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NMC Policy Letter 04-00
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From: Commanding Officer, National Maritime Center
To: Distribution

Subj: ACCEPTANCE OF RECORDS OF TRAINING

Ref: (a) Navigation and Vessel Inspection Circular 5-97, *Guidance on Coast Guard Accepted Training Record Books*

1. This policy letter provides guidance for the acceptance of records of training submitted by mariners to the Regional Examination Centers. A record of training (ROT) is any document or collection of documents that represents the training successfully completed by the holder of the record. Several organizations have established formal processes to document a mariner's training where the records of that training are maintained in a book format, and entries are made by a record-keeping component of the sponsoring organization. These books, or other forms of an ROT, may be presented to the Coast Guard as proof of a mariner's completion of required training.

2. Do not confuse an ROT with a training record book (TRB). A TRB is a formal document required by the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended (STCW). A TRB is required for every applicant who participates in an approved program of training leading to issuance of an STCW certification as either officer in charge of a navigational watch or officer in charge of an engineering watch. A TRB must either meet the Coast Guard's standards as set forth in reference (a) or be approved and accepted as part of an approved training program. Similar requirements do not exist for an ROT.

3. An ROT may be accepted as proof that a mariner has completed all of the training contained therein, provided the training was conducted by the organization that maintains the ROT. The ROT must identify the applicant by name, SSN, address, and license or endorsement(s) on a merchant mariner's document (MMD). If the ROT does not contain an identifying photograph, the mariner must provide a picture identification, preferably an MMD for it to be accepted by a Regional Examination Center (REC). An entry in an ROT must:

- a. Specifically identify the training by title, number, or other unique, identifying characteristic. If the course is an approved or accepted course, the formal name of the course should be used;
- b. Indicate the date that the training was completed;

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- c. Give the location of the training; and
 - d. Be signed by either an authorized agent of the sponsoring organization or by a designated examiner if the entry in the ROT pertains to the completion of the assessments of skills required by the STCW.
4. A maintainer of an ROT may make entries in the record pertaining to training conducted by a provider other than the maintainer. While these third-party entries may provide an overall picture of the training completed for the convenience of the mariner and shipping companies, these entries are not acceptable as formal proof of completion of training for licensing or certification purposes. The mariner must provide a course completion certificate or other acceptable proof of completion of training to an REC.
5. Before acceptance, an ROT should be examined to ensure that it has not been altered. Contact the issuing organization to corroborate the entries in a ROT, if there are signs of tampering, alteration, or deterioration causing loose pages or if it otherwise appears that it may not be legitimate.
6. An ROT is only one possible proof of having completed training. Other acceptable proofs include, but are not limited to, course completion certificates prepared in accordance with current guidance, letters from course providers or designated examiners attesting to the completion of training or assessment, or a transcript. The letters or transcripts should be on letterhead stationary, identify the mariner, identify the course and/or assessments, and be signed by the head of the school and the course's instructor or the designated examiner, as appropriate.

M. S. BOOTHE

Dist: Commandant (G-MSO)
All District Commanders (m)
All Activity Commanders
All COs, MSOs
All RECs