

U.S. Department of  
Homeland Security

United States  
Coast Guard



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16742  
CG-MMC Policy Letter  
No. 01-18  
February 28, 2018

From: M. Medina   
COMDT (CG-MMC)

To: Distribution

Subj: GUIDELINES FOR REQUESTING HARMONIZATION OF EXPIRATION DATES OF MERCHANT MARINER CREDENTIALS AND MARINER MEDICAL CERTIFICATES WHEN APPLYING FOR AN ORIGINAL OR RENEWAL MERCHANT MARINER CREDENTIAL.

1. Purpose. This policy letter provides guidance for requesting a Merchant Mariner Credential (MMC) and Mariner Medical Certificate with harmonized expiration dates in accordance with the requirements of Section 304 of the 2015 Coast Guard Authorization Act (CGAA), Public Law No. 114-120. Regional Examination Centers (REC) will accept application packets with requests for harmonization of expiration dates..
2. Action. This policy establishes the method for MMC applicants to request the harmonization of the expiration dates of their MMC and mariner medical certificates.
3. Directives Affected. None.
4. Background.
  - a. Section 304 of the 2015 CGAA mandates the U.S. Coast Guard establish a process for the harmonization of expiration dates for the MMC, mariner medical certificate and radar observer endorsement when mariners apply for an original MMC or the renewal of an existing MMC. The harmonization of the radar observer endorsement will be addressed under a separate action.
  - b. The act specified that the process established will not require an applicant to renew their MMC earlier than the date on which their current credential expires.
  - c. The provisions in the act specified that the process established does not apply to holders of Standards of Training, Certification and Watchkeeping for Seafarers (STCW) endorsements, federal first class pilot endorsements, or applicants who were previously issued a time-restricted medical certificate.

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5. Discussion.

- a. This policy establishes the method for applicants to request the harmonization of the expiration dates of their MMC and mariner medical certificates. In order to address the requirements of Section 304 of the 2015 CGAA, the Coast Guard considered different options for how to implement them, including that not all applicants may desire to have their expiration dates harmonized. The Coast Guard also sought input from the Merchant Marine Personnel Advisory Committee (MERPAC) on the issue. In order to allow the widest range of flexibility for applicants, harmonization will be initiated upon a request indicated on Coast Guard Form 719B "Application for Merchant Mariner Credential."
- b. The option to post-date is not available when requesting harmonization. 46 CFR 10.205 allows post-dating of MMCs up to 8 months to align with the expiration of the existing MMC. The post-dating option is not available for medical certificates, therefore harmonization of the MMC and medical certificate is not supported when requesting post-dating.
- c. Because harmonization includes both an application for a MMC and an application for a medical certificate in a single submission, direct applications for a medical certificate to the National Maritime Center (NMC) on a Coast Guard Form 719K "Application for Medical Certificate" or 719KE "Application for Medical Certificate/for Entry Level Rating" are not eligible for harmonized expiration dates.

6. Harmonization Process

- a. Requests for harmonization can be done through an application packet that includes both a Coast Guard Form 719B "Application for Merchant Mariner Credential" and an application for a medical certificate; Coast Guard Form 719K "Application for Medical Certificate" or 719KE "Application for Medical Certificate/for Entry Level Rating" in a single submission.
- b. Applicants desiring to have the expiration date of their MMC and mariner medical certificate harmonized should complete the following steps:
  - 1) The application packet must be submitted to one of the seventeen RECs.
  - 2) The application packet must be for either an original or renewal MMC.
  - 3) The Coast Guard Form 719B "Application for Merchant Mariner Credential" must be submitted with either Coast Guard Form 719K "Application for Medical

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Certificate” OR Coast Guard Form 719K/E “Application for Medical Certificate for Entry Level Rating” as part of the same application packet.

- 4) On page 4, under Section II of Coast Guard Form 719B “Application for Merchant Mariner Credential”, under the block titled “DESCRIPTION OF ENDORSEMENT(S) DESIRED”, the applicant must clearly indicate their request for harmonization by including the text: “REQUEST MMC/MEDICAL CERT HARMONIZATION.”
- c. Once the Coast Guard Form 719B “Application for Merchant Mariner Credential” and either Coast Guard Form 719K “Application for Medical Certificate” OR Coast Guard Form 719K/E “Application for Medical Certificate for Entry Level Rating” are accepted at an REC, they will simultaneously work through the Coast Guard evaluation process. When either the professional qualification evaluation or the medical certificate evaluation are completed, it will be held for issuance until both evaluations are complete and the MMC and medical certificate are ready to be issued with harmonized expiration dates.
- d. If a mariner submits an incomplete application for a MMC and/or medical certificate, they will receive an Awaiting Information (AI) letter which will delay the processing of the application packet. If an AI letter is issued, neither the MMC or the Medical Certificate will be issued until the requested information is received and the application packet is approved in its entirety. If the requested additional information is not received within the allowed 90 day period, the MMC and Medical Certificate will be separated and the document not requiring AI, if approved, will be processed independently.
- e. For a MMC evaluation resulting in an Approval to Test letter, neither the MMC nor the Medical Certificate will be issued until the examination requirements have been successfully completed. If the examination requirements are not successfully completed within one year, the Medical Certificate, if approved, will be issued independently.
- f. For a MMC or Medical Certificate evaluation that results in one of the application’s denial, the MMC and Medical Certificate will be separated and the other document, if approved, will be processed independently.
- g. The Coast Guard regularly reviews and updates Form 719B “Application for Merchant Mariner Credential” Form 719K “Application for Medical Certificate” and Form 719K/E “Application for Medical Certificate for Entry Level Rating.” During a future update of the forms the request for harmonization will be added as a standard form field option.

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7. Changes to requests for harmonization. Mariners can request to have their credentials separated at any time prior to the issuance of the MMC and Medical Certificate, if they no longer wish to have the expiration dates harmonized. This may be necessary if a mariner's MMC or medical certificate expires while waiting for their credentials to be harmonized and they need the credential to continue employment. Changes to requests for harmonization should be directed to the National Maritime Center at 1-888-IASKNMC or IAskNMC@uscg.mil.
8. Disclaimer. This guidance is not a substitute for applicable legal requirements, nor is it in itself a regulation. It is not intended to nor does it impose legally binding requirements on any party. This guidance 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. Alternative approaches for complying with these requirements may be acceptable if the approach satisfies the requirements of the applicable statutes and regulations.
9. Changes. This policy letter will be posted on the web at <http://homeport.uscg.mil> and can be accessed via the NMC website. Changes to this policy will be issued as necessary. Suggestions for improvements of this policy should be submitted in writing to Commandant, U.S. Coast Guard Headquarters, Office of Merchant Mariner Credentialing, (CG-MMC) at the address listed on the first page.

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