

Mariner Training Provider (MTP) Updates

The extensions announced in our [bulletin](#) dated January 13, 2022, have been issued. Address any questions or concerns to NMCCourses@uscg.mil.

The number of course and program approval requests requiring additional information from the MTP plays a significant role in the length of time it takes to evaluate them. 46 CFR [10.402](#) and [10.407](#) outline the required components of a complete submittal. Navigation and Vessel Inspection Circular (NVIC) [03-14](#) provides an example of a complete submittal and additional information regarding course lengths, instructor qualifications, etc. There are numerous other regulatory references, NVICs, and Coast Guard Policies regarding the development and approval of training content, all of which can be accessed through the [National Maritime Center \(NMC\) website's Policy and Regulations page](#). Below is a list of common issues, which generate requests for additional information:

- Missing one or more regulatory components of a course or program approval submittal (Framework, Outline, Detailed Teaching Syllabus, etc.).
- Missing topical content. National course content is derived from the topic tables contained in the regulations for the endorsement sought (46 CFR 11, 12, 13). Standards of Training Certification, and Watchkeeping for Seafarers (STCW) content is derived from STCW model courses, NVICs, Policy, and, where the Coast Guard has not promulgated additional information, directly from the STCW Convention and Code.
- Missing topical detail. Only broad subject areas submitted in the detailed teaching syllabus, lesson plans, and instructor notes.
- Lack of or incomplete coverage of the performance standards necessary to assess STCW competencies. Performance standards are in the appropriate NVIC.
- Inconsistencies within the materials submitted such as a schedule indicating X hours of training where the detailed teaching syllabus and lesson plans clearly show a different number.
- Incomplete topical coverage in examinations. End of course examinations should demonstrate comprehensive coverage of the course learning objectives (46 CFR 10.403(a)(4)).

- Duplicate questions on retests. Examination questions exposed in the training content. Examination questions on material not covered in the course.
- Use of question banks to generate examinations. Where question banks are used, the methodology to ensure comprehensive topical coverage and prevent duplication must be addressed.
- Inclusion of outdated content and examination questions in both original and renewal submissions.
- Submitting instructors without vetting their qualifications against the Coast Guard standards and missing documentation of training in instructional techniques (train the trainer or equivalent).
- Submitting a large number of instructors who never teach. This may not result in requests for additional information but occupies significant time in the evaluation process.
- Submitting general instructor résumés that do not address the skills and experience required to instruct the course(s) requested. “Résumé on file” is not acceptable.

When the NMC does request additional information, make every effort to address all points in the request. Review the information on the [NMC Training and Assessment webpage](#), including updated checklists, in effort to minimize the need for additional information. We welcome your feedback on the information provided.

If you have any questions, concerns, or feedback, contact the NMC Customer Service Center by e-mailing IASKNMC@uscg.mil or calling 1-888-IASKNMC (427-5662).

Sincerely,

/B. W. Clare/

Bradley W. Clare
Captain, U.S. Coast Guard
Commanding Officer