



Republic of the Philippines  
OFFICE OF THE PRESIDENT  
**COMMISSION ON HIGHER EDUCATION**

**MEMORANDUM FROM THE CHAIRPERSON**

**TO :** MARITIME HIGHER EDUCATION INSTITUTIONS

**SUBJECT :** Conversion of BS Maritime Education Programs to the Enhanced Support Level Program

**DATE :** 12 March 2015

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This Memorandum clarifies the status of students in the BS programs of maritime higher education institutions (MHEIs) that have been enjoined to convert their BS programs into the Enhanced Support Level Program. It ought to be read against the context depicted in detail in our 20 February 2015 *OMNIBUS UPDATE ON THE ENHANCED SUPPORT LEVEL PROGRAM, THE RECLASSIFICATION OF HIGHER EDUCATION MARITIME PROGRAMS, THE ISSUANCE OF A LIST OF RECOGNIZED BS PROGRAMS FOR THE SCHOOL YEAR 2015-2016; CURRICULAR REVISIONS; AND TIMELINES.*

The 20 February Memorandum clarified what it means to be an academic discipline covered by an international convention, in this case the 1978 International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978 (STCW) as amended. The Memorandum cited the statement of the Secretary General of the International Maritime Organization [IMO] in his opening speech at the HTW2 London meeting in February this year which reminded us that the STCW's role as "the global system for the implementation of global standards adopted at the [International Maritime Organization] IMO [is] to provide a level playing field to the shipping industry, as an assurance that no state would go for unilateral action to impose national or regional requirements/standards". As a party to the Convention, the Philippines is expected to do its part. Since seafaring is global and NOT national or regional, the international convention that backs it—reinforced by the Vienna Convention on the Law of Treaties—compels the Philippine government, the MARINA administration, the maritime industry, and maritime education and training institutions to give full and complete effect to the standards of STCW as amended.

Since 2006, the country's persistent breach of global maritime standards has led the European auditors of its certification system to assert in October 2013 that major shortcomings have not been addressed despite significant changes in the last two years. This critical finding severely threatened the continuing inclusion of the Philippines in the IMO White List of countries eligible to provide the international merchant marine fleet

with maritime officers and officers-in-charge. We could have been voted out of the IMO White List in early 2014 but the European Union deferred its decision to decide on the country's status in this list, subject to another validation visit in October 2014 to check on the country's corrective actions vis-à-vis the non-conformances noted by the inspectors of the European Maritime Safety Agency (EMSA). This inspection of the Philippine maritime certification system of deck and engine officers-in-charge and officers still revealed unaddressed issues, foremost of which is the continuing proliferation of BS maritime programs that do not meet STCW requirements.

Despite the persistence of this issue, a major reason for the extra time the Philippines is given to correct its non-conformances before the European Union casts its vote on whether or not to retain the Philippines in the White List is the establishment of the Enhanced Support Level Program (ESLP) for all MHEIs offering BS programs and the delineation of the BS Program from the ESLP.

The ESLP is a program especially designed for students who wish to enroll in some College courses but actually plan to work as ratings within one or two years. Its outcome is the same as that of the current maritime higher education set up where a significant number of students enrolled in the BS maritime programs drop out after their first or second year to work as ratings. Unlike other programs where the dropout rate is used as an indicator of quality, the high dropout rates in the BS maritime programs have been part of the country's taken-for-granted reality. Poverty and the desire of students to work or to continue working as seafarers before or after finding their own shipboard training opportunities has been used to tolerate and justify this situation. A consequence of the prevailing maritime higher education system—which produces 90% of the country's ratings rather than the significant number of officers-in-charge that academic (i.e. Bachelor of Science) and professional maritime programs are meant to produce—is the erosion of the credibility of the BS maritime programs to educate Officers-in-Charge with the competences stipulated in the STCW Codebook.

Apart from the high drop out and very low graduation rates, other factors have contributed to the shortcomings of the country's maritime higher education sector vis-à-vis the STCW. These include, among others 1) the slow shift from knowledge-based to the learning competency based education standards and from inputs or checklist-based to outcomes-based evaluations—both of which were expected to have transpired in maritime education across the world at the turn of the century but which our education system has begun to adopt only in the last few years; 2) the lack of calibration among evaluators that has undermined trust in the monitoring and evaluation reports on MHEIs; and 3) the inability of MHEIs to offer opportunities for well supervised shipboard training, a *sine qua non* of maritime higher education because it constitutes 25% of the training of an Officer-in-Charge.

As noted in the 20 February 2015 Memorandum, the fact that the country's maritime higher education system is under trial, with profound implications for the fate of about 14,000 Filipino officers and Officers-in-Charge whose expired contracts would not be renewable if the country is removed from the IMO White List, compelled the Maritime Industry Authority (MARINA) and the Commission on Higher Education (CHED) to reclassify MHEIs into those recognized to offer the BS maritime programs in SY 2015-

2016—most of which are required to unbundle their existing programs into the BS and the ESLP; those converting their BS programs into ESLP; and those that will still be reviewed for classification by April 2015. The provision of opportunities for shipboard training—which is stipulated in CHED Memorandum Order No. 2 Series of 2012—figured significantly in the reclassification.

To quote from the 20 February 2015 Memo:

“The reorganization of maritime education at this particular juncture is not a downgrading but an empirically grounded reclassification. As Dr. Mejia underscored in his recent address in the PAMI Convention, “quality, knowledge, and competence must be learned, acquired, and demonstrated in the first instance during the education and training program for OIC of a navigational or engineering watch—not at the license exams or COC assessment stages. Again, this is according to the global language of STCW. Under our local translation, we have somehow transferred the onus to the certification authorities—PRC until recently, and now MARINA. Instead of accepting only the front-loading of quality, knowledge, and competence, we have allowed a situation where quality, knowledge, and competence are back-end-loaded. Shipboard training, a cornerstone and sine qua non of MET are back-end-loaded. Maritime education is not complete without shipboard training. It is an integral part, no less than 25%, of the BSMT/BSMarE program. Without it, the program is not an officer program.

Reclassification at this time will enable the Philippine jurisdiction to “guarantee to the world that we produce quality at the appropriate levels: officers through the BSMT/BSMarE programs, and ratings through the ESLP programs. The functions performed by product of these two programs – BSMT/BSMarE and ESLP -- are equally important. Officers perform an important leadership function, while ratings perform important operational and support functions.’ It is important to bear in mind that the bulk of our seafarers are ratings and shipping will not move without them.

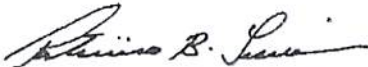
To address the concerns of MHEIs that are converting their BS programs into the ESLP, please take note of the following:

- MHEIs may continue to offer the BS programs to their incoming 2<sup>nd</sup> year, 3<sup>rd</sup> year and 4<sup>th</sup> year students. However, they are strongly urged to give students who prefer to work as ratings at the soonest possible time the freedom to shift to the ESLP (while crediting the courses they have taken). The MHEIs will be guided through this process within the next few weeks;
- Even if they are not allowed to admit freshmen this year, MHEIs are still expected to hone the competencies required of their 2<sup>nd</sup>, 3<sup>rd</sup> and 4<sup>th</sup> year students. To convince the country’s auditors and stakeholders that the graduates from these MHEIs possess the requisite competencies, **additional requirements** will be imposed as recommended by the Technical Panel for Maritime Education. Otherwise, the lack of competencies of their students will

not only jeopardize their employment but the employment of all others if the country is removed from the White List;

- MHEIs may re-apply for a permit to offer the BS maritime programs as soon as they are able to meet the requirements of an officer school including the shipboard training of their students. Such MHEIs may consider resetting their track record through curricular and pedagogical reforms aligned with STCW as amended; the maintenance of the appropriate ratio of equipment to students; and the provision of adequate opportunities for the shipboard training of their students in the upper years.
- In the event an MHEI decides not to reapply for permit to offer the BS programs, the Technical Panel is still deliberating on what to do with students with completed academic requirements from converted programs who will return to the school to graduate after more than 3 years.

The MHEIs will be updated on policies that are still under consideration through a Memorandum and the upcoming workshops on the curricular revisions to further align the CMOs with STCW as amended and on ESLP.



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