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NMC Policy Letter 9-99

December 3, 1999

From: Commanding Officer, National Maritime Center
To: Distribution

Subj: Medical Training And Qualifications Set Forth In The International Convention On
Standards Of Training, Certification And Watchkeeping For Seafarers, 1978, As Amended
(Stcw)

1. This policy letter provides guidance concerning training requirements for certification of mariner competence in the field of medical care.
2. This policy letter supersedes and cancels NMC Policy Letter 21-98, *Acceptance of Training for Qualification as a Person in Charge of Medical Care Onboard Ship*.
3. Strictly speaking, the scheme for medical care competency required of a seafarer laid out in the STCW provides four levels of competency and affects every mariner on a seagoing vessel. Each level of competency is defined and briefly discussed below, and in separate enclosures which may be reproduced locally as information fliers.
 - a. The first level of medical competency, elementary first aid, is the training included as one of the four elements of basic safety training (BST) described in the STCW Code, Section A-VI/1.2.1 and Table A-VI/1-3. This training is discussed in enclosure (1).
 - b. The second level of medical competency is for mariners designated to provide medical first aid onboard a ship and is set forth in the STCW Code, Section A-VI/4.1 to .3 and Table A-VI/4-1. Under the STCW, each applicant for a license as an officer in charge of either a navigational watch or an engineering watch must meet the requirements of STCW Table A-VI/4-1 (required by STCW Code, Table A-II/1 for deck officers and Table A-III/1 for engineering officers). In addition to these mandatory requirements, other mariners may qualify in this competency and be issued the appropriate documentation. The requirements to qualify as a Medical First Aid Provider are discussed in enclosure (2).
 - c. The third level of medical training is required for a mariner who is designated to take charge of medical care onboard ship and is set forth in the STCW Code, Section A-VI/4.4 to .6 and Table A-VI/4-2. Issues relating to the training and certification for Person in Charge of Medical Care (PIC Medical Care) are discussed in enclosure (3).
 - d. The fourth level applies to officers qualified at the management level for service on vessels of 500 gross tons (ITC tonnage) or more. Applicants for licenses as master and chief mate must demonstrate the medical competencies identified in STCW Code, Table

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A-II/2. Applicants may elect to demonstrate these competencies by completion of approved or accepted training as discussed in enclosure (4).

4. In addition to the competencies discussed in the enclosures, the STCW Code, Section A-VI/1.6 requires that all crew members receive sufficient information and instruction to take immediate action upon encountering an accident or other medical emergency before seeking further medical assistance onboard. Crewmembers who have completed the elementary first aid element of basic safety training meet this requirement, as discussed in enclosure (1).

5. The training that leads to competency in levels one, two, and three is modular. While many of the topics are similar, each course stands alone. To qualify for a competency at levels two or three, a mariner must already be qualified at the lower level(s). Elementary First Aid is a prerequisite for competency as Medical First Aid Provider. Elementary First Aid and Medical First Aid Provider are prerequisites for competency as PIC Medical Care.

6. The approval of courses to meet STCW standards is discussed in the enclosures. A training provider who wishes to have a course approved should contact the National Maritime Center (NMC) in accordance with the guidance in NMC Policy Letter 7-98, *Submission of Applications for Course Approval*.

7. Each of the enclosures may be reproduced locally to serve as an information flier about the medical competencies.

M. S. BOOTHE

Encl: (1) Competency in Elementary First Aid
(2) Competency as Medical First Aid Provider
(3) Competency as a Person in Charge of Medical Care
(4) Competency at the Management Level

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

COMPETENCY IN ELEMENTARY FIRST AID

OVERVIEW

1. Elementary first aid training is designed to provide a mariner with the knowledge, understanding, and proficiency to take immediate action upon encountering an accident or other medical emergency.
2. The STCW Code, Section A-VI/1 requires seafarers employed or engaged on a seagoing ship on the business of that ship as part of the ship's complement with designated safety or pollution prevention duties in the operation of the ship to receive appropriate BST. Elementary First Aid is one element of BST. For this element, each crewmember described above must provide evidence of having achieved the required standard of competence to undertake the tasks, duties, and responsibilities listed in column 1 of STCW Code, Table A-VI/1-3. Once initial competence is achieved, the mariner must be reassessed in this competency at least every five years.
3. The requirement for completion of this element of BST became effective 1 February 1997. All mariners who are required to meet the Elementary First Aid requirements must carry acceptable proof of competency as required by 46 CFR 15.1105(c), even if they have a Medical First Aid Provider or Person in Charge of Medical Care endorsement. To accommodate the large number of mariners who needed this training immediately, several alternative schemes were devised to enable mariners to rapidly meet the required standards. These interim schemes and the acceptable proofs of competency are summarized in NMC Policy Letter 5-99 available on the World Wide Web at <http://www.uscg.mil/hq/g-m/marpers/pag/policy.htm>.
4. Mariners who have completed a course approved or accepted by the Coast Guard as a course in Elementary First Aid meet the requirement for first aid training in the familiarization training required by STCW Code, Section A-VI/1.6 and 46 CFR 15.1105(a)(2)(vi). The course must have been completed on or after August 1, 1993.
5. The following personnel have been determined to meet the STCW's standards of training and assessment in Elementary First Aid:
 - a. A staff officer holding a certificate of registry as a medical doctor, professional nurse, marine physician's assistant, or hospital corpsmen; or
 - b. A mariner holding a valid qualification as an emergency medical technician (EMT) (non-ambulance), EMT (ambulance) or as a paramedic.

Personnel meeting the Elementary First Aid requirements in this manner should carry the appropriate credential as the proof of meeting these requirements required by 46 CFR 15.1105(c).

TRAINING AND COURSE APPROVAL

1. The Coast Guard will approve Elementary First Aid courses that cover the learning objectives of Table A-VI/1-3 of the STCW Code. International Maritime Organization (IMO) Model Course No. 1.13, *Medical Emergency - Basic Training*, contains the recommended course content with a length of 12 hours. The Coast Guard has determined that a one day course of eight hours in length

Enclosure (1)

would meet the STCW requirements. Training providers may further refine the IMO Model Course and submit to the NMC for approval, but should ensure that all STCW competencies are taught and assessed.

2. The Elementary First Aid course may be taught separately or included as a part of the required BST course or program.

3. The Coast Guard has not yet determined whether courses approved to meet the requirements of 46 CFR 10.205(h) also meet STCW training requirements. We are working with the American National Red Cross to resolve this issue. In the interim, such courses are not considered equivalent to STCW-compliant courses. To be accepted as meeting the requirements for initial or reassessment of skills in Elementary First Aid, course completion certificates must specifically state that the course is Coast Guard approved as meeting the STCW Code, Section A-VI/1.2.1.3. Some Red Cross Chapters have asked for and received STCW approval; these courses are on the approved course list maintained by the NMC.

4. Once trained, mariners must maintain the minimum standard of competency in elementary first aid, as well as the other required elements of BST. Mariners can demonstrate that they have maintained these skills by assessment of a practical demonstration of their skills and abilities by a Coast Guard approved designated examiner, or completion of a Coast Guard approved or accepted refresher course.

COMPETENCY AS MEDICAL FIRST AID PROVIDER

OVERVIEW

1. Training as a medical first aid provider is the second level of medical training required by the STCW. Medical first aid providers must have the knowledge and skill to conduct a primary and secondary survey of a sick or injured crewmember, immobilize the patient, and begin immediate treatment to preserve life. These are all skills which typically must be performed before obtaining radio medical advice. The STCW Code, Table A-VI/4-1 is a complete list of the required competencies.

2. The STCW Code, Table A-II/1 requires an applicant for certification as an officer in charge of a navigational watch on seagoing vessels 500 gross tons (GT) as measured under the International Tonnage Convention (and equivalent to 200 gross register tons using the domestic tonnage scheme) or more to meet the standards in Section A-VI/4.1 to .3. Similar provisions in the STCW Code, Table A-III/1, apply to an applicant for certification as an officer in charge of an engineering watch or a designated duty engineer on a vessel with main propulsion machinery of 750 Kw (1,000 HP) or more. Officers licensed as a mate of vessels of 500 gross register tons or more or as an assistant engineer on vessels of 1,000 or more HP must meet this requirement to receive an STCW form if:

- a. They began the service or training after 1 August 1998; or
- b. They are issued their licenses on or after 1 February 2002.

The requirement for this training does not apply to currently licensed officers or to candidates for licenses who began training or service before 1 August 1998 and who receive their licenses before 1 February 2002.

These requirements are summarized in the following table.

ISSUANCE DATE OF LICENSE	AND THE TRAINING OR SERVICE BEGAN	THEN THE MARINER MUST COMPLETE AN APPROVED COURSE MEETING
Before 1 February 2002	Before 1 August 1998	46 CFR 10.205(h)
Before 1 February 2002	On or after 1 August 1998	The STCW's standards in STCW Code, Table A-VI/4-1*
On or after 1 February 2002	Anytime	The STCW's standards in STCW Code, Table A-VI/4-1*

* The course's approval letter must specifically state that completion of the course meets these STCW standards.

3. Licensed mariners described in paragraph two and licensed officers at the management level will not have the Medical First Aid Provider endorsement placed on their license, MMD, or STCW form because it is an inherent qualification of the license. A mariner who is not required to complete Coast Guard approved or accepted training as Medical First Aid Provider may still elect to do so and will have his or her STCW form endorsed as Medical First Aid Provider in accordance with 46 CFR 12.13. If no other STCW qualifications require the issuance of an STCW form, the endorsement will be placed on his or her merchant mariner's document (MMD). If the mariner does not hold an MMD, the endorsement will be placed on his or her license.
4. The following personnel have been determined to meet the STCW's standards of training and assessment for Medical First Aid Provider:
 - a. A staff officer holding a certificate of registry as a medical doctor, professional nurse, marine physician's assistant, or hospital corpsmen; or
 - b. A mariner holding a valid qualification as an emergency medical technician (EMT) (non-ambulance), EMT (ambulance) or as a paramedic.

Personnel qualifying as Medical First Aid Provider in this manner will be issued an endorsement, if appropriate, in accordance with paragraph 3 above.

Personnel qualifying as Medical First Aid Provider in this manner also meet the Elementary First Aid training requirements and should carry the appropriate credential as the proof of meeting these requirements required by 46 CFR 15.1105(c).

5. Other mariners may qualify for this endorsement based upon completion of Coast Guard approved or accepted training, or other training equivalent to the STCW's standards. Applicants using the latter alternative should forward the following information to the National Maritime Center for evaluation:
 - a. A resume of his or her training and skills in this area, including information on course's content, provider and instructor(s);
 - b. Proof of completion;
 - c. Proof of any professional rating (i.e., EMT, etc.); and
 - d. If the training was completed over five years ago, information about maintenance of the skills in this area.

TRAINING AND COURSE APPROVAL

1. The Coast Guard will refer to this second level training course as the Medical First Aid Provider Course.
2. The Coast Guard will approve a course that leads to the endorsement of Medical First Aid Provider if the course covers the learning objectives of Table A-VI/4-1 of the STCW Code. IMO Model Course 1.14, *Medical Emergency - First Aid*, is a useful guide to achieving the learning

objectives. The IMO Model Course recommends a course length of 21 hours. The Coast Guard agrees that a course of 21 hours in length would satisfactorily meet the STCW requirements. Training providers may further refine the IMO Model Course and submit to the NMC for approval, but should ensure that all STCW competencies are taught and assessed.

3. To be accepted as meeting the requirements for assessment of skills as Medical First Aid Provider, course completion certificates must specifically state that the course is Coast Guard approved as meeting the STCW Code, Table A-VI/4-1.

4. Completion of a course approved as meeting the STCW Code, Table A-VI/4-1 will also meet the requirements of 46 CFR 10.205(h).

5. A prerequisite for starting this course is to have achieved competency in Elementary First Aid.

COMPETENCY AS A PERSON IN CHARGE OF MEDICAL CARE

OVERVIEW

1. Training as a Person in Charge of Medical Care (PIC Medical Care) is the third level of medical training provided under the STCW. This competency provides for a specified crew member or crew members to effectively participate in coordinated schemes for medical assistance on seagoing ships and to provide the sick or injured with a satisfactory standard of medical care while they remain onboard. Among other competencies, skill must be demonstrated at: using various splints, braces, dressings and bandages; using a resuscitator; using a stretcher; suturing; nursing care; and administration of medications. The average ship's crew member, including senior officers, is typically unfamiliar with such skills.

2. A mariner who meets the requirements for this competency will have his or her STCW form endorsed as PIC Medical Care. If no other STCW qualifications require the issuance of an STCW form, the endorsement will be placed on his or her merchant mariner's document (MMD). If the mariner does not hold an MMD, the endorsement will be placed on his or her license.

3. Because Medical First Aid Provider is a prerequisite of PIC Medical Care, and neither endorsement has a requirement for refresher or other recurring training, endorsement as both is not necessary. The PIC Medical Care endorsement replaces the Medical First Aid Provider endorsement on the mariner's credential.

4. The STCW is not a manning document; it establishes standards for a mariner's professional qualification. The manning laws and regulations of the United States do not require a vessel to have someone specifically designated as a person responsible to take charge of medical care. If by practice, company policy, or to meet STCW requirements, someone aboard a seagoing ship is designated to take charge of medical care, that individual must meet the standards of competency set forth in STCW Code, Section A-VI/4-2, and be able to produce evidence of having met those standards. Having a mariner onboard with this certification may eliminate potential port-state control problems which could otherwise result.

5. Staff officers holding a certificate of registry as a medical doctor, professional nurse, marine physician's assistant, or hospital corpsman have been determined to meet the STCW's standards of training and assessment for PIC Medical Care. Personnel obtaining the PIC Medical Care endorsement in this manner will be issued an endorsement in accordance with paragraph 2 above. Personnel qualifying as PIC Medical Care in this manner also meet the Elementary First Aid training requirements and should carry the appropriate credential as the proof of meeting these requirements required by 46 CFR 15.1105(c).

6. NMC Policy Letter 21-98, *Acceptance of Training for Qualification as a Person in Charge of Medical Care Onboard Ship*, which is cancelled by this policy (NMC Policy Letter 9-99), erroneously allowed a mariner holding a valid qualification as an emergency medical technician (EMT) (non-ambulance) to receive an endorsement as PIC Medical Care. A more in-depth comparison of EMT training and assessment procedures with Table A-IV/4-2 of the STCW Code

has shown that the Code requires training and assessment in topics not usually covered in EMT courses, such as: suturing; wound healing; nursing care; diseases and disease prevention; dental care; etc. EMTs should no longer be given the PIC Medical Care endorsement.

TRAINING AND COURSE APPROVAL

1. The Coast Guard will approve courses leading to qualification as PIC Medical Care if the course covers the learning objectives of Table A-VI/4-2 of the STCW Code. IMO Model Course No. 1.15, *Medical Care*, is a useful guide to achieving the learning objectives. The IMO Model Course recommends a course length of 40 hours. The Coast Guard agrees that a course of 40 hours in length would satisfactorily meet the STCW requirements. Training providers may further refine the IMO Model Course and submit to the NMC for approval, but should ensure that all STCW competencies are taught and assessed.
2. To be accepted as meeting the requirements for assessment of skills as PIC Medical Care, course completion certificates must specifically state that the course is Coast Guard approved as meeting the STCW Code, Table A-VI/4-2.
3. The prerequisites for starting a course leading to a PIC Medical Care endorsement are to have achieved competency in Elementary First Aid and as a Medical First Aid Provider.

COMPETENCY AT THE MANAGEMENT LEVEL

OVERVIEW

1. Training at the management level is the fourth level of medical training required by the STCW. The fourth level applies to applicants for licenses as Master and Chief Mate for service on vessels of 500 gross tons (ITC tonnage) or more. Such applicants must demonstrate the medical competencies surrounding organizing and managing the provision of medical care onboard ship. These are identified in Table A-II/2 of the STCW Code.
2. For all practical purposes, the medical care competencies in Table A-II/2 of the STCW Code are a subset of the competencies required for PIC Medical Care.

TRAINING AND COURSE APPROVAL

1. The Coast Guard will approve courses to assess medical care competencies leading to qualification as Master and Chief Mate for service on vessels of 500 gross tons (ITC tonnage) or more. Such courses must cover only the medical care learning objectives of organizing and managing the provision of medical care onboard ship in Table A-II/2 of the STCW Code. These competencies must be covered in the same manner and same level of detail as generally accepted to satisfy the training requirements for PIC Medical Care as shown in IMO Model Course 1.15, *Medical Care*.
2. No such courses have been approved by the NMC to date. Training providers may submit courses satisfying this requirement to the NMC (NMC-4B).
3. A mariner who completes a Coast Guard approved or accepted PIC Medical Care Course also meets the requirements for proving competence in medical care at the management level.
4. To be accepted as meeting the requirements for assessment of skills at the management level, a course must be Coast Guard approved as meeting Table A-II/2 of the STCW Code, unless it has been approved as meeting the requirements for PIC Medical Care.