

Unapproved Evening Courses at Mid-Atlantic Maritime Academy

An investigation by the Coast Guard has revealed that between January 2015 and December 2019, instruction hours designated for evening courses (courses scheduled to convene at or after 3PM) provided at Mid-Atlantic Maritime Academy in Virginia were cut by 50% or more. End-of-course exams issued for these courses may also have been compromised. The impacted courses did not meet the time requirements contained in the terms of their respective Coast Guard Approvals. As a result, these evening courses were not Coast Guard approved and certificates issued for these courses are invalid.

To avoid interruption of the Marine Transportation System, the National Maritime Center (NMC) will allow mariners to retain endorsements associated with these impacted courses by taking the following actions within six months of this bulletin or prior to any future application to the NMC, whichever is later:

Mariners with a valid MMC or valid endorsements related to the impacted courses:

1. Submit an affidavit to the NMC attesting to competence in the subjects covered by the impacted course(s) and attesting to integrity on the end of course exams for the impacted courses. A sample affidavit can be found at the following link: <https://dco.uscg.mil/Mid-Atlantic-Maritime-Academy-Course/>.
2. The affidavit described above must be accompanied by a certification from a current or most recent (if not currently employed) mariner employer, attesting to competence of the mariner. The individual certifying on behalf of the marine employer must be familiar with the mariner's work and must be able to judge the mariner's qualifications, performance and competence. Companies should authorize, but shall not require, individuals with appropriate knowledge of the mariner's performance and competence to provide these certifications. A sample certification can be found at the following link: <https://dco.uscg.mil/Mid-Atlantic-Maritime-Academy-Course/>.
3. If unable to provide an affidavit or marine employer certification, the mariner may retest at Maritime Institute (who purchased Mid-Atlantic Maritime Academy in late 2021) using the end of course test for the current version of the impacted courses. Coordination for retaking the tests must be done directly with Maritime Institute and comply with their requirements.

4. If unable to take and pass an end of course test, the mariner must retake the course to obtain credit and retain any associated endorsements.
5. All documentation should be sent to the following e-mail: MCFTF@uscg.mil.

Individuals with no valid MMC or no valid endorsements related to the impacted courses:

If a course certificate is not expired on the date of this bulletin, individuals without a valid MMC may retest at Maritime Institute using the end of course test for the current version of the impacted courses to retain credit for the course. The time to retest will be up until the date that the certificate would have expired (using expiration terms applicable on the date of this bulletin) or six months from the date of this bulletin, whichever is later.

Failure to take action:

An individual who does not take any action, as indicated above, will lose any endorsements received in connection with the impacted courses. Furthermore, sea service earned while sailing under endorsements to which a mariner was not lawfully entitled may also be impacted.

Impacted mariners will receive an e-mail or letter from the NMC to advise if they are impacted by the unapproved evening courses. Mariners and marine employers with questions about this bulletin should contact the NMC Compliance Investigations Branch at (304) 433-3466 or via e-mail at MCFTF@uscg.mil.

Sincerely,

/B. W. Clare/

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

Frequently Asked Questions: Mid-Atlantic Maritime Academy

1. What has happened to Mid-Atlantic Maritime Academy (MAMA)? Will the Coast Guard take action against them?

MAMA has ceased to operate as a school. The school was sold to Maritime Institute, which is an independent entity and unaffiliated with the management at MAMA. In addition, two former employees of MAMA were indicted and are defendants in a federal criminal case in connection with the VA fraud that occurred as a result of course truncation.

2. Can Suspension & Revocation (S&R) action be taken against mariners who attended truncated courses?

S&R cannot be taken against mariners whose courses were truncated, as there is no regulation aimed at mariners requiring them to be aware of the length for which courses were approved. While the mariners were likely aware that their courses did not meet approval timeframes, it was incumbent on the school and not the mariners to ensure that the courses met approval criteria.

3. There is a mariner who attended truncated courses and who is believed to be unsafe or lack competence. Can this mariner be required to retrain instead of submitting an affidavit?

The National Maritime Center performed a MISLE data pull and matched available Marine Casualty (MC) Information against the MMC Reference Numbers of mariners who attended truncated courses. No increased risk to the marine environment due to truncation was noticed. Notwithstanding this data, all mariners who took truncated courses will be entered into a MISLE case. In the event a future MC can be linked to the truncated training, this can be taken into consideration when pursuing remedial action (to include retraining) for mariner(s) determined to be at fault.

In the meantime, only mariners whose employers can attest to the mariners' competence will be able to submit an affidavit in lieu of retesting or retraining. Employers should use their best judgment when deciding whether to provide a certification attesting to mariner competence. If a marine employer believes that a mariner in their employ is incompetent or poses a risk to the marine environment due to a lack of skill(s) covered in the truncated courses, the marine employer should not provide a certification. A mariner whose marine employer does not

provide a certification will have the option to retest or retrain. If a mariner is unable to pass an end of course test, complete retraining will be required.

4. Will all mariners be required to provide an affidavit and employer certification? What if the mariner does not submit an affidavit with employer certification?

Mariners who fail to submit an affidavit will have the option to retest or retake impacted courses to retain related endorsements. Mariners who fail to do so within an approved time will have any endorsement(s) associated with truncated course(s) invalidated.

5. Are marine employers required to sign off on a mariner's competence?

There is no requirement to sign off on a mariner's competence. The marine employer should have someone with the knowledge to judge the mariner's competence/skillset(s) associated with truncated courses decide whether to provide a marine employer certification.

6. A marine employer has a mariner with endorsements or courses that are not required for their position (e.g., the mariner is operating on a domestic vessel, but some or all of the mariner's impacted endorsements/truncated courses are STCW related). Can the marine employer still sign off on the mariner's competence?

So long as the marine employer believes that they can accurately judge the mariner's competence/skillset(s) associated with the impacted endorsement(s) the marine employer may certify.

7. If a mariner is in between jobs, what should that mariner do?

The mariner can still submit an affidavit and can obtain a certification as to their competence from their most recent marine employer. If the mariner cannot obtain a certification, the mariner can retest or retake the impacted courses to retain credit.

8. If a mariner took truncated courses at MAMA, but has not used those courses to obtain an endorsement, can the mariner still submit those courses to obtain an endorsement?

The mariner can retest or retake the impacted training if the course certificate is not currently expired. Expiration timeframes can be found in NVIC 03-14, Ch 1. Generally, courses used for domestic endorsements will be good for 1 year from the date of course completion and courses used for STCW endorsements will be good for 5 years from the date of course completion. Mariners with questions about the validity of their certificates should call the NMC contact

center at 1-888-IASKNMC (427-5662) to confirm. Course certificates for truncated courses submitted to the NMC, but not used to obtain endorsement(s) will be removed from mariner(s) records and will not be accepted past initial expiration.

9. Should marine employers avoid hiring mariners who attended truncated courses?

At present, there is no known negative impact to maritime safety because of truncation. Marine employers should independently assess mariners' skills and abilities and should make employment decisions based on their own assessment.

10. How can a retest at Maritime Institute be arranged?

Maritime Institute should be contacted directly by the mariners to arrange for retesting. They have agreed to retest the mariners at no cost; however, travel will not be reimbursed.

11. Who can a mariner or marine employer reach out to with additional questions about what they need to do?

Mariners and marine employers with questions about truncation should contact the NMC Compliance Investigations Branch at (304) 433-3466 or via e-mail at MCFTF@uscg.mil.