



National Maritime Center (NMC) Mariner Licensing and Documentation (MLD)



Vessel Security Officer Rulemaking

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■ *VSO Information*

- 1. Will there be a USCG charge to the mariner in order to receive the VSO endorsement?**
No, there is no charge for a VSO endorsement. 46 CFR 10.109 (table 10.109) establishes that there is no charge for STCW related certificates/endorsement.
- 2. Will there be any stated expiration date for the VSO endorsement?**
Since this is a one time endorsement, there is no expiration date for the endorsement.
- 3. When can mariners expect to begin getting their VSO endorsements processed?**
Mariners can start obtaining the endorsement as of the implementation date of the rule - 19 June 2008.
- 4. When will mariners be required to hold a VSO endorsement?**
All VSOs working on vessels subject to the STCW Convention will be required to hold a VSO endorsement as of 1 July 2009.
- 5. Will the VSO endorsement be added to the SCTW certificate or will a new STCW certificate be issued?**
Once the mariner submits an application and meets all the requirements necessary to receive an endorsement as VSO, a new STCW certificate will be issued with VSO added along with the previous endorsements (where applicable).
- 6. Will the issuance of a new STCW certificate or the endorsement on an existing certificate be undertaken at the local REC level or will the processing be completed by authorities in West Virginia?**
Mariners will have to submit their applications at the local RECs; however due to centralization, the application for VSO on the STCW certificate will be processed and printed in West Virginia.
- 7. Will a mariner be able to take his/her STCW 95 certificate to any REC for the endorsement or does he/she have to go back to the REC of record?**
Yes, mariners can take their applications and supporting documentation to any REC; the application for VSO on the STCW certificate will be forwarded to West Virginia for processing and printing.
- 8. Can a mariner mail his/her STCW and VSO/SSO certificate to the REC for endorsement and return via mail or FedEx?**
Yes, mariners may mail (or fax or deliver) their certificate along with their application and all other supporting documentation to any REC; the application for VSO on the STCW certificate will be forwarded to West Virginia for processing and printing. The certificate will be normally returned via mail.

9. **What will be the estimated turn around time for a STCW certificate/VSO endorsement to be returned to the mariner, assuming that the mariner presents sufficient proof of training?**
If the mariner provides all the requirements necessary for the endorsement as VSO, the estimated turn around time should be relatively short.
10. **If the VSO serves on a barge that is not self propelled, nor STCW compliant, does he/she have to comply with the same VSO training requirements?**
No. The rule only applies to vessels subject to STCW.
11. **What, if any, training requirements does a barge VSO have to comply with other than what is already stated in the regulations?**
A barge for VSO needs to comply with the existing requirements in 33 CFR 104.215.
12. **If the barge VSO has a license and is STCW compliant, but does not serve as a VSO on an STCW compliant vessel, but only on a barge, does he/she have to meet the new VSO training requirements?**
The person would need to meet the new VSO requirements if he/she serves as a VSO on board a vessel subject to STCW.
13. **Is security training provided in the past sufficient to meet the requirements of the new proposed rule making?**
All MARAD approved programs, will be accepted as meeting the requirements under this rule. Persons who attended courses that were not approved under the MARAD approval program, or have received company training, or can document VSO experience will be required to take a refresher training.
14. **Can my organization submit a training course for approval directly to the Coast Guard instead of having to send our personnel to another approved training course?**
As described in the rule, the Coast Guard will not be approving courses. Course approval will be conducted by a QSS organization on behalf of the Coast Guard. The information on the Coast Guard approved QSS organizations can be found on the following Internet Web site: http://www.uscg.mil/nmc/mmic_appcourses.asp.
15. **How do I get contact information for the QSS organizations that the Federal Register (FR) directs me to?**
The Rule directs the public to access the following website CG website to obtain the contact information for the 3 QSS authorized organizations:
http://www.uscg.mil/nmc/mmic_appcourses.asp.
16. **What are the three authorized QSS organizations?**
The Coast Guard approved QSS organizations are as follow: American Bureau of Shipping (ABS), Det Norske Veritas (DNV) and American Council of Education (ACE).
17. **How much does it cost for a course approval through these organizations?**
The rule's Regulatory Evaluation (page 29006) estimated that the cost for approvals would be \$7500, payable directly to the QSS organization. Readers should refer to the regulatory analysis in the docket for a detailed analysis of the costs associated with this interim rule.
18. **Will there be a new STCW Course specific to "Security Officers" that will be required under a policy letter/guidance such as 14-02 or 04-02 or will there be a new policy/guidance specific to Security Officers?**
The new regulations published in the Federal Register will require that the VSOs are trained, and that the training meet the competences included in the regulatory

requirements. It is expected that courses accepted for VSO endorsement by the Coast Guard will be based on the IMO model course for ship security officer, or the MARAD VSO model course.

19. Is there already a STCW course for VSO in place?

The Coast Guard will also accept courses approved by MARAD on behalf of the Coast Guard under section 109 of the Maritime Transportation Security Act of 2002, Public Law 107–295 as meeting the requirements of STCW for purposes of fulfilling the regulatory requirements in 33 CFR 104.215(d)(1)(iv) and (d)(2), as referenced in 33 CFR 104.215(d)(6).

20. If the vessel is in compliance with STCW requirements, then is the crew automatically in compliance?

As of 1 July 2009, all persons serving as VSO will be required to hold a VSO endorsement. See 15.1103.

21. Will an REC honor the VSO/SSO certificates issued by a MARAD approved course provider prior to the MARAD/DNV approval date of April 2005?

The Coast Guard can't accept training outside of the dates of the MARAD/DNV approval certificate. The affected schools will need to seek retroactive acceptance from DNV or another QSS organization. DNV or another QSS organization would need to be satisfied that the training given prior to the original acceptance was substantially similar to that later accepted. The determination of whether the acceptance can be back dated must be made by DNV or another QSS, and not the Coast Guard. Companies or mariners who attended VSO training that was not accepted under the MARAD program should contact the school that provided their training and ask that they seek retroactive acceptance of their training. Retroactive acceptance is also permitted for training that was not accepted in the MARAD/DNV program. Training organizations who gave such training after January of 2003 may request retroactive acceptance from a Coast Guard approved QSS.

22. Many companies and schools did not submit for MARAD/DNV certification. Assuming their courses met the intent of the ISPS Code; will the REC's accept those certificates as evidence of being trained for the VSO/SSO positions?

Those persons who attended courses that were not certified under the MARAD program will be required to take a refresher course or attend a full VSO course. See 33 CFR 104.215(d)(4)(i).

23. Are the MARAD/DNV Approved Security Course Certificates sufficient evidence for the endorsement?

Yes. The course completion certificate from the MARAD approved training provider is sufficient evidence for obtaining the endorsement. See 104.215(d)(6).

24. Assuming that the unapproved course covered the requirements listed in 33 CFR 104.215(d)(2), will the unapproved security course certificates be acceptable to Coast Guard without an additional refresher certificate?

No. The Coast Guard will only accept courses approved by a QSS organization on behalf of the Coast Guard, or courses approved by MARAD on behalf of the Coast Guard under section 109 of the Maritime Transportation Security Act of 2002, Public Law 107–295 as meeting the requirements of STCW for purposes of fulfilling the regulatory requirements in 33 CFR 104.215(d)(1)(iv) and (d)(2), as referenced in 33 CFR 104.215(d)(6).

25. Will Marad and / or NMC set up a system to review the unapproved security courses (offered by schools and companies) to determine whether mariners need to take a “refresher course?”

Training providers who are not approved under the MARAD program must seek approval from a Coast Guard approved QSS organization. See 33 CFR 104.215(d)(1)(iv).

26. Does a SSO/CSO/PFSO training course approved by a foreign administration satisfy the requirement for the mandatory inclusion on a STCW certificate?

The U.S. Coast Guard does not accept course approvals issued by other Administrations. The IMO STCW Convention requires that all courses are approved by the Administration (Coast Guard) and be monitored through a quality standard system. If we accepted the courses approved by Australia, we would be bound to audit the course periodically.

27. What is the Coast Guard's position on re-issuing training certificates to allow training providers approved under the MARAD program to place STCW language on the certificate?

There is no need to re-issue the certificates, since the Coast Guard will also accept courses approved by MARAD under section 109 of the Maritime Transportation Security Act of 2002, Public Law 107-295 as meeting the requirements of STCW for purposes of fulfilling the regulatory requirements in 33 CFR 104.215(d)(1)(iv) and (d)(2), as referenced in 33 CFR 104.215(d)(6).

28. How can I determine if the course I took will be accepted?

A list of all acceptable courses is posted on the National Maritime Center web page at http://www.uscg.mil/nmc/mmic_appcourses.asp. To be acceptable, the course you took must be on the list, and the dates you took it must fall within the range of dates noted as being acceptable.



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