

U.S. Department of  
Homeland Security

United States  
Coast Guard



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16721  
CG-MMC Policy Letter  
No. 01-19

March 4, 2019

From: M. Medina   
COMDT (CG-MMC)

To: National Maritime Center

Subj: PROCESSING OF APPLICATIONS FOR NATIONAL OFFICER AND RATING  
ENDORSEMENTS UNDER TRANSITIONAL PROVISIONS THAT EXPIRE ON  
MARCH 24, 2019

1. PURPOSE. This policy letter provides guidance for evaluating applications for national officer and rating endorsements to Merchant Mariner Credentials (MMCs). It explains how applications submitted near the expiration of the transitional provisions on March 24, 2019 will be processed.
2. ACTION. Officers in Charge, Marine Inspection (OCMIs) and the Commanding Officer of the National Maritime Center should bring this policy letter to the attention of the maritime industry within their zones of responsibility.
3. DIRECTIVES AFFECTED. None.
4. BACKGROUND.
  - a. The Coast Guard amended regulations to qualify for national officer and rating endorsements in a final rule titled *Implementation of the Amendments to the International Convention on Standards of Training, Certification, and Watchkeeping for Seafarers (STCW), 1978, and Changes to National Endorsements (78 FR 77796)*. The rule was published on December 24, 2013. The portions applicable to national endorsements became effective on March 24, 2014.
  - b. The final rule provided grandfathering provisions for mariners who began the service and/or training for their endorsement before March 24, 2014. Under these grandfathering provisions, mariners who began service or training for a national endorsement may qualify for the endorsement under the regulations and policies existing before March 24, 2014, provided they apply for the endorsement before March 24, 2019. Information in transitional or grandfathering provisions for national endorsements is found in Enclosure (1) to Navigation and Vessel Inspection Circular (NVIC) 02-14, "Grandfathering and Transitional Provisions for Merchant Mariner Credentials."

5. DISCUSSION.

- a. Beginning March 24, 2019, the mariner applications will be evaluated against the requirements for original issue, increase in scope and raise of grade of national officer and rating endorsements as published in the regulations, regardless of the date that the mariner began service or training. The Coast Guard recognizes that it is not possible to immediately process all applications received. The following guidance is provided to ensure that mariners who submit timely applications for national endorsements are not subject to the requirements that will take effect while their applications are being evaluated.
- b. Mariners may qualify for the original issue, raise of grade or increase in scope of a national officer or rating endorsement, under rules and policies in effect before March 24, 2014, if all of the following are met:
  - 1) The service or training required for the endorsement began before March 24, 2014;
  - 2) The application for the endorsement(s) was submitted to the Coast Guard before March 24, 2019. The Coast Guard will consider that an application was submitted in a timely manner if it is postmarked or emailed before March 24, 2019; and
  - 3) All professional requirements for the national endorsement, including service, training, and practical demonstrations were completed before March 24, 2019.
- c. A mariner who has met the criteria in paragraph 5.b. above, and did not provide sufficient evidence of meeting all professional requirements for the national endorsement with their application may be permitted up to 90 days to provide any additional information that may have been omitted from their application. As noted above, all professional requirements for the endorsement, including service, training, and practical demonstrations must have been completed before March 24, 2019.
- d. All applications submitted on or after March 24, 2019, must meet the requirements of the current regulations.
- e. A mariner who meets all of the criteria in paragraph 5.b. above and is approved to take the professional examination for their endorsement may examine under the rules and policies in effect before March 24, 2014.
- f. Consistent with 46 CFR 11.217(a), the approval to test based upon the previous regulations will be valid for one year. If a mariner is unable to successfully complete the examinations within one year, they will be required to submit a new application for evaluation and examination in accordance with current regulatory requirements and will not be able to use the expired grandfathering provisions.

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6. DISCLAIMER. While the guidance contained in this document may assist the industry, public, Coast Guard, and other Federal and State regulators in applying statutory and regulatory requirements the guidance is not a substitute for applicable legal requirements nor is it itself a regulation.
7. DISTRIBUTION. This policy letter will be posted on the web at <https://www.dco.uscg.mil/Our-Organization/Assistant-Commandant-for-Prevention-Policy-CG-5P/Commercial-Regulations-standards-CG-5PS/Office-of-Merchant-Mariner-Credentialing/CG-MMC-2/CG-MMC-2-New-Policies/> and the NMC website [www.uscg.mil/nmc](http://www.uscg.mil/nmc) in the Policy and Regulation tab.
8. CHANGES. Changes to this policy will be issued if necessary. Suggestions for improvement 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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