

U.S. Department of
Homeland Security

United States
Coast Guard



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01 Aug 2005

MEMORANDUM

From: C. F. Weiller, Port Security Specialist
CGD Seven (mc-7)

Reply to: mc-7
Attn of: C. Weiller
(305) 415-6838

To: Distribution
Thru: M. P. O'Malley, CAPT *MPD8/2/05*
CGD Seven (m)

Subj: SEVENTH DISTRICT GUIDANCE ON INDUSTRY DRILLS OR EXERCISES
REQUIRED BY 33 CFR SUBCHAPTER H

Ref: (a) 33 CFR Subchapter H

1. Reference (a) requires Vessel and Facility Security Officers to ensure quarterly security drills and annual security exercises are conducted. The purpose of these security drills and exercises is to test the proficiency of vessel and facility personnel in assigned security duties at all MARSEC levels and to effectively implement the Vessel or Facility Security Plan.

2. The enclosed document, the Security Drill or Exercise Report, is intended to assist those vessels and facilities required by 33 CFR Subchapter H to conduct and document security drills and exercises. Because 33 CFR Subchapter H lacks specificity with regards to drills and exercises, D7 Captains of the Port may distribute the Security Drill or Exercise Report as an optional tool for security managers to assist them in meeting the drill and exercise requirements. I want to stress that the use of this optional form does not absolve vessels and facilities from following the procedures outlined in their approved Vessel or Facility Security Plans.

3. This five-part "boilerplate" document is designed to assist the drill and exercise planner through the plan-exercise-evaluate-document cycle of the event.

Part 1 identifies general information regarding the orientation of the event.

Part 2 provides an overview of the event and identifies specific portions of the security plan to be evaluated.

Part 3a is a simplified Incident Command System diagram and, when used with the security plan, assists the planner in identifying personnel and their responsibilities.

Part 3b documents the personnel participating in the drill or exercise.

Part 4 identifies optional sub objectives and serves as an evaluation sheet.

Part 5 documents any lessons learned and assigns follow up action.

4. When properly filled out and followed, the Security Drill or Exercise Report will meet the regulatory requirements for conducting vessel or facility drills and exercises found in 33 CFR

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104.230 and 33 CFR 105.220, and satisfy the recordkeeping requirements found in 33 CFR 104.235 and 33 CFR 105.225

5. This guidance is neither all-encompassing nor is it intended to constrain exercise planners from exercising items from their security plans that are specific to their operation types and locations and not directly addressed here. It is, however, intended to describe in general terms what a drill or exercise should address to provide a substantial test of the security plan and satisfy the requirements of 33 CFR Subchapter H.

6. The drill requirements will be satisfied by addressing any one or more of the eleven core exercise objectives listed in Part 2 of the Security Drill or Exercise Report. To satisfy the annual exercise requirement, the plan holder should consider all eleven objectives, and must specifically evaluate those objectives related to communication and notification procedures, elements of coordination, resource availability, and response in the event of an incident.

7. Once the drill or exercise is completed, it is expected that Security Officers will use the information gathered to address gaps, overlaps or deficiencies in their security plans and use the results as part of the annual audit of their plans.

8. A thorough critique of the drill or exercise is an important part of the event evaluation. In order to meet the intent of 33 CFR 105.225(b)(2) for facilities or 33 CFR 104.235(b)(2) for vessels, exercise planners should dedicate a portion of the time allotted for the drill or exercise to assemble the participants in order to discuss identified best practices and lessons learned which may improve the Facility or Vessel Security Plan.

9. Lastly, this tool can provide a point of reference if the plan holder takes part in a larger port community exercise or an actual event. If, at the end of that exercise or event, the plan holder and his/her security personnel determine that these items substantially have been exercised and addressed, it would be appropriate to use the results for the purposes outlined above and record the exercise as having satisfied the appropriate portions of the security regulations.

10. For further information please contact me at (305) 415-6838.

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Enclosure: Security Drill or Exercise Report

Dist: Chief, Prevention Department, Sector Charleston
Chief, Marine Inspection & Investigations, MSO Jacksonville
Chief, Prevention Department, Sector Miami
Chief, Prevention Department, Sector Key West
Chief, Prevention Department, Sector St Petersburg
Chief, Prevention Department, Sector San Juan