

U.S. Department
of Transportation

**United States
Coast Guard**



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National Maritime Center

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NMC Policy Ltr No. 7-98

From: Commanding Officer, National Maritime Center
To: Distribution

Subj: SUBMISSION OF APPLICATIONS FOR COURSE APPROVAL

Ref: (a) Title 46 CFR, Paragraph 10.302
(b) Navigation and Vessel Inspection Circular (NVIC) 5-95, Paragraphs 3a, 3b, and 3d
(c) COMDTINST 16000.8A, Marine Safety Manual (MSM) Volume III, Chapter 7D and 7E

1. References (a), (b), and (c) set forth the procedures for submitting course approval applications to the Coast Guard. These procedures stated that the course approval application be submitted to the Director of the National Maritime Center (NMC) via the nearest Officer in Charge, Marine Inspection where there is a Regional Exam Center (REC). This has resulted in duplication of work for parts of the course evaluation, and in unwarranted delays in processing the application for course approval.
2. An NMC Quality Action Team (QAT) was convened in late 1997 for the purpose of improving the course approval application process. In addition to recommendations affecting the way the NMC processes the applications, the team recommended the streamlining and simplification of the process outside the NMC by reducing the amount of printed material that had to be shipped back and forth between Coast Guard offices and allowing schools to submit course application packages directly to the NMC. The NMC would make a preliminary determination on the suitability of the proposed course prior to requesting that an REC invest resources in site inspections, interviews, etc.
3. To implement the QAT recommendations, the NMC has initiated required changes to relevant regulations and procedures set forth in NVIC 5-95 and Chapter 7 of the MSM. Regulatory changes routinely take over two years to complete. The NMC wishes to implement the QAT recommendations as soon as possible in order to improve customer service. The NMC believes it can implement these changes prior to completion of any regulatory project since the changes primarily effect only the method in which course approval applications are processed within the Coast Guard. This new policy will reduce the course approval backlog, improve external and internal customer service, and reduce the current workload of the RECs by the elimination of duplicative work.

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4. Beginning March 1, 1998, all training institutions submitting course approval applications should send the application package directly to the NMC. RECs receiving course application packages after this date should forward them immediately to the NMC.
5. The procedure for approval of course approval requests is described briefly as follows:
 - a. The NMC will conduct a preliminary review of the application package to determine if the package contains the necessary documents to process the request for course approval. If the course approval application package is complete, the training institution will be notified by fax that the NMC has received the course approval request. The appropriate REC will also receive a fax acknowledging the NMC's receipt of the course approval request. If the course approval application package is not complete, the package will be returned to the sender with an explanation, with no notification to the OCMI.
 - b. Upon receipt of notification from the NMC of request for a course approval by a training institution within their area of responsibility, the REC will arrange with the applicant to conduct a site visit and instructor interviews. Applicants shall be advised to have a copy of the complete application package available for reference at the time of the site inspection visit.
 - c. Applicants should be notified of any deficiencies found with respect to the site, facilities, equipment, or instructors and given an opportunity to correct the condition or offer a proposed corrective action.
 - d. Upon completion of the site visit and interviews, the REC, via the OCMI, will notify the NMC of its findings and recommendation for approval/disapproval. Because the NMC has established a customer service goal of three weeks from the receipt of an application until its final disposition, OCMI/RECs are requested to take timely action and to keep the NMC informed of any difficulties encountered in arranging timely site visits and interviews.
 - e. The NMC will evaluate the content of the proposed course in accordance with established standards, model courses, etc. We will communicate with the applicant and the appropriate REC as required. After receiving the OCMI's report on the site, facilities, equipment, and instructors, the NMC will make a determination to approve or disapprove the course. The NMC will draft a Conditional Approval, Approval, or Disapproval letter as appropriate. Conditional approval letters will usually ask for the submission of additional or modified material. The NMC will also prepare a Course Approval Certificate, if appropriate.
 - f. Upon completion of the approval/disapproval process, the NMC will provide the appropriate REC with a copy of any letters issued and other RECs will be notified of Approvals and Conditional Approvals.

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W. C. BENNETT
By direction

Dist: All District Commanders (m)
Commandant (G-MSO-1)
All COs, MSOs
All RECs