



# COVID-19 CONTINGENCY PLANNING FOR SUBCHAPTER M COMPLIANCE DEADLINES

*Effective March 30, 2020 through June 30, 2020, subject to extension or modification. (Revised 04/01/2020)*

This contingency plan ONLY applies to audit and survey activities that have a compliance deadline that will not be attainable due to restrictions caused by the COVID-19 virus outbreak within the next 90 days.

Major non-conformities and unsafe conditions are still subject to the reporting requirements as normal.

## Annual Internal Survey Options

- Complete in-person survey using an accepted Internal Surveyor, as normal, according to standard precautions
- OR
- Submit **VIRTUAL ACTIVITY REQUEST** as noted below
  - Utilize vessel crew to work alongside accepted Internal Surveyor by providing objective evidence via remote means
    - Accepted Internal Surveyor must complete and sign the survey checklist
    - Internal Surveyor must have accepted ISQ on file with TVIB prior to the survey
    - Follow TVIB process for internal survey programs as normal
- OR
- Submit **REQUEST FOR EXTENSION** as noted below

## Annual External Survey Options

- Complete in-person survey using an External Surveyor, as normal, according to standard precautions.
- OR
- Submit **VIRTUAL ACTIVITY REQUEST** as noted below
  - Utilize vessel crew to work alongside External Surveyor by providing objective evidence via remote means
    - External Surveyor must be agreeable to a virtual event and is responsible for completing, signing and submitting, the annual survey checklist
  - Follow TVIB process for external survey programs as normal
- OR
- Submit **REQUEST FOR EXTENSION** as noted below

## Drydock/Internal Structural Exam (DD/ISE) Options (Applies to Internal and External Survey Programs)

- Complete in-person DD/ISE, as normal, according to standard precautions.
- OR
- Submit **REQUEST FOR EXTENSION** as noted below

***TVIB has determined that the DD/ISE is not suitable for a virtual activity at this time.***

## External Audit Options (Applies to Management and Vessel Audits)

- Complete in-person audit using an External Internal Auditor as, normal, according to standard precautions.
- OR
- Submit **VIRTUAL ACTIVITY REQUEST** as noted below
  - Conduct virtual audit via remote means
    - For vessels audits: In lieu of observing emergency drill, auditor may accept record(s) of drill(s) performed in the past 30-days
    - External Auditor is responsible for completing, signing and submitting the audit checklist and emergency drill (if applicable)
    - Follow TVIB process for external audits as normal
- OR
- Submit **REQUEST FOR EXTENSION** as noted below

### **Annual Internal Audit Options (Applies to Management and Vessel Audits)**

- Complete in-person audit using an appropriately qualified auditor (must meet §138.310(d)) as normal according to standard precautions.
- OR
- Conduct virtual audit via remote means using an appropriately qualified auditor (must meet §138.310(d)).
  - Audits should include documentation that the activity was conducted using remote means.
  - Follow the company's TSMS process for internal audits as normal
- OR
- Submit **REQUEST FOR EXTENSION** as noted below

---

### **PROCESS TO REQUEST EXTENSION FOR SUBCHAPTER M COMPLIANCE DEADLINES**

---

- 1) The TPO Customer is responsible for submitting the **REQUEST FOR EXTENSION** to [audits@thetvib.org](mailto:audits@thetvib.org) for approval at least 30 days prior to the anniversary date of the compliance date.
  - a) **The anniversary date means the day and month of each year that corresponds to the date of the COI or TSMS Certificate issuance, where applicable.**
- 2) TVIB will submit the written request for extension on behalf of the TPO Customer in accordance with MSIB 09-20:
  - a) External Vessel Audit extension requests will be submitted to the local OCMI
  - b) External Management Audit extension requests will be submitted to the TVNCOE
  - c) Requests for extension of annual internal audits will be received and processed internally by TVIB
- 3) In each case written approval must be granted by the entity processing the written request
- 4) TVIB will review the request and will return the completed form to the TPO customer.

***A separate REQUEST FOR EXTENSION form must be submitted for each compliance deadline.***

---

### **PROCESS TO REQUEST APPROVAL FROM TVIB TO CONDUCT VIRTUAL EXTERNAL AUDITS and INTERNAL/EXTERNAL SURVEYS**

---

- 1) The auditor/surveyor must be agreeable to conducting a virtual activity and is responsible for determining available and appropriate means to conduct the activity.
- 2) The TPO Customer is responsible for submitting the **VIRTUAL ACTIVITY REQUEST** to [audits@thetvib.org](mailto:audits@thetvib.org) for approval at least 2 weeks prior to the event
- 3) Provide meeting invitation/access for the virtual event to TVIB by emailing [audits@thetvib.org](mailto:audits@thetvib.org)
  - a) TVIB reserves the right to participate in and/or observe virtual activities at its sole discretion
- 4) In circumstances where it is not reasonable to observe an item in a virtual capacity, those items must be noted as "not observed" on the checklist and must include the reason
  - a) Such a scenario does not invalidate the audit/survey pending review and acceptance by TVIB
    - i) **Items related to firefighting, lifesaving, and environmental MUST be observed and cannot be marked unobserved.**
    - ii) If these cannot be accomplished, then an extension of the deadline must be requested.
- 5) Audit/survey results produced through virtual activities are subject to additional verification within 1 year at TVIBs sole discretion
- 6) TVIB will review the request and will return the completed form to the TPO customer.

***A separate VIRTUAL ACTIVITY REQUEST form must be submitted for each activity.***

---

## **VIRTUAL ACTIVITY REQUIREMENTS**

---

- 1) The Audit/Survey Plan should incorporate information related to the virtual activity.
- 2) The audit/survey is to be conducted in accordance with TVIB processes, regulatory scope, and using the appropriate checklist.
- 3) The methods and platforms used to perform a virtual activity must be discussed and agreed upon by the auditor/surveyor and TPO Customer.
- 4) For a virtual activity, the methods are not unlike a traditional audit/survey, in that the auditor/surveyor will need to see/view certain things, review documentation, interview or discuss matters with people, and the such.
- 5) With the auditor/surveyor being remote and attending virtually, the platform to carry out the methods in #2 must provide clear video interface, clear voice interaction, adequate document sharing capability, and any other means necessary to perform the activity.
  - a) Some platforms can provide all the necessary functionality as one product suite, but it may not be necessary to have access to all at the same time.
  - b) The video platform is likely the key mechanism to successfully completing a remote/virtual audit/survey. TVIB does not specifically endorse any product, but through knowledge and experience, we think the following may be good options:
    - i) Skype
    - ii) GoToMeeting
    - iii) Zoom
- 6) In advance of any virtual activity, the auditor/surveyor, TPO Customer, and/or vessel personnel must perform a function check to ensure the platform(s) are accessible, function adequately, and all users know how to use it.
- 7) Any notifications (required or otherwise) made to TVIB, the Coast Guard, or other party must indicate that the activity is being carried out in a remote/virtual manner.
  - a) Auditors/Surveyors and TPO Customers are reminded that TVIB and/or the Coast Guard may participate in audits/surveys, including any in a remote/virtual setting.

***Please reference the AWO COVID-19 Contingency Planning Guide regarding the use of the term “standard precautions” throughout this document.***

---

**This and all other referenced documents can be found on TVIBs [COVID-19](https://www.thetvib.org/covid-19/) web page.**

---