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NMC Guidance Document 04-05

June 21, 2005

From: Commanding Officer, U. S. Coast Guard National Maritime Center
To: Distribution

Subj: MARITIME ACADEMY STANDARD OPERATING PROCEDURES (SOP) FOR
LICENSE APPLICATIONS AND EXAMINATIONS

Ref: Title 46, Code of Federal Regulations (46 CFR), Part 10

1. **PURPOSE.** This document provides guidance to Regional Examination Centers (RECs) for the processing of applications for merchant mariner documents (MMDs) and licenses and administration of examinations for the United States Merchant Marine Academy and state maritime academies.
2. **ACTION.** Commanding officers of units with marine safety responsibilities should be guided by the information in this document. This guidance is not a substitute for applicable legal requirements, nor is itself a rule. It is not intended to, nor does it impose, legally binding requirements on any party. This guidance document will be distributed by electronic means only. It is available on the World Wide Web at <http://www.uscg.mil/STCW/m-policy.htm>.
3. **DISCUSSION.** Enclosure (1) provides guidance for the processing of applications and administration of exams for maritime academies.

A handwritten signature in black ink, appearing to read "E. J. Fink", written over a circular stamp.

E. J. FINK

Encl: (1) Standard Operating Procedures (SOP)

Dist: Commandant (G-MSO) (G-MOC); Area Commanders (Am) (Pm); All District
Commanders (m); COs, all MSOs; All Sector Commanders; All RECs

**MARITIME ACADEMIES / REGIONAL EXAMINATION CENTERS
STANDARD OPERATING PROCEDURES (SOP) FOR LICENSE
APPLICATIONS AND EXAMINATIONS**

June 21, 2005

Enclosure (1) to NMC
Guidance Document 04-05

INTRODUCTION

The purpose of this Standard Operating Procedure (SOP) is to provide guidance to Coast Guard Regional Examination Centers (RECs) and maritime academies for the applications and examinations for merchant mariner documents (MMDs), licenses and STCW certificates for maritime academy cadets.

While it would be ideal to process maritime academy cadet applications in the same manner as other mariners, the unique considerations of the maritime academies make this impractical. The large number of applications and the need to administer examinations and issue licenses concurrently requires some modification of standard REC practices. This notwithstanding, one of the objectives of these standard procedures is to treat the applicants graduating from the maritime academies as closely as practicable to other mariners.

A good working relationship between the maritime academies and their RECs is critical to efficient and mutually beneficial administration of the licensing process.

RECs and maritime academies should each designate a single point of contact for all licensing and examination issues. An academy's contact will be its representative and contact for all matters relating to licensing and documentation for cadets, including obtaining MMDs for cadets, applications for license, and the license examinations. The persons so designated should be reported to the National Maritime Center (NMC) and the Joint USCG/MARAD Maritime Academy STCW Review Committee (the "Review Committee").

LICENSE AND MMD APPLICATIONS

Cadet MMDs. Cadets who will receive all of their sea service aboard an academy training ship do not require an MMD endorsed as Cadet. Cadets who will be placed as Cadet aboard U.S. flagged commercial ships require an MMD endorsed as Cadet (Deck) or Cadet (Engine).

Guidance on cadet MMDs is provided in NMC Guidance Document 01-05. Notable provisions include:

Midshipmen at the United States Merchant Marine Academy (USMMA) are subject to 46 CFR 12.25-25. MMDs issued to USMMA midshipmen endorsed as cadet shall have no other ratings. USMMA midshipmen desiring an MMD endorsed with other ratings must exchange their cadet MMD for the commercial mariner MMD.

For the state academies, 46 CFR 12.25-25 is not applicable and cadets at the state academies may have their MMDs endorsed with Cadet (Deck) or Cadet (Engine) in addition to any other rating for which they qualify.

If a cadet who holds an MMD endorsed as Cadet (Deck) or Cadet (Engine) leaves an academy for any reason, including leaves of absence, suspensions, or disenrollment, the academy should attempt to collect the MMD and promptly surrender it to the REC. If the academy is unable to collect the MMD, they should give prompt notice to the REC that the cadet is no longer enrolled at the academy.

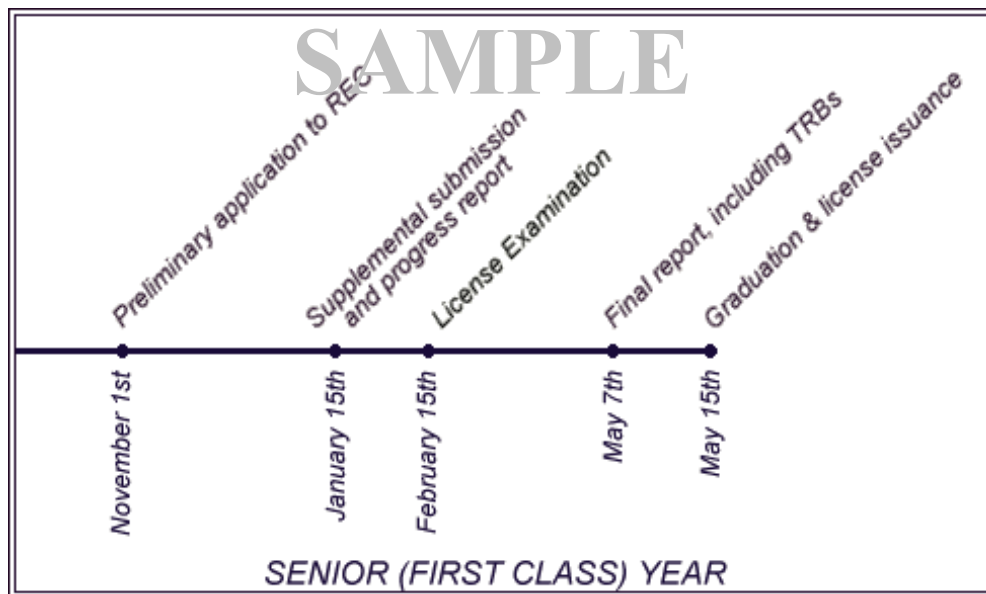
Applicable user fees should be charged for all transactions involving cadet MMDs, including the re-issuance of an MMD to remove the cadet endorsement.

MMD eligibility. At this time, only United States citizens and aliens lawfully admitted to the United States for permanent residence are eligible for an MMD. The only exception is for foreign nationals enrolled in USMMA, who are eligible for an MMD under Section 412 of the Coast Guard & Maritime Transportation Act of 2004, which amended 46 U.S.C. 8103.

License applications. License applications for graduating classes at the maritime academies present unique logistical and administrative challenges. Academies should submit license application packages in sufficient time before graduation to allow for evaluation and advance preparation of the credentials without causing undue disruption and burden to other mariners doing business at the RECs.

Each maritime academy program has received a single, all-inclusive approval from NMC. This approval specifies all requirements satisfied by the academy program. Accordingly, ancillary course completion certificates for training such as basic safety training, bridge resource management, advanced fire fighting, and GMDSS are *not* required. The completed Training Record Book (TRB) and certification by the academy that a cadet has completed or will complete their program is sufficient documentation that all required training and assessment have been provided. Although not required, academies may issue ancillary certificates for discrete training requirements consistent with their approval letter from NMC.

Timing of license applications. In order to efficiently process academy applications, a deviation from the normal practices of requiring complete applications is needed. For maritime academies, a multi-step application process is desirable. Following is a *sample* timeline for applications for an academy class expected to graduate in the spring; the specific timeline for each academy will vary depending on each academy's program schedule. While RECs will make every reasonable effort to ensure that licenses are issued at graduation, this cannot be guaranteed, particularly for applications submitted later than the dates discussed below.



Initial applications should be made in the fall semester of the final year for all cadets “on-track” and expected to graduate the following spring. This initial application should be submitted around November 1st, have all forms completed and include the submission of all fees. The medical examination and drug testing should be complete and reported on the application forms. If separate letters of character are provided, at least three should be enclosed.

In addition to the standard forms, the academy should provide a report of each cadet's sea service and identify those cadets eligible for additional endorsements such as Tankerman-PIC, Medical Care Person In Charge, or Fast Rescue Boat. Cadets who have not yet completed all sea service should be noted, along with a statement of what arrangements are being made to ensure that they will complete their sea service before graduation.

A sample report to provide the above information is included herein as Appendix A. This sample is generic. The specific type and quantity of sea service and specific courses for each academy should be as approved by the Review Committee. Use of this format of report is encouraged, but not required. Each academy and REC may agree upon an alternative format that provides the same information. Also, note that individual service letters for each cadet are not required; the use of a single table or spreadsheet for all cadets is acceptable as long as it identifies the specific service acquired by each cadet.

After submission of the initial applications, the REC should review them for completeness and accuracy, and perform appropriate character and background evaluations in as timely a manner as REC resources and workloads permit. It should be noted that application processing and license issuance may be delayed if a cadet has any convictions or deferred adjudications (including DUI).

The initial application should be supplemented at the start of the spring semester, around January 15th. This report should identify all cadets who remain "on-track" to complete the program and, if applicable, identify those who have either left the academy or are no longer expected to complete the program in the spring. For cadets who were identified in the initial report as having outstanding sea service, the progress of the cadet towards completion of their sea service requirements should be noted.

The academy should certify that all required sea service, training, and practical assessments are completed by the end of the spring semester. A sample of this first supplemental submission is provided in Appendix B.

A final submission should be made by the academy immediately after completion of all training and assessment in the spring semester. This should include fully completed TRBs for each cadet, and a final sea service report for all cadets who did not have their service completed at the time of previous submissions. A sample final report is provided in Appendix C.

Completeness of applications. Submission of accurate and complete applications is essential to the prompt and efficient processing and issuance of documents. Notwithstanding the preceding provisions for a multi-stage application process, academies should pre-screen and review applications before submission to ensure accuracy and completeness.

Validity of applications. Considering that cadets may not test for their licenses for some time after the initial applications are made, some deviation from the one-year validity may be appropriate in order to encourage early submission of applications and to allow cadets an opportunity for re-taking failed exam modules. Without some deviation from the one-year limitation, cadets would have less opportunity to re-take failed exam modules if their applications were submitted well in advance of taking the exam. 46 CFR 10.205(i) provides the OCMI the discretion to adjust the one-year validity period by allowing the OCMI to authorize the examination "[w]hen the OCMI finds the applicant's experience and training to be satisfactory and the applicant is eligible in all other respects."

Therefore, in accordance with the discretionary authority contained in 46 CFR 10.205(i), the OCMI may authorize cadets to sit for license exams for a period of *either* eighteen months from the initial submission of the application, *or* one year from the date the cadet first sits for the license examination, whichever is less. **In no case shall a license or MMD be issued until all requirements have been met.**

Medical conditions/waivers. It is desirable to identify cadets who may have medical issues that would either disqualify them from a license or require a medical waiver early in the cadet's training at the academy. It is the academies' responsibility to avoid problems at the time of license application by identifying cadets with such medical issues early, perhaps in the first year at the academy, and consult with the REC and/or NMC concerning license eligibility. NVIC 2-98, "Physical Evaluation Guidelines for Merchant Mariner's Documents and Licenses," outlines the appropriate physical evaluation guidelines for merchant mariners. Academies should ensure that cadet physicals meet these standards.

LICENSE EXAMINATIONS

Examinations before completion of sea time. It is general Coast Guard policy that a mariner may not sit for a license examination until all requirements for that license, including all training and sea time, have been met; however, the Coast Guard has traditionally allowed maritime academy cadets to sit for exams prior to completion of all requirements because federal law effectively requires cadets at both the federal and state academies to take the Coast Guard exam prior to graduation. See 46 U.S.C. Appendix 1295c(f)(1)(C), 46 CFR 310.7(b)(3)(iii) & 46 CFR 310.52(a). Coast Guard regulations require graduation as a prerequisite to license issuance. See 46 CFR 10.407(a)(2)(iv); 46 CFR 10.516(a)(3)(iv).

To enable the maritime academies to present licenses to cadets at graduation, and to create a practical time to administer exams at each academy, the Coast Guard will allow academy cadets to sit for their license exams before all training and sea service have been completed provided that the cadet has only minimal education and experience remaining to be completed. Specifically, this means that each cadet must have completed the first semester of his (or her) senior year and have only the last semester of class work, and that each cadet has no more than one cruise or sea period (a block of time as described in the program approval for the academy) remaining. However, in all cases, each cadet must be expected to complete all requirements no later than 6 months following the examination. **In any event, no license will be issued until all requirements are met.**

Scheduling of examinations. To accommodate the special circumstances of the maritime academies, cadets should be examined for their licenses at any time after the end of the fall semester of their senior year. Deviations from the above examination schedule are permissible, at REC discretion. The specific scheduling of the examinations should be worked out between the REC and the academy for mutually acceptable dates.

Examinations will not be given until an initial application for each cadet sitting for the examination has been submitted to the REC and an initial evaluation by the REC of the cadet's eligibility for a license, including citizenship and background check, has been made.

Examination room / traveling exam teams. A traveling exam team (TET) should be provided for the original sitting of the license exam if the REC's exam room cannot accommodate all cadets taking the exam at one time. Generally, a TET should not be provided for small numbers of

cadets that can be accommodated at the REC. The scheduling of TETs should be discussed between the REC and academy, and should consider the number of cadets to be tested, the capacity of the REC exam room, and any other factors the REC and/or the academies believe are relevant.

The manner in which re-examinations will be given is to be determined by the REC with consideration given to scheduling and resource constraints. The REC may provide a traveling exam team, or may require that cadets take re-examinations at the REC by appointment.

Examination module schedule. The administration of the license exams given at the academies should match, as closely as practicable, the policy for non-academy applicants at the REC. A non-academy applicant at an REC must take a minimum of two modules per day, but may allocate all of the time available for the entire day as they choose (e.g. they may spend 30 minutes on one module and 5 hours on another). Of course, it is not practicable to provide this level of individual discretion for mass sittings of academy cadets, but reasonable efforts should be made to allow the greatest flexibility.

The academy should be allowed to request the order in which the exam modules will be given, provided that all cadets follow the agreed schedule. All cadets must take the same module at the same time and must start the module at the same time. The academy may request the time allowed for each module, provided that reasonable allowances are made to provide the exam team with a meal break and that the total time spent in one day does not exceed the hours available at the REC exam room. For example, instead of one module from 9:00 AM to noon and a second from 1:00 PM to 4:00 PM, the academy may request the first exam be given from 9:00 AM to 11:00 AM and the second from noon to 4:00 PM. This will more closely align the academy exam schedule with that of the REC exam room and will allow additional time for exam modules that typically require more time to complete. Once the order and time limits for exam modules are set, they must be strictly adhered to for all cadets.

The academy must request the specific exam schedule to be used at least 2 weeks in advance of the start of the examinations.

Exam scoring / answer sheets. Standard Coast Guard answer sheets are to be used *at all times* in order to allow NMC to scan and capture vital exam data. The answer sheets must be completely filled out, with all information completed with *both* handwriting and bubble shading. The REC exam team will score exam modules on-site immediately after the completion of the exam module.

Exam protests. NMC will try to respond to protests as soon as they are received. Due to scheduling and resource constraints, the ability to provide immediate responses will be subject to NMC staff availability and workload. In order to facilitate immediate transmission of protests to NMC, the academy should provide a fax machine in or near the exam room.

MISCELLANEOUS

Transfer students. Cadets who transfer from USMMA or one of the six state academies to another such academy (“inter-academy transfer”) will not be required to duplicate service, training, or assessment done at the prior academy. They will be required to receive all of the training, service, and have demonstrated all of the competencies required by STCW. Since the academies do not have identical curricula, this is not a simple task to determine the extent their training at another academy can be credited by the academy to which they transfer.

Cadets who have transferred to an academy from a school other than the U.S. Merchant Marine Academy (USMMA) or one of the six state maritime academies must complete the entire academy program. Waivers or other consideration may not be given based on courses completed at other (non-academy) schools or prior sea service. This includes cadets transferring from foreign maritime schools. In this context, the approved program is considered to be the maritime courses noted in the academy's STCW submission to the Review Committee. It does not include courses that are taken solely for academic reasons such as humanities courses. Credit for non-maritime courses that do not meet STCW or license requirements is permissible. For special circumstances, the specific cadet should be referred to NMC via the REC for review on a case-by-case basis.

The inter-academy transfer cadet should provide the new academy with a copy of the partially completed Training Record Book (TRB) in addition to their academic transcript. The "new" academy should identify which portions of the TRB remain to be completed, and provide the training and assessment in their program that equates to those parts of the TRB that were not completed. The new academy should also determine if the cadet has met the other requirements not covered in the TRB such as BST, fire fighting, and proficiency in survival craft.

When submitting applications for the inter-academy transfer cadet, copies of the TRBs from both academies should be submitted to the REC who will determine if, in the aggregate, all required elements have been completed. An academy should not certify in a TRB the completion of training they did not provide.

As practical assessments are not individually noted in a TRB, and because each academy's program differs somewhat from others, cooperation between academies is critical to the effective evaluation of a transfer cadet. Academies are encouraged to share information amongst each other and to assist each other in evaluating transfer cadets. The staff of the National Maritime Center is also available to assist in this regard.

Leaves of absence or late graduation. For cadets who began their academy training prior to the academies receiving STCW approval for their program (cadets who first entered an academy before August 1, 1998), leaves of absence, breaks in academy attendance, or late graduations are acceptable, provided that the cadet completes the entire academy program. Cadets who began their academy training prior to August 1, 1998, must be considered on a case-by-case basis as the training they received prior to 1998 may be different than that evaluated and approved by the Review Committee. Requests for consideration and evaluation of these cadets should be submitted to the National Maritime Center via the REC.

Cadets who have lapses in their academy training must re-validate their basic safety training (BST) if more than five years has elapsed since the original BST was completed. Academies can re-validate BST by having the cadet complete all of the written and practical assessments associated with the original BST. It is not necessary for the cadet to re-take all of the BST.

Changes to academy programs. All significant changes to the academy programs must be submitted to the Joint Coast Guard/MARAD Maritime Academy STCW Review Committee for evaluation and written approval. This includes changing the amount or type of sea service, changing or replacing courses or practical assessments within the curriculum, and a change of simulators or training vessels. With the exception of the inter-academy transfers discussed above, credit or waivers of specific parts of an academy program cannot be granted for prior or outside training or sea service absent specific approval from the Review Committee.

APPENDIX A

Generic Maritime Academy

November 1, 2005

Commanding Officer (REC)
USCG Marine Safety Office
4200 Wilson Blvd.
Arlington, VA 22203-1804

Dear Sir/Madam:

Enclosed please find preliminary application packages for cadets that are expected to graduate from Generic Maritime Academy in May of 2006.

Attached to this letter is a listing of the sea service acquired by each. All cadets listed are expected to complete the entire deck or engine curriculum, and each cadet's Training Record Book will be provided to you at a later date.

We also provide a listing of cadets who have completed the various elective courses that have been approved for portions of the STCW Code and/or domestic endorsements, as well as a list of those cadets who have acquired the tanker service and cargo transfers required for Tankerman-PIC endorsement. Documentation of the required service and transfers for the Tankerman-PIC endorsement are being provided with the application files for these cadets.

We will supplement this submission to complete each cadet's application as they progress towards graduation. We will also advise you as soon as possible if any of the cadets included in this submission will not complete the entire curriculum and/or will not graduate on time.

If you have any questions or comments, please do not hesitate to contact me.

Sincerely,

STCW Coordinator

Encl: (1) Sea Service Report
(2) Supplemental Training and Service

APPENDIX B

Generic Maritime Academy

January 15, 2006

Commanding Officer (REC)
USCG Marine Safety Office
4200 Wilson Blvd.
Arlington, VA 22203-1804

Dear Sir/Madam:

We write to follow up on our initial submission of applications for cadets expected to graduate from GMA in May.

We have determined that all cadets are enrolled in the courses needed to complete their training, and we anticipate they will graduate and be eligible for their licenses on schedule. At the conclusion of this semester we will provide you with copies of the fully completed TRBs for each cadet.

Please note that one of the cadets included in our initial submission, Archimedes Smith, SSN 123-45-6789, has left the academy and will not graduate as previously expected.

Also enclosed is a listing showing the revised sea service for cadets who had not completed all of their service at the time of the initial submission. These cadets sailed on commercial ships during their semester break and have now obtained all required service.

If you have any questions or comments, please do not hesitate to contact me.

Sincerely,

STCW Coordinator

Encl: (1) Revised Sea Service Report

APPENDIX C

Generic Maritime Academy

May 7, 2006

Commanding Officer (REC)
USCG Marine Safety Office
4200 Wilson Blvd.
Arlington, VA 22203-1804

Dear Sir/Madam:

We write to confirm the status of the cadets in the class of 2006 who will graduate this month.

We are pleased to report that all cadets previously submitted have successfully completed all outstanding requirements and may be issued their licenses at graduation.

Enclosed are fully completed Training Record Books for all cadets who have completed the program.

If you have any questions or comments, please do not hesitate to contact me.

Sincerely,

STCW Coordinator

Encl: (1) Training Record Books