



**Safety Management Systems for Domestic Passenger Vessels**  
**USCG-2020-0123; RIN 1625-AC65 Safety Management Systems for Domestic Passenger Vessels**  
**AGENCY: Coast Guard**

ASSP is the oldest society of safety professionals in the world. Founded in 1911, we represent more than 38,000 professionals advancing workplace safety and health in every industry, in every state and around the globe. ASSP members have set the occupational safety and health (OSH) community's standards for excellence, ethics and practice for more than 100 years.

It is important to note that the Society does not have a position on the proposed rule. This submission is only intended to offer technical materials that might be of assistance during future review of safety management systems by the Coast Guard. We are aware that the ASSP materials are related to occupational safety and health but might be of some interest based on the proposal detailed in the Federal Register.

The following materials and files are attached and we hope they are of value:

- ASSP has [position statements](#) on the use of management systems and the return-on-investment for the implementation of such programs. We do understand this statement addresses occupational safety and health in business and industry but might still be of value when evaluating this issue.
- We are not sure if the Coast Guard is aware, but the U.S. Department of Labor is finalizing an extensive study on the use of safety management systems. We are aware that the results of this study may not necessarily apply to this proposal. However, the Coast Guard may get some value from the study after its release. [Agency Information Collection Activities: Submission for OMB Review; Comment Request, Employer Adoption of Voluntary Health and Safety Standards, New Collection](#)
- ASSP offers a series of American National Standards addressing occupational health and safety management systems. We will include a document including information on our standards written under accreditation by the American National Standards Institute (ANSI). We offer the following publication on a complimentary basis that the Coast Guard and its stakeholders may wish to review when considering this proposal:
  - [ASSP GM - Z10.101-2019 Guidance Manual: Keep Your People Safe in Smaller Organizations:](#) *The ASSP/Z10 Guidance Manual is a quick start guide for implementing Z10 in a small to medium size organization. This document outlines the basics of health and safety management systems, contains in-depth discussions of new and innovative approaches and provides the tools and information to help you succeed. Useful forms and checklists are included to assist with accessing your current program and guiding you toward improvements. Detailed examples of how the standard can be implemented are also included.*

Thank you for your attention to this matter and please let us know if we can provide any additional information on safety management systems.

