomplish their assigned duties;
   (iii) Observing persons performing specific tasks within their assigned duties;
   (iv) Examining equipment to ensure proper maintenance and operation; and
   (v) Checking training records and work environments.
ASKING and OBSERVING

• Verify that crewmembers know the answers or how to find the answers (using resources).
• Can the crewmember discuss the policy or procedure?
• Observe crewmembers performing some of their duties.
OPPORTUNITIES FOR LEARNING

- CHECKLISTS
- TSMS / SMS
- VESSEL VISITS
- NEWSLETTERS
- MANAGEMENT MEETINGS
- EXTERNAL AUDITS
- INTERNAL AUDITS
- TRAINING
- DRILLS
- SURVEYS
- RESOURCE SHEET
- SAFETY MEETINGS
HEADLINES

EL FARO 33 dead; Table Rock Island Duck 17 dead; CONCEPTION 34 dead. The common thread throughout USCG inspected and certified.
"The Conception wasn't required by federal regulation to have fire sprinklers aboard, according to the U.S. Coast Guard." And the reason sprinklers weren't required by federal regulations? Did the USCG ever recommended or require that an equivalent system to a sprinkler be retrofitted? Water misting system? Dry chemical? Local sounding smoke alarms throughout the boat? Were emergency/abandon ship drills required by the USCG for guests and crew before getting underway? Did any of the "inspectors" climb over the bunks and through the escape hatch? Is there emergency lighting on the deck of the sleeping area to guide guests to safety? Is the ship fitted with fire resistant material? Did the USCG personnel who inspected and certified the vessel as compliant ever formally identify the guests sleeping area as a tragedy waiting to happen?"
“To blame this on the age of the vessels and the Jones Act is missing the point - that being it is the responsibility of the operator to ensure all systems meet the requisite regulation, are in order, and the crew is properly trained in emergency procedures. The last requirement is the common thread in all of these losses; while the crews may be competent for operating the vessel and knowledgeable about safety of their tasks (such as dive safety), they are not as well trained on how to respond when a hazardous condition appears which is not within the scope of their training. “
Operators and regulators need to see that management of safety requires hazards be identified so they can be addressed.

USE YOUR TOOLS!!!!!!
#1 - Do you feel like you’ve been audited?
#2 - Did you learn anything?

- Understanding the why helps with the how.
- Opportunity to have a dialogue with crewmembers regarding Subchapter M, new regulations and existing regulations.
- Review a sampling of the TSMS.
Thank You!

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