

What the Coast Guard NMC Won't Tell You



MarEx Editor's Note: Andy Hammond spent many years working for the Coast Guard in the Boston, MA REC and in a variety of roles. Although he no longer works for the Coast Guard, he submitted this article for consideration and given his experience and base of knowledge, we thought that it would be a good "read." MarEx stresses that Hammond's opinions do not necessarily reflect those of this publication and we also recognize that this five part series will likely spark some discussion. As always, we welcome that dialogue.

The United States Coast Guard has embarked upon an ambitious plan to centralize the licensing and documentation process for mariners. The centerpiece of that effort is the consolidation of 17 REC's into the new National Maritime Center (NMC), leaving the previously autonomous REC's standing as local, service centers. The plan has its supporters and detractors, but the entire process is slated to be completed no later than the end of this year.

Part 1: Shift of Career

As the Coast Guard National Maritime Center (NMC) moves closer this year to the end of its plan to restructure the Merchant Mariner licensing and documentation program, they will continue to broadcast the positive aspects of this plan. This paper offers a slightly different perspective from the "inside" that you might not otherwise hear. Back in May of 1998, I was a civilian employee of the U. S. Coast Guard. My position was officially called "fishing vessel safety coordinator" and I was assigned to the Boston Marine Safety Office. While the primary focus of that assignment was to inspect commercial fishing vessels, my first supervisor in the Coast Guard, then LCDR Ernie Fink, wanted me to become qualified in other areas, which I had done by that time. These areas included passenger vessels, freight ships, and survival craft; just to name a few. I enjoyed the work immensely and the diversity it brought with it. The job allowed and encouraged the incorporation of my private sector, merchant marine experience with the marine inspection program, with the goal of becoming a fair and balanced marine inspector.

In late May of 1998, CDR John O'Brien, Executive Officer of MSO Boston, was walking over to the civilian personnel office to discuss how to post a job vacancy for the MSO Boston REC Chief. That position was, in those days, commonly referred to as Senior Inspector of Personnel (SIP). As he walked by my desk, he did a double take and I could see a light go on. As a graduate of Massachusetts Maritime Academy and the holder of an upper level merchant mariner's license, it suddenly dawned on him that I had the background to fill that position. I had known it was going to be vacant, as the current SIP had given notice a while

back. However, it never dawned on me to apply for that position as I was happy in my work and knew firsthand of the drudgery of the work in the REC.

As a working mariner, I had of course submitted applications to the very REC I now worked above. Like many customers who came before and after me, my experience was not a very positive one. At one time, I had been denied a raise of grade incorrectly and had it not been for the advice and council of a previous shipmate--who provided me with the regulatory ammunition to correct the evaluator--I probably would have just accepted the first decision and it would have slowed my career. But the problem went far deeper than an incorrect decision to deny my application. That I was treated poorly in the process only exacerbated the situation.

After coming ashore to work for the Coast Guard, I did not pay much attention to the folks in the REC or the activities there. In those days, the REC was known as the "red headed stepchild" of the marine safety program. Simply ask any LT or LCDR assigned to any REC and they will tell you that for the military members, it was akin to being denied a raise of grade.

When CDR O'Brien stopped at my desk asked me if I was interested in the SIP position, I paused for a second and replied that I had not actually even thought about it, but that I would think about it over the weekend and let him know. I did just that and for reasons unknown to me, I told CDR O'Brien that I was interested in the position. Because I was at the same "grade" as the SIP position, civilian personnel simply executed a lateral assignment, and within a week, I was the SIP of REC Boston.

I did recognize that the job would be a huge challenge. I had hoped to bring my mariner experience, a dash of reality, and a pinch of common sense to the job, much the same way as I had done as a marine inspector. I knew the REC was "broken" and it would be a challenge to fix. CDR O'Brien met with me and gave me my marching orders to first improve the morale of the employees (both civilian and military) of the REC. REC work can be tedious and unfulfilling. When the REC's were created in 1982, they were "manned" by both military and civilian employees. Formerly the domain of every marine safety office, the licensing of merchant mariner's had now been "consolidated" into 17 "Regions," throughout the country.

The Boston REC was combined with the files from Portland, ME and Providence, RI. Unfortunately, the necessary billets to get the job done were not brought in to Boston from the outlying Coast Guard offices. The Coast Guard, at the time, was frugal with its classification of REC employees and staffing levels. Initially, and as a first impression, I was amazed at the technical level of work expected and the dissimilar pay grades of the persons filling these billets. Needless to say, most of the employees of the REC did not enjoy the work, nor did they feel like the Coast Guard truly cared much for their mission. Whether real or not, that was the

perception of the average Coast Guard REC employee in the late 1990's. It was very obvious that I had a tough task ahead of me.

Part 2: Changing perceptions, attitudes and asking “Why?”

Throughout my maritime career, I never had a problem asking why certain things were the way they were. The merchant mariner-licensing program was and is full of areas in which one can ask “why”. One of my first missions as the SIP was to make sure we were following the rules fairly. Back then, perhaps nothing bothered me more than to be told to do something just because some bureaucrat tells me to. Now, I was one of those bureaucrats.

There were any number of local or what I called “SIP policies” in Boston, many of which I immediately questioned. The Coast Guard regulations do allow for what is referred to as OCMI discretion. This “discretion” is located in many areas of the marine safety program. The “up” side of this is that there are always local issues that need some deviation from a national regulation or law. The downside is that it can be used to make rules that don't make much sense.

One particularly bothersome local policy had to do with the then new Tankerman Ratings. My predecessor felt that Engineers should not qualify for Tankerman-PIC. When I asked him to show me where in the regulations that this was stated, he simply responded, “Because I said so.” This is not uncommon in the world of the regulator. It is all too easy to become blind to reality and to pay far more attention to the absolute power that you think you might have. Needless to say, I immediately instructed my staff to correct this policy and to find the files of those who had been “wronged” and correct their MMD's. By the way, any mariner that meets the regulations can become a Tankerman-PIC, including Engineers and Able Seaman.

My staff quickly learned my no nonsense approach and ultimately realized that my goal was to actually make life easier for them. By following the regulations, being courteous to mariners, and not carrying the burden of making false policies, we would take the steps to return to the task of properly completing our mission. I constantly reminded them that I was not the final word. We ALL represented the Officer in Charge of Marine Inspection (OCMI) of Boston, who was also the Captain of the Port. I reminded them that if a mariner questioned their evaluation, they needed to clearly and professionally explain how they came to that decision. I also drummed home the “policy” that they were not to become combative or argumentative and to immediately bring the mariner to me and we would have a calm, professional discussion to clear up the situation.

I also made it a point to spend a great deal of time explaining the merchant mariner world to the staff. Other than some Coast Guard petty officers and officers, most employees of the REC's have no seagoing experience. I was the only unlimited license holder in charge of an REC at that time and - this reality

extends to this very day. While that by itself does not make a good SIP, it certainly brings a different perspective to the job. Mariners that dealt with my staff and I soon learned to respect our ways of doing business. We had a mission to ensure that all applicants were qualified for the credential they applied for, but we did so in a professional manner. This does not mean that we did not experience many tough encounters with mariners who “just didn’t get it.” You will never please everyone, but the Boston REC staff began to understand that I cared about their welfare, but also cared as much about the mariners.

Part 3: Balancing Act

It was my perception from the outset that staff discontent at REC Boston was, at least in part, a function of the management style in place before I arrived. This included a wholesale failure of the previous management to balance the needs of the mariner with the welfare of his staff. The walk-in hours established for the Boston REC in 1998 were a prime example of this. Open from 0630 to 1600 every day, the schedule was likely very convenient to the mariner public, but the REC didn’t have the staff or resources to be “open” that long.

Given the fact that REC Boston helps every mariner that walks in to completion, this put a tremendous strain on the staff. These employees were tasked with making sure people were qualified to operate that largest ships in the world, yet they made less than someone pounding nails or painting a house. Not that those jobs aren’t important. I was often asked by many Coast Guard leaders as to what a solution to the REC “crisis” might entail and one of the first points that I always made was to say, “You get what you pay for”. If the Coast Guard didn’t see fit to compensate these REC workers properly, then it didn’t matter what changes were made.

One of my first acts as the SIP was to amend the walk-in hours to what it is today; 8 to 4. We then took the leap and closed the lobby on Fridays to allow the staff a day to catch their breath, make follow-up telephone calls, e-mails, print licenses, file documentation, evaluate mail-in applications and a myriad of other tasks that were otherwise just impossible to accomplish on a daily basis. The seemingly constant regulatory changes and the training associated with being a federal employee had to also be scheduled amidst all of this. In many respects, the job of SIP necessarily had to embrace the Coast Guard concept of “doing more with less.” The balancing act continued.

After making certain changes to the working conditions at the REC, I then pushed for overtime funding. Prior to my arrival as SIP, the REC had never budgeted for OT. Finally able to demonstrate that the job regularly took more than 8 hours daily to complete the mission, I was finally able to get the District office to appropriate funds for overtime. We immediately took advantage of that funding; making headway in the considerable work backlog. By this time, of course, it was obvious that REC staff members who waited on “live” mariners all

day had little time to get anything else done. It was a constant managerial task to balance the needs of the Coast Guard, mariner, and the staff.

Change was the only constant. We amended our “processes” all the time and shifted personnel around, within the limitations of the civilian employee rules, to meet these changes and challenges. Once the staff saw that we could improve, they became part of the process and took more ownership in their specific job and understood how they were important to the overall mission. The task of producing an MMD or license document is not, by itself, a difficult task. Educating someone as to reality that this tedious task was so critical to the mission and important to mariner customer was another thing altogether.

In Boston, we taught by example. Managers (including myself) would work the counter as a clerk, in the exam room, as evaluator, mail clerk and eventually, all the “jobs” that it takes to run the REC properly. By doing so, it provided an atmosphere of teamwork within the REC as well as to emphasize that no task was below the dignity of anyone in the building. To be fair, in a military organization, this is a lesson which can sometimes be lost in the chain-of-command. The constant “balancing act” was a daily event. Although “off-balance” at times, it was also clear to both mariners and REC staff alike, that we were moving forward, we were trying and more importantly, making progress with the final product.

Part 4: Okay, Smart Guy -- What Would You Do?

It is always easy to criticize virtually anything. And while all of this “inside information” is nominally good reading, the question remains: How do you fix a broken program? NMC always had their own ideas, of course. The plan that is currently underway (consolidation of regional REC’s to West Virginia, leaving Storefront “help” desks) is the third plan proposed by NMC since 1998. The first two called for complete closure of the 17 REC’s, leaving one or two “super REC’s”. While this latest plan is somewhat of a hybrid of those earlier proposals, the basic premise is the same.

With the creation of the National Maritime Center in West Virginia, the decision to issue a credential will no longer rest with the local OCMI or his representative (the SIP), but by a national OCMI. As this plan was being presented to REC staffers in 2003, all of the SIPs were asked for input. However, that “input” was limited to the general plan and any ideas to keep the REC’s structured as before, were simply brushed aside. By that time, the decision to centralize the OCMI authority was a “done deal” and all input had to be couched within those parameters. At that point, any ideas not centered on the migration of local authority to a centralized location elsewhere were probably sent to the “round” file.

Along the way, I made several observations on how I thought this program could

be improved to make the credentialing process easier. These ideas did NOT include taking away the authority at the local level. I also recognized that while it might be easy to be in the field and make recommendations, I was not unaware of how things generally work in Washington. The regulatory process is slow and cumbersome, unless you want to restructure the whole program. However, my ideas on how the program could move forward were put forward, and some of these are listed below:

•Amend and update the regulations. *The current licensing and documentation regulations were “revised” in 1989. Several “patches” have been added along the way, but a complete overhaul is long overdue. Incorporate the STCW code and make that the licensing scheme. As scary as that sounds to some mariners, the reality is that it’s a less complicated structure that requires more of a practical approach to credentialing a mariner.*

•Consolidate all credentials. *The time it takes to enter data and print a license, MMD, and STCW endorsement for a mariner is simply outrageous. This extreme inefficiency adds hours to the process and opens the door for countless errors in production. Mariners should be issued ONE style of credential for all types of qualifications to match all US and STCW capacities. Plans are currently underway to do this, but as usual, the Coast Guard is taking the slow road and asking for too much input. Just do it!*

•Prioritize applications. *The Boston REC typically receives approximately 5,000 - to - 6,000 applications annually. Upwards of 30-40% of those applications are from individuals who are NOT using the credential to work and not surprisingly, those applications serve to clog a system that is already overloaded. Like other government credentialing systems, there should be a different process for those who actually need their credential for employment from those that don’t. One of the tools that NMC is using to move forward with this plan is to state that mariners have right to expect better service. This is true, but what exactly is that? The retired mariner who simply wants a Continuity Renewal should have a much different expectation than the mariner who’s waiting to go back to the ship.*

•Pay them and they will come! *I always believed in the theory that one could do more with less highly qualified AND compensated employees. Put a true and accurate market value on the REC jobs and decide whether a government employee or a contractor can complete the mission. In either case, you need to have well trained employees that understand the merchant marine and understand the service nature of this job. The need to establish a bona fide training mechanism for those entering the program is paramount in this effort.*

The four basic ideas for improvement laid out above would, of course, take a lot of work. On the other hand, the money being spent on standing up a new NMC and centralizing the entire process could have paid for these ideas and many more. Contrary to the national perspective on the REC’s, there were some offices

that were as efficient and professional as could be expected, especially given the limited tools that were made available. These “models” should have been used as examples for the rest of the country and other REC’s should have been held accountable to the same standards.

The analogy of comparing Coast Guard REC’s to -- for example -- a Starbucks franchise is not misplaced. Whether that storefront is in Los Angeles or Baton Rouge, you expect and get the same level of service and the Latte is pretty much identical. You can’t force the maritime licensing program into a cookie cutter operation in all areas, but the expected level of service and professionalism should be the same, no matter where you go.

Part 5: Time to Move On

In June of 2006, I was offered a position outside of the Coast Guard. At this point -- and in no small part because of the reasons enumerated in the first 4 parts of this series -- I was tired of butting my head against the walls of NMC and was ready to move on. For eight years, I had tried to make the best out the REC job but the handwriting was clearly on the wall by then. The future of the REC had been set in motion and nothing that I said or did was going to change the plan. I retired in September 2006 and hopefully left behind an REC that was in better shape than when I arrived in May of 1998.

Now working as the Executive Director of the Boston Harbor Pilot Association, as well as a consultant for maritime licensing issues, the new job description(s) were a good fit for me. Because there are very few persons outside the Coast Guard with the necessary knowledge to navigate the maze known as the Coast Guard licensing process, I decided to help mariners take the proper steps toward getting the license or document they need.

Watching from the outside, it is clear that the program is moving forward and continuing on to the final NMC and REC structure envisioned by the Coast Guard. While employed by the Coast Guard, NMC showed little inclination to implement any of my ideas and their motivation to recognize any of those points, now that I am gone, is uncertain. Today’s Coast Guard has been admonished by ADM Thad Allen (Commandant’s Expectations for Interactions with Maritime Industry - ALCOAST 108/08) to provide better service and response to the industry as a whole. I would respectfully suggest that this is one of those times.

I do have concerns. By removing the authority from the REC to help a mariner, the service that makes that structure work has also been removed from the local level. In my time as SIP, we had many mariners come into the REC in a “crisis” mode. They had been called back to the ship early or had just been called for their first job and they needed service right away. In Boston, we would help them -- whether that meant printing a Radar endorsement or some other credential that could be done expeditiously, we did it. Using a logical and prioritized system,

in cases like this, it was clear that the retired sailor could wait.

The person standing directly in front of us, with his livelihood on the line, needed our help *today*. I do not think it would be an understatement to say that we saved many a livelihood in my time. There is little doubt that a good portion of this type of service will go away -- perhaps forever -- when NMC takes over the authority to approve applications and issue all of the credentials. I have no idea what the mariner in crisis will do.

The best recommendation for today's professional mariner is to stay on top of your credentials and be ready, ahead of time, to sail. Do not rely on the Coast Guard to fix your "problem". The old adage, "Poor planning on your part does not necessarily constitute an emergency on mine" could, very soon, become a painful reality when it comes to the licensing and documentation process.

Do your own research and when that fails, call on someone that knows better. There are many tools and sources for finding out what the licensing requirements are, but the difficulty comes when these rules have to be applied to your unique situation. At the end of the day, it is this narrow area of uncertainty that forms the crux of a program that cannot be centralized or put into a "process" designed to streamline the work. And, it will be this aspect of Coast Guard service to the maritime industry which could make or break their quest to return their service to "acceptable levels." Amid all the good news of mariner satisfaction with the new and improved NMC process, this will be the one thing that *NMC won't be telling you*.