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NMC Policy Ltr No. 18-98  
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From: Commanding Officer, National Maritime Center

To: Distribution

Subj: CONSISTENCY OF EVALUATIONS

1. This policy letter provides guidance for the transferring and acceptance of mariner files containing approved applications. It is intended to highlight the need for consistency of evaluations between ports, and encourage greater participation and acceptance of industry involvement in the evaluation process.
2. The Coast Guard Mariner Licensing and Documentation (MLD) Program continues to evolve as international requirements become effective and administration of licensing functions shifts toward commercial sources. Recently implemented STCW requirements for completion of approved courses or participation in approved company training programs as a prerequisite to shipping, has placed a greater financial burden on the industry and mariner.
3. Issuing authority for licenses, certificates, and merchant mariner documents will remain a Coast Guard function. However, we will be investigating the feasibility of migrating evaluations, examinations, and administrative functions to commercial sources. Increasingly, mariners are receiving screening and preliminary evaluations by unions, employers, and/or training institutions. Formal training companies, unions, and employers are becoming more skilled and knowledgeable in performing these functions. In many instances, these preliminary reviews are saving RECs time and reducing interaction with individual mariners. Developing partnerships with these organizations and mentoring their professional capabilities is particularly important to the future of the MLD Program. The Coast Guard must keep pace or risk becoming a hindrance to mariners and employers.
4. It is becoming more common for mariners, unions, and employers to request licensing services from multiple RECs. Mariners may apply for a rating or license on the West Coast, attend an approved course in lieu of exam on the East Coast, but request issuance of the license or document on the Gulf Coast. Approved applications transferred from one REC are occasionally rejected by another. It reflects poorly on the Coast Guard when a mariner is found qualified by one REC, only to be rejected by another at the time of issue. To the mariner, we are all one Coast Guard. This is costly for an employer or mariner who invested time, travel expenses, and formal training assuming the eventual issuance of a credential based on an REC approval.
5. Mariners should be discouraged from transferring files containing approved evaluations, although not prevented. The use of exam monitors at other RECs can permit flexibility for the mariner while ensuring the integrity, consistency, and authority of an evaluation and virtually eliminates the potential complications arising from transfers of approved applications.
6. Mariners, unions, training institutions, or employers requesting issuance of a credential at a local REC which is not the approving REC, may receive the service. In these cases, the

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approving REC shall provide a written/email/fax request to the issuing REC, signed by the SIP or a representative that has authority to sign the level of license or merchant mariner document being issued. The request should include a statement that the individual has been found fully qualified in all respects for the credential sought.

7. In those cases when a mariner's file is transferred to a new REC after the evaluation is approved, some discretion is warranted on the part of the issuing REC in determining the level of detail necessary in reviewing the evaluation. Certainly, RECs should not issue a credential if critical errors are discovered. This is also true if it is discovered that a mariner withheld or attempted to conceal information. However, disapproval or delay as a result of disagreements with local or national policy or regulatory interpretation places the customer in the dubious position of reconciling the difference of opinion.
8. Quality assurance of an evaluation often occurs at the time the credential is signed. Where an application is transferred after approval but prior to issuance of the credential, the quality assurance review may not have been performed and errors may be contained within the evaluation. Prior to transferring an approved application, SIPs shall ensure it receives the same level of scrutiny given an application at the instant of signature. A letter or memo shall accompany the file stating; the application is approved, the credential for which it is approved, and any outstanding requirements.
9. In an age of instant communication, we should be capable of resolving discrepancies through partnering between all parties involved in the process. Greater trust in industry verification and documentation should be cultivated to enable rapid resolution of minor or moderate discrepancies. Effective interaction and communication between individual RECs, and between RECs and training organizations are particularly important. Assignment of an REC liaison to training organizations can be extremely helpful. Building partnerships with these organizations improves work practices and procedures, reduces workloads, and eliminates unnecessary delays and disagreements.

W. C. BENNETT  
By direction

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