

MARINE SAFETY MANUAL

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CHAPTER 7. MARITIME TRAINING COURSE APPROVAL

A. Background.

The Coast Guard's policy with respect to maritime training is changing as a result of several influences. These include the development of new technology, obligations resulting from the implementation of the Standards of Training, Certification and Watchkeeping (STCW), and the economic realities faced by both the Coast Guard and the maritime industry. Labor saving technological advances have resulted in smaller crews and the elimination of traditional apprentice/training billets. STCW requires mariners to demonstrate practical proficiency, as well as knowledge, prior to the issuance of documents and licenses. The Coast Guard is required to meet its responsibilities regarding marine safety and environmental protection with fewer resources each year. The maritime industry needs to operate its vessels in the most cost effective manner possible while also meeting its obligation to employ well trained, competent mariners using clearly defined and understood procedures to safely operate the vessels. Well designed training programs, including the integration of simulators, can provide the mariner with a quality training experience.

B. Requirements.

The Coast Guard will consider granting approval of a course or training program for one of the following reasons:

1. The course is required by regulation.
2. The course substitutes for part of the sea service required for issuance of licenses and certificates.
3. The satisfactory completion of a course is substituted for a required examination.

C. Course Approval Application Procedures.

1. The course approval process is explained in Title 46 of the Code of Federal Regulations, Part 10, Subpart C (46 CFR 10.301 - 10.304). An organization desiring to have a course approved by the Coast Guard must submit a Course Curriculum Package to the Commanding Officer, National Maritime Center (NMC-4B) at 4200 Wilson Blvd.; Suite 510; Arlington, VA 22203-1804.
2. Course approval submissions must document that the course covers the material necessary to satisfy regulatory training requirements. Specific course guidelines produced and used by the Coast Guard for the review of approved courses are discussed below and may be obtained through the Internet via the Marine Safety Web site at [www:uscg.mil/hq/g-m/gmhome.htm](http://www.uscg.mil/hq/g-m/gmhome.htm) or by writing the Commanding Officer, National Maritime Center (NMC-4B). The course curriculum package should consist of the following:

a. Cover letter.

The cover letter consists of:

- (1) the identity of the school;
- (2) the name of the course;
- (3) the length of the course;
- (4) what regulatory/STCW requirements will be satisfied;
- (5) what examination requirement the course will substitute for;
- (6) the sea service requested;
- (7) the location of the training facility; and
- (8) whether the course will be offered at satellite locations.

b. Course framework.

This section provides an overview of the main components of the course and establishes the purpose of the course. The framework consists of:

(1) Scope.

A brief description of the regulatory, sea service, or examination requirement the course seeks to satisfy. Where sea service credit is the objective of the course, justification must be provided for the sea service credit requested.

(2) Objective.

A statement discussing the goal(s) and overall learning objective(s) of the course.

(3) Entry standards. A list of the prerequisites a student must have to attend the course, such as minimum amount of sea service, mariner's document or license, etc.

(4) Class limitations.

(a) Class size.

State the maximum number of students to be admitted for classroom lessons and, if appropriate, for practical demonstrations or simulation program lessons, along with the number of the students per simulator.

(b) Student/teacher ratio.

State the student/teacher ratio and discuss the organization's policy for circumstances when more than one instructor will be present during any of the lessons.

(c) Instructors.

Provide a resume for each instructor designated to teach the course that includes a description of his or her experience, background and qualifications. NVIC-5-97 and NMC Policy Letter 6-98 provide guidance on instructor qualifications. The instructor must hold a valid Coast Guard license, MMD, or other professional certificate appropriate to the maritime subject(s) being taught, or have unique qualifications specific to non-maritime subject(s) being taught, such as welding, first aid, or CPR.

(5) Teaching facilities and Equipment.

(a) Facility.

This should include the address and a description of the facility at which the training will be held. This includes a detailed training facility site plan, labeled, and to scale, showing the arrangement of student's desks, instructor's area, training aid placement, aisles, doors and fire exits.

(b) Course equipment.

A description of the equipment that will be used during the course. This is to include all equipment used during hands-on training and/or testing, and any simulators or simulation programs. If a simulator or simulation program is used, technical and performance specifications must be included. For courses satisfying STCW training requirements, any simulator required to be used must meet the applicable performance standards.

(c) Teaching aids.

(d) Visual aids.

A discussion of how audiovisual and other aids will be used during the training course, and which performance objectives they will impact should be included in the lesson plans.

(e) Textbooks.

Include copies of all student handouts, homework assignments and/or workbooks, and a bibliography of the student textbooks to be used.

Note: If the NMC does not have the textbooks available, copies may be required for review. Texts will be returned after the course has been evaluated.

c. Instructor's Manual.

The instructor's manual provides specific guidance on teaching strategies and techniques used during the course of instruction. Include a copy of the instructor's manual when requesting an original course approval. The manual should address the course presentation strategies and is to include the following:

(1) Course Outline.

The course outline will be given to each student. This outline should indicate the subject areas, topics and sub-topics comprising the body of the course

(2) Course Schedule.

The course schedule includes the length of each lesson and indicates whether the lesson is a classroom lecture, practical demonstration, simulator exercise, other lab exercise or examination. The subject matter headings should correspond to the subject areas listed in both the *Course Outline* and the *Learning Objective Syllabus*.

(3) Learning Objective Syllabus.

The Learning Objectives Syllabus should be written in the IMO Model Course learning objectives format. References should be made to the learning objectives indicating which publications and teaching aids the instructor will use when preparing and presenting the course material. The syllabus is to include the total length of each subject area in hours.

(4) Lesson Plans.

Lesson plans should be provided for each subject or class session. An exception will be permitted for training organizations recognized by an accrediting or training organization whose courses are approved by a USCG accepted QSS organization.

Samples of a course outline, a course schedule, and a learning objective syllabus may be obtained through the Internet via www.uscg.mil/hq/g-m/gmhome.htm or by writing the Commanding Officer, National Maritime Center (NMC-4B).

(5) Examination and Assessment.

Include an explanation detailing the methods of evaluating students' performance throughout the course. Include the following as applicable:

(a) Written examinations.

Schools should submit copies of all written examinations (multiple choice, subjective essay, or combination) and the grading procedure to be used. The frequency of revision of exams, a description of the methods of selecting multiple choice questions for each examination to be administered, and the passing score for the examination should also be submitted.

NOTE: "Simple" multiple choice format questions about the computational process can not be accepted where computational problems are necessary for determining the student's acquisition of knowledge, such as navigation problems. However, a computational problem in which the student must work through the solution and select from multiple answer choices is acceptable, e.g. questions comparable to those used for Navigation Problems on Coast Guard license exams.

(b) Practical demonstrations.

Detailed descriptions of all practical and/or simulator demonstrations, tests, and practical exercises that describe the exercises to be presented to the student. This should include copies of the evaluation process standards for each exercise, separate checklist(s) used to evaluate and record each practical demonstration, the evaluation process to determine competency, and the process by which each student's performance will be evaluated.

(c) Determination of final grade.

A discussion of how the final grade will be determined, including proportioning written examination scores and practical demonstration output performance as appropriate.

NOTE: Homework and other out-of-class assignments will not be considered as acceptable portions of the student's final grade.

(d) Re-test procedures.

A description of the school's policy on re-tests of failed examinations and other assessment methods and the method of providing an unsatisfactory course completion.

(e) Course Critique.

Submit a student course critique. A student course critique provides one method by which students are given the opportunity to provide feedback to the training organization on the suitability of the course, the instructor's overall performance, suitability of training aids, etc. All forms providing the student the opportunity to submit evaluation to the training organization are to be included with the approval request. Completed student course critiques should be maintained with all other records

D. Training and Granting Sea Service Substitution Criteria.

Courses that are found satisfactory in all respects, e.g., meet or exceed U.S. Coast Guard and/or IMO standards, may be evaluated by the National Maritime Center staff, upon request, to determine and grant a reasonable equivalent amount of sea service credit for the successful completion of the training. The factors considered when determining the granting of sea service credit for approved training are provided below: Sea Service equivalency can not be used to reduce sea service below that required by STCW or 46 CFR Part 10.

1. Course Characteristics

The NMC will consider the characteristics of the course and the type of training being conducted. Generally, sea service may be credited on the following basis:

Classroom lecture	2:1
Part Task Simulators	4:1
Full Mission Simulator	6:1

When training involves a combination of the above, sea service is to be awarded on a pro rata basis proportionate to the amount of time devoted to each type of training (7 hours = 1 day). For example, a course involving 14 hours of classroom lecture and 14 hours of full mission simulator exercises would receive 16 days sea service credit (2 days classroom at 2:1 and 2 days full mission simulator at 6:1).

The above guidelines should be applied to new courses and to existing courses at the time the course is renewed.

“Specialized” sea service may be awarded, as appropriate, on the basis of 2 days credit for 1 day of training (7 hours). The amount of sea service awarded shall not exceed 10% of the required service. For example, up to 9 days tank vessel service may be awarded for a dangerous liquids course (90 days service required for endorsement).

2. Consistency with Other Courses.

Once the sea service credit has been determined the scope of training provided, the course is to be compared with similar courses which have already been approved to ensure consistency of standards.

3. Underway Training.

The accrued sea service, as a result of participation in MARAD approved schoolship programs or training cruises, is credited at 1.5:1, or "time and one-half." MARAD is the approval authority for maritime academy programs and uses this ratio, based upon a 12-hour, standard day, in addition to the fact that the program consists of a structured program of on board instruction. Sea service credit is granted for individuals/students completing cruises aboard commercial vessels and is provided at a 1:1 ratio, or day for day.

4. Constraints on Sea Service Credit.

Credit granted for training time must be in compliance with the STCW 1978 as amended; or 46 CFR Part 10, Subpart C; or Section 7315 of Title 46 U.S. Code (46 U.S.C. 7315).

- a. STCW suggests that a maximum of two-thirds of the required service for a deck officer in charge of a navigational watch can be substituted by school time. For example, if one sea-year of experience (360 days) is required of a deck license applicant, 240 days of the at-sea experience may be substituted by training. The remainder of the experience (120 days) must be obtained at sea.
- b. Satisfactory completion of approved training courses may substitute for up to two-thirds of the required service on deck or in the engine department respectively for deck or engineer licenses. Satisfactory completion of approved training courses may substitute for up to one-third of the required service for a qualified deck rating, or up to one-half of the required service for qualified ratings in the engine department, or as provided by 46 CFR 10.304(a).
- c. Sea service credit from approved training course or on a training simulator is not accepted to satisfy recency requirements. However, underway time at an approved course may be used for this purpose. An applicant who met the recency requirement prior to entering a school program shall not be penalized by attendance at an approved training course.
- d. Training received prior to obtaining a license may not be used for any subsequent raise in grade.
- e. Paragraph (d) of 46 CFR 10.304 limits the amount of credit granted for the completion of a course featuring simulator training. A maximum of 25 percent of the required service for any license transaction may be substituted for graduates of such courses.

- f. 46 U.S.C. 7315(b) and (c) restricts substitution of school time to one-third of the required service for an able seaman (AB), and one-half for a qualified member of the engine department (QMED) rating. When reviewing license, certificate, or document applications, evaluators shall ensure that creditable service granted to qualified graduates of approved courses is not counted twice.
5. Repeating Approved Courses.
Approved courses may be repeated for credit under certain circumstances, such as completing shiphandling training or a diesel course at different license levels, unless expressly prohibited under the provisions of the approval.

E. Instructor Qualifications.

The training organization must include a list of the experience, knowledge and skills the course instructors are to possess to effectively teach the course. When recommending a person for approval as a qualified instructor, the training facility must establish that the person has the necessary instructional experience or instructional technique training acquired, maritime related knowledge and skills, and otherwise explain why the person is qualified. When reviewing an instructor's credentials several factors are considered:

1. Experience.

The individual should have a valid Coast Guard license, document, or certificate appropriate to the content of the course. If the person does not hold a valid license, evidence must be presented that demonstrates an equivalent level of maritime (industry/field) experience, knowledge, and skill. For example, an instructor for an unlimited radar observer course should have at least a license as master of near coastal steam or motor vessels of not more than 500 gross tons with an unlimited radar observer endorsement, or other equivalent watchkeeping experience appropriate to the course.

2. Skills.

An instructor must have a high level of understanding of the knowledge and skills taught in the course, in addition to having experience in their practical application. A license does not always serve as proof that the individual has experience with or a thorough understanding of all topics covered by the license examination. On the other hand, a person without a license may have the appropriate experience, knowledge, and skills necessary to teach a specific course. In either case, the following items presented in NVIC 6-97, "*Policy on Qualified Instructors and Designated Examiners Who Train or Assess The Competence of Merchant Mariners*" must be verified:

a. Instructor Credentials.

A background or experience in teaching or training in instructional techniques.

b. Subject Knowledge.

A high level of understanding of the particular subject area.

c. Instructor Skills.

The ability to use appropriate training techniques to accomplish the objectives of the training

3. Teaching Ability.

A prospective instructor should have experience in teaching or training and/or knowledge of instructional techniques. An instructor must be able to communicate his/her experience, knowledge, and skills to the students. A highly knowledgeable person will not add to the course if he or she is unable to communicate that knowledge.

Training institutions should consult NMC Policy Letter 6-98 and NVIC 6-97 for further guidance on instructor qualifications.

F. Training Site Requirements.

The Coast Guard considers a suitable training facility an important component in providing quality training. 46 CFR, 10.303 requires: "**Each school with an approved course must: (a) Have a well maintained facility that accommodates the students in a safe and comfortable environment conducive to learning.**" The following guidelines are provided as a means to establish a suitable, shore-based, training room in which the student is provided an atmosphere conducive to learning. These guidelines are recommendations. However, where a training facility does not meet site acceptance guidelines, the training organization must present substantiating documentation supporting their contention that the site is suitable for the training offered.

1. General Considerations.

OCMI's should consider the following as the minimum standards for all approved course training facilities including local alternate (satellite) training facilities. To assist in the determination of suitability of all training facilities, obtain as a minimum, the following information before an approval is provided:

a. Site Plan.

A scaled site plan must be provided for each training facility location request. If classes are to be held in a local alternate training facility, the site plan when necessary, should be accompanied by marketing brochures or other reliable information, such as signed copies of contracts, to support the information set forth in the scaled site plan.

b. Class Size.

The maximum number of students permitted to occupy a classroom at a training facility, or alternative location, will be limited to the number permitted by the original course approval. Class size may be further limited by the physical size of the primary (original) or local alternate training facility (classroom) by the application of the following student/room size ratio:

An area of 72 ft² must be allowed for the instructor, and an area of 36ft² per student must be provided as a suitable minimum. To calculate the maximum number of students permitted in the training room, subtract 72 ft² from the total square footage of the room, and then divide the remainder by 36 ft².

EXAMPLE: A request is made to conduct training in a local hotel conference room:

[1] site plan area equals:	900 ft ²
[2] deduct (instructor's area)	- 72 ft ²
[3] usable student area	828 ft ²

Dividing the student area of 828ft² by 36ft²/student results in 23 students as the maximum number permitted.

c. Class Room Practical Work.

For courses requiring practical work, such as chart exercises, each student must have sufficient table space to use the chart without folding it or interfering with and overlapping another student's chart. An acceptable chart table should measure approximately six (6) feet long by 2.5 feet at a minimum (folding tables are acceptable). The distribution of tables and chairs should include aisle space. The widths of the aisles between rows of desks should be no less than 2.5 feet and perimeter aisles should be no less than 2.5 feet unless superseded by local codes.

G. Review of Course Curriculum Packages.

1. Site Review.

The OCMI in whose zone the training is to be conducted, by direction of the National Maritime Center (NMC), will conduct the initial review of the request for course approval. A visit will be made to the training site to evaluate and assess the facilities utilized in the conduct of a course by each school. The evaluation will include, but is not be restricted to:

- a. The suitability of the facility and classroom environment,
- b. The inspection and testing of simulators, simulation programs, equipment to be used in practical demonstrations, vessels to be used for training, or any other associated training equipment;
- c. *The NMC will determine whether simulators meet training and applicable performance requirements.*
- d. The review of visual aids;
- e. The interview of instructors;
- f. The discussion of course administration; and
- g. Other issues related to the approval of the course.

2. Course Element Review.

The National Maritime Center will evaluate courses submitted for approval as follows:

- a. Whether it can be reasonably be assumed that a student who successfully completes the course would, on the first attempt, pass a comparable exam prepared by the Coast Guard. *See 46 CFR 10.303(c)*
- b. Review of the approval request regarding the objective(s) of the course.
- c. Review and verification of the qualifications of the instructor(s).
- d. Student proficiency objectives.
- e. Suitability of the examinations and assessments.

- f. Lecture and examination topics cover learning objectives and otherwise satisfy U.S. Coast Guard and/or International Maritime Organization (IMO) requirements.
 - g. Review of the description of the facility and training equipment (including simulators) and its relationship to the presentation of the course.
 - h. Comparison with other similar courses that have already been approved.
3. Unsatisfactory site reviews will be brought to the attention of the applicant and followed up by a letter stating the nature of the deficiency.
 4. Course submissions and recommendations that may impact Maritime Administration (MARAD) programs may be submitted to the Office of Maritime Labor and Training for review and comment.

H. Conduct Of Schools with Approved Courses.

Any training facility with a Coast Guard approved course must operate within the requirements of 46 CFR 10.303:

1. For at least one year after the end of each student's enrollment, the school must maintain the students' completed examinations on file, a report of practical tests administered, and a record of their classroom attendance; and
2. Allow at any time, the OCMI or a designated representative, to:
 - a. Inspect the facilities, equipment, and records (e.g. attendance, test scores);
 - b. Conduct interviews and surveys of students to supplement the students' evaluation of the course;
 - c. Assign personnel to observe or participate in the course of instruction (with or without prior notification); and
 - d. Supervise or administer the required examinations or practical demonstrations.
3. If a particular course site approval allows the course to be taught in various locations (e.g., conference rooms at national hotel chains) and it is to be offered to provide training to merchant mariners for the purpose of meeting licensing requirements, the course offeror must also provide to the designated representative:
 - a. Advance notice of at least 15 days must be submitted to the OCMI within the zone of responsibility where the training will be conducted. The designated representative may, at his or her option, visit the training facility to determine that the training is being conducted in a suitable manner and in accordance with the Coast Guard approval;
 - b. A class schedule indicating the course, date, location, and the instructor(s) of the training being offered;
 - c. The address and telephone number(s) of the central location where student records are kept and where the validity of an individual student and/or instructor's certificate may be verified; and
 - d. A list of students scheduled to attend the course. Where applicable, students repeating the course are to be indicated.

I. Changes To Approved Courses.

1. Curriculum Change.

Any proposed change to an approved curriculum, including a change of simulators or training aids, must be submitted to the National Maritime Center for evaluation and written approval. A course may not be altered due to the failure of equipment necessary for the presentation or operation of the course. A training organization has the responsibility to suspend the conduct of the course if the required equipment is not operational.

2. New Training Site.

Review for acceptance of a training facility, other than the one for which it was originally approved, is to be done by the OCMI in whose zone the new training facility is located. The OCMI should ensure that only the approved curriculum will be used and that the course will only be taught by qualified instructors. An on-site inspection must be made to ensure the site will be suitable to the needs of the course and the students. If the new facility is found acceptable, the OCMI will notify the National Maritime Center of its acceptance by providing a copy of the acceptance letter. Any special conditions for convening the course at the new site should be noted in the letter. If a training facility is relocating an approved course to a site which is in the area of responsibility other than that of the original OCMI, the process of acceptance is essentially the same. If the new site is acceptable, the OCMI will notify the school, the National Maritime Center, and, if necessary, identify any special requirements for conducting the course at the new site.

3. Acceptance of New or Additional Instructor.

After the initial/original approval, but prior to the individual conducting the approved course, the acceptance of an additional or replacement instructor must be submitted by the applicant to the NMC for evaluation and written approval.

J. Period of Approval.

Initial approvals are effective for a period of two years, unless sooner suspended, withdrawn or surrendered. Subsequent renewal periods may be granted for five-years, unless sooner suspended, withdrawn or surrendered.

K. Retroactive Approval.

In some cases, schools submitting an original course approval have requested that the approval be backdated. Generally, an original approval is only granted back to the date of the letter requesting that the course be considered for approval and sea service credit.

L. Approval Renewal Requests.

Requests for the renewal of an approved course should be submitted to the Commanding Officer, National Maritime Center (NMC-4B) at 4200 Wilson Blvd.; Suite 510; Arlington, VA 22203-1804 at least 90 days before the current approval expires. Courses that are submitted for renewal will be reviewed based on current guidelines and are to include a copy of the course outline and schedule. The letter requesting renewal should include:

1. Modifications that were made to the course;
2. What facility and/or equipment changes have occurred;
3. The number of times the course has been presented during the 12 month period immediately prior to the date of the renewal request.

NOTE: *Courses that have received approval and have not been conducted during the period of approval are to be resubmitted as an initial approval request. The new approval will not exceed the initial two year period.*

When a school with an existing approved course submits the letter requesting renewal, the OCMI should visit the school as directed by the National Maritime Center as part of the evaluation process and note their findings in the forwarding letter. When a course is submitted for renewal, the date of approval will generally run consecutively with the last date of expiration. If an approval expires during the approval process as a result of administrative handling, the renewal will be backdated to maintain continuity with the last expiration date. If, however, an approved course is not submitted for renewal on or before its expiration, the Course Curriculum Package will have to be re-submitted and processed as an original course approval.

M. Third Party Training Organizations.

Training organizations offering approved courses should have course approval in their own name. A training organization wishing to conduct training by the adoption of a previously approved course acquired from another training organization must submit their request to conduct the training to the NMC. The training organization is to submit the course curriculum package in the same manner as if the course were an original course approval request.

N. Approval of Foreign Training Courses.

The Coast Guard will not approve any course taught outside the territory of the United States, either by schools or institutions incorporated in a foreign country or by U.S. owned/operated schools or institutions. However, training courses offered in schools whose states are on the “white list” maintained by the IMO, will be accepted to satisfy STCW training requirements provided training does not lead to certification or licensing. A U.S. owned or operated training institution desiring to offer training outside the United States, must obtain the approval of that country’s administration.

O. Approved Course Oversight.

Effective oversight is considered essential to the approved course program. OCMI's are encouraged to establish a schedule of oversight visits to courses within their zone. The National Maritime Center may be consulted as to the frequency and detail of course audits. Regulations and policy guidance are in development establishing formal oversight

procedures.

1. OCMI's are to ensure that course oversight can be conducted on each alternative site. For the oversight program to succeed in improving the overall quality of instruction, schools with approved courses must understand that the Coast Guard can inspect their course at any time. Until an OCMI has developed a comprehensive plan and schedule to account for the total number of courses and the available resources to conduct oversight of all courses, in addition to proposed local alternate training facility, OCMI's should not authorize the conduct of an approved course at an alternate site within their jurisdiction. In developing the inclusive plan, priority one courses are to be audited on at least an annual basis. Approved courses presented in lieu of Coast Guard examinations are to be audited within six months of the initial "interim" approval.

2. Administrative Actions.

The following administrative actions may be taken by the designated representative after consultation with the National Maritime Center;

a. Administrative Censure.

Administrative censures are warnings issued for lesser discrepancies, to include, but not be limited to a training organization as a result of incomplete student evaluation forms, student files occasionally missing information, the inability of the training organization to produce required administrative files within a reasonable period of time, continual reuse of written examinations, inappropriate advertising of courses, etc. Discrepancies of this type are to be discussed with the training organization, followed by a written report summarizing the noted problems and setting a reasonable time period in which to cure the deficiencies, not to exceed 30 days.

Administrative censure may also be used for actions involving an instructor's teaching technique. Regardless of the extent of training, instructional techniques extend beyond methodology. Any consideration by an auditor must, therefore, include the opinions of the students attending the course. Where student interviews and/or critiques substantiate an auditor's appraisal of an instructor's ineffectiveness, the training organization and the instructor are to be provided the opportunity to modify the individual's instructional technique and to be re-evaluated the next course presentation.

A training organization cited with three administrative censures within a three year period or three administrative censures in one visit, may have all affected courses suspended for not less than 30 days.

Administrative censures recorded by each OCMI or designated representative will be entered into a database, established and maintained by NMC, to track discrepancies and actions taken.

b. Suspension Of Approval.

The Commanding Officer, National Maritime Center or its designated representative have the authority to suspend approval for a course. Approvals may be suspended if the NMC, or its designated representative determine that the course does not comply with applicable portions of the Code of Federal

Regulations, or has not maintained the requirements specified by the course approval, or if there are substantial deviations from the course curriculum package as submitted for approval, or if the course is being presented in a manner that is unsatisfactory, or that the course is not conducive to achieving the submitted learning objectives, or that a training organization has received multiple and/or frequent administrative censures. The NMC, or its designated representative, may suspend the course approval, require the surrender of the certificate of approval and/or direct the approval holder to cease claiming the course is Coast Guard approved. Upon suspension, the NMC is to verify that the approval holder has been notified how the course failed to meet applicable requirements and explain how deficiencies may be corrected. The NMC may suspend the approval for up to 60 days to cure the deficiencies cited.

If the training organization considers the suspension to be unwarranted, they may appeal the decision to the respective Coast Guard District Commander. If the training organization elects, they may reapply for a new approval of the suspended course prior to the end of suspension, emphasizing their new operating standards, through the National Maritime Center. This request shall be treated as an original approval request.

c. Withdrawal Of Approval.

Withdrawal of an approved course can be applied, but not limited to the following: if found in violation of the regulations pertaining to the conduct of an approved course, or if the school ceases operation, or ceases to offer the course, or if there has been a determination that the approval holder has demonstrated a pattern or history of failing to comply with applicable regulations or the requirements of course approval, or substantially deviates from the approved course curricula, or presents the courses in a manner that is unsatisfactory or not conducive to achieving the specified learning objectives, or actions by instructors or training organization staff members contributing to the falsification of student documents or inappropriate issuance of a course completion certificate, or unauthorized modification of a course without having filed a request or provided appropriate notification, or prompting the students to give correct answers during an examination, or the coaching of students to correctly perform a demonstration during a performance-based assessment. A school will be notified by the NMC in writing by return receipt mail of the circumstances and pending action. At any time after the approval of a course has been withdrawn, the school may initiate another request for approval of the subject course(s). Any such request will be treated as an original course approval request.

d. Supplemental Processes.

The Coast Guard recognizes that quality work produced by a training organization is worthy of being disseminated throughout the arena of maritime training. Therefore, it must be recognized that the quality of an approved course extends beyond the approval of a course package. Just as a manufacturer is required to guarantee a product to the consumer, the originator of an approved course has the responsibility to verify that their course can be effectively delivered at a satellite location. Verification by the course originator must be completed

prior to the request for a satellite location of a previously approved course. A letter of verification from the approved training course originator must be forwarded when requesting approval of a satellite location.

To emphasize the responsibility of the course originator, the suspension or withdrawal of an approved course at an accepted satellite location may result in an administrative censure for each occurrence to the originator's training organization.

Training organizations offering a Coast Guard approved course should provide written affirmation to the mariner that the course approval is still valid at the time the course is offered to the student. The affirmation should also set forth the credit offered, based upon course completion.

Courses which have had approval withdrawn must be resubmitted for evaluation to consider reinstatement of the affected course(s). The withdrawal of a course approval is indicative of a managerial system that is totally unacceptable. The new submission must include a detailed account of the training organization's adoption and implementation of a quality management system (QMS). In particular, the QMS must provide a strategic plan as part of this process which will address how the events which lead to the course approval being withdrawn will be prevented from recurring. Additional guidance is available through NVIC 7-97, *Guidance on STCW Quality Standards System (QSS) for Merchant Mariner Courses or Training Programs*.

