

**State Maritime Academy (SMA)’s
compliance with
*Training Ship – Special Considerations for incorporating EMBARC Standards
(TS-EMBARC)*
for Cadet Embarkation Eligibility on a MARAD-owned Training Ship (TS)**

SELF-ASSESSMENT CHECKLIST

Item No.	EMBARC Section	EMBARC REQUIREMENT	<u>STATUS</u> Completed or ETC Date	COMMENTS
Immediate Actions:				
1	II.1	Agreed to comply with the TS-EMBARC and confirming completion of the immediate action items. Submitted copies of SMA SASH PR policies with this completed checklist and statement of compliance document.		
2	II.2	Agreed to conduct self-assessments of compliance with the TS-EMBARC annually, to submit confirmation of self-assessments to MARAD, any resultant changes from the self-assessments, and copies of their SASH PR policies together with assessment results.		
3	II.3	Agreed to permit MARAD—including third parties engaged by MARAD—to conduct recurring assessments of compliance with the TS-EMBARC.		
4	III.1	Agreed that SASH reporting policies and procedures that ensure compliance with the TS-EMBARC will be operational upon enrollment in TS-EMBARC and will be documented within their TS SMS within 90 days of enrollment.		
4.1	III.1	Completed SMS revision within 90 days.		
5	III.2	Designate a person ashore who will be the primary contact for all SASH issues (SASH Contact). The SASH Contact must have completed the free 40-hour Victim Assistance Training Online provided by the Office for Victims of Crime Training & Technical Assistance Center, and		

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		received the Certificate of Completion, or have completed an equivalent training program.		
6	III.3	Established process to confirm that cadets will have (1) a virtual or in-person meeting with the SASH Contact or designee before joining a ship; or (2) if there is inadequate time between a cadet's assignment to a vessel and the cadet's embarkation, the SASH Contact or designee shall make contact with the cadet within 48 hours of the cadet's embarkation (via the cadet's satellite phone if the cadet is equipped with such a device). The SMA SASH Contact or designee may conduct the required meetings either individually with each cadet or with a group of cadets.		
7	III.4.a	Established and implemented procedures for appropriate communication frequency, communication means, and response times for communications between the SMA SASH Contact and the SMA's cadets aboard the training vessel, in lieu of EMBARC Standard III.§. a-c.		
7.1	III.4.b	Implement effective means for a cadet to privately contact the SMA SASH Contact.		
7.2	III.4 c	Submitted the SMA communication procedures under III.4.a-c to MARAD as part of the SMA SASH procedures submittal required under II.1.		
8	III.5	Established process to reinforce safety practices (including SASH prevention, bystander intervention, reporting procedures, and alcohol prohibitions) frequently with every cadet and crew member through onboard or virtual meetings in accordance with SMA procedures to strengthen a culture of prevention and build industry-wide understanding and accountability.		
9	III.6	A. Established policies that: i. Prohibit cadets from entering the		

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		<p>stateroom of any crew members, SMA faculty, SMA staff, SMA contractors and supernumeraries (hereinafter collectively referred to as “non-cadets”) except in specific circumstances.</p> <p>ii. Prohibit non-cadets from entering cadets’ private staterooms or large shared berthing compartments for any reason other than official maintenance, housekeeping or sanitary inspection duties during appropriate working hours and with adequate notice.</p> <p>B. The SMA may establish other criteria, such as safety checks, emergencies, or room inspection when non-cadets may enter cadets’ staterooms and berthing compartment.</p> <p>C. When non-cadets are in the private stateroom or berthing compartment with cadets, the door shall be left open and a minimum of either two cadets or two non-cadets should be present.</p> <p>D. "Cadets' private staterooms" and "cadet staterooms" exclude any cadet berthing compartments and large occupancy rooms (dormitory style cadet berthing compartments) which are not considered to be private cadet staterooms.</p>		
9.1	III.6	<p>Established procedure to check and maintain functional door locks for all cadet staterooms.</p> <p>For dormitory style cadet berthing compartments on a non-NSMV TS, a lock is not required on the door.</p>		
9.2	III.6	<p>Established a list of all master key holders with access to cadet staterooms identified by position.</p>		

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10	III.7.a	SMS established quarterly training requirements on SASH prevention, bystander intervention, reporting, and response procedures for all shipboard personnel (regardless of whether cadets are onboard). The SMA may provide a role to appropriately trained senior cadets in managing the quarterly training requirements on SASH prevention, bystander intervention, reporting, and response procedures for other junior cadets only aboard the TS.		
11	III.7.b	Established procedure to ensure that all SMA’s officers, crew, cadets, faculty, and onboard contractor personnel shall be required to individually complete the Ship Operations Cooperative Program (SOCP) computer-based training on Maritime Sexual Assault and Sexual Harassment Prevention Training before embarking the vessel, or if not practicable, within the first 48 hours of being onboard, and to repeat the training annually such that there is no more than 365 days between two consecutive training sessions.		
12	III.7.c	Established process to incorporate SASH discussions in periodic Vessel Safety Meetings using materials similar to those in the Facilitator’s Guide and Student Workbook in the SOCP SASH Tool Kit .		
13	III.7.d	Established procedure to provide copies of SMA’s SASH prevention policies and reporting procedures to each of their SMA crew, cadets, faculty, staff and subcontractors upon boarding the vessel.		
14	III.7.e	Established procedure to display SMA policies prohibiting SASH, retaliation, drug and alcohol usage, and cadet presence in non-cadet staterooms/non-cadet presence in cadet staterooms, on board.		

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15	III.7.f	Established procedure to display posters and guides that support a respectful and inclusive workplace culture, SASH prevention, reporting, and response posters, and the Title IX notice required by the MARAD-SMA MOA 2023, Article 5(D)(3), prominently in common areas of the vessel.		
15.1	III.7.f	In lieu of “ <i>Vessel Operators shall also display such posters in shoreside facilities to which cadets have access</i> ”, , the SMA shall comply with the requirements in the MARAD-SMA MOA 2023, Article 5(D)(3).		
16	III.7.g	Established procedure to distribute the quick reference guide brochures in the SOCP SASH Tool Kit² or other comparable materials to all crew, officers, cadets, faculty, staff and subcontractors aboard the TS; and to all shore-based personnel who interact with or have responsibilities related to officers, crew and cadets. Tips for prevention of and response to SASH behaviors as appropriate for each intended audience. The SMA may satisfy this requirement in part by distributing SASH PR materials produced by or for their serving Title IX office.		
17	III.7.h.i	Established procedure to require Vessel Masters to introduce cadets to ship’s company employees as soon as practicable after boarding to foster an open, welcoming environment for students.		
18	III.7.h.ii	Established procedure to require Vessel Masters to ensure that cadets are familiarized with the ship during onboarding in accordance with the SMS.		
19	III.7.i	Established process to ensure that reporting procedures provided to officers, crew, cadets, faculty, staff, and SMA		

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		subcontractors and posted on the vessel shall include: <ol style="list-style-type: none"> i. Contact information for the SMA's SASH Contact(s). ii. If applicable, contact information for any SMA SASH Contact designee on board to whom cadets may make reports in lieu of reporting to the SASH Contact ashore. iii. Point of contact information for notifications to the Coast Guard. Refer to the EMBARC Standard in TS-EMBARC for additional details. 		
20	III.8.a	Established procedures to ensure implementation of the following Items # 20.1 thru #20.1, if the SMA is required to notify the USCG or voluntarily notifies the USCG of an allegation of SASH-involved behavior:		
20.1	III.8.a SC – SMA Operated TS, # A.	The SMA shall notify MARAD via the MCC at mccwatchanalyst@dot.gov within 24 hours after learning of an allegation of SASH involved behavior that occurs or is reported on board the TS, regardless of whether the behavior involves a cadet or even if cadets are onboard. The notification shall include, at a minimum: <ol style="list-style-type: none"> i. date of incident; ii. classification of the allegation(s); iii. category of persons involved (such as cadet, licensed crew, unlicensed crew, faculty, SMA contractor, etc.); iv. actions taken by the SMA; and v. confirmation that the U.S. Coast Guard (USCG) was notified. 		
20.2	III.8.a SC – SMA Operated TS, # B	Established procedure to ensure that the TS Master shall notify the SMA SASH Contact of an alleged SASH-involved behavior.		

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20.3	III.8.a SC – SMA Operated TS, # C	Established procedure to ensure that the SMA shall provide a complete report of investigation without FERPA-protected information, regardless of whether the behavior involves a cadet, to MARAD’s Office of Civil Rights (OCR) at civilrights.marad@dot.gov within 15 days of resolution of the complaint.		
20.4	III.8.a SC – SMA Operated TS, # D	Established policies that require (1) thorough investigation of alleged violations of the SASH policy that meet best practices, listed in the SOCP Best Practice Guide (BPG) as modified or permitted by other federal or state requirements, for investigations of sexual assaults and sexual harassments; and (2) interviews be conducted using trauma-informed interview methods.		
21	III.8.b	Established SMA policies that require all shipboard complaints of a sexual offense prohibited under current law to be immediately reported to the Coast Guard. These notifications can be made to the Coast Guard National Command Center at +1 (202) 372-2100, or an attributed report through CG Tips.		
22	III.8.c	Established procedure that encourages SMA leadership to inform the Coast Guard of adverse or disciplinary actions that result in termination or a probationary status of any crewmember for harassment or SASH. Reports of mariner misconduct should be made to nearest Coast Guard Officer In Charge, Marine Inspection which can be found at the following website: https://www.uscg.mil/contact/ .		
23	III.9	Reviewed SMA policies within the SMS to determine if they are at least as comprehensive as those listed in the SOCP Best Practices Guide ³ and revised as necessary, including but not limited to the following policies:		

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23.1	III.9.a	a. Employee Best Practices: <ul style="list-style-type: none"> i. Best Practice #1: Reporting of Sexual Harassment & Sexual Assault iii. Best Practice #2: Basic Do's and Don'ts iv. Best Practice #3: Safety on Shore Leave v. Best Practice #4: Response to Sexual Harassment & Sexual Assault vi. Drugs & Alcohol vii. Company Investigation Process viii. Victim Advocacy xi. "Did You Know?" 		
23.2	III.9.b	b. Vessel Operator Company Best Practices: <ul style="list-style-type: none"> i. Best Practice #1: Defining Sexual Harassment & Sexual Assault ii. Best Practice #2: Nurturing a Culture Free of Sexual Harassment & Sexual Assault iii. Best Practice #3: Development of Prevention Policies iv. Best Practice #4: Effective Training on Sexual Harassment & Sexual Assault Prevention and Response v. Best Practice #5: Establishing Reporting Options vi. Best Practice #6: Response to Sexual Harassment & Sexual Assault <p><i>Note: SMA shall comply with the reporting procedures listed herein under section III.7.i and section 8, instead of reporting procedures in the SOCP Best Practices Guide.</i></p>		
24	III. 10	Agreed to meet with MARAD, USMMA and other invited government and industry participants quarterly, or as called by DOT/MARAD/USMMA, to assess compliance with SASH policies and implement any necessary adjustments and/or		

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		corrections.		
Intermediate Actions:				
Commits to implementing the following intermediate actions:				
25	IV.1	Within one year, implement master key control systems, manual or electronic, for the vessel.		
26	IV.2	Within one year, develop and implement recommended SASH Contact training and annual refresher training for designated SASH contacts to include survivor advocacy and instruction in training and education principles		
26.1	IV.2	Within one year, appoint and train an appropriate number of designated SASH contacts to ensure that an adequate number (minimum one primary and one alternate) are always available.		
27	IV.3	Within one year, work with other Vessel Operators, labor, academies, SOCP and/or other industry organizations, SASH subject matter experts, MARAD and other stakeholders to review and enhance SASH policies used by vessel operators.		
27.1	IV.3	Within one year, participate and provide input—with other Vessel Operators, labor, academies, other industry organizations, SASH subject matter experts, MARAD and other stakeholders—in the revision of the SOCP SASH Best Practices Guide, including: Development of best practices and templates to support incorporation of SASH prevention, reporting, and response as well as internal audit and external audit procedures into Company and Vessel Safety Management Systems.		
28	IV.4	Within one year, work with other Vessel Operators, labor, academies, industry organizations, SASH subject matter experts, MARAD, and other stakeholders to develop enhanced policies and training pertaining to		

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		bystander reporting requirements and bystander duty to intervene in SASH incidents.		
29	IV.5	<p>Within eighteen months, collaborate with other Vessel Operators, maritime labor unions, academies, union training schools, SASH subject matter experts, MARAD and USCG to develop and implement expanded mandatory annual SASH training for all crew members including, but not limited to:</p> <ul style="list-style-type: none"> a. SASH (including bystander intervention); b. Micro aggression consciousness; c. Cadet relationships; d. Creating and maintaining a respectful work environment; and e. Training regimens and methods that enable effective crew awareness of SASH prevention principles 		
30	IV.6	<p>As soon as practicable, but not later than two years, work with other Vessel Operators, labor, Academies, industry organizations, SASH subject matter experts, MARAD, USCG, and other stakeholders to develop, establish and participate, to the extent permissible under law, in the maintenance and operation of a SASH perpetrator information exchange. The exchange shall contain the names of all merchant mariners who are the subjects of substantiated reports of discriminatory, SASH-related, violent, or other violative behavior, or who were terminated in related proceedings; the incident dates; the bases of substantiation; and the disposition of each circumstance shall be recorded and accessible to all operators of U.S.-flag vessels.</p>		

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<p>Long-Term Actions: Commits to work together to develop, in coordination with the MARAD and other Government and maritime industry participants, long-term actions, as soon as feasible, which may include:</p>				
31	V.1	<p>Consideration of a range of possible measures to address accountability for the SASH climate onboard Vessel Operator ships, including:</p> <ul style="list-style-type: none"> a. training records maintenance; b. identified perpetrator tracking and record keeping, to the extent permissible by law; c. recorded video monitoring of, at a minimum, passageways immediately adjacent to cadet staterooms. d. enhanced Diversity, Equity, and Inclusion (DEI) initiatives and practices in the mariner workforce; e. training and credentialing of officers at the Provisional level by the National Advocate Credentialing Program. 		
32	V.2	<p>Collaboration with the U.S. Coast Guard, other vessel operators, mariner unions and industry organizations to develop the requirements of a merchant mariner credential that satisfies training requirements for SASH Contacts and designated onboard officers or other persons ashore to attain and maintain respective Basic and Provisional NACP training levels.</p>		
33	Addendum: Definitions	<p>Established procedure to ensure that SMA shall advise MARAD of any EMBARC definitions which cannot be incorporated in the SMA's SASH procedures due to any conflicts with the definitions in other applicable laws and regulations. The SMA shall submit proposed alternate definitions for MARAD's consideration.</p>		