

Marine Safety Information Bulletin

Commandant
U.S. Coast Guard
Commercial Regulations & Standards Directorate
2703 Martin Luther King Jr Ave SE, STOP 7501
Washington, DC 20593-7501

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E-Mail: OutbreakQuestions@uscg.mil



COVID-19 – Mariner Credentials

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Extension of Merchant Mariner Credential Endorsements, Medical Certificates and Course Approvals

This update to MSIB 08-20 provides guidance concerning mariner credentials, medical certificates and course approvals, and the action being taken by the Coast Guard due to the novel coronavirus and the disease it causes (COVID-19). We are doing this in keeping with national guidance to meet the challenge of this disease and in response to a number of questions and concerns raised by the maritime industry and mariners. The provisions in this MSIB are consistent with the Executive Order on Regulatory Relief to Support Economic Recovery issued on May 19, 2020.

The Coast Guard has also been consulting with the International Maritime Organization (IMO) and other administrations to ensure alignment with respect to the extension of endorsements issued in accordance with the Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended (STCW). We are taking a pragmatic approach consistent with the IMO Secretary General's circular Letter No.4204/Add.5 dated March 17, 2020.

Please be aware the following measures may cause a backlog in the processing of credentials and course approvals, especially near the end of the extension dates. Mariners and training providers are strongly encouraged to fulfill the requirements and submit applications as early as possible in order to avoid a lapse in their credential or training approval. Mariners are advised that under our current statutory authority, the expiration dates of merchant mariner credentials may be extended for no more than one year.

To mitigate the impact to the seafarers and the industry caused by the novel coronavirus disease COVID-19, the Coast Guard is taking the following actions:

Merchant Mariner Credentials.

- National Endorsements: Under 46 USC Section 7507, Merchant Mariner Credentials may only be extended for up to one year from their date of expiration. Merchant Mariner Credentials (MMC) (National Endorsements only) that expire between March 1, 2020 and June 30, 2021 are extended until the EARLIER of
 - October 31, 2021; OR
 - One (1) year after the initial expiration date of the credential (i.e., one year after the expiration date printed on the credential).

Mariners who are actively working on expired credentials that meet the extension criteria must carry the expired credential with a copy of this notice.

- **STCW Endorsements:** MMCs with STCW endorsements that expire between March 1, 2020 and June 30, 2021 are extended until the EARLIER of
 - October 31, 2021; OR
 - One (1) year after the initial expiration date of the credential (i.e., one year after the expiration date printed on the credential).

Mariners who are actively working on expired credentials that meet the extension criteria must carry the expired credential with a copy of this notice.

- Until October 31, 2021, for mariners who have met the requirements for initial competency in survival craft and rescue boats other than fast rescue boats (PSC), PSC-limited, fast rescue boats (FRB), basic training (BT), and advanced firefighting (AFF) and who are renewing MMCs that expire between March 1, 2020 to June 30, 2021, the Coast Guard will accept shipboard experience in fire, emergency, and/or abandon ship drills for demonstrating continued competence in PSC, PSC-Ltd, FRB, BT, and/or AFF provided they have obtained at least 360 days of relevant service within the past five years. Relevant seagoing service will be determined as described in NVICs 4-14, 05-14, 08-14 and 09-14.
- Mariners who do not have at least one year of relevant service in the past five years can only renew their STCW endorsements by demonstrating continued competence for PSC, PSC-Ltd, FRB, BT, and/or AFF as specified in 46 CFR 12.613(b)(4) or 46 CFR 12.615(b)(4) and NVIC 04-14 (for PSC and PSC-Ltd); 46 CFR 12.617(b)(4) and NVIC 05-15 (for FRB); 46 CFR 11.302(e), 12.602(e), and NVIC 08-14 (for BT); and/or 46 CFR 11.303(e) and NVIC 09-14 (for AFF). These mariners will need to complete original or “refresher” training for PSC, PSC-Ltd, FRB, BT, and/or AFF, as appropriate. Shorter and less comprehensive “revalidation” courses are not acceptable.

Medical Certification. The NMC is processing applications for medical certificates within normal time frames. Some mariners have reported difficulties scheduling medical examinations with an authorized medical provider and others are on board vessels overseas and are unable to obtain the required medical examination. The problem is particularly acute for mariners who travel in order to be examined by an authorized provider. Therefore, we are providing extensions for medical certificates.

- **Medical Certificates (National, Pilot, or STCW).** Under 46 USC Section 7508, Medical Certificates may be extended for up to one year from their date of expiration. Medical Certificates that expire between March 1, 2020 and June 30, 2021 are extended until the EARLIER of
 - October 31, 2021; OR
 - One (1) year after the initial expiration date of the medical certificate (i.e., one year after the expiration date printed on the certificate).
- **Pilot Annual Physical examinations.** 46 USC 7101(e)(3) requires that pilots undergo an annual physical examination each year while holding a credential. The Coast Guard does not intend to enforce this requirement given the current the pandemic and its impacts on health care providers. This posture applies until October 31, 2021 irrespective of when the medical certificate expires.

Mariners who are actively working on expired medical certificates that meet the extension criteria must carry the expired certificate with a copy of this notice. This measure ONLY relaxes the requirement to carry an unexpired STCW medical certificate and not the actual medical standards. It is important that mariners with disqualifying medical conditions do not sail.

Additional administrative measures.

- Regional Exam Centers and Monitoring Units. With the exception of Monitoring Unit Guam, all RECs and MUs are open for examinations only. Seating capacity is reduced to comply with CDC guidelines. See the National Maritime Center website for scheduling information. The Coast Guard is considering additional options to augment examination capacity.
- Approval to Test Letters (ATT) and Course Completion Certificates. In recognition of the time REC's and MUs were closed to the public, ATTs and mariner training course completion certificates that expire between March 1, 2020 and June 30, 2021 are extended until October 31, 2021.
- Additional Information (AI), Qualified Assessor (QA), Designated Examiner (DE). The National Maritime Center will provide guidance on the validity of AI, QA, and DE letters on the NMC website.
- Course and Program Approvals.
 - Course and program approvals that expire between January 1, 2020 and December 31, 2020 are extended for six months from their current expiration date. This MSIB serves as formal notification of the extension. The NMC will not issue new course approval letters or certificates. NMC will update internal records to ensure the acceptance of course completion certificates issued during the extension and that the website reflects appropriate information.
 - The NMC will continue to work with training providers on a case-by-case basis to approve alternate training delivery methods, including distance or blended learning. Approved requests and new requests for alternate training delivery methods will become part of the existing course approval and will be valid until the expiration date of the course; and where applicable, will be subject to the extension provided in the previous paragraph. At the time of renewal of the course, the Coast Guard will closely review the training delivery methods including those previously approved as a temporary measure. All testing, practical assessments, and labs associated with these courses must be completed no later than 6 months from the completion of the knowledge-based portion of the training.
 - The NMC will consider, on a case-by-case basis, the use of alternative testing methods for some courses for some end of course examinations provided the training provider can show that the alternative method includes confirmation of the identity of the person taking the test, and maintains the integrity of the examination. The Coast Guard will consider the tools and business processes submitted for approval along with the course content in determining whether to approve the request. Requests should be submitted to NMCCourses@uscg.mil and include a list of courses, a complete description of the alternative requested, the tools involved, and the business process to be employed.
 - The NMC will also consider and approve, on a case-by-case basis, alternative assessment methods for some courses provided it allows the instructor or a qualified assessor to properly witness the

assessment. Requests should be submitted to NMCCourses@uscg.mil and include a list of courses, a complete description of the alternative requested, the tools involved and the business process to be employed.

- This MSIB serves as the extension for previously approved courses using alternate delivery methods.

The NMC may issue additional guidance on these extensions and other administrative measures consistent with this MSIB. This guidance will be posted at <https://www.uscg.mil/nmc/>. If you have questions, visit the NMC website, or contact the NMC Customer Service Center by using the NMC online chat system, by e-mailing IASKNMC@uscg.mil, or by calling 1-888-IASKNMC (427-5662).

R. V. Timme, RDML, U.S. Coast Guard, Assistant Commandant for Prevention Policy sends