

U.S. Department of
Homeland Security

United States
Coast Guard



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CG-MMC Policy Letter
No. 01-24
April 25, 2024

From: M. Medina
COMDT (CG-MMC)

To: National Maritime Center

Subj: Temporary Extension of Administrative Grace Period for Credentialing Transactions

Ref: (a) 46 Code of Federal Regulations (CFR) 10.227(h)

1. PURPOSE. This policy letter announces a temporary extension of the administrative grace period in reference (a).
2. ACTION. The Coast Guard will use this policy when evaluating applications for a merchant mariner credential (MMC) when the applicant's previous MMC has expired.
3. DIRECTIVES AFFECTED. None.
4. BACKGROUND.
 - a. In December of 2016, the President signed the National Defense Authorization Act for Fiscal Year 2017, Pub. L. No. 113-328. Section 3517 of the Act required a Maritime Workforce Working Group (MWWG), to examine and assess the size of the pool of citizen mariners necessary to support the United States Flag Fleet in times of national emergency.
 - b. In 2017, the MWWG estimated that 11,768 qualified mariners with unlimited credentials were available to crew the Ready Reserve Force. The MWWG also estimated that 13,607 mariners with unlimited credentials would be needed to maintain concurrent sustained sealift and commercial fleet operations.¹
 - c. During the years since the 2017 study was released, the maritime industry—like many other industries—has been profoundly affected by the COVID-19 pandemic. Subsequent disruptions to the labor pool have negatively impacted mariner retention. To facilitate the entry of qualified mariners into the merchant marine, section 3534(j) of the National Defense Authorization Act (NDAA) of 2024, (Pub. Law 118-31) temporarily reduced sea service requirements for certain deck rating endorsements. In addition to facilitating the entry of new individuals; there is a need

¹ Maritime Workforce Working Group Report, dated September 29, 2017.

to allow mariners whose credentials have lapsed and induce them to reenter the maritime industry.

- d. Reference (a) provides a one-year administrative grace period for merchant mariners whose MMC has expired. The administrative grace period allows mariners to renew their MMC during the grace period without further examinations or training, provided all other requirements for renewal have been met. Mariners who apply after the expiration of the grace period are required to demonstrate continued professional competence by completing an approved course or by taking the complete original examination for the credential sought, per 46 CFR 10.227(i)(1).
5. DISCUSSION. The Coast Guard is temporarily extending the administrative grace period contained in reference (a) from one year to six years.
- a. As noted in reference (a) the administrative grace period does not extend the validity of an MMC and a mariner may not sail under the authority of an expired credential.
 - b. The six-year administrative grace period may be extended by a term of active service in the Uniformed Services as indicated in reference (a). No other extensions of the administrative grace period are authorized by this policy letter.
 - c. This extension will allow mariners to renew an MMC up to six years after its expiration without taking the complete original examination. All other credentialing requirements for renewal after expiration remain unchanged and so in some circumstances, an open book examination may be required in accordance with 46 CFR 10.227(e)(1).
 - d. This policy letter is effective immediately and will remain in effect indefinitely. The Coast Guard will provide additional guidance concerning expiration of this policy as necessary.
 - e. Mariners who had previously applied for renewal of their MMC after the one-year grace period had expired may re-apply for renewal if they are within the new, extended grace period. A new application will be necessary, including payment of required fees, per 46 CFR 10.219.
6. 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.
7. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS.
- a. The development of this guidance and the general policies contained within it have been thoroughly reviewed by the originating office in conjunction with the Office of Standards Evaluation and Development, Commandant (CG-REG). Pursuant to 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), we have determined that this action is categorically excluded (CE) from further environmental analysis under paragraphs #A3, #L5 and #L56 in Appendix A, of Table 1 of DHS Directive Instruction Manual 023-01, Rev. 1. Our rationale for selecting these CEs is as follows. “Promulgation of rules, issuance of rulings or interpretations, and the development and publication of policies ... and other guidance ... that implement, without substantive change, statutory or regulatory requirements” or “...that interpret or amend and existing regulation without changing its environmental effect “ are covered under DHS CE #A3. Promulgation of this policy and its associated guidance implements, without substantive change, the applicable Commandant Instruction or other federal agency regulations, procedures, manuals, and other guidance documents. Accordingly, Coast Guard CE #L5 applies. In addition, the policy letter includes elements that pertain to training, qualifying, licensing and disciplining maritime personnel. These latter aspects of the policy letter and its associated guidance are covered under Coast Guard CE #L56.

- 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.
8. 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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