



# Marine Safety Information Bulletin

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MSIB Number: 02-23  
Date: February 22, 2023

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## UPDATING CONTACT INFORMATION FOR TWIC<sup>®</sup> AND MMC ELIGIBILITY DETERMINATIONS

Merchant Mariner Credential (MMC) applicants or holders who have had their Transportation Worker Identification Credential (TWIC) application denied or TWIC revoked, as a result of a Transportation Security Administration (TSA) Security Threat Assessment (STA), may pose a security threat and may have their MMC revoked. Failure to obtain or remain eligible to hold a TWIC may serve as a basis for the denial of an MMC application or as a basis for suspension and revocation (S&R) action(s) against an MMC, under [46 U.S.C. §§ 7702](#) and [7703](#). Mariners who receive a TWIC Preliminary Determination of Ineligibility (PDI) letter from the TSA and intend to appeal TSA's determination or seek a waiver, should promptly respond to TSA to mitigate potential TWIC and/or MMC denial or revocation. As detailed below, mariners are advised to keep their contact information up to date with both TSA and the Coast Guard National Maritime Center (NMC) to assist in the timely resolution of these issues should they arise.

### Security Threat Assessment

The Coast Guard relies on TSA's TWIC STA as a means of confirming mariners do not pose a threat to national or transportation security. TSA conducts initial and recurrent vetting of all TWIC applicants and holders to ensure they are eligible to hold a TWIC. If TSA determines a TWIC applicant or holder does not meet the STA standards described in [49 C.F.R. § 1572.5](#), TSA will send a PDI letter to the last address provided to TSA by the TWIC applicant or holder. The TSA assumes the address is correct and a PDI is considered served when sent to the address provided.

The PDI includes a statement that TSA has determined the TWIC applicant or holder may pose a security threat, the regulatory basis for that determination, and information on how the TWIC applicant or holder may appeal the determination or seek a waiver from the STA standards. In accordance with [49 C.F.R. § 1515.7](#), this should be done within 60 days of the PDI. If the individual does not respond to the PDI within 60 days, TSA's determination becomes final and a TWIC will not be issued or the current TWIC will be revoked, including publication on the TWIC Canceled Card List (CCL). If a TWIC holder is disqualified from holding a TWIC under [49 C.F.R. § 1572.5](#), they must surrender their TWIC to TSA.

### MMC Revocation

If an MMC holder's TWIC is denied or revoked, the Coast Guard will be advised by the TSA. The Coast Guard may initiate S&R action against the mariner's MMC, under 46 U.S.C. §§ 7702 and/or 7703(5), alleging the mariner is a security risk, based on the TSA's determination that the mariner does not meet the STA standards.

*This release has been issued for public information and notification purposes only.*

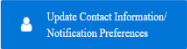

The TWIC denial or revocation is proof the mariner does not meet the STA standards and may pose an imminent security threat. During any subsequent S&R proceeding, TSA's decision to deny or revoke a mariner's TWIC will not be subject to review, and the mariner's ineligibility to hold a TWIC will be treated by the Coast Guard as proof that the mariner is not eligible to hold an MMC.

## CG-CVC (formerly CG-543) Policy Letter 11-15

[CG-CVC Policy Letter 11-15](#), *Processing of Merchant Mariner Credentials (MMC) for Mariners Not Requiring a Transportation Worker Identification Credential (TWIC)*, describes the Coast Guard's policy to exempt mariners who do not require unescorted access to a secure area of vessels from the requirement to hold a valid TWIC, as a precondition of holding an MMC. However, the policy does not exempt MMC holders from remaining eligible to hold a TWIC. It states, "[t]he Coast Guard will exercise its enforcement discretion by not including the absence of a valid TWIC as a reason to pursue suspension or revocation action against an MMC."

While there may be no requirement to hold a valid TWIC, MMC holders must remain eligible to hold a TWIC and pass TSA's STA. Thus, the policy does not preclude S&R action against an MMC in situations where the TSA has conducted a STA and determined that the mariner may pose an imminent security threat.

### What to Do

- ✓ MMC holders should keep their contact information with the TSA and NMC up to date.
- ✓ For TSA, visit <https://universalenroll.dhs.gov/>, and click on, , or call (toll free inside the U.S.) 855-347-8371, between 8 a.m. and 10 p.m. EST, Monday through Friday.
- ✓ For NMC, visit [National Maritime Center \(NMC\) Home Page \(uscg.mil\)](#), click on , call (toll free inside the U.S.) 888-427-5662 (888-IASKNMC), or e-mail: [iasknmc@uscg.mil](mailto:iasknmc@uscg.mil).
- ✓ If an MMC holder receives a TWIC PDI from the TSA and they intend to appeal TSA's determination or seek a waiver, they should respond as instructed within 60 days of receipt.

### Conclusion

MMC holders who are determined by the TSA to not meet the STA standards described in [49 C.F.R. § 1572.5](#), who may pose a security threat, and whose TWIC is denied or revoked, are deemed a security risk, as described by [46 U.S.C. § 7703\(5\)](#). As a security risk, the mariner's MMC is subject to being REVOKED. Mariners should keep their address with the TSA and NMC up to date to ensure they receive a PDI, if one is sent. If a mariner receives a PDI and intends to appeal TSA's determination or seek a waiver, they should respond to TSA promptly to mitigate a potential TWIC and MMC revocation.