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NVIC

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO.

Subj: GUIDANCE ON COAST GUARD ACCEPTED TRAINING RECORD BOOKS

- Ref: (a) International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended
 (b) Federal Register Vol. 62, No. 123, pg. 34505, dated June 26, 1997
 (c) Navigation and Vessel Inspection Circular (NVIC) 6-97, "Policy on Qualified Instructors and Designated Examiners Who Train or Assess the Competence of Merchant Mariners"

1. PURPOSE.

- a. This Circular establishes guidance on the use of Coast Guard-accepted training record books for meeting the requirements of Title 46, Code of Federal Regulations (CFR), section 10.304 ("Substitution of training for required service, and use of training record books").
- b. Specifically, this Circular provides: (1) model training record books, which may be used without further application for approval or acceptance by the Coast Guard; and (2) procedures for submitting record books, which are different from the basic model, for Coast Guard acceptance.

2. DIRECTIVES AFFECTED. None

3. BACKGROUND.

- a. In 1993, the International Maritime Organization (IMO) embarked on a comprehensive revision of the Standards for Training Certification and Watchkeeping - 1978 (STCW) to establish the highest practical standards of competence for mariners and to reduce human error as a major cause of marine casualties. On July 7, 1995, a conference of Parties to the

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STCW adopted a package of amendments to the Convention which establishes requirements for qualification of masters, officers, watchkeeping and other crew personnel on seagoing merchant vessels operating outside the boundary line and the responsibilities of companies that operate such vessels. The STCW Amendments entered into force on February 1, 1997 (see reference (a)).

- b. STCW Regulation II/1 (officer of the navigational watch) requires candidates for certification to have “approved seagoing service of not less than one year as part of an approved training program which includes on-board training which meets the requirements of Section A-II/1 of the STCW Code and is documented in an *approved training record book*, or, otherwise, have approved seagoing service of not less than three years” (emphasis added).
- c. STCW Regulation III/1 (officer in charge of an engineering watch or designated duty engineer) requires that candidates for certification have “completed not less than six months seagoing service in the engine department” and have “completed approved education and training of at least 30 months. This is to include on-board training and documented in an *approved training record book*, meeting the standards of competence specified in Section A-III/1 of the STCW Code” (emphasis added).
- d. Section A-I/6 of the STCW Code (“Training and Assessment”) provides for on-board, in-service assessment of competence by qualified instructors, supervisors, or assessors.
- e. The Coast Guard published an Interim Final Rule on June 26, 1997, in the Federal Register (reference (b)) which revised the regulations in Title 46, CFR Parts 10 and 12 to implement the requirements of the 1995 STCW Amendments to ensure that U.S. merchant mariners and vessel owners/operators conform to the new provisions. Title 46 CFR, Section 10.304(e) and (f) require the use of a Coast Guard-accepted training record book for candidates for STCW certificates or endorsements as deck officers or engineer officers who commence their training or sea service on or after August 1, 1998.

4. DISCUSSION.

- a. The Coast Guard will be requiring formal record keeping of demonstrated competencies and formalized training as part of an approved program of training, in addition to approved sea service and examinations, as criteria for issuing STCW certificates and endorsements. The following question-and-answer format is intended to provide guidance to:
 - (1) assist individuals and/or training programs in determining whether they have compiled an appropriate document for the purpose of verifying the performance of training and assessment functions;
 - (2) enable those who offer training to merchant mariners an appropriate record keeping system to ensure that qualified individuals can verify that all skill demonstrations and knowledge have been provided; and
 - (3) assist those who conduct monitoring of training programs under a quality standards system

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in evaluating whether the program is achieving its stated objectives and meeting regulatory requirements.

b. The following questions and answers provide information on “Training Record Books.”

(1) *What is a “Training Record Book?”*

A “Training Record Book” (TRB) is required by 46 CFR 10.404 (e) for certification as officer in charge of a navigational watch on ships of 500 gross tonnage or more, and 46 CFR 10.304 (f) certification of officers in charge of an engineering watch in a manned engine room or as a designated duty engineer in a periodically unmanned engine room, to adequately document systematic practical training and experience in the tasks, duties, and responsibilities of an officer in charge of a watch.

(2) What must be provided in a TRB?

All TRBs, at a minimum, must contain the following items listed in 46 CFR 10.304 (g):

- (a) The identity of the candidate.
- (b) The tasks to be performed or the skills to be demonstrated, with reference to the standards of competence set forth in the tables of the appropriate sections in part A of the STCW code.
- (c) The criteria to be used in determining that the tasks or skills have been performed properly, again with reference to the standards of competence set forth in the tables of the appropriate sections in part A of the STCW code.
- (d) A place for a qualified instructor to indicate by his or her initials that the candidate has received training in the proper performance of the task or skill.
- (e) A place for the a designated examiner to indicate by his or her initials that the candidate has successfully completed a practical demonstration and has proved competent in the task or skill under the criteria, when assessment of competence is to be documented in the record books.
- (f) The identity of each qualified instructor, including any Coast Guard license or document held, and the instructor’s signature.
- (g) The identity of each designated examiner, when any assessment of competence is recorded, including any Coast Guard license or document held, and the examiner’s signature confirming that his or her initials certify that he or she has witnessed the practical demonstration of a particular task or skill by the candidate.

In general, the following items will be needed to supplement the items listed above and include the tasks and corresponding criteria for satisfactory performance as a watchstander for either a navigational watch or an engine room watch. In addition each TRB is to

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include the candidate's personal history page with photo ID, ship service record, ship data sheet, shipboard training officer's review of training progress, an inspection of record book form for the company's training and senior officers, an introduction (describing guidance in the use, scope, and objectives of the TRB and the training program) and guidance for those directly involved with the candidate's training and evaluation (see enclosures 1 and 2).

(3) *Has a format been developed for the layout and presentation of the TRBs?*

Enclosure (1) is a model training record book for certification as officer in charge of a navigational watch for use onboard vessels where a complete training program has been approved and established. Enclosure (2) is a model training record book for certification as officer in charge of an engineering watch or designated duty engineer for use onboard vessels where a complete training program has been approved and established.

These enclosures are based on the respective models developed by the International Maritime Organization. They are provided with supplemental guidance on instructional and assessment techniques and arrangements to be taken into account when using the training record book for on-board instruction and assessment.

(4) *Will every training organization be required to submit the exact same contents?*

Any training record book which follows the model is Coast Guard-accepted for purposes of meeting the requirements of 46 CFR 10.304(e), provided the training program in which it is used and is approved under 46 CFR 10.302 (Coast Guard course approval) or 10.309 (Coast Guard accepted training other than Coast Guard approved courses). In addition, any training record book which conforms with the model TRB is Coast Guard-accepted for purposes of meeting the requirements of 46 CFR 10.304(f), provided the training program in which it is used and is approved under 46 CFR 10.302 (Coast Guard course approval) or 10.309 (Coast Guard accepted training other than Coast Guard approved courses).

However, this should not be interpreted as every training organization being required to conduct its training program in exactly the same manner as another.

(5) *Can a Training Record Book be developed to meet the needs of a specific training program and used in place of the IMO models?*

Yes, all training record books need not conform in every respect with the models in either enclosure (1) or (2). Variations from these models may be accepted by the Coast Guard to suit the circumstances of training programs which are adapted to special classes of vessel or limited areas of training and assessment, or are otherwise justified by the nature and purpose of the training objectives.

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- (6) *What are the required qualifications for the on board instructor/assessor referred to in the training record book?*

The requirements and qualifications for instructors and assessors are discussed in NVIC 6-97, (reference (c)).

- (7) *Will the use of the TRBs in existing training programs, such as the maritime academies, require significant changes?*

Existing academy training programs are not considered to be significantly affected by the use of the TRBs. Primarily, the TRB will be a document, when properly completed, that will be used to indicate that all training and the competent demonstration of appropriate skills has been accomplished.

- (8) *The use of the TRB appears to be fairly simple, in which case, something that simple must have some requirement that will end in producing a problem?*

When the TRBs are used in a training program, each instructor and/or assessor will need to develop the specific criteria for the conduct of instruction and/or assessment reflected by the guidelines presented in the model TRBs. One perceived problem may be related to the specific criteria that will need to be developed by each instructor and/or assessor. There is concern that the same level of assessment may not be uniformly applied and as a result consistency of assessment may be diminished. This concern can be minimized by each training organization developing specific criteria by which students will be assessed, rather than relying upon each individual assessor having to develop their own standards.

- (9) *Can the task of developing assessment criteria be that difficult?*

Enclosure (3) is an example of how the base criteria for determining competency (as provided in the IMO model Training Record Book) has been expanded into a specific criteria of assessment for determining the competent conduct to be demonstrated by the student. Although the development of the criteria is not necessarily difficult, it is the extent of detail that will become the focus of a lack of agreement. Once enclosure (3) has been reviewed, some will argue that the criteria is too detailed, while others will argue that there is insufficient detail provided by the criteria. With that set of arguments being anticipated, each program should establish a uniform set of criteria for all who will be required to conduct assessment of their trainees.

- (10) *Can the specific criteria of assessment be considered as a Training Record Book?*

Again, it should be reiterated that a specimen for an alternative training record book may be submitted, along with an explanation of how and why the alternative training record book is different from the models provided in enclosure (1) or (2). When a training organization submits a complete set of specific criteria for assessment and, corresponding to all demonstrable skills as laid out in the respective IMO model TRB, it will be given significant consideration for acceptance. The included explanation will also need to address how the remaining criteria, listed in the IMO models, is to be acknowledged.

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(11) *Where should the Training Record Books be submitted for acceptance?*

All Training Record Books, adopted directly from the IMO models are Coast Guard - accepted and need not be submitted for further consideration. Where an organization may prefer to submit an alternative training record book, the specimens are to be submitted, along with an appropriate letter explaining how and why the training record book differs from the models provided in enclosure (1) or (2) to the:

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

or for additional information call (703) 235-0014.

(a) Evaluation. The National Maritime Center will:

- (1) evaluate the alternative record book submitted;
- (2) consult with the applicant, when necessary, to clarify any details; and
- (3) issue a letter to the applicant with a determination of whether or not the proposed alternative record book can be “Coast Guard accepted.”

(b) Recognition.

- (1) Once the determination is issued that a particular alternative record book is in fact “Coast Guard approved”, it may be used in the context of an approved training program to meet the requirements of 46 CFR 10.304(e) or (f), as appropriate.
- (2) The Coast Guard OCMI will accept valid, properly-completed training and assessment record books which conform with the models in enclosures (1) or (2) as evidence that the candidate named in the book has met the requirement of 46 CFR 10.302(e) or (f), as appropriate.

5. ACTION.

- a. The guidelines contained in this circular apply to training record books which are to be Coast Guard-accepted for purposes of complying with the requirements of 46 CFR 10.304(e) and (f).
- b. Entities and organizations offering training to candidates for U.S. licenses, documents, and STCW endorsements should be aware that a Coast Guard-accepted training record book is required under some circumstances for individuals pursuing certification as deck or engineer officers under the STCW Convention and implementing regulations in 46 CFR 10.304.
- c. Entities and organizations offering maritime training should follow the guidance in this NVIC to ensure the appropriate training record book is employed during training and is properly completed by qualified instructors and assessors.

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- d. OCMI's should use this circular as guidance for maintaining oversight of maritime training programs in their area of responsibility.

- Encl: (1) Model training record book for candidates for certification as an officer in charge of a navigational watch
(2) Model training record book for candidates for certification as an engineer officer in charge of an engineering watch or designated duty engineer
(3) Specific Criteria for Assessment

Non-Standard Distribution:

B:a G-MSO(4); G-MOC(4); G-MOA(2); G-MSE(1); G-MSR(1); G-M(1); G-MS(1)

C:e New Orleans (90); Hampton Roads (50); Baltimore (45); San Francisco (40); Philadelphia, Port Arthur, Honolulu, Puget Sound (35); Miami, Houston, Mobile, Morgan City, Los Angeles/Long Beach (25); Jacksonville, Portland OR, Boston, Portland ME, Charleston, Galveston, Anchorage, Cleveland, Louisville, Memphis, Paducah, Pittsburgh, St. Louis, San Juan, Savannah, Tampa, Chicago, Buffalo, Detroit, Duluth, Milwaukee, San Diego, Juneau, Valdez, Providence, Huntington, Wilmington, Corpus Christi, Toledo, Guam (20).

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

D:l CG Liaison Officer MILSEALIFTCOMD (Code N-7CG) (1).

RSPA (DHM-22), CG Liaison Officer MARAD (MAR-720.2) (1).

NOAA Fleet Inspection Officer (1).

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