

Thank you for joining today's
national teleconference on:

Recreational Boating Accident Reporting Manual
COMDTINST M16782.1

Federal Register Notice

<https://federalregister.gov/a/2015-20738>



Docket No: USCG-2015-0753
www.regulations.gov

Comment deadline: Nov. 19, 2015



Resources and links are available at:
www.nasbla.org/BARManual



► [Federal Register](#)

Boating Accident Reporting
Manual (comment deadline
11/19/15)

Boating Accident Report (closed
9/29/15)

Recreational Vessel Accident
Reporting (closed 12/31/2011)

Changes to SNS VIS BARD (final
rule issued 3/28/12)

► [Model Acts](#)

► [Policy Positions](#)

► [Reauthorization](#)

► [Resolutions](#)

[Home](#) > [Policy](#) > [Federal Register](#) > [Boating Accident Reporting Manual \(comment deadline 11/19/15\)](#)

Boating Accident Reporting Manual (Comment Deadline 11/19/15)

On Aug. 21, 2015, the Coast Guard published a 90-day [Federal Register Notice](#) seeking public comment on a [draft Recreational Boating Accident Reporting Manual, COMDTINST M16782.1](#), to replace [Standard Method of Reporting \(CG-449\)](#), last published in 1973. The Notice and draft manual are also posted to [regulations.gov](#) under Docket USCG-2015-0753.

Additional Resources:

[First Look: Information and Issues--a Q&A on COMDTINST M16782.1 \(as of Sept. 9, 2015\)](#) - copy revised 9/14/15 to fix a broken link in the document

[Information about COMDTINST M16782.1](#) - Presentation delivered by ERAC Committee Chair at NASBLA workshop (Wichita) for discussion purposes, Sept. 13, 2015.


[Overhaul of the Recreational Boating Accident Reporting Manual, 2015-2](#) - resolution approved by NASBLA membership, annual Business Meeting (Wichita), Sept. 15, 2015

Watch this site for additional information and resources as they become available.

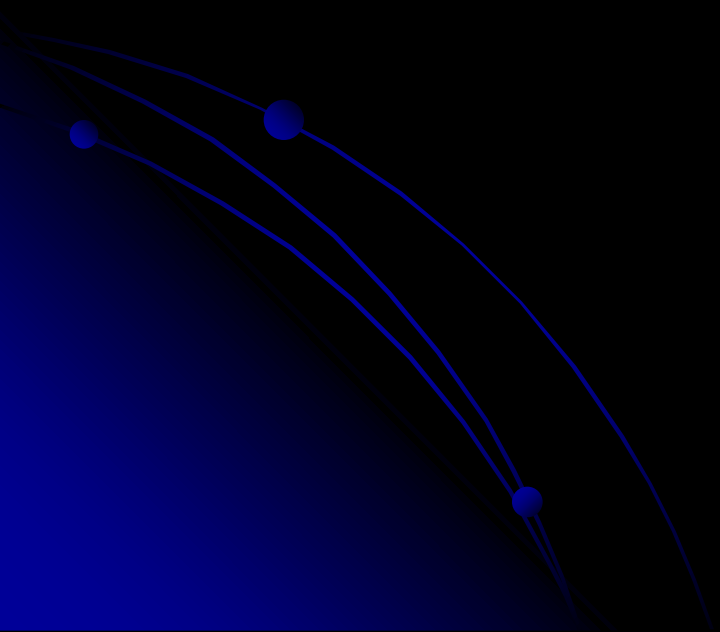
Purposes of this teleconference

- Overview – what is this draft Manual?
- Rewind – what preliminary work was done in the wake of its release? what actions were taken by NASBLA membership at the annual conference?
- Looking ahead – what's the guidance, tasks and timeframes for drafting the pieces of NASBLA's response to the Federal Register Notice on the Manual?

Purposes of this teleconference

- Issue highlights – what are some major points of interest or concern that were found in the initial review of the Manual?
 - Let's hear from you – what have you found? what else do you think should be included / emphasized in the association's response?
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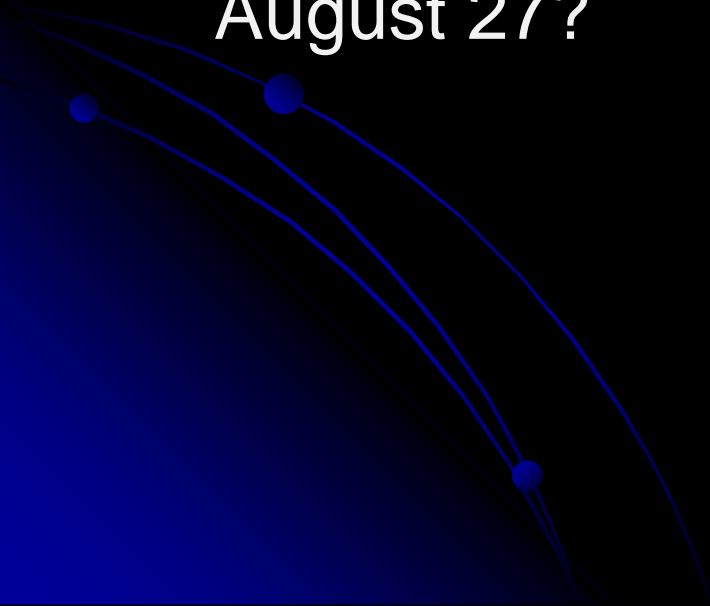
Overview: What is this draft Manual?

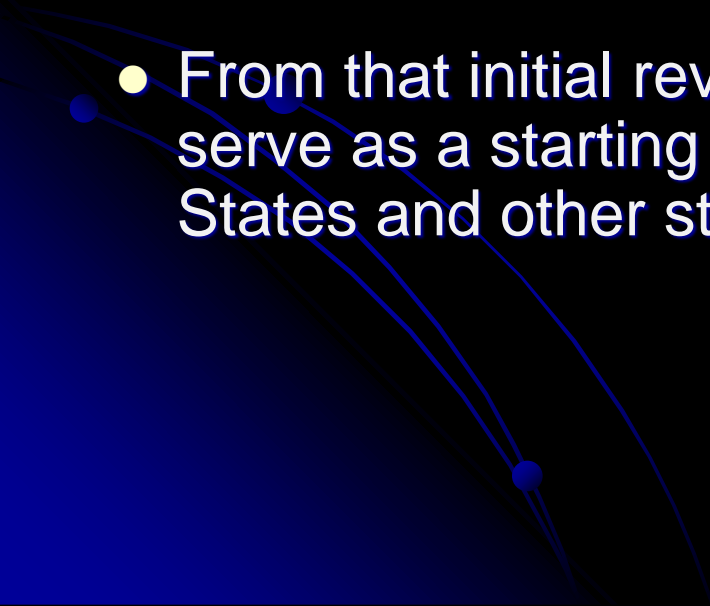


- It's a replacement for CG-449, Standard Method of Reporting (Boating Accidents), last published in 1973
- The replacement format is a Commandant's Instruction with eight sections and eight appendices
- It's intended to consolidate Coast Guard policies and operating procedures into a manual on reporting, investigation, and processing of recreational boating accidents

Rewind:

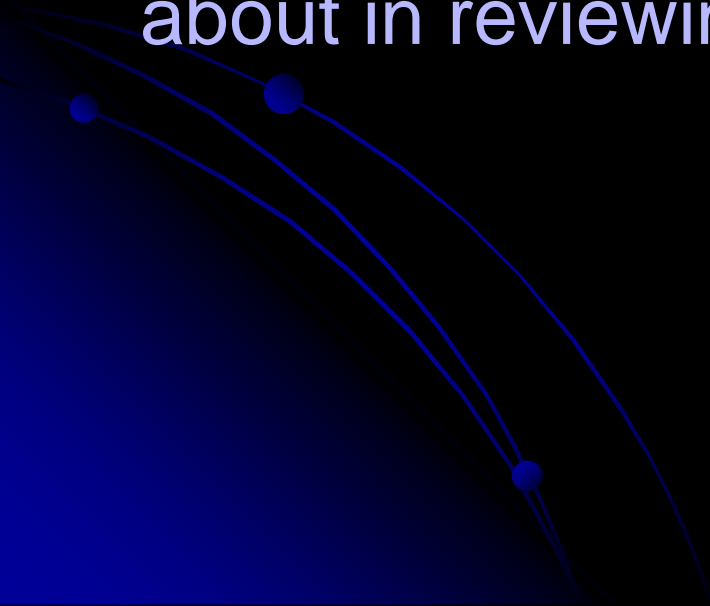
What initial work was done in the wake of the Manual's posting to www.regulations.gov on August 27?



- ERAC's standing charge to coordinate / provide input to Coast Guard policy and regulatory proposals on accident reporting kicked into high gear.
 - Created a "Writeboard" on NASBLA's Basecamp as a collection hub for items of interest, concern, questions, "missing" elements, etc., that members identified.
 - From that initial review and list, created a document to serve as a starting point for discussions among the States and other stakeholders.
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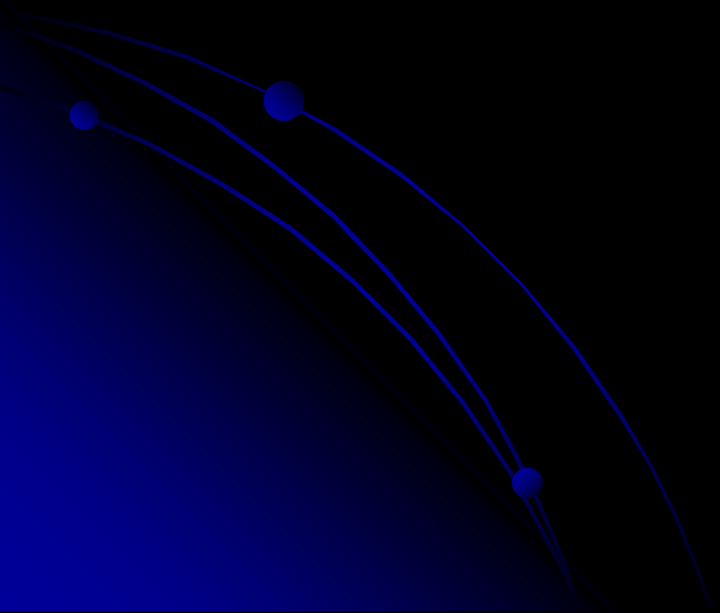
*First Look: Information and Issues – a Q&A on
COMDTINST M16782.1 (as of Sept. 9, 2015)*

Background information and things to think
about in reviewing the draft Manual

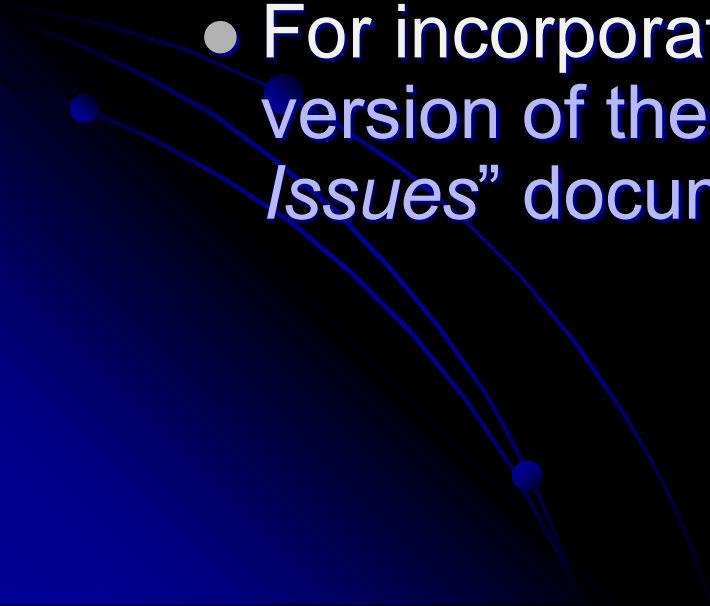


Rewind:

What actions were taken by NASBLA membership at the annual conference?

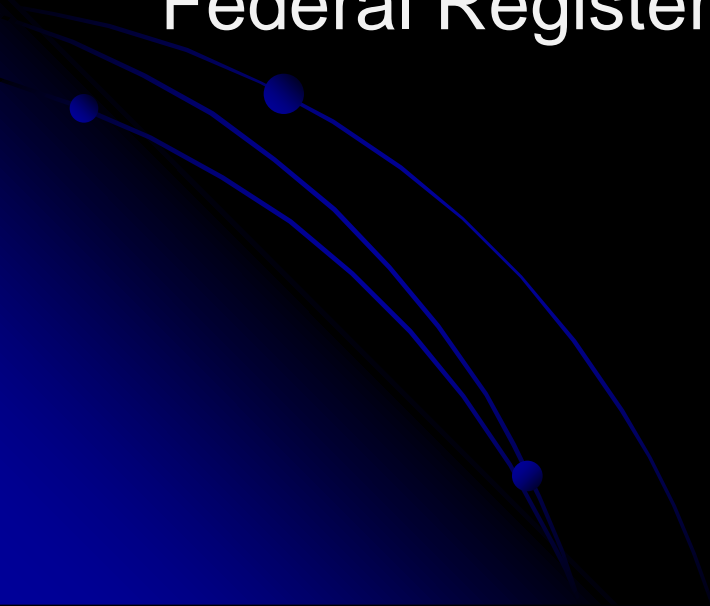


- Approved a NASBLA response to a related Federal Register Notice that closed Sept. 29... re Coast Guard's intent to submit an ICR to OMB for approval of extension of collection 1625-0003 Boating Accident Report (www.nasbla.org/BARICR)
- Approved Resolution 2015-2 Overhaul of the Recreational Boating Accident Reporting Manual in response to issues identified in the preliminary review (www.nasbla.org/BARManual)
- Settled on coordination of an effort that would result in an association response to the Manual Notice, and a reference point for States that draft separate comments.

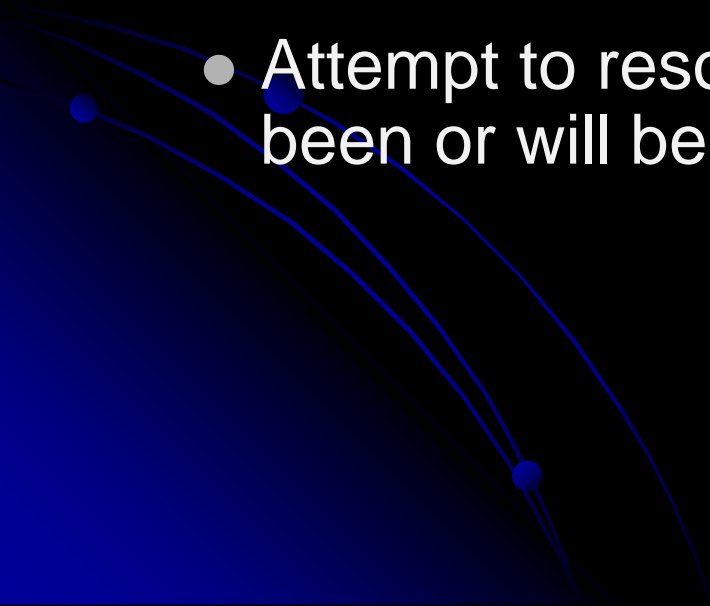
- The association response to the Manual Notice:
 - General letter, and
 - For incorporation by reference, an updated version of the “*First Look: Information and Issues*” document
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Looking ahead:

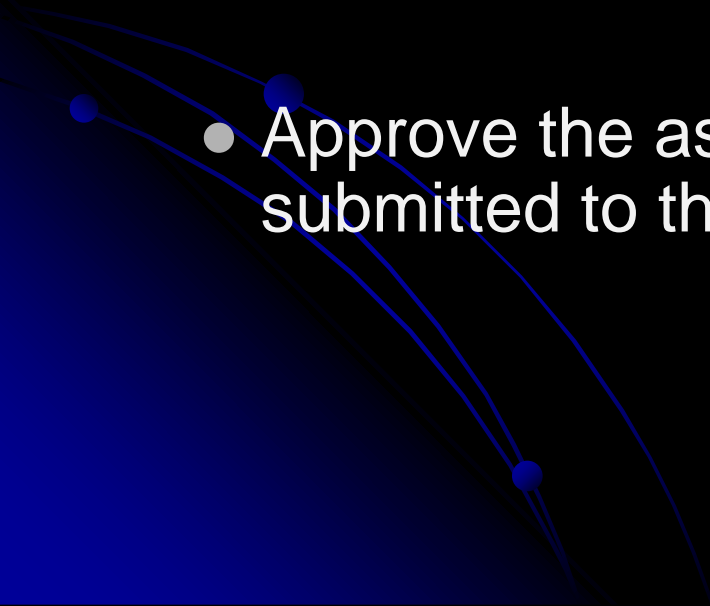
What's the guidance, tasks and timeframes for drafting the pieces of NASBLA's response to the Federal Register Notice on the Manual?



- The general letter should outline core principles discussed at the conference, including a call for withdrawal of the Manual draft and comprehensive revisions to it in cooperation with stakeholders
- ERAC should finish the Manual review begun pre-conference, and in the updated version of “First Look,” incorporate any other critical issues identified in the process

- The response, and in particular, the work to revise “First Look” should not:
 - Involve an elaborate, “line-by-line” evaluation of the Manual draft at this time
 - Attempt to resolve individual issues that have been or will be identified in the process
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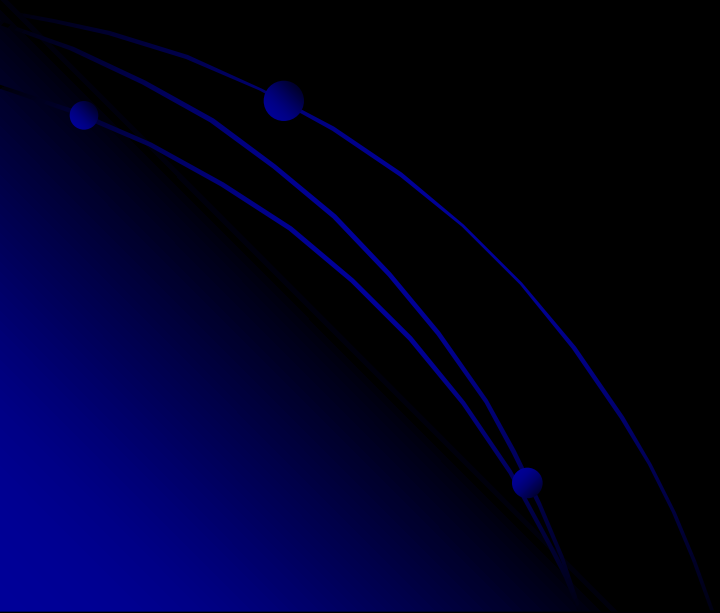
- The response, and in particular, the revised “First Look” should:
 - Capture additional, major concerns that States and other stakeholders not currently represented on ERAC might surface through independent reviews of the Manual and would like included in the update
 - Point out recommendations that have been proposed in past efforts directed toward improving accident reporting
 - Help to frame any follow-up discussions intended to address Manual revisions

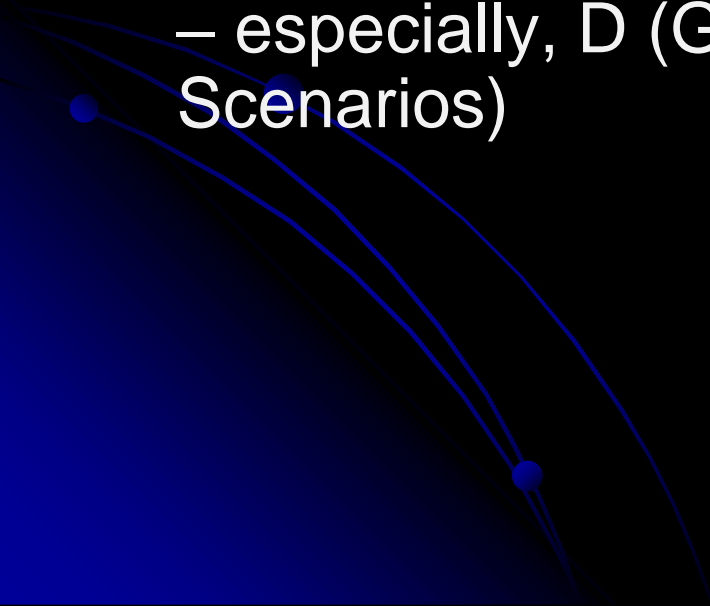
- Completion of the final draft of the association response is on a fast track to give NASBLA members the chance to:
 - Reference the materials in developing any individual state submissions
 - Approve the association package before it is submitted to the docket on regulations.gov
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- The comment period for the Federal Register Notice on the Manual draft ends November 19
- NASBLA Bylaws require a 30-day window for voting on matters of official business during the interim between in-person meetings
- The hope is to kick-off the voting period on the association's final draft submission about October 12

Issue highlights:

What are some major points of interest or concern that were found in the initial review of the Manual?



- The COMDTINST M16782.1 covers far more ground than the CG-449 guidance it is meant to replace
 - The appendices to the manual are *absolutely* critical;
 - especially, D (Glossary) and E (Accident Scenarios)
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- Previous, related work and recommendations by NASBLA and the National Boating Safety Advisory Council (NBSAC), like...
 - NBSAC Accident Reporting Task Force recommendations related to potential policy and regulatory action; accepted by NBSAC in 2009, and included in Obj. 9 of the National RBS Strategic Plan 2012-2016
 - NASBLA ERAC / USCG Accident Reporting Terms & Definitions Project standardized lists in five report areas approved by NASBLA membership, 2012-13; using review process approved by NASBLA Board & USCG BSX in 2011

Are notable largely for their omission, not incorporation into the manual.

- In some places, the Manual repeats what's in regulation, with no additional interpretation/guidance
- In others, the provisions are still somewhat vague, subject to varying interpretations
- And in others, the provisions contradict current practice or recommendations made by NBSAC and NASBLA, among others ... for example...

- Casualties resulting from departing the vessel
(Appendix E, p. E-1, A.2.a.)

“Casualties resulting from departing an *anchored/moored vessel* will be included as a reportable accident scenario because the individuals were still engaged in boating.” (italics added)

Now, let's hear from you:

What struck you in your review of the Manual draft?

What else do you think should be included or emphasized in—or perhaps even de-emphasized or pulled from—the “First Look” component of the association’s response?

