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NMC-4 Policy Ltr No. 1-99
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From: Commanding Officer, National Maritime Center
To: Distribution

Subj: INSTRUCTOR REQUIREMENTS

Ref: (a) NVIC 6-97, POLICY ON QUALIFIED INSTRUCTORS AND DESIGNATED EXAMINERS WHO TRAIN OR ASSESS THE COMPETENCE OF MERCHANT MARINERS
(b) NVIC 7-93, Enclosure (1) on Fishing Vessel Instructor Qualifications
(c) Title 46, Code of Federal Regulations (46 CFR), Part 10.302(a)(3)
(d) NVIC 5-95, GUIDELINES FOR ORGANIZATIONS OFFERING COAST GUARD APPROVED COURSES, Enclosure (2), on instructor requirements
(e) Marine Safety Manual (MSM), Volume III, Section 7.H., Instructor Qualifications
(f) International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended (STCW), Regulation I/6.2
(g) Seafarer's Training, Certification and Watchkeeping Code (STCW Code), Section A-I/6, A-I/8, and A-I/12
(h) 46 CFR 10.309(a)(3) to (a)(5)

1. This Policy Letter clarifies existing requirements for instructors of Coast Guard approved courses and training programs. It explains requirements for instructors who may be very qualified to teach certain subjects, but who do not have a maritime background or seagoing experience.
2. As announced in National Maritime Center (NMC-4) Policy Letter 4-98, Coast Guard policy allowing Regional Examination Centers (RECs) to approve instructors was cancelled and instructor approval authority was centralized at the NMC. The only other instructor approval authority rests with Coast Guard approved Quality Standards Systems (QSS); QSSs follow Coast Guard requirements and policies when approving or disapproving instructors. All requests for approval of instructors for Coast Guard approved training courses or programs should be submitted to the NMC or the training provider's QSS by the training provider, along with resumes of instructor experience and qualifications. Any merchant marine or other professional credentials held should be indicated on the resume, along with expiration dates. Training providers are responsible for veracity of the information on the resume.
3. Instructors are not approved outside of an approved course; this ensures that all curricula being taught and performance measures being used have been Coast Guard approved.
4. References (b) through (e) are Coast Guard regulations and policies applying to all Coast Guard approved courses. References (a) and (f) through (h) apply specifically to Coast Guard approved STCW compliant training courses and programs. Section A-I/6 of reference (g) specifically states that the trainer must have an appropriate level of knowledge and

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understanding of the subject matter, and be qualified in the task being taught (or skill being assessed). Having the appropriate mariner's document or license and STCW endorsement is certainly evidence of having the prerequisite professional skill and knowledge. However, the definition of a Qualified Instructor in 46 CFR 10.103 *does* allow for being "otherwise qualified to provide the required training." The requirements for instructors are similar for courses which must be STCW compliant and for those not required to be STCW compliant. The primary difference is that a Qualified Instructor for an STCW compliant course must have experience or training in instructional techniques [in specific areas] or must obtain knowledge in these areas by obtaining training which meets the requirements of reference (a).

5. The requirement and intent of all Coast Guard regulations and policies in references (a) through (h), some of which were in effect before implementation of STCW and some of which were promulgated as a result of STCW, is the same -- to insure that instructors of approved training courses are qualified. Good instructors must have:
 - a. Subject matter expertise or knowledge which shows a high level of understanding of the subject matter;
 - b. Professional skill, usually of a specialized nature (competence). More specifically, the instructor must have the ability to apply knowledge in the environment where the student will be required to use the subject matter. Another way of saying this is that good instructors must have operational experience in the subject area; an instructor for a Tank Barge Dangerous Liquid Course must have been in charge of dangerous liquid transfer operations, or a navigation instructor must have actually navigated vessels; and,
 - c. Knowledge of the education process (instructional technology) and teaching experience, i.e., the instructional skills and ability needed to accomplish the objectives of the training and impart the required information to the students. Such experience and skill covers a wide range of abilities, including those necessary to:
 - (1) Understand learning objectives and curricula;
 - (2) Develop an effective training program;
 - (3) Be familiar with various training media and presentation techniques;
 - (4) Communicate the knowledge to the students;
 - (5) Develop, understand and apply assessment criteria; and,
 - (6) Measure performance.

The end result will be an effective and credible learning experience for the student, allowing transfer of skills and knowledge learned in the classroom to situations outside the classroom.

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6. The Coast Guard allows expertise and knowledge to be substantiated by:
 - a. Possessing a valid mariner's credential appropriate for the subject being taught, or another valid professional credential related to the subject being taught; and,
 - b. Successful completion of relevant education or training.

NOTE: Successful completion of training alone, such as taking a course as a student in a subject you then want to teach, is not sufficient. As stated in paragraph 5.b., many subjects require an experienced instructor who can not just show, but guide, students who are having difficulty grasping knowledge or skill objectives.

7. The Coast Guard allows work related operational experience and professional skill and to be substantiated by the following means:
 - a. Possessing a valid mariner's credential appropriate for the subject being taught;
 - b. Possessing another valid professional credential related to the subject being taught; and,
 - c. Having work experience, equivalent to the subject being taught and skills being assessed, in a merchant marine, military, or civilian occupation. This means that the work performed was the same as the task(s)/subject(s) being taught, and provided experience, knowledge, and skill related directly to those task(s)/subject(s). This work experience is mandatory for STCW compliant courses and training programs.

NOTE: Education or training, used to substantiate professional expertise and knowledge, cannot alone substitute for the experience and judgement gained by having actually performed the task, in most cases.

8. To show knowledge, experience, and ability in instructional technology, the Coast Guard requires experience in course/curriculum development, as well as instructor ability. This can be substantiated by:
 - a. Work experience as an educator, documented by performance evaluations showing successful performance in curriculum development, assessment criteria development, and presentation of material and lecturing. The National Maritime Center (NMC) does not consider student course critiques or letters prepared specifically as documentation to obtain instructor or course approval to be performance evaluations;
 - b. Successful completion of relevant education and training; and/or,
 - c. Successful completion of a 40-hour "train-the-trainer" course.

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NOTE: For STCW compliant course or programs, the documentation of work experience, education or training must show knowledge and/or work experience covering the material on instructional and assessment techniques outlined in reference (a).

9. In this light, some course and training program topics require the instructor to have seagoing experience or a merchant marine credential to be qualified to perform the task being taught, while some do not. The following categories of instructors will be approved.

a. Mariner Credential(s) Required. To teach the subject matter, instructors must have seagoing experience and hold the appropriate mariner's credential, or have other specialized operational experience (Person in Charge of a Dangerous Liquid Transfer, or operation of ARPA). Military experience doing the tasks in the subject area would be acceptable; for example, a person with several years of Navy/Coast Guard experience as a qualified small boat coxswain would probably have the necessary operational experience to teach an OUPV Course. Recency will be judged in context with quality and quantity of experience. Twenty years of experience followed by an eight year lay-off would be acceptable for many courses; recency would not be required in this example -- individuals with credentials issued "for continuity purposes only" would be accepted as instructors [because they have had the relevant operational experience in the past]. Yet, two years of experience followed by an eighteen year lay-off would not be acceptable. Courses which are taught by such individuals include, but are not limited to:

Mate/Master 100/200 gross tons
Operator of Uninspected Passenger Vessels (OUPV)
Designated Duty Engineer
Able Bodied Seaman
Lifeboatman
Qualified Member of the Engine Department
Rules of the Road
Celestial Navigation involving practical assessment
GMDSS
Tankerman
Radar (Unlimited Radar course instructors must have a 500 ton Masters license or greater, or the equivalent experience)

b. Mariner Credential(s) Not Required. Some subjects may not require an instructor to have had operational or seagoing experience, or to hold a mariner's credential. Alternative methods of demonstrating subject matter expertise and competence will be considered, and instructors may be approved, in the following categories.

(1) A proposed instructor may demonstrate subject matter expertise by passing the appropriate Coast Guard exam module(s). The exam must be taken; successful completion of a course approved by the Coast Guard in lieu of examination will not suffice. This is a limited category of instructor approval where training and assessment of knowledge/competence can be conducted in the classroom. Topics

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might include ship construction or celestial navigation theory (sight reduction only, not involving practical demonstrations or assessments of practical skills).

- (2) Seagoing experience is not required for training topics where there is extensive crossover of skills and knowledge from non-maritime occupations. To allow proper evaluation of instructors, expertise and operational job experience must be clearly laid out in the submitted resume. This training includes:

- Electrical Theory
- Fire Fighting
- Medical Training
- Marlinspike Seamanship (knot tying)
- Social Responsibility
- Meteorology
- Boating Safety

- (3) The last category of instructor approvals will involve case-by-case evaluation of the instructor's resume. Many people have backgrounds with education, training and work experience which, when combined with passing appropriate Coast Guard exam modules at a REC, would substantiate the level of knowledge and skill needed for approval as an instructor. To allow proper evaluation of instructors, expertise and job experience must be clearly laid out in the submitted resume. Examples of possible approvals include:

- (a) An individual with military seagoing experience, who does not meet the requirements in paragraph 9.a., who passes the appropriate OUPV module(s), may be qualified to teach an OUPV course, depending on seagoing experience. Similarly, for 100 GT Master or Mate, depending on previous experience at sea.
- (b) A naval architect, with professional credential(s) and knowledge of the contingencies/situations experienced at sea, may qualify to teach stability and/or ship construction.
- (c) An admiralty lawyer with extensive experience in Rules of the Road issues, who passes a Rules of the Road module, may qualify to teach Rules of the Road courses.

10. The NMC will also continue to approve assistant instructors in subject or skill areas where operational or seagoing experience is not crucial. Assistant instructors may conduct instruction and assessment under the supervision of a lead instructor. Subdivision of training courses or programs into specific areas of subject matter (course modules or topic areas) will allow for easier evaluation of assistant instructor qualifications.

11. To use successful completion of a Coast Guard exam to demonstrate subject matter expertise for the purposes of instructor qualification, the following steps must be completed.

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- a. Training institutions must request approval for an applicant to sit for an exam to demonstrate subject matter expertise. A complete resume should be included with this request. The request should indicate the applicant's choice of a REC at which to be examined.
- b. The NMC must approve the applicant to sit for an exam. Before approval will be given, the applicant must have met all other instructor qualification requirements.
- c. The NMC will determine the appropriate module(s) which must be taken.
- d. The NMC will notify the training institution of the approval by letter, with a copy to the chosen REC. Module(s) which must be taken will be identified in this letter. If the applicant was not approved to use an exam to demonstrate subject matter expertise, the NMC will notify the institution of the reason(s) why.
- e. The applicant will make any necessary arrangements for taking the exam with the selected REC. The applicant must present the original letter from the NMC authorizing the exam and pay the user fee for taking an exam, before the exam will be administered. All normal exam administration procedures will be followed (e.g., re-tests, protests, scoring, proctoring, etc.), except that only one exam cycle (original test followed by two re-tests and payment of the user fee one time) will be allowed.
- f. Following completion of the exam(s), the REC will notify the NMC of the applicants' score(s).
- g. If the exam was passed, the NMC will issue an instructor approval letter to the institution providing the course.
- h. The instructor approval letter issued to the training institution is not transferable. However, the demonstration of competency (passing the Coast Guard test) can be used on resumes submitted by any training institution.

W. C. BENNETT
By direction

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