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CG-MMC Policy Letter
No. 03-20
August 24, 2020

From: M. Medina
COMDT (CG-MMC)

A handwritten signature in blue ink, appearing to read "M. Medina", written over the printed name.

To: National Maritime Center

Subj: TEMPORARY GUIDANCE FOR RENEWAL OF MERCHANT MARINER
CREDENTIALS DURING THE COVID-19 PANDEMIC

- Ref: (a) Marine Safety Information Bulletin (MSIB) 08-20, Change 1, *Extension of Merchant Mariner Credential Endorsements and Medical Certificates*
(b) MSIB 08-20, Change 2, *Extension of Merchant Mariner Credential Endorsements, Medical Certificates and Course Approvals*
(c) Navigation and Vessel Inspection Circular (NVIC) 04-14, *Guidelines for Qualification for STCW Endorsements for Proficiency in Survival Craft and Rescue Boats Other Than Fast Rescue Boats*
(d) NVIC 05-14, *Guidelines for Qualification for STCW Endorsements for Proficiency in Fast Rescue Boats*
(e) NVIC 08-14, *Guidelines for Qualification for STCW Endorsements in Basic Training*
(f) NVIC 09-14, *Guidelines for Qualification for STCW Endorsements for Advanced Firefighting*

1. PURPOSE. This policy letter provides temporary guidance for renewal of a Merchant Mariner Credential (MMC) and STCW endorsements for Proficiency in Survival Craft (PSC), Proficiency in Survival Craft-Limited (PSC-Ltd), Proficiency in Fast Rescue Boats (FRB), Basic Training (BT), and Advanced Firefighting (AFF) for MMCs with expiration dates from March 1, 2020 to June 30, 2021.
2. ACTION. Until July 1, 2021, the Coast Guard will use this policy to evaluate mariner applications requesting renewal of MMCs with expiration dates between March 1, 2020, and June 30, 2021.
3. DIRECTIVES AFFECTED. Until July 1, 2021, the guidance in this policy letter will temporarily supersede portions of NVICs 04-14, 05-14, 08-14, and 09-14.
4. BACKGROUND.
 - a. On March 30, 2020, the Coast Guard published MSIB 08-20, Change 1 in recognition of the current COVID-19 pandemic. This MSIB provided for the extension of the expiration

date of national and STCW endorsements to MMCs due to expire from March 1, 2020 to July 31, 2020. The expiration date of those MMCs was extended to October 31, 2020.

- b. On June 4, 2020, the Coast Guard published Change 2 to MSIB 08-20. This change revised the previous Change 1 to provide that the expiration date of MMCs expiring from March 1, 2020 to September 30, 2020, are extended to December 31, 2020.
- c. The Coast Guard published Change 3 to MSIB 08-20 which extends the expiration date of MMCs expiring from March 1, 2020 to September 30, 2020, to March 31, 2021. This change also provides information on the renewal of STCW endorsements requiring continued competence, including: survival craft and rescue boats other than fast rescue boats (PSC), PSC-limited, fast rescue boats (FRB), basic training (BT), and advanced firefighting (AFF).
- d. The extension of the expiration dates of national and STCW endorsements was, in part, to recognize that training providers offering courses needed for the renewal of STCW endorsements may have suspended operations during the current COVID-19 pandemic, and that mariners may be unable to obtain courses needed for renewal before their MMCs will expire.

5. DISCUSSION.

- a. The extension of the MMC expiration described in MSIB 08-20 Change 3 was intended to allow mariners to continue to work in their current capacities until they are able to meet all of the requirements for renewal of their credential.
- b. Although the expiration of MMCs has been extended, the Coast Guard has become aware that some vessel owners and operators will not engage a mariner if the expiration date printed in their MMC will occur during a voyage.
- c. The Coast Guard recognizes that some STCW courses, including BT and AFF “revalidation” courses, may not be available for the near future. The Coast Guard also recognizes that some mariners may have been planning to take courses to renew their STCW endorsements at the time courses became unavailable. In order to allow mariners to renew their MMC, the following temporary guidance will apply until July 1, 2021. This guidance is applicable for renewals of MMCs that have an expiration date between January 1, 2020, and June 30, 2021, and for mariners who have at least one year of relevant service during the previous five years. It does not apply to MMC renewals when the mariner does not have at least one year of relevant service during the previous five years.

6. ACTION.

- a. For applications for renewal of MMCs expiring from March 1, 2020 to June 30, 2021, that are received by the Coast Guard before July 1, 2021, the Coast Guard will accept one year (360 days) of relevant service within the past five years as meeting the requirements for continued competence for all of the components of PSC, FRB, PSC-Ltd, BT, and AFF. All

mariners currently holding endorsements as PSC, PSC-Ltd, FRB, BT, and/or AFF will be considered for this waiver. The endorsements combined with the relevant service will be considered as having demonstrated continuing competence for all of the PSC, PSC-Ltd, FRB, BT and/or AFF components required to renew their STCW endorsements. Relevant service will be determined as it is described in NVICs 04-14 (PSC and PSC-Ltd), 05-14 (FRB), 08-14 (BT), and 09-14 (AFF).

- b. Mariners who do not have at least one year (360 days) of relevant service in the past five years can only renew their STCW endorsements by demonstrating continued competence for PSC, PSC-Ltd, FRB, BT, and/or AFF as specified in 46 CFR 12.613(b)(4) or 46 CFR 12.615(b)(4) and NVIC 04-14 (for PSC and PSC-Ltd); 46 CFR 12.617(b)(4) and NVIC 05-15 (for FRB); 46 CFR 11.302(e), 12.602(e), and NVIC 08-14 (for BT); and/or 46 CFR 11.303(e) and NVIC 09-14 (for AFF). These mariners will need to complete original or “refresher” training for PSC, PSC-Ltd, FRB, BT, and/or AFF, as appropriate. Shorter and less comprehensive “revalidation” courses are not acceptable.
 - c. NMC will issue the credential and/or endorsements in the following manner:
 - i. Applicants requesting raise of grade, new endorsement, or modification of endorsements on an extended MMC, will be issued a new MMC with an expiration date of March 31, 2021.
 - ii. Applicants who request renewal and meet all renewal requirements will be issued a new MMC with an expiration date five years from the date of issuance in accordance with 46 CFR 10.205(a).
 - iii. Applicants renewing MMCs where all renewal requirements for specific endorsements are not met will result in those endorsements becoming invalid in accordance with 46 CFR 10.205(d) and those endorsements will not be retained on the renewed MMC. These applicants may request continuity for specific national endorsements in their application or may request continuity after receiving an Awaiting Information letter from the NMC.
 - d. The guidance in this policy letter will expire on July 1, 2021.
7. DISCLAIMER. This guidance is not a substitute for applicable legal requirements, nor is it 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 general public, and the Coast Guard, as well as other Federal and State regulators, in applying statutory and regulatory requirements. Alternative approaches for fulfilling this policy may be acceptable if the approach satisfies the requirements of the applicable statutes and regulations.

8. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS.

- a. The development of this guidance and the general policies contained within it have been thoroughly reviewed under 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) by the originating office, and are categorically excluded (CE) from further environmental analysis under paragraph #A3 in Appendix A, of Table 1 of DHS Directive Instruction Manual 023-01, Rev. 1. Because this guidance implements, without substantive change, the applicable Commandant Instruction or other federal agency regulations, procedures, manuals, and other guidance documents, Coast Guard categorical exclusion #A3 is appropriate.
- 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.

9. 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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