



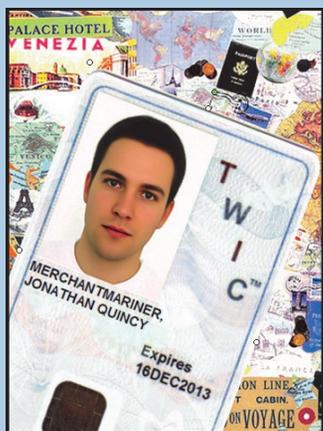
The Coast Guard has released Policy Letter 11-15 which describes the process it intends to follow in implementing Section 809 of the Coast Guard Authorization Act of 2010 (Public Law 111-281). Section 809 modified the requirement that all mariners obtain a

Transportation Worker Identification Credential (TWIC) in order to be issued a Merchant Mariner Credential (MMC). Although full implementation of Section 809 may require regulatory changes, this policy letter implements two policy mechanisms that will allow the Coast Guard to begin to implement the intent of the Act while working on the final regulatory solution.

The Coast Guard has interpreted the act to exempt Merchant Mariners who are not serving on vessels required to have a Vessel Security Plan (VSP) from the requirement to hold a valid TWIC. However, in order for the Coast Guard to process a credential application, the applicant must have held or applied and been qualified to hold a TWIC from Transportation Security Administration (TSA). Additionally, in order for the

## How do recent TWIC changes affect me?

Coast Guard to process a credential application for a mariner who is not in possession of a valid TWIC, the mariner must submit a statement indicating an understanding of the potential for delays in processing associated with a Name Based Safety and Suitability Check and that they don't require a TWIC.



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**The National Maritime Center**

**Mariner  
Applications  
and  
TWIC Changes**

The Coast Guard is allowing mariners without a valid TWIC who operate on-board vessels that do not have a VSP to acquire and renew an MMC. The applicant must have held or applied and been qualified to hold a TWIC from the Transportation Security Administration (TSA). This policy will apply to mariners who are inactive or not operating under the authority of their credential, as well as to those who serve on vessels that are not required to have a VSP.

Vessels not required to have a VSP include:

- Uninspected passenger vessels of less than 100 gross register tons (GRT)
- Vessels inspected under subchapter T of Title 46 Code of Federal Regulations, except those on international voyages
- Towing vessels not involved in towing barges inspected under 46 CFR subchapters D, I, or O
- Towing vessels involved in fleetting, docking, or ship assist as excepted in Title 33 CFR, Section 104.105(a)(11).

**NOTE:** This list is not all inclusive.

Mariners on such vessels will be permitted to renew an existing credential without submitting proof of holding a valid TWIC.

Vessels that are required to have a VSP include:

- Mobile Offshore Drilling Unit (MODU)
- Cargo or passenger vessel subject to the International Convention of Safety of Life at Sea, 1974 (SOLAS) Chapter XI-1 or Chapter XI-2
- Towing vessels greater than eight meters in registered length engaged in towing barges
- Passenger vessels certified to carry more than 150 passengers.

**NOTE:** This list is not all inclusive.



Mariners who are being issued an *initial* MMC, or who never held a TWIC, will need to enroll for a TWIC at a TWIC enrollment center. They will also have to pay all applicable fees associated with getting a TWIC. This is required because the TWIC enrollment center is the only place where the Coast Guard can obtain biometric information (fingerprints) from the applicant. The Transportation Security Administration (TSA) will also continue to conduct all screenings. Mariners associated with vessels not required to have a VSP will not be required to return to the TWIC enrollment center to pick up their TWIC as a precondition for receiving their initial MMC.

Mariners renewing their MMC - who have previously applied for and have been approved for a TWIC - may skip the TWIC enrollment process and apply for an MMC at a Regional Exam Center (REC). The Safety and Suitability “background check” conducted by the NMC will be name based. If the mariner chooses this option, they will need to affirmatively indicate that they do not require a TWIC and that they understand that name-based processing could significantly delay their credential processing. A link to the policy letter and a sample exemption statement can be found at <http://www.uscg.mil/nmc/twic/?tab=3#TabbedPanels1>.

With regard to inspection enforcement, the Coast Guard will change its enforcement policies so that a mariner who does not hold a TWIC, or holds an expired TWIC but a current MMC, will not be considered in violation of the applicable regulations.

The Coast Guard is considering a regulatory project that would propose to adjust a portion of the MMC fees to compensate mariners for costs associated with enrolling for a TWIC. This regulation is still in development, but the Coast Guard intends to complete the rule in accordance with the timeline set forth in the Unified Agenda of Regulatory and Deregulatory Action (<http://www.reginfo.gov/public/do/eAgendaMain>). The Coast Guard welcomes feedback on this process, and intends to seek and respond to public comments on the regulation. Until such a regulation becomes effective, the existing MMC and TWIC fee structures remain in place.

For a list of frequently asked questions and answers, please visit [http://www.uscg.mil/nmc/faq/pdfs/twic\\_faq.pdf](http://www.uscg.mil/nmc/faq/pdfs/twic_faq.pdf).