From: Commander, Naval Service Training Command

Subj: NAVAL SERVICE TRAINING COMMAND TRAINING SAFETY PROGRAM

Ref: (a) OPNAVINST 6110.1J
    (b) OPNAVINST 5100.29A
    (c) NETCINST P1552.16
    (d) OPNAVINST 3591.1F
    (e) OPNAVINST 3500.39D
    (f) OPNAVINST 1500.75D
    (g) NETCINST 1500.13C

Encl: (1) Emergency Action Plan Drill Package

1. **Purpose.** Establish instruction and policy for implementing and administering the Naval Service Training Command (NSTC) High Risk Training (HRT) Safety Program in accordance with references (a) through (g). Additional guidance is provided for training that is physical in nature but does not meet the high risk training definition per reference (a) once a risk assessment is completed.

2. **Cancellation.** NSTCINST 1500.13A.

3. **Background.** Aggressive training programs designed to prepare military personnel to perform professionally in normal, as well as potentially hazardous, evolutions entail elements of risk. A fatal or serious mishap can occur in any environment; however, some evolutions are more likely to result in serious mishaps than others and require procedures designed to reduce risk. NSTC must ensure training is conducted as safely as possible while meeting required course objectives. Safety initiatives shall be maintained at levels to facilitate safe but realistic training that fulfills fleet operational requirements within practical limits. These initiatives are not intended to eliminate risk where it is necessary to meet valid training objectives but rather to promote the safest training that produces confident, capable Fleet Officers and Sailors.

4. **Scope and Applicability.** This instruction applies to all NSTC activities, NSTC civilian employees, and military personnel involved in providing training that is physical in nature. However, only Officer Training Command Newport (OTCN) and Recruit Training Command (RTC) have formal high risk courses, which are defined as high risk courses having a Course Identification Number (CIN). All formal HRT shall be conducted in accordance with references (a) through (g). Formal HRT courses in the NSTC domain include:
a. OTCN

b. Officer Candidate School

c. Officer Development School

   (1) Small Arms Training

   (2) General Shipboard Firefighting Training

   (3) Advanced Shipboard Firefighting Lab

   (4) Senior Shipboard Firefighting Refresher Course

   (5) Basic Shipboard Damage Control Wet Trainer

   (6) Swim Skills Maintenance and Improvement Course

   (7) Capstone Event

d. RTC

   (1) Recruit PT in Freedom Hall

   (2) Live Fire Training

   (3) Dive Motivator Training

   (4) Swim Skills Maintenance and Improvement Course

5. NSTC Domain High Risk (HR) Trainers

   a. OTCN and RTC Commanding Officers shall approve the use of their respective commands HR trainers by Department of Defense (Military or Civilian), U.S. Coast Guard, National Oceanographic and Atmospheric Administration (NOAA), and International Military Students. All others shall require written approval from Commander, Naval Service Training Command (CNSTC).

   b. Use of NSTC domain HR trainers for any other use than conducting approved formal training shall require written approval from CNSTC, example requiring CNSTC approval: Use of a fire trainer by Special Operations personnel to conduct search and seizure training while exposed to an atmosphere with fire hazards.
6. Naval Reserve Officers Training Corps (NROTC) units

a. NROTC units do not conduct formal high risk training, but NROTC Units do conduct training evolutions that are physical in nature and can be considered a High Risk (HR) evolution. This will be determined by completing the Naval Education and Training Command (NETC) Risk Assessment form located in Enterprise Safety Adaptation Management System (ESAMS) under the resource option. An initial Risk Assessment Code (RAC) of 1, 2, or 3 in the severity level of I or II in any step is considered high risk. The only exception to using the NETC Risk Assessment form will be when a unit is conducting training on a military base and that base requires the unit complete a risk assessment using the base form. The commanding officer (CO) is required to sign the form to ensure controls are in place to mitigate risk and accepts the risk.

b. HR evolutions for NROTC Units must at a minimum include a thorough risk assessment per references (a) through (c) to identify hazards and put in place controls that eliminate or minimize those hazards to an acceptable level determined by the CO, an Emergency Action Plan (EAP) that complies with reference (c), instructor training requirements, Personal Protective Equipment (PPE) requirements and fall protection (i.e. Crash Mats, Rubber/Mulch attenuation, etc.). Units that use local military facilities and trainers need to ensure they are safe for use and apply safety controls to mitigate injury. The unit’s responsibility for the safety of staff and students does not change when the training is conducted by individuals other than the NROTC staff, the unit CO has the responsibility to ensure the training is safe for the staff and students before allowing them to participate. Examples of NROTC HR evolutions include but are not limited to:

1. Physical Fitness
2. Swim Testing
3. Small Arms live fire training by NROTC Staff. Note: Units using NROTC staff to conduct live fire training must notify the NSTC Safety Manager N00X to ensure compliance with OPNAVINST 3591.1F prior to conducting the training. Additional oversight may be required depending on how the unit is conducting the training.
4. Physical Readiness Testing (PRT) and Combat Fitness Testing (CFT) for Midshipmen (MIDN)
5. Field exercises
6. Confidence Courses
7. Rope Climb
8. NROTC Safety Representative. The Safety Representative shall develop a safety binder that will provide one location for safety documents and ease the turnover process if not able to conduct face to face. The binder shall include at a minimum:
a. Designation of Safety letters
b. Commanding Officer’s Safety Policy
c. Official Mail Messages (OMM) pertaining to safety
d. Applicable OPNAV, NETC, and NSTC instructions or a page listing applicable instructions and where to find them.
e. Current copies of all command risk assessments signed by the commanding officer.
f. Copy of the Safety Officer Training Compliance Checklist
g. Copy of virtual ESAMS reviews (1-2 per year)
h. Copy of past Safety Occupational Health Management Evaluations (SOHME’s) including deficiencies.

7. Additional Requirements. Regardless of whether a course or evolution has been determined “high risk,” the following additional guidelines will be implemented and adhered to for all training conducted throughout the NSTC domain that is physical in nature:

a. All units will conduct a comprehensive review of all training that is physical in nature and implement risk mitigation, Training Time Out (TTO) procedures, Emergency Action Plan (EAP) development/drills, and staff oversight. At a minimum, EAPs will be walked through on a quarterly basis at RTC and OTCN, and each semester at NROTC units, and exercised fully on an annual basis at all commands. The purpose of the EAP drill/walk through requirement in this instruction is to ensure the information and staff actions in the EAP are accurate, staff can administer first aid for a life threatening and non-life threatening injury while waiting for emergency services and to ensure staff is thinking about the various areas they operate in and how they will get emergency services to the victim. When feasible, local Naval Station or University Emergency Response Personnel should be involved this allows the emergency personnel to understand how and where the command operates to reduce response time to the victim. Record the EAP walk through and annual exercise in ESAMS.

b. All NSTC instructors must be Cardiopulmonary Resuscitation (CPR) and Automatic External Defibrillator (AED) qualified and remain qualified while attached to NSTC.

c. AED/CPR and administering oxygen for Sickle Cell Traits training and drills will be done at least once per quarter at RTC and OTCN and at least twice per academic year (e.g., once per semester) at NROTC units. Training and drills should require rapid recognition of cardiac emergencies and demonstrate proficiency at CPR, AED and administering oxygen use. When appropriate, lessons learned from drills will be shared throughout the command and forwarded to the NSTC Safety Officer for NSTC domain-wide awareness. Enclosure (1) can be utilized to document the drill. Record the AED/CPR drills in ESAMS and annotate in the notes that administering oxygen was included in drill.
d. Students will be given a brief on TTO procedures prior to any training that is physical in nature. Staff will be trained to recognize the symptoms of distress in others. Within the first 14 days of reporting onboard, students will receive training to recognize the early signs of distress in themselves for cardiac arrest, dehydration, and heat exhaustion.

e. An AED/CPR-trained Safety Observer, who is not simultaneously serving as the event instructor/leader, must be present throughout the entire evolution with an AED that is ready for use. The Safety Observer must be positioned in an area sufficiently close to, but not within, the danger zone. For events that are executed inside a facility specifically designed for HRT evolutions, AEDs permanently located within the facility will meet the AED ready-for-use requirement. At mobile, outdoor events, the AED must be carried in a chase vehicle or carried in pack. A Safety Observer must also carry an operable two-way communications device. The communications device shall be checked for proper operation, and, if emergency services other than 911 are used, the emergency services will be kept on speed dial and a communications check will be conducted prior to beginning the day/event. The CO or Officer-in-Charge (OIC) shall determine if the event is large enough to require more than one Safety Observer, unless otherwise directed below or by higher authority.

f. All units will ensure that AEDs are easily accessible, storage locations are clearly marked, routine maintenance and updates are conducted, and a minimum of a monthly documented inspection to verify batteries are operable, defibrillator pads are not expired, and emergency kit contains non-latex gloves in various sizes, CPR face mask with some type of barrier device, disposable razor, blunt end scissors, biohazard bag and absorbent towel. When there are multiple, similar buildings that comprise the command, AED stowage areas will be standardized. All COs and OICs must determine if their unit has a sufficient quantity of AEDs. If more AEDs are desired, NSTC will assist with procurement in accordance with reference (b).

g. Instructors will ensure all students are briefed on TTO policies and procedures. For multi-day or all-day evolutions, TTO procedures shall be re-briefed prior to the start of training following major breaks, such as meal times. These procedures shall be standardized to conform with established fleet distress indicators where appropriate, e.g., taking a knee, standard small arm range procedures, diving distress signals, etc. Emphasis shall be placed on specific verbal and nonverbal signals to be used by students and instructors.

h. In any situation when students or instructors express concern for personal safety or a need to clarify procedures or requirements, they shall call a TTO. TTO is also an appropriate means to obtain relief for students who are experiencing chest pain, heat stress, or other serious physical discomfort. When a TTO is called, training will immediately cease until the situation or condition is returned to a safe state. Then, and only then, will training resume. Calling a TTO is a safety procedure that allows students and instructors to stop a training evolution and should only be utilized when an actual emergency or safety issue is made a concern. Leg pain, stomach/side cramps, congestion, or tiredness do not generally constitute a TTO. Following a TTO, the situation shall be thoroughly examined. Additional explanation and instruction shall be provided as needed to allow safe resumption of training.
i. It is the responsibility of the command or unit to properly understand the level of gravity in any given situation in order to efficiently manage EAP resources and minimize training cessation periods due to issues not deemed emergent, grave, or where immediate medical attention is not warranted.

j. If a student is injured or experiences minor discomfort in a manner that DOES NOT require an emergent action such as a Health Care Provider, AED, CPR, or base Emergency Medical Service, the student will locate the closest staff member for assessment and follow-on directions.

k. Instructors are responsible for maintaining situational awareness and shall remain alert to signs of student panic, fear, extreme exhaustion, or lack of confidence that may impair safe completion of the training exercise. Instructors shall cease training immediately when they consider such action appropriate.

l. If a student refuses to participate in training after being instructed, after an unsafe condition has been corrected, or uses TTOs excessively to disrupt training, that student shall be removed from training and referred for further counseling or administrative processing.

m. Per reference (a), in addition to the Command Fitness Leader or Assistant Command Fitness Leader, the CPR-certified monitor to participant ratio shall not be less than 1:25 while conducting a semi-annual or NROTC inventory Physical Readiness Test.

n. Per reference (c), a current qualified Navy Swim Tester, Navy Swimming and Water Survival Instructor, or Naval Aviation Water Survival Instructor, and one qualified lifeguard are required for five swimmers or less. If all swimmers are placed in deep water (deep water defined as water too deep to stand with mouth and nose above the surface) an additional in-water lifeguard must be added for each five swimmers or portion thereof.

o. Per reference (d), an additional safety observer/line coach is required when more than four students are participating in small arms training. The safety observer/line coach to student ratio shall not be less than 1:4. Due to partitions between recruits at the USS WISCONSIN that obstruct safety observer line of sight, the safety observer/line coach to student ratio at RTC shall not be less than 1:2.

8. RTC and OTCN. RTC and OTCN shall establish AED/CPR Training Teams. These teams will train, evaluate, and drill staff on AED/CPR protocols utilizing American Heart Association standards. AED/CPR training and drills will be done at least quarterly and fully documented in the ESAMS.

9. RTC. For RTC only, during the baseline Physical Readiness Test (PRT), Recruit Division Command Assessment, and final PRT, two hospital corpsmen (HMs) are required on deck and will be identified during the introduction brief. During these three evolutions, if a TTO is called by a recruit, the PRT will continue for all other recruits. One of the HMs will make an assessment of the recruit in distress and, if emergency services are deemed appropriate, will call a medical emergency and cease the PRT. If the HM determines that there is no need for emergency services, the HM will tend to the recruit while the PRT continues. If a second TTO is
called by a second recruit in distress, a medical emergency will be immediately called by all officials, and the PRT will stop for all recruits while the second HM makes an assessment.

10. **NROTC.** For NROTC units only, the CO or OIC may assign MIDN, Marine Enlisted Commissioning Education Programs (MECEPs), or Seaman to Admiral (STA-21) candidates as safety observers or first responders for training that is physical in nature. Individuals assigned as safety observers must be qualified, including current AED/CPR training, and must be designated in writing by the CO. The CO may develop and require a MIDN Personnel Qualification Standard tailored to the intended evolution. At least one staff member must also be the primary safety observer; at no time shall MIDN, MECEPS or STA-21’s act as the only safety observer. MIDN, MECEPS, and STA-21’s will only serve as an assistant safety observer to the staff member assigned as the primary safety observer.

11. **Records Management.** Records created as a result of this notice, regardless of media and format, must be managed per Secretary of the Navy Manual 5210.1 of January 2012.

12. **Review and Effective Date.** Per OPNAVINST 5215.17A, NSTC will review this instruction annually on the anniversary of its effective date to ensure applicability, currency, and consistency with Federal, DoD, SECNAV, and Navy policy and statutory authority using OPNAV 5215/40 Review of Instruction. This instruction will automatically expire 10 years after effective date unless reissued or canceled prior to the 10-year anniversary date, or an extension has been granted.

Releasability and distribution:
This instruction is cleared for public release and is available electronically only via the Naval Service Training Command issuance website, http://www.netc.navy.mil/nstc/NSTC_Directives/instructions.html.