

Maritime Administration (MARAD) CVSSA Training Provider Frequently Asked Questions



The CVSSA Frequently Asked Questions are framed around the processes for CVSSA Program Certification, Program Auditing and Training Provider Suspension/Revocation and Reconsideration. As MARAD receives CVSSA program common questions, this list will be updated. Training providers may submit their questions to <u>CVSSA-MARAD@dot.gov</u>.

CVSSA Training Provider Certification Questions

- 1. Is there a Model Course that training providers must follow in order to become a MARAD Certified CVSSA Training Provider? Yes. Training providers voluntarily seeking certification must meet the minimum requirements found in the Model Course CVSSA 11–01; Crime Prevention, Detection, Evidence Preservation and Reporting (July 2011 version). The course was prepared by the USCG, in consultation with MARAD and the FBI. A copy of the [Model Course] is available for download.
- 2. What is the purpose of the Model Course? The purpose is to provide training standards and curricula to allow for the certification of passenger vessel security personnel, crewmembers and law enforcement officials on the appropriate methods for prevention, detection, evidence preservation and reporting of criminal activities in the maritime environment.
- 3. Must organizations that provide security and safety training be certified by MARAD? No. Training provider certification is voluntary.
- 4. What course records should be maintained? Training providers must retain each student's assessment reports, reports of practical tests administered (if any) and record of classroom attendance.
- 5. How long must my organization maintain course records? A training provider must maintain course records at the training facility, or other location approved by MARAD, for at least five (5) years after the end of each student's enrollment. Course records must be made available for inspectors within three (3) business days of notice.
- 6. How should my organization administer course completion certification? Training Providers must issue consecutively numbered certificates to students who successfully complete the approved course. Blank course completion certificates must be kept secure at all times. The paper stock of course completion certificates must contain micro printing, watermarks and/or other effective measures to help prevent production of fraudulent certificates. Training providers should consult International Maritime Organization MSC/Circ. 1089 "Guidance on Recommended Anti- Fraud Measures and Forgery Prevention Features for Seafarers' Certificates" available via the <u>IMO website</u>.



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Course completion certificates should be in a standardized format and contain the following:

- a. The name of the course as stated in the course certification letter;
- b. The name of the school or training provider;
- c. The date the training began and was completed;
- d. The signatures of the course instructor and director or department head and
- e. The student's full name.
- 7. May my organization deviate from or modify the specifications of the Model Course and still obtain MARAD approval and certification? Deviations from or modifications to the Model Course format are permissible. However, all course material required by the Model Course must be included in proposed course curricula to the extent stated in the Model Course. To facilitate MARAD review, training providers are encouraged to present the information in the format indicated in the Model Course outline. Any proposed deviations from or modifications to the specifications of the Model Course must be highlighted in the application for certification, with an explanation justifying the change, discussing its benefits and describing how the material will be taught.
- 8. What will MARAD do with the materials submitted? MARAD will review all information and materials submitted and determine whether the course submitted is consistent with the Model Course. If consistent, MARAD will issue a training provider certification after receipt of the executed Training Provider Agreement which acknowledges MARAD and its designees may audit the course.
- 9. How will I know if approved for certification? MARAD will issue a certification to the training organization. MARAD will publish the names of certified training providers on the MARAD website.
- 10. What happens if my application does not receive certification? MARAD will send an email to the organization detailing deficiencies in the organization's package that need to be improved to meet the certification criteria.
- 11. After my course is approved and my organization is certified, are there any ongoing responsibilities necessary to maintaining my certification? Yes. Certified training organizations must notify MARAD in writing within 30 calendar days of any changes in information last furnished with respect to the course, teaching staff, maximum teacher/student ratio, maximum class size, training facility or training equipment. Certified training organizations must also maintain, for audit purposes, a copy of the identification of all students who successfully complete the course.
- 12. **Does certification expire?** Yes. Certifications are effective for a period of five (5) years or until the certification is suspended or revoked.



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13. How can I renew my organization's certification? A request for the renewal of a course approval and certification should be submitted at least 90 days before the current approval expires. The applicant is responsible for the content of its submission. Therefore, the renewing organization should review MARAD application instructions and guidance to ensure that the new application is consistent with current MARAD requirements. Assuming that no updates have been made to the CVSSA training provider application process, to facilitate the renewal process, all changes should be highlighted. If there have been no changes since the last approval, a statement to the effect that the curriculum, instructors and facilities are the same as was previously submitted and approved should accompany the submittal.

CVSSA Auditing Questions

- 1. How will MARAD ensure that certified training organizations provide training that is effective and consistent with the Model Course? MARAD will ensure compliance through scheduled audits performed by qualified independent auditors, in which MARAD personnel may participate. MARAD may also conduct audits by agency personnel. Three audits will take place during the 5-year certification period. The first audit must be scheduled within the first six (6) months of MARAD certification. A mid-period audit will be conducted between the second and third anniversary of certification. A final audit must take place no earlier than 6 months before the expiration of the MARAD certification. It is the responsibility of the training provider to schedule and ensure completion of these three audits. It is also the responsibility of the training provider to ensure that MARAD receives audit results, descriptions of non-conformities and corrective action plans. Training providers must inform MARAD in advance of the dates for audits.
- 2. Who pays for audits? The costs of audits by qualified independent auditors will be borne by the certified training provider. The costs of MARAD's participation in those audits, when MARAD elects to participate, will be borne by MARAD.
- 3. What is considered a qualified auditor for the CVSSA program? Auditors must be able to demonstrate that they are competent to carry out the task and that they have been assessed against a recognized standard. Auditors designated by Flag states, or by Classification Societies that are members of the International Association of Classification Societies (IACS) and ISO 9001 Quality Management certified auditors will be considered qualified auditors.



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CVSSA Training Provider Suspension/Revocation and Reconsideration Questions

- 1. What actions or issues would cause MARAD to suspend or revoke a training provider's certification? MARAD may suspend or revoke certification if the agency determines that the training provider is unable to meet the course objectives; has submitted documentation that is found to be fraudulent or inaccurate; has failed to satisfactorily implement corrective action within an agreed timeframe or at the request of the training provider.
- 2. Will the training provider have an opportunity to recertify as a training provider after suspension or revocation of their certification? Yes. Training providers may request reconsideration of a disapproval of certification, or the suspension/revocation of certification. Requests must be in writing, stating the basis for the reconsideration request and provide any additional relevant information. Training providers may send request for reconsideration via CVSSA-MARAD@dot.gov or may mail the request to the Maritime Administration's Associate Administrator for Environment and Compliance, who can be reached at the following address:

U.S. Department of Transportation Maritime Administration Assoc. Administrator for Environment and Compliance W25-302 1200 New Jersey Avenue SE Washington, DC 20590