

U.S. Department of  
Homeland Security

United States  
Coast Guard



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CG-MMC Policy Letter  
No. 04-23  
June 12, 2023

From: M. Medina  
COMDT (CG-MMC)

To: National Maritime Center

Subj: SEA SERVICE CREDIT FOR ABLE SEAMAN COURSES OF INSTRUCTION

1. PURPOSE. This policy letter provides guidance for crediting sea service in connection with courses of instruction authorized under 46 U.S.C. 7315(b).
2. ACTION. The Coast Guard will use this policy when evaluating course approval submissions to determine the amount of sea service credited for completion of an able seaman course of instruction authorized under 46 U.S.C. 7315(b).
3. DIRECTIVES AFFECTED. None.
4. BACKGROUND.
  - a. The minimum service requirements for Able Seaman rating endorsements are established in 46 U.S.C. Chapter 73 and Title 46 Code of Federal Regulations (CFR) 12.403(a). Completion of a course of instruction may be substituted for not more than one-third of the required service on deck as authorized by 46 U.S.C. 7315(b).
  - b. Recent appeals and policy inquiries have demonstrated a need to clarify how sea service is credited as part of an approved course of instruction. This policy provides guidance on how sea service is credited under approved courses of instruction.
  - c. As used in this policy letter, courses of instruction includes both approved courses under 46 CFR 10.402 and approved programs under 46 CFR 10.407.
5. DISCUSSION. The Coast Guard will calculate sea service credit for completion of approved courses of instruction under 46 U.S.C. 7315(b) in the following manner.
  - a. Sea Service Credit for Shore-Based Training. Shore-based training may consist of classroom lectures, practical demonstrations, simulation, laboratory, or workshop training and may be credited towards service on deck. The maximum allowable credit is one-third of the required service on deck. The credit granted will vary according to the type of training as outlined in Marine Safety Manual , Vol III, Marine Industry Personnel,

COMDTINST M16000.8B, CH-2., Part A, Chapter 7, Section D. Paragraph 1 as outlined below:

- i. Classroom lectures may be credited at a 2:1 ratio where one day of shore-based training will count as two days of service on deck.
    - ii. Part-task simulation, workshop skills, laboratory training, practical demonstrations, and similar training may be credited at a 4:1 ratio where one day of training will count as four days of service on deck.
    - iii. Full mission simulation may be credited at a 6:1 ratio where one day of simulation training will count as six days of service on deck.
    - iv. Based on article A-7.D.1 of The Marine Safety Manual, Volume III, Marine Industry Personnel, COMDTINST M16000.8B, 7 hours of actual shore-based training will be considered a day for purpose of this calculation.
  - b. Sea Service on Training Vessels. Each day underway on a school's training vessel may count as one and one-half days of service on deck without limitation. Service on training vessels as a trainee may be credited at the 1.5:1 ratio if the training provider demonstrates that the course of instruction includes structured on board training warranting the additional credit and that the training vessel is suitable for the proposed credential to be issued.
  - c. Sea Service on Other Vessels. The Coast Guard will credit sea service on other vessels as specified in 46 CFR 10.232. Service must meet the requirements for the specific Able Seaman endorsement in 46 CFR 12.403(a).
  - d. Documentation: Course providers should request approval for the sea service credit in paragraph 5(a) through the course approval process. Documentation of service within the course of instruction should list the days underway using "calendar days" without applying the ratios associated with paragraphs 5(b) or 5(c).
6. DISCLAIMER. This guidance is not a substitute for applicable legal requirements, nor is it itself a regulation. It is not intended to, nor does it impose legally-binding requirements on any party. This guidance represents the Coast Guard's current thinking on this topic and may assist industry, mariners, the general public, and the Coast Guard, as well as other Federal and State regulators, in applying statutory and regulatory requirements. Alternative approaches for fulfilling this policy may be acceptable if the approach satisfies the requirements of the applicable statutes and regulations.
7. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS.
- a. The development of this guidance and the general policies contained within it have been thoroughly reviewed by the originating office in conjunction with the Office of Standards Evaluation and Development, Commandant (CG-REG). Pursuant to Department of

Homeland Security Directive 023-01, Rev.1, associated implementing instructions, and Environmental Planning COMDTINST 5090.1 (series), which guide the Coast Guard in complying with the National Environmental Policy Act of 1969 (42 U.S.C. 4321-4370f), we have determined that this action is categorically excluded (CE) from further environmental analysis under paragraphs #A3, #L5 and #L56 in Appendix A, of Table 1 of DHS Directive Instruction Manual 023-01, Rev. 1. Our rationale for selecting these CEs is as follows. “Promulgation of rules, issuance of rulings or interpretations, and the development and publication of policies ... and other guidance ... that implement, without substantive change, statutory or regulatory requirements” or “...that interpret or amend and existing regulation without changing its environmental effect” are covered under DHS CE #A3. Promulgation of this policy and its associated guidance implements, without substantive change, the applicable Commandant Instruction or other federal agency regulations, procedures, manuals, and other guidance documents. Accordingly, Coast Guard CE #L5 applies. In addition, the policy letter includes elements that pertain to training, qualifying, licensing and disciplining maritime personnel. These latter aspects of the policy letter and its associated guidance are covered under Coast Guard CE #L56.

- b. This guidance will not have any of the following: significant cumulative impacts on the human environment; substantial controversy or substantial change to existing environmental conditions; or inconsistencies with any Federal, State, or local laws or administrative determinations relating to the environment. All future specific actions resulting from the general policies in this guidance must be individually evaluated for compliance with the National Environmental Policy Act (NEPA), DHS and Coast Guard NEPA policy, and compliance with all other environmental mandates.
8. REQUEST FOR CHANGES. All requests for changes and questions regarding implementation of this policy and/or requests for changes should be directed to the Office of Merchant Mariner Credentialing (CG-MMC), at (202) 372-2357 or [MMCPolicy@uscg.mil](mailto:MMCPolicy@uscg.mil).

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