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NMC Policy Letter 10-01  
May 10, 2001

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

Subj: SEA SERVICE CREDIT FOR APPROVED COURSES

Ref: (a) COMDTINST M16000.8B (Marine Safety Manual) Vol. III Article 7.D.4  
(b) Title 46 Code of Federal Regulations, Part 10.304

1. PURPOSE.

- a. This policy letter provides guidance to the Regional Examination Centers (RECs) about the substitution of approved training courses for a portion of the sea-service experience and amplifies references (a) and (b). This policy letter applies to transactions involving credentials subject to the provisions of the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended (STCW) that are processed:
  - (1) Based only on service or training acquired after 31 July 1998; or
  - (2) After 31 January 2002.
- b. This policy letter does not apply to transactions involving mariner's credentials that are not subject to the STCW.

2. ACTION.

- a. Commanding officers of marine safety units should bring this policy letter to the attention of components of the maritime industry having interests in the marine personnel field. Commanding officers of units with an REC attached should be guided by the provisions of this policy letter when processing applications. This letter will be distributed by electronic means only and is available on the World Wide Web at <http://www.uscg.mil/STCW/m-policy.htm>.
- b. The NMC will notify all training organizations with approved training that is authorized to substitute for sea-service about the status of their course(s) and the effect of the implementation of STCW that will occur on February 1, 2002.

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3. BACKGROUND.

- a. Reference (a) summarizes the regulatory limitations on the acceptance of sea service credit towards meeting the sea service requirements for issuance of a mariner's license or endorsement to a license or merchant mariner's document. It also provides amplifying information and policy guidance.
- b. When some training courses were originally approved, completion of that course was considered to provide a level of knowledge equivalent to that acquired through a stated number of days of sea service. To encourage mariners to improve their professional knowledge by completing these approved training courses, graduates were authorized to apply the sea-service equivalency towards the sea service required for a license or endorsement.
- c. The STCW requires specific terms of sea service and training to qualify for various certifications. It does not authorize substitution of sea service credit towards meeting its sea-service requirements, and therefore, may limit the full sea-service credit authorized within a pre-existing course's approval.
- d. Sea service credit for course completion may be granted for issuance of STCW-78 certificates during the transition period; however, that authority will expire on 1 February 2002 when the Convention is fully implemented.

4. DISCUSSION. Sea-service credit for course completion may be applied to the required sea service for a license or endorsement in the following situations:

- a. The United States has qualification levels in excess of those established by the STCW; e.g., second mate and second assistant engineer. Enclosure (1) provides a list of all transactions where a mariner may use course completion for sea service credit for issuance of a license or license endorsement.
- b. The United States sea-service requirements for certain qualified ratings endorsements exceed the sea service requirements for the equivalent STCW certification; e.g. able seaman endorsements, or there is no equivalent STCW certification. Enclosure (1) includes information on these situations.

M. S. BOOTHE

Encl: Applying credit for course completion in lieu of sea service

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

## APPLYING CREDIT FOR COURSE COMPLETION IN LIEU OF SEA SERVICE

1. GENERAL. Sea service credit acquired through completion of an approved course may be accepted as set forth in this enclosure. In each evaluation of sea service credit applied to a transaction affecting a credential subject to the STCW, the basic rule is that the STCW's sea service requirements must be met through actual sea service. Once this rule is met, sea service credit granted for course completion may be accepted to meet any domestic requirements that **exceed** the STCW's standards. With the exception of the requirement for conformity with the STCW's requirements, the standards listed below do not apply to the approved training programs conducted on nautical schoolships or at the maritime academies.

### 2. DECK LICENSES AND QUALIFIED RATINGS.

a. LICENSES. Course completion may substitute for up to eight-months sea-service credit required for a raise in grade from third mate to second mate. The applicant will already have met the STCW's sea-service requirements for certification at the officer-in-charge level when he or she first applied for initial certification as third mate or third assistant engineer. Applicants who use courses-in-lieu of-sea-service credit to apply for the second mate's license may find themselves short of the required, total amount of sea service when they ultimately apply for a master's certification.

b. QUALIFIED RATINGS. For initial issuance of an able seaman endorsement, the maximum limits for substitution of course completion for sea service are listed below. The mariner must have had actual sea service to qualify for the STCW's proficiencies, rating forming part of a navigational watch and proficient in survival craft, which are both pre-requisites for qualification as an able seaman.:

- (1) Able seaman-unlimited – 12-months sea-service credit may be accepted;
- (2) Able seaman-limited – 6-months sea-service credit may be accepted;
- (3) Able seaman –special – 4-months sea-service credit may be accepted;

c. To raise the level of certification as an able seaman, up to one-third of the additional sea service required by the upgrade may consist of sea-service credit granted for completion of another relevant approved course(s).

### 3. ENGINEERING LICENSES AND QUALIFIED RATINGS

a. LICENSES. Sea service credit may be applied to the following licensing situations:

(1) For an original license as third assistant engineer or assistant engineer, up to six-months sea-service credit for course completion may be accepted; however, the mariner must have another six months actual sea service and participate in an approved training program;

(2) For a raise in grade from third assistant engineer to second assistant engineer up to 8-months sea service credit for course completion may be accepted. Applicants who use sea-service credit to apply for the second assistant engineer's license may find themselves short of the required, total amount of sea service when they ultimately apply for a chief engineer's

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certification because certification as a chief engineer requires an overall period of seagoing service as a licensed engineer;

(3) For addition of an alternate propulsion mode(s) at the same license level up to two-thirds of the sea service required by 46 CFR 10.503 may be accepted through sea-service credit for course completion; and

(4) For raising or removal of horsepower limitation(s) at the same license level, up to two-thirds of the sea service required by 46 CFR 10.502 may be accepted through sea-service credit for course completion.

b. QUALIFIED RATINGS. For qualified engineering ratings, sea service credit may be accepted as follows:

(1) For original qualification as a machinist, electrician, refrigerating engineer, pumpman, or deck engineer, up to three-months, sea-service credit may be accepted.

(2) For ratings of oiler, fireman/watertender, or junior engineer which also satisfy the STCW's requirements for rating forming part of an engineering watch, the applicant must either participate in approved training which includes at least two-months actual sea service and completion leads to issuance of the endorsement or complete six months of actual sea service.

(3) For subsequent qualification as a deck engine mechanic or as an engineman, up to three-months sea-service credit for course completion may be accepted.