

Subchapter M – A Strategic Plan for Towing Vessel Companies

Item	Task	Commence	Complete	Comments
1.	Have all responsible employees, including captains, read the Final Rule, TVCE FAQs, and any further CG guidance issued.	Immediately	01/01/17	Management should read the entire final rule including the preamble.
2.	Decide which compliance option is best for the company.	Immediately	01/01/17	This is the biggest decision to make and should not be taken lightly.
3.	Determine the route, service, manning, persons in addition to the crew, and other endorsements or restrictions on the COI.	Immediately	01/01/17	It's difficult to survey and prepare your boats if you don't know this.
4.	Begin Subchapter M regulatory compliance surveys of vessels, and bring them into compliance.	01/01/17	12/31/17	A comprehensive compliance survey will tell you exactly what you have to do to get each vessel ready.
5.	Develop a Health & Safety Plan	04/01/17	06/30/17	Required for either option. Do a gap analysis on existing documents. CG option- have a stand-alone document.
6.	Develop a compliance management system including all logs, records, (TVR) and training required.	04/01/17	06/30/17	These are commercially available, paper and electronic. Buyer beware.
7.	Develop a training matrix of required items.	04/01/17	06/30/17	You may have most, but do a gap analysis to make sure.
For those choosing the TSMS option:				
8.	Identify the Third Party Organization (TPO) you will use and obtain their guidance.	05/01/17	06/30/17	A classification society authorized by the Coast Guard, or other TPO authorized by the Coast Guard.
9.	Conduct a gap analysis with of your TSMS with the regulation and the TPO guidance. (involve all levels)	07/01/17	09/30/17	You have to satisfy the Coast Guard regulation and guidance, as well as the TPO's guidance.
10.	Decide on an internal or external survey program, and who will conduct the surveys.	08/01/17	09/30/17	The best candidate for this task may be inside, or outside of the company. Choose wisely.
11.	Submit your TSMS to the TPO for review and approval, make required modifications.	10/01/17	12/01/17	You have to satisfy the Coast Guard regulation and guidance, as well as the TPO's guidance.
12.	Require all responsible employees to study and learn the TSMS, especially anything related to their duties.	12/01/17	01/01/18	An SMS workbook is an excellent tool for this essential step.
13.	Conduct formal training for all employees on operating under a TSMS.	01/01/18	03/31/18	This is essential. It will require a major cultural change if done correctly.
14.	Complete a management audit with the TPO and obtain a TSMC.	04/01/18	06/30/18	According to Coast Guard FAQs only a plan review and management audit are required for a TSMC.
15.	Complete vessel surveys and vessel externals audits	04/01/18	06/22/18	This is a regulatory deadline.
16.	Obtain COI for 25% of the company vessels	08/01/18	ASAP or by 07/22/19	This is a regulatory deadline.