

## Frequently Asked Questions: Transportation Worker Identification Credential

### 1. Am I required to obtain a Transportation Worker Identification Credential (TWIC) card?

The Coast Guard is allowing mariners without a valid TWIC to acquire and renew a Merchant Mariner Credential (MMC) if: the mariner is inactive; not operating under the authority of their credential; or sailing in a vessel that is not required to have a vessel security plan (VSP) as defined in [Coast Guard Policy Letter 11-15](#).

### 2. What should I do if I am not required to obtain a TWIC card?

Submit a merchant mariner application with a statement that you do not require a TWIC. A sample statement may be found [here](#).

### 3. What should I do if I am new and getting my initial MMC?

Even if you are not required to hold a TWIC, you will need to enroll at a TWIC enrollment center and pay all applicable fees associated with getting a TWIC. However, you will not be required to pick up your TWIC as a precondition for receiving your MMC. Reference [Coast Guard Policy Letter 11-15 \(5\) \(a\) paragraph 3](#).

### 4. 4. If I do not need a TWIC card, can I get a refund of paid fees associated with obtaining the TWIC?

No. All applicable fees associated with getting a TWIC must be paid by the mariner to the Transportation Security Administration (TSA) to capture the required biometric and biographic information needed for the Coast Guard's safety and suitability background check. TSA will continue to conduct all security screenings associated with obtaining a TWIC.

### 5. What is a name-based safety and suitability check?

If your safety and suitability record with the National Maritime Center (NMC) is not current and no new information is provided by the TSA, the NMC will search available criminal record data using any information that you have provided with current and/or previous applications.

### 6. Where is the announcement of the Coast Guard Policy Letter 11-15 posted?

The announcement can be found [here](#).

7. If a mariner does not want to spend \$132.50 for a TWIC renewal from TSA, you state that the mariner can have a “name-based” background check performed that “could significantly delay the processing of my MMC application.” Since the mariners have provided his/her fingerprints for the first TWIC on file, and they provided their full name, date of birth, and social security number on the application, can’t we do a better search than just “name-based”?

“Significant” delays associated with the background check process is not expected. However, it is anticipated that there may be some delays experienced on a case-by-case basis.

Yes, we would conduct a more thorough search. Although [Coast Guard Policy Letter 11-15](#) makes reference to a “name-based” background check, this does not exclude the employment of additional information. As part of this process, the Coast Guard will make use of additional information (e.g., date of birth and social security number) submitted as part of the application in order to facilitate the background checks in a comprehensive manner.

8. When a mariner sends in their application, will the whole package be reviewed (service time and medical), or will the “name-based” search need to be completed before the rest of the application is processed? If this is the case, should people renew 9 months early and ask for a delayed issuance MMC to avoid license creep?

A complete evaluation, inclusive of professional and medical, will not be conducted. Please note that per §614 of the Coast Guard Authorization Act of 2010, advanced renewals to avoid “license creep” are not permitted at a 9-month interval. Accordingly, it is not advisable.

9. If a mariner holds any of the MMC types, but also holds old Merchant Mariner Document (MMD) ratings such as Able-Bodied Seaman (AB), Ordinary Seaman (OS), etc., would he/she still need a TWIC card to renew that credential because of the unlicensed ratings?

The requirement to hold a TWIC for renewal is largely driven by the specific type of vessel on which the mariner is employed. Regardless of the type of endorsement held (officer or unlicensed), if the specific vessel is required by regulation to have a security plan, then the mariners employed on board are required to hold a valid TWIC. Mariners employed on vessels (as listed in [Coast Guard Policy Letter 11-15](#)) not required to hold a security plan are not required to hold a valid TWIC (but may choose to do so) in order to renew their MMC.

**10. We have three uninspected passenger vessels (UPVs) greater than 100 GRT. These vessels do not require a “Vessel Security Plan” ([33 Code of Federal Regulations \(CFR\) 101 and 104](#)). Within the context of [Coast Guard Policy Letter 11-15](#), are mariners who serve solely on these 100 GRT and larger vessels, or solely on these 100 GRT and larger vessels and any of the other listed vessels on the adjusted and credentialing policy list, required to have TWICs?**

[Title 46 CFR section 24.10-1](#) provides two categories in the definition of UPV. Although not specifically mentioned in [Coast Guard Policy Letter 11-15](#), as long as the subject vessels are not otherwise required to carry an approved VSP (as may be otherwise required by statute or regulation), they would fall into a similar classification status and would otherwise be exempted under this policy.

**11. How does Policy Letter 11-15 apply to law enforcement officers required to be credentialed (USCG MMC) as a condition of employment?**

Per [33 CFR 101.514\(c\)](#), law enforcement officials at the state or local level are not required to obtain or possess TWICs to gain unescorted access to secure areas. Therefore, service under the authority of an MMC (although not required by applicable federal regulation or statute) on a law enforcement (public) vessel would fall under the provisions of the subject policy letter ([11-15](#)) and a TWIC would not be required for renewal. However, should they opt to renew without a TWIC, they would be subject to a name-based background check.

The above, notwithstanding service under the authority of an MMC outside of the scope of their official duties (e.g., moonlighting as a vessel operator) for commercial purposes on a vessel with a security plan (per [33 CFR 104](#)) would require a TWIC.

**12. For those individuals who decide to renew their MMC now, and in the future, without presenting a TWIC card, will they have to present an updated photograph or will the existing photograph in the TWIC system continue to be utilized?**

The intention of the policy is to utilize the existing photograph from the TWIC system.