



April 3, 2009

TWIC Status During MMC Application Process

This bulletin provides guidance for interpretation of the Consolidation of Merchant Mariner Credential (MMC) Final Rule which was released on Monday, March 16, 2009. In a number of places in the rule, the mariner is required to submit proof that he/she holds a valid TWIC as part of the application for the MMC. In light of the implementation of the TWIC and MMC processes, the Coast Guard will accept proof that the mariner has applied for a TWIC for all MMC applications – original merchant mariner credentials (46 CFR 10§10.225), modification or removal of limitations or scope (46 CFR 10§10.223), renewal (46 CFR 10§10.227), and issuance of duplicate merchant mariner credentials (46 CFR 10§10.229). The Coast Guard will interpret that an MMC applicant holds a valid TWIC when TSA determines they are qualified based upon the Security Threat Assessment.

The Coast Guard will receive the information regarding the status of your TWIC application through electronic means directly from TSA. Once we have received the information that the mariner is qualified for a TWIC, we will print the credential and send it to the mariner. In the event the mariner is not qualified for a TWIC, we will notify the mariner that the credential will not be issued due to denial of the TWIC.

Mariners should note that an MMC may be received before your TWIC; however, employers are still responsible to ensure that vessels are manned by individuals holding both the MMC and a TWIC. U.S.-credentialed mariners should be able to present a valid Merchant Mariner Document, Merchant Mariner License, valid Certificate of Registry, or once phased in, a valid Merchant Mariner Credential in addition to a TWIC during a document check conducted during a USCG boarding.

This clarification is being made to eliminate as much of the processing delay as possible for the mariner due the integration of the TWIC into the MMC issuance process.

This interim measure will be available until 15 April 2010.

Sincerely,

David C. Stalfort
Captain, U. S. Coast Guard