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MEMORANDUM

TO: AWO Members
AWO-Recognized Third-Party Auditing Organizations

FROM: Brian S. Bailey

DATE: July 30, 2020

RE: Internal Audit Extension Requests Due to COVID-19

Please be advised that this correspondence is sent on behalf of the Responsible Carrier Program® (RCP) Standards Board of The American Waterways Operators (AWO), which “has the authority to issue Clarifications and Directives Memoranda, as needed, to guide RCP interpretation by AWO-recognized third party organizations,”¹ to advise its members of certain procedures that may be undertaken when, due to extraordinary circumstances, there is a need to request an extension of an internal management and/or vessel audit due date(s).

Due to the rapid escalation of the Coronavirus Disease 2019 (COVID-19) pandemic and the resulting importance of limiting travel and promoting social distancing, this guidance is provided to offer relief to member companies regarding the requirement that their respective auditors meet upcoming RCP internal management and vessel audit deadlines. For those companies utilizing the International Safety Management System (ISM) Code, please reference the U.S. Coast Guard’s [U.S. Flag Interpretations on the ISM Code](#)². The guidance contained herein is consistent with these understandings.

The RCP Standards Board has determined that the COVID-19 pandemic qualifies as an extraordinary circumstance. In this circumstance, the RCP Standards Board will authorize due date extensions for RCP internal management and vessel audits as follows:

¹ RCP Addendum E.4

² *U.S. Flag Interpretations on the ISM Code*, Serial: CVC-WI-004(1), Mission Management System Work Instruction, Office of Commercial Vessel Compliance, U.S. Coast Guard, April 16, 2018

Internal Audit Extension(s)

The RCP mandates that “internal audits must be carried out annually, and initiated by the anniversary date of the last internal audit, for all towing vessels and managing offices (all offices with management oversight of towing vessels)” and that “audits can be conducted up to three months before the anniversary of the original audit and will maintain the original anniversary date.” Each vessel internal audit must be “by anniversary of last audit” and each managing office internal audit must “maintain original anniversary date.”³

If a company deems it necessary to postpone an internal managing office or vessel audit due to the COVID-19 outbreak, they may do so for generally not more than up to three months after the anniversary date of the last internal managing office or vessel audit and will maintain the original anniversary date. Postponements exceeding three months should be permitted only in extenuating circumstances. The company should thoroughly document the cause of the internal audit’s postponement and the efforts generally taken to conduct the internal audit. The company should reschedule the internal audit and for RCP audit tracking purposes, must notify AWO in writing via email at rcpnotifications@americanwaterways.com of the internal audit postponement and provide the rescheduled date.

Please note that “any extension of an audit due date does not change an AWO member’s obligation to conduct audits in the timeframes required by regulation under 46 CFR Subchapter M.”⁴

Thank you for your attention to this matter. Please do not hesitate to contact me if you have any questions or concerns.

³ RCP II.G.1

⁴ RCP Addendum A.4.c