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CG-MMC Policy Letter
No. 02-25

September 12, 2025

From: C. B. Mauro
Acting COMDT (CG-MMC)

To: National Maritime Center

Subj: CREDITING RECENT SERVICE OF APPLICANTS FOR NATIONAL OFFICER
ENDORSEMENTS

Ref: (a) Title 46 Code of Federal Regulations (CFR) 11.201(c)(1)
(b) Marine Safety Manual, Volume III: Marine Industry Personnel, COMDTINST M16000.8B

1. PURPOSE. This Policy Letter establishes policy for evaluating and crediting recent sea service for applicants for national officer endorsements on merchant mariner credentials (MMCs). The Coast Guard is publishing this policy in alignment with Administration priorities to reduce burden on industry and to provide ways to streamline mariner career progression.
2. ACTION. The Coast Guard will use this policy when evaluating applications for a national officer endorsement on a merchant mariner credential (MMC).
3. DIRECTIVES AFFECTED. None. The contents of this policy letter will be considered for incorporation in the next revision of references (a) and (b).
4. BACKGROUND.
 - a. Following a change to [46 U.S.C. 7101](#), reference (a) was amended on September 16, 2020, [[85 FR 57757](#)] to include an authorization for the Coast Guard to issue national officer endorsements to applicants who have three months of qualified service on vessels of the uniformed services within the 7-year period immediately preceding application who are otherwise fully qualified.
 - b. The period for recent sea service for mariners without service on vessels of the uniformed services was not changed and remains at three years. [[46 CFR 11.201\(c\)\(1\)\(i\)](#)]
 - c. In their April 8, 2020, meeting, the Merchant Marine Personnel Advisory Committee (MERPAC) recommended an increase in the recency period for non-military mariners. MERPAC advised an increase would be appropriate “to promote equality amongst mariners.”



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5. DISCUSSION.

- a. This policy letter will harmonize the period for recent sea service for national officer endorsements for all applicants. Mariners without service on vessels of the uniformed service will have the same 7-year period for recent sea service as mariners with service on vessels of the uniformed services.
- b. All applicants for national officer endorsements who have at least three months of qualifying service on vessels of appropriate tonnage or horsepower within the seven years immediately preceding application will be deemed to have met the requirements for recent sea service in [46 CFR 11.201\(c\)\(1\)\(i\) to \(c\)\(1\)\(iii\)](#).
- c. Mariners who had previously applied for a national officer endorsement which was denied because of having less than the required recent sea service may re-apply if they meet the new recent service provisions described in this policy letter. A new application will be necessary, including payment of required fees, per 46 CFR 10.219.
- d. This policy letter is effective immediately.

6. DISCLAIMER. This guidance document is not a substitute for applicable legal requirements, nor is it itself a rule. It is not intended to, nor does it impose legally binding requirements on any party. It represents the Coast Guard's current thinking on this topic and may assist industry, mariners, the public, and the Coast Guard, as well as other federal and state regulators, in applying statutory and regulatory requirements. You can use an alternative approach for complying with these requirements if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative approach (you are not required to do so), please contact the Office of Merchant Mariner Credentialing (CG-MMC) at (202) 372-2357 or MMCPolicy@uscg.mil.

7. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS.

- a. The development of this guidance and the general policies contained within it have been thoroughly reviewed by the originating office in conjunction with the Office of Standards Evaluation and Development, Commandant (CG-REG). Pursuant to Department of Homeland Security Directive 023-01, Rev.1, associated implementing instructions, and Environmental Planning COMDTINST 5090.1 (series), which guide the Coast Guard in complying with the National Environmental Policy Act of 1969 (42 U.S.C. 4321-4370f), we have determined that this action is categorically excluded (CE) from further environmental analysis under paragraphs #A3, #L5 and #L56 in Appendix A, of Table 1 of DHS Directive Instruction Manual 023-01, Rev. 1. Our rationale for selecting these CEs is as follows. "Promulgation of rules, issuance of rulings or interpretations, and the development and publication of policies ... and other guidance ... that implement, without substantive change, statutory or regulatory requirements" or "...that interpret or amend and existing regulation without changing its environmental effect" are covered under DHS CE #A3. Promulgation of this policy and its associated guidance implements, without substantive change, the applicable Commandant Instruction or other federal agency regulations, procedures, manuals, and other guidance documents. Accordingly, Coast Guard CE #L5 applies. In addition, the policy letter includes elements that pertain to training, qualifying, licensing and

disciplining maritime personnel. These latter aspects of the policy letter and its associated guidance are covered under Coast Guard CE #L56.

- b. This guidance will not have any of the following: significant cumulative impacts on the human environment; substantial controversy or substantial change to existing environmental conditions; or inconsistencies with any Federal, State, or local laws or administrative determinations relating to the environment. All future specific actions resulting from the general policies in this guidance must be individually evaluated for compliance with the National Environmental Policy Act (NEPA), DHS and Coast Guard NEPA policy, and compliance with all other environmental mandates.
8. REQUEST FOR CHANGES. All requests for changes and questions regarding implementation of this policy and/or requests for changes should be directed to the Office of Merchant Mariner Credentialing (CG-MMC), at (202) 372-2357 or MMCPolicy@uscg.mil.

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