

U.S. Department of
Homeland Security

United States
Coast Guard



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CG-CVC Policy Letter
No. 15-03

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From: 
CAPT K. P. MCAVOY
COMDT (CG-CVC)

To: Distribution

Subj: CREDITING RECENT SERVICE OF UNIFORMED SERVICE PERSONNEL

Ref: (a) Marine Safety Manual, Volume III, Marine Industry Personnel, COMDTINST
M16000.8B (MSM)
(b) Title 46, Code of Federal Regulations (46 CFR), Section 11.201(c)(2)
(c) Howard Coble Coast Guard and Maritime Transportation Act of 2014, P. L 113-281.

1. PURPOSE. This Policy Letter describes policy for evaluating and crediting recent sea service for applicants who have qualifying service on uniformed service vessels.
2. DIRECTIVES AFFECTED. The substance contained in this policy letter will be considered for incorporation in the next revision of reference (a).
3. BACKGROUND.
 - a. Reference (b) requires an applicant for a national officer endorsement to have at least three months of required service on vessels of appropriate tonnage or horsepower within the three years immediately preceding the application.
 - b. Section 305(a) of reference (c) added a new subsection to 46 U.S.C. 7101 authorizing 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.
 - c. Section 305(c) of reference (c) directs the Secretary to maximize the extent to which United States Armed Forces service, training, and qualifications are creditable.
4. DISCUSSION.
 - a. Uniformed Service Vessels.
 - 1) Uniformed services are defined in Title 10 United States Code (USC) section 101(a) as the armed forces and the commissioned officer corps of National Oceanic and Atmospheric Administration (NOAA) and the Public Health Service (PHS).

Subj: CREDITING RECENT SERVICE OF UNIFORMED SERVICE PERSONNEL

- 2) Therefore, qualifying service for the purposes of this policy letter may be earned on vessels of the Army, Navy, Air Force, Marine Corps, Coast Guard, NOAA and PHS.
 - 3) This service may be earned regardless of status on the vessel, e.g., active duty military or civilian mariner.
- b. Qualifying individuals.
- 1) Applicants who have three months of qualifying service on uniformed service vessels within the seven years immediately preceding application will be deemed to have met the requirements of reference (b).
 - 2) Individuals who have the qualifying service as indicated in subparagraph b.1 above are eligible for this consideration regardless of present status. Therefore, active duty members, reservists, retirees, recently separated personnel, and civilian mariners with qualifying service on uniformed service vessels are eligible to be considered under these provisions.
- c. Appropriate horsepower or tonnage. As discussed in section 1.G.3.d of reference (a), appropriate horsepower or tonnage is determined by the same rules as under the individual regulations stating appropriate qualifications for an officer endorsement. However, since the publication of reference (a), the regulations have been changed to allow crediting of service on vessels of at least 100 GRT for unlimited tonnage national endorsements. See 46 CFR 11.402(a). Therefore, service on vessels over 100 GRT is creditable.
- d. Evaluating Sea Service. Sea service, including sea service as a member of the Armed Forces of the United States will continue to be evaluated in accordance with 46 CFR 10.232.
- e. Retroactive Application. Applicants who met the requirements of this policy letter when reference (c) was enacted (December 18, 2014) but prior to issuance of this policy letter who had the required three months of service in the last seven years will be considered to be a qualifying individual under the terms of this policy letter. They will be deemed to have met the requirements of reference (b). This will prevent applicants from being adversely affected by delays in implementing this Policy Letter.
5. ACTION.
- a. The National Maritime Center (NMC) and all OCMI's shall be guided by the information in this policy letter.
 - b. Commanding Officers of units with marine safety responsibilities should bring this policy letter to the attention of the maritime industry in their areas of responsibility.

Subj: CREDITING RECENT SERVICE OF UNIFORMED SERVICE PERSONNEL

- c. This Policy Letter will be posted along with other CG-CVC policy letters on the Coast Guard's Homeport internet website at <http://homeport.uscg.mil> by selecting the following links: Library > Policy > Policy Letters > Inspection. For more information, contact the NMC Customer Service Center at 1-888-IASKNMC (1-888-427-5662) or iasknmc@uscg.mil. You may also review this and other guidance documents at the NMC website: <http://www.uscg.mil/nmc/regulations/default.asp>.

6. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS.

- a. The development of this directive and the general policies contained within it have been thoroughly reviewed by the originating office and are categorically excluded under current USCG categorical exclusion (CE) #33 from further environmental analysis, in accordance with Section 2.B.2. and Figure 2-1 of the National Environmental Policy Act Implementing Procedures and Policy for Considering Environmental Impacts, COMDTINST M16475.1 (series).

- b. This directive 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 Manual must be individually evaluated for compliance with the National Environmental Policy Act (NEPA), Council on Environmental Policy NEPA regulations at 40 CFR Parts 1500-1508, DHS and Coast Guard NEPA policy, and compliance with all other environmental mandates.

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. It represents the Coast Guard's current thinking on this topic. You can use an alternative approach 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), you may contact the Mariner Credentialing Program Policy Division at 202-372-2357 or MMCPolicy@uscg.mil.

8. QUESTIONS. All questions regarding implementation of this NVIC should be directed to the Mariner Credentialing Program Policy Division (CG-CVC-4), at (202) 372-2357 or MMCPolicy@uscg.mil.

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