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COMDTPUB P16700.4  
NVIC 7-97

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 7-97

Subj: GUIDANCE ON STCW QUALITY STANDARDS SYSTEMS (QSS) FOR MERCHANT MARINER COURSES OR TRAINING PROGRAMS

- Ref:
- (a) Navigation and Vessel Inspections Circular (NVIC) No. 5-95 "Guidelines for Organizations Offering Coast Guard Approved Courses."
  - (b) International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended in 1995 (STCW).
  - (c) NVIC No. 5-97 "Guidelines on STCW Training Record Books."
  - (d) NVIC No. 4-97 "Guidance on Company Roles and Responsibilities under the 1995 STCW Amendments."
  - (e) NVIC No. 6-97 "Guidelines on STCW Qualified Instructors and Designated Examiners."
  - (f) Federal Register, Vol. 61, No. 174, pg. 47060, dated September 6, 1996 "Final Rule: Modernization of Examination Methods."
  - (g) Annex to IMO Resolution A.741(18) International Safety Management (ISM) Code for the Safe Operation of Ships and for Pollution Prevention.
  - (h) Federal Register, Vol. 62, No. 123, pgs. 34505-34541, dated June 26, 1997 "Interim Rule: Implementation of 1995 STCW Amendments."
  - (i) NVIC No. 2-94 "Guidance Regarding Voluntary Compliance with the ISM Code."
  - (j) IMO Circular STCW.7/Circ.1 dated September 24, 1996 "Clarification of regulations I/9, I/10 and I/15 of the STCW Convention."

1. PURPOSE. All training that is required by the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW) must be monitored as part of a quality standards system (QSS). The entire process of applying for, obtaining, and maintaining a U.S. Coast Guard license or document is the responsibility of the Merchant Marine Licensing and Documentation (MMLD) Program. The MMLD Program fulfills the requirements of STCW's quality standards system.

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NON-STANDARD DISTRIBUTION: (See page 11)

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The mission of the MMLD Program is to effectively and efficiently promote the acquisition and maintenance of the necessary professional skills and knowledge by merchant mariners, ensure they are physically competent, and provide first-class customer service. To this end the MMLD Program is implementing a policy of continuous improvement that actively seeks the input of industry, incorporates, to the maximum extent possible, the application of new technology and keeps our efforts clearly focused on this mission.

The Coast Guard's course approval process, as described in Title 46, Code of Federal Regulations (CFR), Section 10.302 and NVIC 5-95, (see reference (a)) is the Coast Guard's quality standards system *for training*. This circular provides guidelines so that a third party may accept training (courses or training programs) on behalf of the Coast Guard. Organizations that follow these guidelines can qualify to act as an alternative to the Coast Guard course approval process for the specific training listed in this Navigation and Vessel Inspections Circular.

2. DIRECTIVES AFFECTED. None.

3. BACKGROUND.

- a. In 1993, the International Maritime Organization (IMO) embarked on a comprehensive revision of the STCW in order to reduce human error as a major cause of marine casualties. On July 7, 1995, a conference of Parties to the STCW adopted amendments ('95 STCW Amendments) to the convention which establishes the most practicable training standards for mariners. These amendments entered into force on February 1, 1997.
- b. The United States, as a signatory to the STCW, fully supports the goal of reducing human error by establishing the most practicable training standards for mariners. The Coast Guard implemented the '95 STCW Amendments by publishing an interim rule on June 26, 1997, (see reference (b)). This rulemaking modified 46 CFR Parts 10, 12, and 15. Title 46 CFR 10.309 and 46 CFR 12.03-1 now require offerors of training required by STCW to be monitored "in accordance with a Coast Guard-accepted quality standards system."
- c. The STCW is complex and involved. While the backbone of its requirements can be implemented in Coast Guard regulations, many of its details will be addressed by Coast Guard policy. This policy will be issued in the form of NVICs.
- d. The STCW addresses, in detail, the training required for Masters, officers and crew and then broadens its scope to those activities that directly impact that training. It recognizes, as the Coast Guard always has, that training, both on-the-job and formal, is an integral and vital part of any job. It acknowledges the on-the-job training that has taken place between senior and junior personnel and has been a part of maritime tradition for centuries. It formally captures training in a training record book (see reference (c)), it establishes responsibilities for companies operating seagoing vessels (see reference (d)); it realizes the criticalness of all training, and requires the establishment of criteria for those people

conducting training and those assessing skills (see NVIC 6-97, reference (e)); it also requires organizations offering training toward an STCW certificate be monitored by a quality standards system, which is the subject of this NVIC.

4. DISCUSSION.

- a. STCW seeks to ensure the most practicable standards for merchant mariner competence. To do this, all training, assessment of competence, certification, endorsement and revalidation activities regarding STCW certificates must be monitored by a quality standards system overseen by the organization(s) issuing STCW certificates.
- b. The entire process of applying for and obtaining a Coast Guard license or document fulfills the requirements of STCW's quality standards system. The Coast Guard's QSS encompasses applying for obtaining, issuing, upgrading, and renewing a Coast Guard license or document. The criteria for these activities includes, among other things, professional experience, medical standards, character references and approved training. This NVIC addresses the specific issue of training. It addresses how an organization can accept training on behalf of the Coast Guard.
- c. The Coast Guard's course approval system, as described in 46 CFR 10.302 and NVIC 5-95, satisfies the mandatory requirements of STCW's QSS in the area of training. However, given the breadth and scope of the training requirements brought about by STCW, the Coast Guard has decided to expand its partnerships with industry. Enclosure (1) lays out the criteria for an organization that seeks to accept and monitor training on behalf of the Coast Guard. These organizations will be called Coast Guard-accepted QSS organizations.
- d. STCW's recommended guidance for a QSS in Section B-I/8 of '95 STCW Amendments describes a quality management system paralleling ISO 9000 guidelines. Elements of quality management are part of the guidelines for becoming a Coast Guard-accepted QSS organization. However, the Coast Guard has decided not to take the next step and turn these recommendations into mandatory requirements for organizations offering training. Nonetheless, the Coast Guard agrees with the concepts of quality management and has made these recommendations a voluntary option for training organizations. Training organizations that voluntarily incorporate quality management into their organizational structure may see benefits from the Coast Guard. For training submitted to the Coast Guard, the Coast Guard is considering a more streamlined course approval process, the option of modifying courses in-house without submitting them for re-approval, and primary consideration for being allowed to offer examinations for Coast Guard licenses in accordance with the concepts described in reference (f) - Modernization of Examination Methods, for training organizations that incorporate quality management principles into their corporate structure. For training submitted to Coast Guard-accepted QSS organizations, the benefits of incorporating quality management principles into their corporate structure will need to be discussed between the training organization and the Coast Guard-accepted QSS organization.

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- e. The implementation of STCW is ushering in a number of new concepts and terms. Additionally, STCW works in concert with the ISM Code (reference (g)). These concepts, terms and interactions are discussed below:

(1) **QUALITY STANDARDS SYSTEM (QSS)** - A system that provides for, and ensures that, the most practicable standards for merchant mariner competence are met. The existing Coast Guard course approval process is part of the Coast Guard's overall quality standards system; it ensures training is designed, offered and monitored in accordance with Coast Guard-accepted standards.

(2) **COAST GUARD-ACCEPTED QSS ORGANIZATIONS** - Once the Coast Guard has recognized an organization as having the necessary procedures in place to accept training on its behalf, it will designate the organization a Coast Guard-accepted QSS organization. Training that is reviewed and accepted by a Coast Guard-accepted QSS organization will be termed "Coast Guard-accepted." This training will have the same weight and bearing as Coast Guard-approved training within the licensing and documentation process. This training must meet the requirements of 46 CFR 10.309.

(3) **ACCEPTED TRAINING** - The training that a Coast Guard-accepted QSS organization may accept on behalf of the Coast Guard is listed in paragraph 4.f.1 of this NVIC. The Coast Guard is retaining approval authority for those courses listed in paragraph 4.f.2 until the implementation of third party quality standard systems has been reviewed and evaluated. The Coast Guard will retain approval authority for training that seeks sea service credit or is used in lieu of all or part of a Coast Guard examination because this training shows the greatest variation in training content. Having a single national approval point for training that seeks sea service credit and training used in lieu of all or part of a Coast Guard examination will ensure a consistent application of evaluation standards.

### (4) **ON-BOARD TRAINING**

(a) Acknowledging the importance of on-board vessel, on-the-job training, STCW has elevated on-board training to a requirement for an STCW certificate in some areas and accepted it as an option to reduce sea service in other areas. Whether used to satisfy a requirement or an option, if the training is to be applied to an STCW certificate, an on-board training program must be approved by the Coast Guard, or accepted by a Coast Guard-accepted QSS organization. [NOTE: The training listed in paragraph 4.G does not have to be Coast Guard- accepted or approved.]

(b) To be accepted toward an STCW certificate, on-board training must be recorded in a training record book. This record book must be approved or accepted by the Coast Guard. It is to document training received, and if appropriate, assessment of demonstrated competencies, as part of a Coast Guard approved or Coast Guard-accepted on-board training program. See NVIC 5-97 for further guidance.

- (c) SM Code certified shipping companies should refer to the paragraphs in 4.h to assess their options. Non-ISM Code certified shipping companies wishing to offer their crews on-board training to be applied toward an STCW certificate must have the training Coast Guard approved or accepted, or they must be associated with a Coast Guard approved or accepted shoreside training program.

(5) QUALIFIED INSTRUCTORS AND DESIGNATED EXAMINERS

- (a) The STCW moves away from the strict use of written exams and documented sea service as the primary qualifying criteria for obtaining an STCW certificate. The STCW still supports this traditional criteria, but has increased its emphasis on demonstrated competencies and documented training to supplement this primary qualifying criteria.
- (b) In support of this, the STCW requires training to be provided by persons qualified to conduct training (qualified instructors) and requires mariners to demonstrate their skills to persons qualified to assess those skills (designated examiners). The criteria for these qualified instructors and designated examiners are the subject of NVIC 6-97.
- (c) Qualified Instructor - an individual who has been trained or instructed in instructional techniques and is otherwise qualified to provide required training to candidates for licenses, documents, and endorsements. See NVIC 6-97 for further guidance.
- (d) Designated Examiner - an individual who has been trained or instructed in techniques of training and assessment and is otherwise qualified to evaluate whether a candidate for a license, document, or endorsement has achieved the level of competence required to hold the license, document, or endorsement. See NVIC 6-97 for further guidance.

f. TRAINING THAT MUST BE COAST GUARD-ACCEPTED OR APPROVED.

- (1) TRAINING THAT A QSS ORGANIZATION MAY ACCEPT ON BEHALF OF THE COAST GUARD. Listed below is training that authorized QSS organizations may accept on behalf of the Coast Guard. Following the title of the training, the list shows which mariners must have the training for their STCW Certificate. Current U.S. regulatory requirements for first aid/ cardiopulmonary resuscitation (CPR) are incorporated into this list. For further guidance on the scope of these courses, refer to 46 CFR Part 10, Section B of the '95 STCW Code, or IMO Model Courses.

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ALL VESSELS [NOTE: This training does not apply to vessels less than 200 gross regulatory tons, except passenger vessels of 100 gross tons or over. This training does not apply to fishing vessels.]

Automatic Radar Plotting Aid (ARPA) - All deck officers on a ship fitted with ARPA.

Global Maritime Distress and Safety System (GMDSS) - Every person in charge of, or performing radio duties on, a ship required to participate in GMDSS.

Basic Training - Any crewmember on the Certificate of Inspection (COI) or a muster list with designated safety or pollution prevention responsibilities. This training or instruction is to include:

- Personal Survival Techniques
- Personal Safety and Social Responsibility
- Elementary First Aid (includes CPR)
- Fire Prevention and Firefighting\*

\* for licensed individuals, this requirement is already met by virtue of their holding a valid license. Licensed individuals must meet this requirement through completion of a Coast Guard approved course. For unlicensed individuals, this training or instruction must be obtained or otherwise provided.

On-board Training Programs - see discussion in paragraph 4.e.4.

Proficiency in Survival Craft and Rescue Boats other than Fast Rescue Boats - Any crewmember required to have this designation.

Proficiency in Fast Rescue Boats - Any crewmember desiring this designation.

Medical First Aid - Any crewmember designated to provide medical first aid.

Medical Care - Any crewmember designated to take charge of medical care.

### RO-RO PASSENGER SHIP SERVICE (FERRIES)

Familiarization - All officers and ratings.

Crowd Management - Personnel designated on muster lists to assist passengers in emergency situations.

Safety Training for Personnel Providing Direct Service to Passengers in Passenger Spaces - Personnel providing direct service to passengers in passenger spaces.

Passenger Safety, Cargo Safety and Hull Integrity - Masters, Chief Engineers, Chief Mates, and First Assistant Engineers, and any person with immediate responsibility for

embarking and disembarking passengers, for loading, discharging or securing cargo or for closing hull openings.

Crisis Management and Human Behavior - Masters, Chief Engineers, Chief Mates, and First Assistant Engineers, and any person with immediate responsibility for the safety of passengers in emergency situations.

- (2) TRAINING THAT THE COAST GUARD WILL CONTINUE TO APPROVE PENDING REVIEW OF THIRD PARTY QSS IMPLEMENTATION. Listed below is training that the Coast Guard will continue to approve. Following the title of the training, the list shows which mariners must have the training for their STCW Certificate. For further guidance on the scope of these courses, refer to 46 CFR Parts 10 and 13.

### ALL VESSELS

Radar Observer - All persons listed in 46 CFR 15.815.

Basic Training - Any crewmember with designated safety or pollution prevention responsibilities. This training includes:

Fire Prevention and Firefighting for licensed individuals

Advanced Firefighting - Officers and any crewmember designated to control firefighting operations.

Lifeboatman - Officers and any crewmember designated as a lifeboatman.

### TANKER SERVICE

Tanker Familiarization - Officers and ratings assigned specific duties and responsibilities related to cargo or cargo equipment.

Hazardous Oil and Chemical Tanker Training Program - Masters, Chief Engineers, Chief Mates, and First Assistant Engineers, and any person with immediate responsibility for transferring cargo. [NOTE: This training encompasses both the Oil Tanker Training Program and the Chemical Tanker Training Program in STCW.]

Liquefied Gas Tanker Training Program - Masters, Chief Engineers, Chief Mates, and First Assistant Engineers, and any person with immediate responsibility for transferring cargo.

- (3) TRAINING THAT ONLY THE COAST GUARD WILL APPROVE. The Coast Guard will retain approval authority for any training that seeks sea service credit or is used in lieu of all or part of a Coast Guard examination.

g. TRAINING THAT DOES NOT HAVE TO BE COAST GUARD-ACCEPTED OR APPROVED.

Shipboard familiarization - All persons aboard a ship other than passengers. This area of instruction is outlined in Section A-VI/1.1 and is intended to encompass navigating crew as well as waiters, entertainers, riding maintenance crews, etc.. [NOTE: Navigating crews that have received the basic safety training listed in para. 4.f.1 do not need to have this instruction]

Responsibilities of Companies - All persons aboard a ship other than passengers. This shipboard familiarization requirement is outlined in Section A-I/14 and described more fully in NVIC 4-97.

h. INTERNATIONAL SHIP MANAGEMENT (ISM) CODE AND STCW QSS

- (1) Shipping companies that are ISM Code certified should be credited for the steps they have taken toward responsible ship management. Paragraph 6.5 of reference (g) requires the implementation of a training program as part of the ISM Code's safety management system (SMS), but does not proscribe specific requirements for the training program. Therefore, a training program, simply by virtue of being under the ISM umbrella, may not necessarily meet the STCW QSS criteria. Specifically, it is the level of detail required by the Coast Guard in its implementation of STCW in 46 CFR 10.309 (see reference (h)) that would make the difference. In order for shipping companies that are ISM Code certified (see NVIC 2-94) to have their training, other than the training listed in paragraph 4.g meet the STCW QSS requirement, their training program must meet the criteria in 46 CFR 10.309. An organization that conducts ISM Code certification on behalf of the Coast Guard may also accept training, listed in paragraph 4.f.1, if that organization is accepted by the Coast Guard to accept training on its behalf. An organization that conducts ISM Code certification on behalf of the Coast Guard should apply to the Coast Guard in accordance with enclosure (1) of this NVIC if it wishes to accept training on behalf of the Coast Guard.
- (2) The ISM Code, in paragraph 6.3 of reference (g), requires newly assigned crewmembers to be familiarized with the vessel to which they are reporting. This ISM Code requirement is identical to the general STCW requirement in regulation I/14-1.4 (*Responsibilities of Companies*). Satisfying the ISM Code for shipboard familiarization also satisfies STCW regulation I/14-1.4. This training does not have to be Coast Guard-accepted or approved. See reference (d) for further guidance.
- (3) The ISM Code requirement for shipboard familiarization (paragraph 6.3 of reference (g)) is not sufficiently detailed to meet the requirements for specific vessel type familiarization training in STCW regulations V/1-1.2 and V/2-5. The familiarization training in STCW regulation V/1-1.2 (Tanker familiarization) must be approved by the Coast Guard. The familiarization training in STCW regulation V/2-5 (RO-RO familiarization) must be approved by the Coast Guard, accepted by the ISM Code



certifying organization if it has been authorized to accept training on behalf of the Coast Guard, or accepted by Coast Guard-accepted QSS organization.

5. IMPLEMENTATION.

- a. All training that is begun after August 1, 1998, and is applied toward an STCW Certificate, must be approved by the Coast Guard or accepted by a Coast Guard-accepted QSS organization. However, training and assessment activities begun before this date are subject to Coast Guard approval or Coast Guard-acceptance if they are conducted to meet an STCW requirement under the regulations published in reference (h).
- b. Organizations wishing to accept and monitor training on behalf of the Coast Guard should submit applications to the Coast Guard in accordance with enclosure (1) of this NVIC. An organization submitting an application is not authorized to act as a Coast Guard-accepted QSS organization until it has received the letter of acceptance.
- c. The Coast Guard will be reviewing these applications as well as continuing to approve courses. As a result, it will typically take at least 60-90 days to review these applications. Submit applications with this time frame in mind.
- d. Currently approved Coast Guard training will retain that approval until its expiration date. At that time, a training organization may either have the training re-approved by the Coast Guard or accepted by a Coast Guard-accepted QSS organization.
- e. Training organizations are free to choose any Coast Guard-accepted QSS organization. If a training organization is considering switching from/to Coast Guard approval to/from a Coast Guard-accepted QSS organization, or from one Coast Guard-accepted QSS to another, they must plan well ahead and ensure that they receive acceptance from the organization to which they are switching *before* the expiration of the training's approval or acceptance. Training organizations desiring to continue with direct Coast Guard approval need to consider that the Coast Guard will guarantee that the beginning of the review of the submitted course material will begin no later than 45 days following receipt of the course by the National Maritime Center from the Regional Examination Center.
- f. When a training organization or shipping company changes from one Coast Guard-accepted QSS organization to another, or from Coast Guard approval to a Coast Guard-accepted QSS organization, they must notify the Coast Guard in writing. Notification should include the name of the Coast Guard-accepted QSS organization to which they are changing, and the courses they will have the organization accept. For notification address see paragraph 5.j.
- g. Courses listed in paragraph 4.f.2 of this NVIC must be submitted to the Coast Guard in accordance with 46 CFR 10.302 and NVIC 5-95.
- h. Training listed in paragraph 4.f.1 of this NVIC may be submitted to the Coast Guard in accordance with 46 CFR 10.302 and NVIC 5-95, or it may be submitted to a Coast

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Guard-accepted QSS organization in accordance with 46 CFR 10.309 or 12.03-1, NVIC 5-95, and the submittal guidelines established by the Coast Guard-accepted QSS organization.

- i. Submission of training material to Coast Guard-accepted QSS organizations should encompass the same content as submissions to the Coast Guard as described in NVIC 5-95. However, each Coast Guard-accepted QSS organization may have a preferred format for these submissions. Training organizations should confer with the Coast Guard-accepted QSS organization they have chosen prior to submitting training material for acceptance.
- j. A list of Coast Guard-accepted QSS organizations will be maintained by:

Director, National Maritime Center  
NMC-4B  
4200 Wilson Boulevard, Suite 510  
Arlington, VA 22203-1804  
Telephone No. (703) 235-1864

This list will be updated regularly and is made available to the public via the internet at <http://www.dot.gov/dotinfo/uscg/hq/g-m/gmhome.htm>. A list can also be requested from the National Maritime Center at the above address.

- k. Coast Guard-accepted QSS organizations must be completely independent of any organizations offering training. Coast Guard-accepted QSS organizations may not exercise direct or indirect managerial or financial control through contract or understanding over any training organization. Likewise, training organizations may not exercise direct or indirect managerial or financial control through contract or understanding over any Coast Guard-accepted QSS organization.
- l. Training organizations that choose to be served by Coast Guard-accepted QSS organizations must grant these organizations the same access granted to the Coast Guard. Coast Guard-accepted QSS organizations must have convenient access to all appropriate documents and facilities, and opportunities both to observe all appropriate activities and to conduct confidential interviews when necessary. Arrangements must be such that

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persons representing the Coast Guard-accepted QSS organization are not rewarded, directly or indirectly, by the training organization for making any particular observations or for reaching any particular conclusions.

Encl: (1) Guidance for Becoming a Coast Guard Accepted QSS Organization  
(2) Sample letter of acceptance

Non-Standard Distribution:

B:a COMMANDANT (G-MOC) (20); (G-MSO) (20); National Maritime Center (40).

C:e New Orleans, Miami (90); Boston, Baltimore, Puget Sound (45); San Francisco, Hampton Roads, Honolulu, Los Angeles/Long Beach, Houston, Boston, Charleston, Anchorage, Memphis, Toledo (40); Philadelphia (35); Mobile, Jacksonville, Portland OR (20); Portland ME, Port Arthur (15); Cleveland, Cincinnati, Louisville, Nashville, Paducah, Pittsburg, St. Louis, Savannah, San Juan, Tampa, Galveston, Buffalo, Chicago, Detroit, Duluth, Milwaukee, San Diego, Valdez (10); Providence, Huntington, Wilmington, Corpus Christi (5).

C:m New York (70); St. Ignace (5); Sturgeon Bay (4).

D:l CG Liaison Officer MILSEALIFTCOMD (Code N-7CG), CG Liaison Officer JUSMAGPHIL, RSPA (DHM-22), CG Liaison Officer MARAD (MAR-720.2), NOAA Fleet Inspection Officer (1).

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C:m New York (70); St. Ignace (5); Sturgeon Bay (4).

D:l CG Liaison Officer MILSEALIFTCOMD (Code N-7CG), CG Liaison Officer JUSMAGPHIL, RSPA (DHM-22), CG Liaison Officer MARAD (MAR-720.2), NOAA Fleet Inspection Officer (1).

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GUIDANCE FOR BECOMING A COAST GUARD-ACCEPTED QSS ORGANIZATION

- Ref:
- (a) International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended in 1995 (STCW)
  - (b) ANSI/ASQC Q9004-1-1994 Quality Management and Quality System Elements - Guidelines
  - (c) BSR/ASQC Z-1.11 (Draft Standard), Quality Management and Quality Assurance Standards - Guidelines for the Application of ANSI/ASQC Q9001-12994 or Q9002-1994 to Education and Training Institutions
  - (d) ISO 9000-2:1993, Quality Management and Quality Assurance Standards - Part 2: Generic Guidelines for the Application of ISO 9001, ISO 9002 and ISO 9003
  - (e) ISO 9004-4:1993, Quality Management and Quality System Elements - Part 4: Guidelines for Quality Improvement
  - (f) ANSI/ISO/ASQC Q10011-1-1994, Q10011-2-1994, and Q10011-3-1994 Guidelines for Auditing Quality Systems
  - (g) ISO 10013 Guidelines for Developing Quality Manuals
  - (h) The Malcolm Baldrige National Quality Award Criteria

1. INTRODUCTION

- a. Key components in the STCW certification process are ensuring the training a mariner receives, and the assessment of a mariner's skills after the training is completed, support the goal of placing qualified mariners on board merchant vessels. In this arena, the Coast Guard and maritime training organizations have worked together to ensure that the maritime community is supplied with qualified mariners. The Coast Guard course approval process has been a primary part of this effort. Through this process we have sought to promote quality in merchant mariner training and assessment.
- b. The Coast Guard is expanding its partnership with maritime industry by allowing organizations who meet the criteria of this enclosure to accept training on behalf of the Coast Guard. An organization wishing to become a Coast Guard-accepted QSS organization must have a process for reviewing and accepting training that equals or exceeds the Coast Guard's course approval process. This enclosure describes the minimum processes an organization must establish. An organization that meets the criteria of this enclosure will be acknowledged as a "Coast Guard-accepted QSS organization." This organization will then be added to the list of Coast Guard-accepted QSS organizations maintained by the Coast Guard's National Maritime Center.

2. SUBMISSION REQUIREMENTS. An organization wishing to become validated as a Coast Guard-accepted QSS organization should send their documentation to:

Director, National Maritime Center  
NMC-4B  
4200 Wilson Boulevard, Suite 510  
Arlington, VA 22203-1804

Prospective QSS organizations should contact the Coast Guard at the above address to discuss the scope and depth of their documentation prior to submitting it in final form.

3. FUNCTIONAL ELEMENTS OF A COURSE ACCEPTANCE PROCESS. The documentation that is submitted to the Coast Guard must contain, at a minimum, the following elements. An organization that has already been approved as a recognized classification society in accordance with 46 CFR Part 8, Subpart B, has already complied with many of these elements. An organization that presents proof of this recognition need not present evidence of compliance with paragraphs 3.a and 3.k.

a. Identification of the Organization.

- (1) Name of the organization and its organizational structure. If it is an independent organization, an organizational chart of senior management down to the auditor level is required. If it is part of a larger organization, then an organizational chart of the QSS department and its chain of responsibility up to the Chief Executive Officer and down to the auditor level should be submitted.
- (2) Name, address, telephone (fax and e-mail if available) of the person who will serve as the point of contact for the organization with the Coast Guard.

b. Scope and Background of the Organization.

- (1) Areas of maritime training and assessment which the organization is designed to monitor.
- (2) Examples of situations, if any, in which the organization is being employed, or has been employed previously, as the accepting scheme in training or assessment activities.
- (3) Samples of audits, if any, of training or assessment activities previously completed by the organization.

c. Staffing for the Organization.

- (1) Names of the individuals who would actually review, accept, and perform monitoring of maritime training and assessment, and their qualifications for doing so. Ensure compliance with 46 CFR 10.309(9)(i).



- (2) Description of any training given to individuals who will be conducting review, acceptance, and monitoring activities.
  - (3) Normally, the monitoring function will be carried out by persons working exclusively for the QSS organization. A Coast Guard-accepted QSS organization may, however, use persons not exclusively affiliated with the QSS organization provided such persons are subject to the quality assurance system of the QSS organization. This applies to all sub-contractors.
  - (4) An organization must maintain adequate managerial and monitoring resources to accomplish the monitoring function.
- d. Infrastructure Support. Infrastructure within the organization to support the review, acceptance, and monitoring activities. An organization must maintain adequate technical and support resources to accomplish the monitoring function.
- e. Submission Guidelines. The organization should provide guidelines for training organizations regarding how training is to be submitted for review and acceptance. These guidelines should include criteria on course design, instructor /evaluator qualifications, syllabi, equipment, facilities, etc. Organizations should ensure appropriate updating of these criteria.
- f. Organization / USCG Liaison.
- (1) Organizations should allow Coast Guard participation in the development of submission criteria, and training review and acceptance procedures. Organizations should contact the Coast Guard as early as practicable, so that both parties can present and discuss their views on any intended changes to submission criteria, or training review and acceptance procedures. The organization should consider recommendations for additions or amendments to its criteria or procedures made by the Coast Guard.
  - (2) This participation will support information exchange between the organization and the Coast Guard. The Coast Guard will send any changes to relevant regulations or instructions to the organization and the organization must provide any changes in its submission criteria or training review and acceptance procedures to the Coast Guard.
- g. Training Review and Acceptance Procedures.
- (1) Description of how the physical, administrative and infrastructure support aspects of the training organization will be evaluated. Ensure compliance with 46 CFR 10.309(6).
  - (2) Description of how the instructors and designated examiners of the training organization will be evaluated and compliance with 46 CFR 10.309(3) through (5), and 46 CFR 10.309(7) will be maintained.

- (3) Description of format for accepting training material, including training record books. [NOTE: The Coast Guard has accepted the IMO Model Course format. Any variations from this format should be justified. NVIC 6-97 may be used for guidance on training record books.]
- (4) Period of time for which training is accepted. [NOTE: If different for initial acceptance and renewal, state reasons.]
- (5) Sample document showing training acceptance.
- (6) Description of how the course acceptance process responds to requests for modification of the training curriculum by the training organization.
- (7) Description of how the course acceptance process responds to requests for changing instructors or examiners by the training organization.
- (8) Description of how the course acceptance process responds to requests for changes in the physical, administrative and infrastructure support aspects of the training organization.
- (9) Description of procedures for renewing accepted training.

h. External and Internal Auditing Procedures.

- (1) Description of how the training organizations will be audited.
  - (a) Specimen forms which will be used in conducting audits (initial evaluation and periodic audits).
  - (b) Instructions issued to those conducting the audits.
  - (c) Guidance issued to the training organization to prepare for an announced audit.
  - (d) Procedures used in the remediation of situations where a training organization is either unable to pass an initial evaluation or is found not to be in compliance with established procedures during a periodic audit. This should include disenrollment procedures.
  - (e) Procedures for following up on deficiencies.
  - (f) Sample report for submitting audit results to the training organization and the Coast Guard. These reports must be submitted to the Coast Guard within 30 days of completion of the audit (46 CFR 10.309(10)).
  - (g) Frequency of audits.

- (2) Description of the internal auditing procedures for the Coast Guard-accepted organization.
  - (a) Specimen forms used in conducting audits.
  - (b) Instructions to those conducting the audits.
  - (c) Procedures used in situations where the Coast Guard-accepted organization does not comply with established procedures during a periodic audit.
  - (d) Procedures for following up on deficiencies.
  - (e) Sample report for submitting audit results to the Coast Guard.
  - (f) Frequency of audits.

i. Record Keeping.

- (1) Record keeping requirements for the Coast Guard-accepted QSS organization are to specifically address internal and external audits, and auditor qualifications and training.
- (2) Record keeping requirements for the training organizations are to ensure compliance with 46 CFR 10.309(8).

j. Contractual Relationship with Training Organizations. Specimen agreement(s) used in establishing a contractual relationship between the training organization and the Coast Guard-accepted QSS organization. This agreement should ensure compliance with 46 CFR 10.309(9)(ii) and (iii) in that they contain a binding commitment to:

- (1) provide access to:
  - (a) training sites, syllabi, material, aids, manuals, equipment, facilities, etc.;
  - (b) instructor qualifications and evaluations;
  - (c) designated examiner qualifications and evaluations;
  - (d) examination and assessment protocols; and
  - (e) relevant administrative policies and procedures including, but not limited to, student admission requirements, staff recruitment and appraisal, and functions of, or performed by, subcontractors.

(2) ensure:

- (a) adequate opportunities for visiting the training facility, for observing activities, and for discussing training and assessment activities with students, instructors, assessors and administrators. This should include the freedom to make unannounced audits.
  - (b) unconditional release of information which must be included in the audit report submitted to the Coast Guard.
  - (c) unfettered independence for those performing audit activities and report preparation.
  - (d) adequate procedures for removing acceptance from specific training that has documented deficiencies. [NOTE: 46 CFR 10.309(c) describes procedures for removal of specific training acceptance through a Coast Guard appeal process. Title 46 CFR 10.309(c) may be incorporated into the contractual agreement, however, the procedure in 46 CFR 10.309(c) does not preclude a Coast Guard-accepted QSS organization from describing its own terms for removal of specific training acceptance.]
  - (e) adequate procedures for removing acceptance from the training organization itself.
  - (f) adequate procedures for addressing grievances between a training organization and the Coast Guard-accepted QSS organization. This should include an appeal process.
- k. Quality Commitment. References (b) through (h) are recognized national and international standards for all or part of a quality management system. These references are not meant to be all inclusive; they are mentioned here so that organizations may refer to them as starting points in creating their own quality management system. Organizations are free to use other quality standards as they are developed.

The breadth and scope of the different elements in a quality management system are dependent upon the objectives, methods, and administrative practices unique to an organization. Listed below are the key elements in a quality management system. This list is not intended to be exhaustive. Ultimately, the elements of a quality management system are to be established between the organization and the Coast Guard.

Organizations that are ISO 9000 certified have already demonstrated this commitment. Proof of ISO 9000 certification will satisfy this requirement.

- (1) Demonstration of Management Responsibility - Commitment of senior management is critical to the success of quality management (QM). This commitment can be demonstrated by establishing:
  - (a) Quality Policy - Senior management must clearly articulate and document its quality policy. As all employees impact the quality of the monitoring, this policy must be understood by all members of the organization.
  - (b) Responsibility and Authority - The personnel who manage and perform work affecting the quality of the monitoring function (review, acceptance and auditing) should be identified. Adequate authority should be delegated to individuals to allow them to identify, record and resolve problems within their areas of responsibility.
  - (c) Resources - Management should ensure that adequate resources are available and procedures are in place to perform work in a quality fashion and to continuously appraise the ongoing monitoring function.
  - (d) Management Representative - Management shall appoint an individual to ensure that the quality practices are established, implemented and maintained. This individual is the recommended choice for liaison with the Coast Guard.
  - (e) Management Review - Management should review the effectiveness of their QM efforts at routine intervals.
    1. The scope and timetable for these internal quality assurance reviews should be established between management and the Coast Guard. In no case should it be less than twice in five years with a minimum of two years between reviews.
    2. The review should include:
      - a. organizational structure (monitoring and support systems), including the adequacy of staffing and resources;
      - b. how well the QM is being implemented;
      - c. customer satisfaction, internal feedback, evaluation results, assessment criteria and documented improvements.
      - d. a listing of discrepancies and a plan of action for correcting them.

e. conclusions and recommendations.

- (2) Documentation of Quality Management Procedures - A quality management system should be understood to encompass the organizational structure, responsibilities, procedures, and resources which ensures quality monitoring. The range and detail of these procedures is dependent upon the complexity of the work, the methodology used, and the skills and training required by the personnel carrying out the activity. These procedures should be documented in a Quality Manual. Organizations may use reference (g) for guidance on how to draft a quality manual.
- (3) Document and Data Control - Clear identification of what is to be controlled, and who is responsible for controlling, the approval, issue, distribution, modification, and administration of documentation, including the removal of obsolete documents. This applies to internal and external documents.
- (4) Assessment of Sub-contractors - Clear identification of how sub-contractors are chosen. This should include a review of previous performance in supplying similar products or services, an assessment of the supplier's commitment to quality, and a periodic review of supplier performance.
- (5) Process Control - The characteristics that are most critical to the quality of the monitoring function should be identified and controlled. This includes the procedures for reviewing, accepting, and auditing training.
- (6) Nonconformity Issues - Procedures should be established and maintained to determine when the monitoring function is not in conformance. This involves the performance of those individuals who review, accept and audit training. It should address how a nonconformity is identified and what corrective action is to take place.
- (7) Records - Records should be maintained to demonstrate effective operation of quality management. This should include audit records, training submissions and their evaluations/responses, auditor qualifications, auditor training, etc.
- (8) Training - Establish and maintain documented procedures for identifying training needs and providing training for all personnel performing activities affecting quality.
- (9) Pre-Implementation Review. Once the elements of quality management are understood by the QSS organization, it is recommended that the QSS organization consult the Coast Guard on the scope of their quality management implementation prior to final drafting of the quality manual. This can be done in any manner satisfactory to both parties.

1. Code of Ethics. The organization should be governed by the principles of ethical behavior, which should be contained in a Code of Ethics. This Code should recognize the inherent responsibility associated with this delegation of authority.
  
4. COURSE/TRAINING PROGRAM IDENTIFICATION. The Coast Guard is developing a course identification numbering system for all Coast Guard approved courses and training programs. When an organization receives approval as a Coast Guard-accepted QSS organization they will be given a unique identifier which must be used to identify the courses they accept. Complete course identification details will be provided when an organization is approved.
  
5. COAST GUARD NOTIFICATION. Coast Guard-accepted QSS organizations must notify the Coast Guard, in writing, of the training they have accepted within 14 days of the acceptance date. The notification must include the name and address of the training institution, the course title, the STCW requirement the course is meeting, and a one paragraph description of the course content. Notifications are to be sent to the National Maritime Center at the address in paragraph 2.
  
6. CHANGE OF OWNERSHIP. Any time a Coast Guard-accepted QSS organization changes ownership, the new senior management of the organization must, within 90 days of the change of ownership, meet with the Coast Guard (Chief, NMC-4B branch in Arlington, VA) to reconfirm the processes the organization uses to conduct Coast Guard acceptance of merchant mariner training. Failure to meet with the Coast Guard within 90 days of the change of ownership will result in the disenrollment of the organization as a Coast Guard-accepted QSS organization.
  
7. REQUIRED AUDITS OF COAST GUARD-ACCEPTED QSS ORGANIZATIONS
  - a. Internal Quality Assurance Reviews. An organization must conduct internal quality assurance reviews (audits) not less than twice in five years with a minimum of two years between reviews. Record keeping requirements and reporting formats for these reviews should be established by the organization. Guidance on conducting internal quality assurance audits is contained in ref. (g).
  
  - b. Independent Evaluations - Each Coast Guard-accepted QSS organization will be audited at least once every five years by the Coast Guard. Continued service as a Coast Guard-accepted QSS organization is contingent upon satisfactory results during these audits. Audit results will be sent to the Coast Guard-accepted QSS organization by the Coast Guard within 60 days of the completion of the audit. Audit results should be kept with the organization's original approval letter.

(1) Coast Guard Audits

- (a) Coast Guard audits may be announced or unannounced.
  
- (b) Coast Guard audit procedures are available to Coast Guard-accepted QSS organizations by contacting the National Maritime Center at the address in paragraph 2 of this enclosure.

8. REQUIRED REPORTS

- a. Internal quality assurance reviews - Results of the internal quality assurance reviews must be submitted to the Coast Guard within 60 days of their completion.
- b. Independent evaluations - Results of the independent evaluation done by the Coast Guard will be available to the audited organization within 60 days of the completion of the audit.
- c. Coast Guard-accepted QSS organization audits - Results of audits of training organizations conducted by Coast Guard-accepted QSS organizations must be submitted to the Coast Guard within 30 days of completion of the audit (46 CFR 10.309(10)).

9. COAST GUARD OVERSIGHT

- a. Oversight is integral to ensuring the integrity of this program. The Coast Guard reserves the right to audit training organizations that are served by Coast Guard-accepted QSS organizations in the same way it audits the training organizations for which it provides course approval, i.e., in accordance with NVIC 5-95.
- b. The Coast Guard will provide, in writing, the results of its audits of training organizations that are served by Coast Guard-accepted QSS organizations to both the training organization and the Coast Guard-accepted QSS organization.

10. ENROLLMENT AS A COAST GUARD-ACCEPTED QSS ORGANIZATION. Once an organization has been approved as a Coast Guard-accepted QSS organization, it will receive a letter (enclosure (2)) granting it the authority to accept the training listed in paragraph 4.F.1 of this NVIC for which it qualifies. No organization may act as a Coast Guard-accepted QSS organization until it has received the letter of acceptance. Approvals have no expiration date but are dependent upon satisfactory results of the external Coast Guard audit described in paragraph 6.b of this enclosure.

11. DISENROLLMENT AS A COAST GUARD-ACCEPTED QSS ORGANIZATION.

- a. Voluntary. A Coast Guard-accepted QSS organization must give the training organizations it serves a 180 day notice of its intention to disenroll as a Coast Guard-accepted QSS organization. This should enable the training organizations affected by the disenrollment to take the necessary steps to have their training accepted by another Coast Guard-accepted QSS organization or approved by the Coast Guard.
- b. Involuntary. If the Coast Guard determines, on the basis of its audits, that a Coast Guard-accepted QSS organization is not meeting its obligations, the Coast Guard will notify the organization in writing, enclosing the audits and the conclusions that lead to this determination. The organization will then have a specified period to correct the deficiencies or appeal the conclusions to the Director, National Maritime Center. If the organization appeals and the appeal is denied, or the deficiencies are not



corrected within the allotted time, the Coast Guard will disenroll the organization from the list of Coast Guard-accepted QSS organizations. The Coast Guard will notify all training organizations affected by this decision so that they may make arrangements to transfer to another Coast Guard-accepted QSS organization or seek Coast Guard approval for their training. This transfer must take place within 180 days of notification that their Coast Guard-accepted QSS organization has been disenrolled.



United States Coast Guard

4200 Wilson Boulevard, Suite 510  
Arlington, VA 22203-1804  
Staff Symbol: NMC-4B  
Phone: (703) 235-0011  
Fax: (703) 235-1062

16700  
Seq. No. / CY  
dd mmm yy

Organization Name  
Address  
Address  
City, State ZIP

Dear Sir or Madam:

*Organization Name* is approved as a Coast Guard-accepted Quality Standards System (QSS) organization effective MMM dd, yyyy and has been added to the list of Coast Guard-accepted QSS organizations available to the public. *Organization Name*'s designator is AA. You are hereby granted authority to accept, on behalf of the United States Coast Guard, the training identified below and are authorized to state that *organization name* meets the requirements for a Coast Guard-accepted QSS organization for this training:

*[List training for which the organization has displayed the proper staffing to accept.]*

This approval is conditional, and is valid only if you follow all procedures contained in USCG NVIC XX-97 and maintain your course acceptance process in the manner described in your application. Continued service as Coast Guard-accepted QSS organization is contingent upon satisfactory results of Coast Guard audits. This approval may be revoked if these conditions are not met or if discrepancies, discovered during an audit, are not corrected to the Coast Guard's satisfaction. If, at any time during this approval period, you wish to change the procedures contained in your application, you must submit your proposed changes to this office prior to implementing them.

As a Coast Guard-accepted QSS organization you are assuming an integral role in the maritime community's efforts to reduce maritime casualties by establishing the highest practicable standards of competence for merchant mariners. The Coast Guard sincerely appreciates the efforts you have taken in the promotion of maritime safety.

Director, National Maritime Center  
By direction