



COMDTPUB 16700.4

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NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 9 01

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

1. PURPOSE.

- a. This NVIC provides information for organizations that wish to serve as a QSS on behalf of the U. S. Coast Guard.
- b. Training and assessment activities required by the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW) must be monitored as part of a QSS. The U. S. Coast Guard's course-approval process described in Title 46, Code of Federal Regulations (46 CFR), section 10.302 and the oversight program described in Commandant Instruction 16721.1, *Standards for Oversight of Licensing and Seaman's Certification Activities*, comprise the U. S. Coast Guard's QSS for training courses or programs required by the STCW.

2. ACTION. Officers in Charge, Marine Inspection should bring this NVIC to the attention of maritime interests within their areas of responsibility. Internally, it will be distributed electronically. It will also be available on the World Wide Web at <http://www.uscg.mil/hq/g-m/nvic/index.htm>.

3. DIRECTIVES AFFECTED. NVIC 7-97, COMDTPUB 16700.4 is superseded and cancelled.

4. BACKGROUND.

- a. In 1993, the International Maritime Organization embarked on a comprehensive revision of the STCW to reduce human error as a major cause of marine casualties. On July 7, 1995, a conference of Parties to the International Convention on Standards of Training,

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Certification and Watchkeeping for Seafarers, 1978, as amended (STCW) adopted amendments which entered into force on February 1, 1997.

- b. The U. S. Coast Guard implemented the 1995 amendments by publishing an interim rule on June 26, 1997, that modified 46 CFR parts 10, 12, and 15 and incorporated the 1995 amendments into the domestic regulations. Title 46 CFR 10.309 and 46 CFR 12.03-1 now require entities offering training required by STCW to be monitored “in accordance with a U. S. Coast Guard-accepted quality standards system.”
- c. The STCW details the training required for masters, officers and ratings and then broadens its scope to those activities that directly impact that training. It recognizes that training, both on-the job and formal, is an integral and vital part of career development. It acknowledges that on-the-job training has taken place between senior and junior personnel and has been a part of a long-standing maritime tradition. It formally captures training in a training record book or other record of training and establishes responsibilities for companies operating seagoing vessels. It recognizes the criticality of all training, and requires the establishment of criteria for those conducting training and assessing skills. It also requires organizations offering training required by the STCW to be monitored by a QSS, the subject of this NVIC. This function can be accomplished either by the U. S. Coast Guard or by a U. S. Coast Guard-accepted QSS.

5. DISCUSSION.

- a. The STCW seeks to ensure the highest standards for functions and processes relating to a mariner’s competence. To do this, all training, assessments of competence, certification, endorsement, and revalidation activities regarding STCW certificates must be monitored by a QSS. The U. S. Coast Guard’s QSS encompasses the above plus the processes of applying for, obtaining, issuing, upgrading, and renewing a U. S. Coast Guard-issued license or document.
- b. The U. S. Coast Guard’s course approval system described in 46 CFR 10.302 and NVIC 5-95, *Guidelines for Organization Offering Coast Guard Approved Course*, satisfies the mandatory requirements of the STCW for a QSS in the area of training. However, due to the scope of the STCW’s training requirements, the U. S. Coast Guard decided to expand its partnerships with industry. Enclosure (1) lays out the criteria for an entity that seeks acceptance as a QSS to review and monitor training on behalf of the U. S. Coast Guard. These entities will be called U. S. Coast Guard-accepted QSS organizations.
- c. The STCW’s recommended guidance for a QSS, contained in the STCW Code B-1/8, describes a quality management system paralleling ISO 9000 guidelines. Elements of quality management are part of the guidelines for becoming a U. S. Coast Guard-accepted QSS organization. While these are not mandatory requirements for organizations offering training, the U. S. Coast Guard agrees with the concepts of quality management and has made these recommendations a voluntary option for training organizations.
- d. The implementation of the STCW ushered in a number of new concepts and terms. Additionally, the STCW works in concert with the International Safety Management (ISM) Code. These concepts, terms, and interactions are defined and discussed below:

- (1) **QUALITY STANDARDS SYSTEM (QSS)** A system that provides for, and ensures through, the acceptance and monitoring of mariner training that such training provides the highest standards of merchant mariner competence. The existing U. S. Coast Guard course approval process is part of the U. S. Coast Guard's overall QSS; it ensures training is designed, offered, and monitored in accordance with the U. S. Coast Guard's standards.
 - (2) **U. S. COAST GUARD-ACCEPTED QSS ORGANIZATION** An organization meeting the standards contained in this NVIC and recognized by the U. S. Coast Guard as competent to act in lieu of the U. S. Coast Guard for the purposes of review, acceptance, and oversight of training courses and programs.
 - (3) **ACCEPTED TRAINING** Training that has been reviewed and accepted by a U. S. Coast Guard-accepted QSS organization will be termed "U. S. Coast Guard-accepted." This training will have the same weight and acceptance as U. S. Coast Guard-approved training within the licensing and documentation process.
 - (4) **ON-BOARD TRAINING**
 - (a) In some areas, the STCW requires on-board training as a requirement for an STCW certificate. An approved or accepted training program that includes on-board training must have the details of the on-board training included in the overall program approval issued by the U. S. Coast Guard or the acceptance by a U. S. Coast Guard-accepted QSS organization.
 - (b) ISM Code-certified, shipping companies should refer to paragraph 5.f to assess their options. Non-ISM Code-certified shipping companies wishing to offer their crews on-board training creditable toward an STCW certificate must ensure the training conforms to U. S. Coast Guard standards or have it reviewed and accepted by a recognized QSS.
 - (5) **QUALIFIED INSTRUCTORS AND DESIGNATED EXAMINERS** Training and assessments required by the STCW must be conducted by persons trained and qualified to perform these tasks. A qualified instructor is an individual who has been trained or instructed in instructional techniques of training. A designated examiner is an individual who has been trained or instructed in techniques of training and assessment and is qualified to evaluate whether a candidate has achieved the required level of competence. Information about the acceptance of ships' officers serving as assessors of practical skills that can only be completed aboard ship are available on the STCW web site, <http://www.uscg.mil/STCW/s-home.htm>.
- e. Enclosure (2) is a list of all training that a QSS may review and accept on behalf of the U. S. Coast Guard. Enclosure (3) is a list of all training reserved for review and approval only by the U. S. Coast Guard. Enclosure (4) lists training required by the STCW, but which does not require either approval or acceptance. New training required by statute, treaty, regulation or new technology will be reviewed by the U. S. Coast Guard to determine which agencies will be authorized to serve as the QSS for such training.
 - f. The ISM Code also contains requirements for training; however, it does not prescribe 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 criteria. Specifically, the U. S. Coast Guard requires an enhanced level of detail before approving a course as well as periodic oversight by either the U. S. Coast Guard or an organization accepted as a QSS. For a shipping company certified under the ISM Code that wishes to have ISM-required training meet the STCW, it must be approved by the U. S. Coast Guard or accepted by a QSS.

- (1) An organization that conducts ISM Code certification on behalf of the U. S. Coast Guard may also serve as a QSS for training if accepted as such in accordance with enclosure (1).
- (2) The ISM Code requires newly assigned crewmembers to be familiarized with the vessel to which they are reporting. This ISM Code requirement is identical to STCW regulation I/14. Satisfying the ISM Code for shipboard familiarization also satisfies STCW regulation I/14-1.4. This training does not have to be U. S. Coast Guard-accepted or -approved.
- (3) The ISM Code requirement for shipboard familiarization is not sufficiently detailed to meet the requirements for training required by STCW regulation V/1-1.2 (Tanker familiarization). This training must be approved or accepted by a QSS.
- (4) STCW regulations V/2-5 and V/3-5 require familiarization training for personnel serving on passenger vessels. This training is not required to be approved or accepted by a QSS, and providing familiarization training is a responsibility of the vessel's operator. ISM Code familiarization training may also meet the STCW's requirements for familiarization training if it covers the areas set forth in the respective sections of part A of the STCW Code.

6. IMPLEMENTATION.

- a. All training creditable towards STCW certification must meet standards established by the U. S. Coast Guard, or it must be accepted by a U. S. Coast Guard-accepted QSS organization. The QSS will also monitor that training. In accepting training, the QSS will, at a minimum, ensure the training covers the subject areas in the model courses developed by the International Maritime Organization (IMO) and listed in enclosure (2).
- b. Organizations wishing to serve as a QSS, and accept and monitor training on behalf of the U. S. Coast Guard, should apply to the U. S. Coast Guard's National Maritime Center (NMC) in accordance with enclosure (1). An organization submitting an application may not act as a U. S. Coast Guard-accepted QSS until it has received its letter of acceptance. Review of an application to serve as a QSS normally requires 60 to 90 days.
- c. Except for the courses listed in enclosure (3), training organizations may elect to have the U. S. Coast Guard or a U. S. Coast Guard-accepted QSS serve as its QSS. Training currently approved by the U. S. Coast Guard retains that approval until its expiration date. At that time, a training organization may either have the training re-approved by the U. S. Coast Guard or accepted by a U. S. Coast Guard-accepted QSS organization.
- d. A training organization wishing to switch its QSS must ensure that it receives approval from the organization to which they are switching before the expiration of the current

approval or acceptance. The NMC must be notified in writing of the change and include the name of the new QSS organization, the effective date of the change, and the courses accepted by the new QSS.

- e. NVIC 5-95 provides information about the submittal of courses to the U. S. Coast Guard for approval. Courses submitted to a U. S. Coast Guard-accepted QSS organization should conform to the standards established by the U. S. Coast Guard-accepted QSS organization and should encompass the same content as submissions to the U. S. Coast Guard as described in NVIC 5-95.
- f. A list of U. S. Coast Guard-accepted QSS organizations is available on the World Wide Web at <http://www.uscg.mil/STCW/m-achome.htm>.
- g. U. S. Coast Guard-accepted QSS organizations must be completely independent and may not exercise direct or indirect managerial or financial control through contract or understanding over any training organization for which they serve as the QSS. Likewise, a training organization may not exercise direct or indirect managerial or financial control through contract or understanding over any U. S. Coast Guard-accepted QSS organization that serves as its QSS.
- h. A training organization choosing to be monitored by U. S. Coast Guard-accepted QSS organization must grant the QSS the same access granted to the U. S. Coast Guard. A U. S. Coast Guard-accepted QSS organization 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 persons representing the U. S. 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.



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 Rear Admiral, U.S. Coast Guard
 Assistant Commandant for Marine Safety
 and Environmental Protection

- Encl : (1) Guidance for becoming a U. S. Coast Guard-accepted QSS organization
 (2) Training that may be accepted by a U. S. Coast Guard-accepted QSS
 (3) Training that may be approved only by the U. S. Coast Guard
 (4) Training that is not required to be approved or accepted

GUIDANCE FOR BECOMING A U. S. COAST GUARD-ACCEPTED QSS
ORGANIZATION

1. INTRODUCTION. An organization wishing to become a U. S. Coast Guard-accepted QSS organization must have processes for reviewing, accepting, and monitoring training that is equal or superior to the U. S. Coast Guard's course approval and oversight processes. This enclosure describes the processes an organization must establish to be acknowledged as a U. S. Coast Guard-accepted QSS organization.

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

Commanding Officer, National Maritime Center (NMC-4B)
U. S. Coast Guard
4200 Wilson Boulevard, Suite 630
Arlington, VA 22203-1804

Prospective QSS organizations may contact the NMC to discuss the scope and depth of their documentation prior to final submission.

3. ELEMENTS REQUIRED TO BE SUBMITTED FOR REVIEW. The documentation submitted to the U. S. Coast Guard must contain the elements listed below. An organization approved as a recognized classification society in accordance with 46 CFR part 8, subpart B, need not present evidence of compliance with paragraphs 3.a and 3.k below.
 - a. Identification of the Organization.
 - (1) Name of the organization and its organizational structure. If it is an independent organization, provide an organizational chart of senior management down to the auditor level. If it is part of a larger organization, chart the QSS department and its chain of responsibility up to the Chief Executive Officer and down to the auditor level; and
 - (2) Name, address, contact information (telephone and fax numbers and e-mail address), and organizational position of the person who will serve as the point of contact with the U. S. Coast Guard.

 - b. Scope and Background of the Organization.
 - (1) Areas of maritime training and assessment which the organization wishes to monitor;
 - (2) Examples of situations, if any, in which the organization is being employed, or has been employed previously, as the accepting agent for review and acceptance of training and/or assessment activities;

- (3) Samples of audits, if any, of training or assessment activities previously completed by the organization; and
- (4) Criteria for selection of sub-contractors. A U. S. Coast Guard-accepted QSS organization may use persons not exclusively affiliated with the QSS organization provided such persons are subject to the quality assurance system of the QSS organization.

c. Staffing for the Organization.

- (1) Names and qualifications of the individuals who would actually review, accept, and monitor maritime training and assessment, [see 46 CFR 10.309(a)(10)(ii)];
- (2) Description of any training given to individuals who will be conducting review, acceptance, and monitoring activities; and
- (3) Staffing must be adequate to perform the duties the organization must perform in carrying out review and oversight functions.

d. Support Infrastructure. Include technical and support resources within the organization that support the review, acceptance, and monitoring activities.

e. Submission Guidelines. Provide guidelines required for client organizations to submit courses, assessments, or other functions for review and acceptance. These guidelines should include criteria on course design, instructor/evaluator qualifications, syllabi, equipment, and facilities.

f. Liaison Between the Organization and the NMC. Provide information about on-going liaison between the organization and the NMC. Organizations are urged to allow NMC participation in the development of new, or revision of existing, submission criteria; training review; and acceptance procedures. This will support information exchange between the organization and the NMC. The NMC will send any changes of relevant regulations or instructions to the organization, and the organization must provide to the NMC any changes in its submission criteria or review and acceptance procedures.

g. Review and Acceptance Procedures.

- (1) Descriptions of the methods of evaluation of the physical, administrative and infrastructure support aspects of client organizations [see 46 CFR 10.309(a)(2)];
- (2) Descriptions of the methods of evaluation of the instructors and designated examiners of a client organization and the maintenance of their records [see 46 CFR 10.309(a)(3), (4) and (7)];
- (3) Description of format for accepting training material, including training record books [NOTE: The U. S. Coast Guard has accepted the IMO Model Course format. Any variations from this format must be justified. NVIC 6-97 may be used for guidance on training record books.];

- (4) Once training has been accepted, the period of its validity [NOTE: If different for initial acceptance and renewal, state reasons.];
 - (5) Sample document showing training acceptance;
 - (6) Descriptions of the methods by which the course acceptance process responds to requests for modification of the training curriculum by a client organization;
 - (7) Descriptions of the methods by which the course acceptance process responds to requests for changes in instructors or examiners by a client organization;
 - (8) Descriptions of the methods by which the course acceptance process responds to requests for changes in the physical, administrative, and infrastructure support aspects of a client organization; and
 - (9) Descriptions of the procedures for renewal of an acceptance of a training course that is nearing expiration.
- h. External and Internal Auditing Procedures. Descriptions of the methods of auditing client organizations including:
- (1) Specimen forms which will be used in conducting audits (initial evaluation and periodic audits);
 - (2) Instructions issued to those conducting the audits;
 - (3) Guidance issued to the client organization to prepare for an announced audit;
 - (4) Procedures used when a client organization is either unable to pass an initial evaluation or is found not to comply with established procedures during a periodic audit. This should include disenrollment procedures;
 - (5) Procedures for following up on deficiencies;
 - (6) Sample report for submitting audit results to the client organization and the NMC. These reports must be submitted within 30 days of completion of the audit [46 CFR 10.309(a)(11)]; and
 - (7) Frequency of audits.
- i. Record Keeping. Address the records required for internal and external audits. Record keeping requirements for the training organization must ensure compliance with 46 CFR 10.309(a)(9).

j. Contractual Relationship with Training Organizations. Provide a specimen agreement(s) used to establish a contractual relationship between a client organization and the QSS organization. This agreement should ensure compliance with 46 CFR 10.309(a)(10)(i) and (ii) in that it contains a binding commitment to provide access to:

- (1) Training sites, syllabi, material, aids, manuals, equipment, and facilities;
- (2) Instructor qualifications and evaluations;
- (3) Designated examiner qualifications and evaluations;
- (4) Examination and assessment protocols;
- (5) Student records; and
- (6) Relevant administrative policies and procedures including, but not limited to, student admission requirements, staff recruitment and appraisal, and functions of, or performed by, subcontractors.

The agreement(s) must also ensure:

- (7) Adequate opportunities for visiting the training facility, observing activities, and discussing training and assessment activities with students, instructors, assessors and administrators. This includes the freedom to make unannounced audits;
 - (8) Unconditional release of information to be included in the audit report submitted to the U. S. Coast Guard;
 - (9) Complete independence for those performing audit activities and report preparation;
 - (10) Adequate procedures for removing acceptance from specific training or functions that have documented deficiencies [NOTE: 46 CFR 10.309(c) describes procedures for removal of specific training acceptance through a U. S. Coast Guard appeal process and may be incorporated into the contractual agreement. However, the procedure in 46 CFR 10.309(c) does not preclude a U. S. Coast Guard-accepted QSS organization from describing its own terms for removal of specific training acceptance.];
 - (11) Procedures for dis-enrolling a client organization from acceptance; and
 - (12) Procedures for addressing grievances between a client organization and the U. S. Coast Guard-accepted QSS organization. This should include an appeal process.
- k. Quality Commitment. Provide evidence of a firm commitment to the operation of a high quality organization. Commitment of senior management is critical to the success of quality management. Organizations that are ISO 9000 certified already demonstrate this commitment, and proof of ISO 9000 certification will satisfy this requirement. The breadth and scope of the elements in a quality management system are dependent upon the

objectives, methods, and administrative practices unique to an organization. This commitment can be demonstrated by establishing a quality management system that includes the following key elements:

- (1) Quality Policy – Senior management must clearly articulate and document its quality policy. As all employees impact the quality of the acceptance and monitoring of training, this policy must be understood by all members of the organization.
- (2) 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.
- (3) 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 U. S. Coast Guard.
- (4) Management Review – Management should review the effectiveness of the quality management efforts at routine intervals and make appropriate revisions when necessary. The scope and timetable for these internal quality assurance reviews should be established between management and the U. S. Coast Guard. In no case should it be less than twice in five years with a minimum of two years between reviews. The review should include:
 - (a) The organizational structure (monitoring and support systems), including the adequacy of staffing and resources;
 - (b) How well quality management is being implemented;
 - (c) Reviews of information about customer satisfaction, internal feedback, evaluation results, assessment criteria and documented improvements;
 - (d) A listing of discrepancies and a plan of action for correcting them; and
 - (e) Conclusions and recommendations for improving the effectiveness of the organization.
- (5) Documentation of Quality Management Procedures – A quality management system includes the organizational structure, responsibilities, procedures, and resources which ensure quality monitoring. The range and detail of these procedures are dependent upon the complexity of the work, the methodology used, and the skill and training required by the personnel carrying out the activity. These procedures should be documented in a quality manual as set forth in ISO standard 10013, *Guidelines for Developing Quality Manuals*. It is recommended that the QSS organization consult the U. S. Coast Guard on the scope of their quality management implementation prior to final drafting of the quality manual.

- (6) 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.
 - (7) 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, and assessment of the supplier's commitment to quality, and periodic review of supplier performance.
 - (8) Process Control – The characteristics that are most critical to the quality of the monitoring-of-training function should be identified and controlled. This includes the procedures for reviewing, accepting, and auditing training.
 - (9) Oversight Issues – Procedures should be established and maintained to determine when the monitoring-of-training function is not in conformance. This involves the performance of those individuals who review, accept, and audit training. It should address how deviations from standards are identified and what corrective actions must occur.
 - (10) Records – Records should be maintained to demonstrate effective operation of quality management. This includes audit records, training submissions and their evaluations/responses, auditor qualifications, and auditor-training.
 - (11) Training – Establish and maintain documented procedures for identifying training needs and providing training for all personnel performing activities affecting quality.
 - (12) Code of Ethics – The organization should be governed by the principles of ethical behavior contained in a published Code of Ethics. This Code should recognize the inherent responsibility associated with this delegation of authority.
4. COURSE/TRAINING PROGRAM IDENTIFICATION. When an organization receives approval as a U. S. Coast Guard-accepted QSS organization, it will be given a unique identifier to be used when identifying the courses it accepts. Details for complete course identification will be provided when an organization is approved.
 5. U. S. COAST GUARD NOTIFICATION. U. S. Coast Guard-accepted QSS organizations must notify the NMC of the training they have accepted within 14 days of the acceptance date. The notification must include the name and address of the client institution, the course's title, the STCW or regulatory requirement the course meets, and a one-paragraph description of the course's content.
 6. CHANGE OF OWNERSHIP. Any time a U. S. Coast Guard-accepted QSS organization changes ownership, the new senior management of the organization must, within 90 days of the change of ownership, reconfirm the processes and organization used to conduct acceptance of merchant mariner training. Failure to reconfirm with the NMC within 90 days of the change of ownership will result in the disenrollment of the organization as a U. S. Coast Guard-accepted QSS organization.

7. REQUIRED AUDITS OF U. S. 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.
- b. Independent Evaluations – Each U. S. Coast Guard-accepted QSS organization will be audited at least once every five years by the NMC. Continued service as a U. S. Coast Guard-accepted QSS organization is contingent upon satisfactory results of these audits. Audit procedures are available from the NMC. The U. S. Coast Guard will send the audit results to the QSS organization within 60 days of the completion of the audit. Audit results should be kept with the organization's original approval letter.

8. REQUIRED REPORTS.

- a. Internal quality assurance reviews – Results of the internal quality assurance reviews must be submitted to the NMC within 60 days of their completion.
- b. Independent evaluations – Results of an independent evaluation done by the NMC will be available to the audited organization within 60 days of the completion of the audit.
- c. U. S. Coast Guard-accepted QSS organization audits – Results of audits of client organizations conducted by the QSS organization must be submitted to the NMC within 30 days of completion of the audit [46 CFR 10.309(a)(11)].

9. U. S. COAST GUARD OVERSIGHT.

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

10. ENROLLMENT AS A U. S. COAST GUARD-ACCEPTED QSS ORGANIZATION. Once an organization has been approved as a U. S. Coast Guard-accepted QSS organization, it will receive a letter from the NMC granting it the authority to accept the training listed in this NVIC for which it qualifies. No organization may act as a U. S. Coast Guard-accepted QSS organization until it has received its letter of acceptance.

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

- a. Voluntary – A U. S. Coast Guard-accepted QSS organization must give each client organization it serves a 180-day notice of its intention to disenroll the client organization

as a U. S. Coast Guard-accepted QSS organization. This enables the client organization time to take the necessary steps to have their training accepted by another U. S. Coast Guard-accepted QSS organization or approved by the NMC.

- b. Involuntary -If the U. S. Coast Guard determines that a U. S. Coast Guard-accepted QSS organization is not meeting its obligations, the NMC will notify the organization in writing and enclose information about the events that led to this determination. The organization will then have a specified period to correct the deficiencies or appeal the conclusions to the Director of the Field Activities Directorate (G-MO) in U. S. Coast Guard Headquarters. If the organization appeals and the appeal is denied, or the deficiencies are not corrected within the allotted time, the NMC will disenroll the organization from the list of U. S. Coast Guard-accepted QSS organizations. The NMC will notify all client organizations affected by this decision so that they may make arrangements to transfer to another U. S. Coast Guard-accepted QSS organization or seek NMC approval for their training. This transfer must take place within 180 days of notification that their U. S. Coast Guard-accepted QSS organization has been disenrolled.

TRAINING THAT MAY BE ACCEPTED BY A COAST GUARD-ACCEPTED QSS

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TRAINING FOR INDIVIDUAL CERTIFICATION

NAME OF TRAINING	STCW REF.	COMMENTS
Automatic Radar Plotting Aid (ARPA)	A-II/1 A-II/2	Required by deck officers serving on vessels equipped with ARPA. A CG-accepted QSS may approve a course if the simulator(s) conforms to STCW standards and the protocol developed by the Coast Guard's Research and Development Center. ¹ IMO model course 1.07
Bridge resource management (i.e., bridge team training)	A-II/1 A-II/2	Completion of formal training course is not required by STCW; however, many deck officers elect to complete a course in lieu of on-the-job training.
Global Maritime Distress and Safety System (GMDSS)	A-IV/2	Required for deck officers on vessels equipped with GMDSS systems. IMO model courses 1.25 and 1.26
Medical first aid provider	A-VI/4-1	IMO model course 1.14
Person in charge of medical care	A-VI/4-2	Required for applicants as officer in charge of a navigational or engineering watch. IMO model course 1.15
Proficiency in survival craft and rescue boats other than fast rescue boats/lifeboatman	A-VI/2-1Reg VI/	Required for able seaman (AB) endorsement where service is not limited to non-lifeboat equipped vessels; applicants for lifeboatman endorsements; and applicants for certification as an officer in charge of a navigational or engineering watch. All applicants for lifeboatman must meet standards for proficiency in survival craft. See 46 CFR 12.10. IMO model course 1.23
Proficiency in fast rescue boats	A-VI/2-2	See NVIC 3-00
Radar observer	A-II/1; A-II/2	See 46 CFR 10.305 and 15.815. Course may be accepted if simulator(s) conforms to STCW standards and the protocol developed by the Coast Guard's Research and Development Center. ¹ Courses using other simulators must be approved by the U. S. Coast Guard. IMO model courses 1.07, 1.08, and 1.09
Rating forming part of an engineering watch	A-III/4	Required for applicants for a qualified engineering watchstanding rating.
Rating forming part of a navigational watch	A-II/4	Required for applicants for an AB endorsement.
Signaling	A-II/1	
Training program for officer in charge of a navigational watch	A-II/1	IMO model course 7.03
Training program for officer in charge of an engineering watch	A-III/1	IMO model course 7.04

Note 1. Available from the National Maritime Center (NMC-4B)

TRAINING THAT MAY BE ACCEPTED BY A COAST GUARD ACCEPTED QSS
VESSEL SPECIFIC TRAINING

NAME OF TRAINING	STCW REF.	COMMENTS
TRAINING FOR PERSONS SERVING ON TANKERS ²	A-V/1	Formal training is also required for persons serving on vessels not subject to the STCW. See 46 CFR part 13. IMO model courses 1.01, 1.02, 1.04, and 1.06
Tankerman - PIC - DL		See 46 CFR 13.121 and STCW A-V/1 paragraphs 8 - 21
Tankerman - PIC - LG		See 46 CFR 13.121 and STCW A-V/1 paragraphs 22 - 34
Tankerman assistant - DL or LG		See 46 CFR 13.121 and STCW A-V/1 paragraphs 1 - 7
Tankerman engineer - DL or LG		See 46 CFR 13.121
TRAINING FOR CERTAIN PERSONS ON RO-RO PASSENGER SHIPS	A-V/2	The four subordinate elements of required training are listed. See STCW cite to determine which personnel are required to complete each element of training
Crowd management		IMO model course 1.29
Safety training		IMO model course 1.29
Passenger safety, cargo safety, and hull integrity training		IMO model course 1.28
Crisis management and human behavior		IMO model course 1.28
TRAINING FOR CERTAIN PERSONS ON PASSENGER SHIPS OTHER THAN RO-RO PASSENGER SHIPS	A-V/3	The four subordinate elements of required training are listed. See STCW cite to determine which personnel are required to complete each element of training
Crowd management		IMO model course 1.29
Safety training		IMO model course 1.29
Passenger safety		IMO model course 1.28
Crisis management and human behavior		IMO model course 1.28

Note: 2 PIC is person-in-charge; DL is dangerous liquid; LG is liquefied gas

TRAINING THAT MAY BE ACCEPTED BY A COAST GUARD-ACCEPTED QSS

OTHER REQUIRED TRAINING

NAME OF TRAINING	STCW REF.	COMMENTS
BASIC SAFETY TRAINING		Comprises the following four training elements
Personal survival techniques	A-VI/1-1	IMO model course 1.19
Personal safety and social responsibility	A-VI/1-4	IMO model course 1.21
Elementary first aid including CPR	A-VI/1-3	IMO model course 1.13
Fire Prevention and firefighting	A-VI/1-2	IMO model course 1.20

TRAINING THAT MAY BE APPROVED ONLY BY THE U. S. COAST GUARD

NAME OF TRAINING	STCW REF.	COMMENTS
Radar observer	A-II/1; A-II/2	See 46 CFR 10.305 and 15.815 Courses in which the simulators do not meet either the STCW's standards or the protocol developed by the U. S. Coast Guard's Research and Development Center must be approved by the U. S. Coast Guard.
Any training for which sea service credit is given for completion of the training		Does not include signaling.
Any training that substitutes in whole or in part for a professional examination		Required for applicants as officer in charge of a navigational or engineering watch. IMO model course 2.03
Firefighting - advanced	A-VI/3	See 46 CFR 13.121 for the scope of this training. IMO model course 1.20
Firefighting - basic for tankerman	V/1	

REQUIRED TRAINING THAT IS NOT REQUIRED TO BE APPROVED OR ACCEPTED

NAME OF TRAINING	STCW REF.	COMMENTS
Familiarization training	A-VI/	See STCW A-I/14 and 46 CFR 15.1105
Training for persons serving on Ro-Ro passenger ships and passenger ships other than Ro-Ro passenger ships	A-V/2 paragraph 2 A-V/3 paragraph 2	All training for persons serving on passenger ships other than that specified in the reference must be approved or accepted.