

## Training Provider Audit Updates (June 2024)

The National Maritime Center (NMC) continues to conduct more robust audits to determine compliance with regulation, policy, and issued course/program approvals. Below is the first of what we intend to be an ongoing update of commonly observed audit issues resulting in nonconformities and/or administrative actions. Training providers are encouraged to use these observations to improve their internal audit processes and ensure training delivery is in accordance with regulation, policy, and the approval granted by the NMC.

### Basic Firefighting (BFF)

Integration of simulated fire into BFF courses for assessment of competence:

The Coast Guard has not approved simulation to replace the requirement for extinguishing live fires as part of the final assessment of competence (NVIC 08-14).

### Personal Survival Techniques (PST)

Conducting the in-water righting of a life raft assessment in an improper manner by having the overturned raft held at the side of a pool, instructors assisting students in the water, and/or only having a portion of the students conduct the task:

All students must be individually assessed for competence without assistance.

### Combining Courses

Integrating courses together requires approval before the course can be delivered, this includes combining full courses with revalidation and refresher courses. While it may be possible to combine assessment activities for BFF and PST/Personal Survival Craft, the course curriculum must be delivered as approved (46 CFR Part 10, Subpart D). Modifications must be submitted to [NMCCourses@uscg.mil](mailto:NMCCourses@uscg.mil) for approval prior to implementation.

### Course Examinations

Administering unapproved examinations, including examinations from previous approvals and making significant changes to or substituting a new examination without approval:

Minor corrections to an examination, such as rewording a question or correcting a confusing answer, must be documented in the record of change for that course (46 CFR 10.403). All other changes to examinations must be submitted to [NMCCourses@uscg.mil](mailto:NMCCourses@uscg.mil) for approval prior to implementation.

## Course Completion Certificates

Completion dates must reflect the actual date each student completed the course requirements. Where multiple courses are delivered in 1 week, do not date all certificates on Friday. If the approval language is included on the course completion certificate, it must be verbatim from the final course/program approval letter.

Should you have any questions, contact the NMC Customer Service Center by using the [NMC online chat system](#), by e-mailing [IASKNMC@uscg.mil](mailto:IASKNMC@uscg.mil), or by calling 1-888-IASKNMC (427-5662).

Sincerely,

/B. W. Clare/

Captain, U.S. Coast Guard  
Commanding Officer