

Coast Guard-Approved Training Courses



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It is a rare mariner in today's industry who does not attend some type of course or participate in a training program on a regular basis. This training includes everything from basic work safety and vessel familiarization for newly hired, entry-level mariners, to advanced ship handling for aspiring captains. Most of this training has one thing in common—it is approved by the Coast Guard.

What Training Will the Coast Guard Approve?

The Coast Guard will approve training of three basic types. The first of these is training that takes the place of a Coast Guard examination for an endorsement to a merchant mariner document.

The Coast Guard will also approve training to substitute for a portion of a service requirement to obtain a license or a document. We will approve up to two-thirds of the service for a license, and up to one-half of the service for an able seaman or QMED endorsement. The specific amount we will award is based on the type and duration of the training.

Finally, the Coast Guard will approve training that satisfies a specific requirement for a mariner to receive training. This has become the most common reason the Coast Guard will approve training due to recent initiatives like the Seafarers' Training, Certification, and Watchkeeping code.

Who Provides Coast Guard-Approved Training?

There is no "typical" approved training provider. The organizations offering approved training are as diverse as the maritime industry. There are currently almost 2,200 approved courses and training programs given by 270 different organizations. These include vessel operators, labor unions, public and private colleges, high schools, state and federal government agencies, chari-

table organizations, and a host of large and small maritime schools. While most training providers have three or less approved courses or programs, there are some with as many as 60 or 70.

Who Approves Training for the Coast Guard?

Almost all Coast Guard-approved merchant mariner training is approved by the National Maritime Center. The mariner training and assessment division has a four-person course approval branch that evaluates close to 2,500 requests per year for course approval, renewal of course approvals, or for changes to courses or addition of new instructors.

How Can I Get My Course or Training Program Approved?

Organizations wishing to have their course or training program approved should submit a request for approval to the National Maritime Center. The request should describe the program and the approval requested. The request should include a complete documentation of the course.¹ Our program goal is to respond to all requests within 30 days of receipt. We generally take courses in the order they are received.

The course is assessed against the appropriate standard to ensure it is comparable in content and that the material is covered to a similar level. We also look at whether there is sufficient equipment for the course—for example, whether there are sufficient sets of fire-fighting "turnout" gear for a firefighting course. We look at lesson plans to ensure that delivery methods are appropriate for each lesson and will be effective in accomplishing each training objective.

The course evaluation also takes into account the manner in which the training objectives are assessed. This includes the written examinations as well as any prac-



tical exercises. Written examinations are reviewed to see if they adequately assess the course material. If the training is in lieu of a Coast Guard examination, we check to see if the course's exams are comparable in scope and difficulty. Practical exercises are reviewed to see if there is a specified, objective criteria to assess student performance, and if the practical demonstrations are appropriate to the course.

Finally, we look at the instructors proposed for the course to see if their experience and qualifications are appropriate.

If the course meets all standards, we issue an approval letter and approval certificate. The approval letter identifies the approval given to the course, the location

where it can be given, and the instructors who may present it. Both original course approvals and renewals are currently valid for five years.

What If a Course Is Not Approved?

If we determine we are unable to approve a course, we contact the school, describe the problem, and advise what is needed to remedy it. If the problems with a course are relatively minor and can be quickly remedied without significant revision or effort, we contact the school by phone or e-mail and ask them to submit the additional documentation. We typically allow the school a specified amount of time (usually one or two weeks) to provide the missing information without losing their "place in line" and having to return to the queue of courses awaiting our review.

Common Misconceptions About Course Approval

The Coast Guard Will Only Approve Classroom Courses Given Ashore.

The National Maritime Center is receptive to and will consider all types of training. In addition to classroom training, we have approved programs where the training is given entirely aboard commercial vessels, is delivered as computer-based training ashore and aboard ships, or is delivered over the Internet. We also approve programs that use various combinations of these training methods.

Although we do approve distance learning and computer-based training, we have concerns about student identity and the integrity of the training. To assuage these concerns, we require that all assessments (practical and written) be conducted live, at an approved location, and in the presence of an instructor or proctor.

Schools Must Use Coast Guard Examination Questions.

While we allow schools to use questions selected from the Coast Guard's database of over 25,000 questions used on our merchant marine license examinations, we definitely do not mandate their use.

In fact, we encourage training providers to develop their own questions. If they do, we may even ask permission to use them on our examinations! Schools are not bound to use the multiple choice format we use on our examinations. We permit various other types of questions, including short answers and essays. We will not, however, allow "true/false" questions.

For courses that will substitute for a Coast Guard examination, we do require that the course be comparable in its scope and difficulty to the corresponding Coast Guard examination. If students are given questions to study or practice, the study materials must either have completely

different questions than are used on the examinations, or have a sufficient number of questions, so that students cannot easily memorize questions and answers instead of learning the material.

You Must Rigidly Follow Coast Guard Training Models.

Although we have standards for minimum content for specific training, we afford schools discretion in how to present and package training. We look at the total training and determine if the training meets our standards in the aggregate. We also allow some flexibility as to the chronology of the training. We do not require that it be done on consecutive days or in any specific time frame. We do require that the specific training schedule be identified, and will place a reasonable time limit on the time in which the course must be completed.

The Coast Guard Approves Schools to Give "The Test."

Although the Coast Guard approves courses to substitute for our examinations, we do not approve schools to give license exams. In order to be approved, the training must include a final assessment of whether the student has achieved the same level of knowledge they would demonstrate by passing a Coast Guard exam. Students must take the entire course. Simply taking a test is not permitted.

Similarly, we don't approve instructors per se. We are frequently asked "How can I become a Coast Guard-approved instructor?" Since we only approve instructors as part of a specific course at a specific school or training provider, the answer is to either become affiliated with a school having approved courses, or to develop and obtain approval for your own course(s). It is also worth noting that the approval of the instructor for a course does not authorize the instructor to teach other courses or a similar course at another school.

For more serious deficiencies, we send the school a letter explaining in detail the reasons we cannot approve the course. If appropriate, we include links to applicable policy documents and/or copies of applicable guidelines for the type of course at issue. As these courses usually require substantial revision, we do not put them “on hold,” and if the school re-submits the course, it’s placed in the queue with other courses awaiting our review.

What Happens After a Course or Training Program Is Approved?

The process does not stop when the approval is given. Schools using a dynamic instruction system design process will be continuously assessing and improving their programs and courses. Any change to an approved course needs to be submitted to the National Maritime Center for evaluation and approval. This may include adding or changing exams, adding new texts or other learning aids, or revising lesson plans.

Schools also need to routinely obtain reviews and approvals for any new instructors teaching their courses. Instructor requests are considered a priority and given expedited handling, with most approvals completed within one week of receipt.

Finally, the Coast Guard monitors and oversees the training it approves. We are currently in the midst of a comprehensive re-evaluation and revision of our oversight policies to more effectively manage and oversee approved training. When fully implemented, the new oversight policy will provide for occasional comprehensive formal audits of training providers at specified intervals, perhaps once every five years. In addition, all courses will receive some form of lesser oversight that may include less extensive audits, observation by Coast Guard personnel, or survey testing in which students may be asked to complete a Coast Guard examination appropriate to the course. We also plan to vigorously investigate complaints about approved training.

Schools should not view our plans for more rigorous oversight with apprehension. We recognize that training providers provide needed, valuable services to the industry, and that the Coast Guard needs adequate training providers ready and able to carry out this mission. Considering the service most training organizations provide, our philosophy will be to help schools work towards compliance. The oversight will provide a benefit in that it will level the playing field and ensure that all schools are operating to similar standards.

Are There Any Options for Approval Besides the Coast Guard?

Yes. For certain types of STCW training, the Coast Guard has authorized several organizations to “accept” training on behalf of the Coast Guard. There are cur-

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USCG-approved courses:
www.uscg.mil/nmc

rently three organizations the Coast Guard has approved to act as quality standards systems (QSS): the American Bureau of Shipping, the American Council on Education, and Det Norske Veritas. Training accepted by one of these QSS organizations will carry the same weight and effect as training approved by the Coast Guard.

There are pros and cons with using a QSS rather than the Coast Guard. Chief among the disadvantages is cost. The QSS is likely to assess a fee for training evaluation and participation in its program of auditing and oversight. The Coast Guard does not charge fees for approval of courses or oversight after approval.

There are some positive aspects to using the QSS, as well. For example, the training may become more broadly recognized. At present, the Coast Guard only approves training that is either conducted in the United States and its territories, aboard a U.S. flag commercial vessel or a U.S. military vessel, or aboard a foreign flag vessel while that vessel is in a U.S. port. The QSS has the capacity to accept and oversee training given outside of the United States, granting it the same significance as Coast Guard-approved training.

About the author:

Mr. James D. Cavo is the chief of the National Maritime Center's mariner training and assessment division. Prior to coming to NMC in 1997, he worked for nine years as a deck officer on U.S. flag oil tankers and for five years as a maritime attorney. He holds licenses as chief mate any gross tons and master 1600 tons. He is a graduate of the S.U.N.Y. Maritime College, Maine Maritime Academy, and the New England School of Law.

Endnote:

¹ The general requirements for course approval are specified in Navigation and Vessel Inspection Circular 5-95, Guidelines for Organizations Offering Coast Guard Approved Courses. You can find this and other NVICs on the internet at <http://uscg.mil/hq/cg5/nvic>.

