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CG-MMC Policy Letter  
No. 03-24

August 26, 2024

From: C. Mauro, for M. Medina  
COMDT (CG-MMC)

To: National Maritime Center

Subj: EXEMPTION FROM FEES ASSOCIATED WITH MERCHANT MARINER  
CREDENTIAL APPLICATIONS FOR ACTIVE DUTY AND SELECTED RESERVE  
MEMBERS OF THE UNIFORMED SERVICES

1. PURPOSE. This policy letter provides guidance for exemptions from the fees associated with an application for a merchant mariner credential (MMC) for members of the uniformed services on active duty and selected reserve members of the uniformed services.
2. ACTION. The Coast Guard will use 46 CFR 10.219(m) and this policy letter to evaluate whether an applicant for an MMC is exempt from fees associated with their application.
3. DIRECTIVES AFFECTED. This policy letter cancels CG-MMC Policy Letter 02-20, *Waiver of Fees Associated with Merchant Mariner Credential Applications for Active-Duty Members of the Uniformed Services*.
4. BACKGROUND.
  - a. On August 6, 2024, the Coast Guard published a final rule titled *Exemption for Active-Duty Uniformed Service Members from Merchant Mariner Credentialing Fees*. The rule provides for an exemption from the fees associated with an application for an MMC for active duty and selected reserve members of the uniformed services. ([FR63830 USCG-2021-0288](#))
  - b. The Coast Guard had previously published CG-MMC Policy Letter 02-20 to promptly implement the directives of Executive Order 13860, *Supporting the Transition of Active-Duty Service Members and Military Veterans into the Merchant Marine*, and section 3511 of the National Defense Authorization Act for Fiscal Year 2020. That policy letter provided for waivers of the fees associated with MMC applications for members of the uniformed services. CG-MMC Policy Letter 02-20 is cancelled by this new policy letter.

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5. DISCUSSION.

- a. General. This policy applies to the fees described in 46 CFR 10.219, including fees for evaluation of an application for an MMC, the administration of a required credentialing examination, and for the issuance of an MMC. Applicants who can demonstrate eligibility will be exempt from paying these fees.
- b. Eligibility.
  - 1) The Coast Guard is exempting the payment of evaluation, examination, or issuance fees for an MMC for:
    - A) Members of the uniformed services on active duty:
      - i. United States Army;
      - ii. United States Navy;
      - iii. United States Air Force;
      - iv. United States Marine Corps;
      - v. United States Space Force;
      - vi. United States Coast Guard;
      - vii. Commissioned Corps of the National Oceanic and Atmospheric Administration (NOAA); and
      - viii. Commissioned Corps of the United States Public Health Service (USPHS);
    - B) Members of the Selected Reserve of the Ready Reserve of any of the armed forces:
      - i. Army National Guard of the United States;
      - ii. Army Reserve;
      - iii. Navy Reserve;
      - iv. Marine Corps Reserve;
      - v. Air National Guard of the United States;
      - vi. Air Force Reserve;
      - vii. Coast Guard Reserve; and
    - C) Ready Reserve Corps of the USPHS.
  - 2) Applicants will need to provide evidence of their active duty or reserve status with their application as described in paragraph 5.c below. Applicants who are unable to provide acceptable evidence of eligibility will not be exempt from payment of fees.

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3) The following definitions apply:

- A) *Armed forces* means the Army, Navy, Air Force, Marine Corps, Space Force, and Coast Guard. (10 U.S.C. 101(a)(4)). This includes midshipmen and cadets at the four military academies (United States Air Force Academy, United States Coast Guard Academy, United States Military Academy, and United States Naval Academy).
- B) *Uniformed services* means the armed forces; the commissioned corps of NOAA; and the commissioned corps of the USPHS (10 U.S.C. 101(a)(5)).
- C) *Active duty* has the same meaning, as applicable, as *active duty* as defined by 33 U.S.C. 3002(b)(1) for members of the commissioned corps of the National Oceanic and Atmospheric Administration and *active duty* as defined by 10 U.S.C. 101(d)(1) for members of the military. Active duty members of the uniformed services includes members of the reserves and National Guard who are serving on Title 10 U.S.C. orders and Coast Guard reserve serving on active duty in accordance with 14 U.S.C. 3713. In addition, for purposes of this guidance, *active duty* also applies to active duty commissioned corps members of the Public Health Service, including members of the Ready Reserves on active duty in accordance with 42 U.S.C. 204.
- D) Applicants that are not eligible for an exemption from fees include, but are not limited to, the following:
  - i) Members of a uniformed service component that is not specifically listed in paragraph b.1, above;
  - ii) Civilian mariners employed on vessels of the U.S. Navy Military Sealift Command, U.S. Army Corps of Engineers, or NOAA;
  - iii) Civilian employees or contractors of any of the uniformed services;
  - iv) Midshipmen at the United States Merchant Marine Academy and cadets at a state maritime academy administered under 46 CFR Part 310; and
  - v) Members of reserve components of the uniformed services other than those specified in paragraphs 5.b.1.B and 5.b.1.C above who are not on active duty.
- c. Documentation of eligibility. To demonstrate eligibility for exemption from fees discussed in this policy letter, applicants should provide with their application documents showing the applicant is a current member of the service components identified in paragraph b.1, above. Acceptable documents include, but may not be limited to:
  - 1) Active duty orders citing Titles 10 or 14 of the United States Code;

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- 2) Statement of Credible Service or similar document;
  - 3) Certificate of Release or Discharge from Active Duty (DD-214);
  - 4) Transcript of Sea Service (TOSS);
  - 5) History of Assignments (HOA);
  - 6) Permanent Change of Station (PCS) Orders;
  - 7) Active Duty Military ID; or
  - 8) A letter or memo dated not more than 180 days prior to the date of application from their command or personnel office on official letterhead that states the applicant is a current member of the uniformed services on active duty or a member of the reserve components specified in paragraphs b.1.B or b.1.C, above.
- d. Duration of exemption. To receive an exemption, a mariner must be eligible for the exemption at the time of each application or not more than 180 days prior to the date of the application. An exemption is limited to a single application. The applicant must demonstrate they are eligible for an exemption each time they apply for an original, renewal, or raise of grade of an MMC. Accordingly, a mariner who received an exemption in the past may not be eligible for an exemption on a subsequent application if their active duty or reserve status has changed.
- e. Effective date. This policy letter is effective November 4<sup>th</sup>, 2024.
- f. Transitional provisions. Mariners who submitted an MMC application prior to the date of this policy letter and had received a waiver of fees will have any remaining unpaid fees associated with their application waived. This waiver is limited to fees associated with a pending application and will not apply to any subsequent applications. On subsequent applications, mariners must demonstrate they meet the eligibility requirements for an exemption in 46 CFR 10.219(m) and as described in this policy letter.
- g. Refund of fees paid by applicants eligible for fee exemption.
- 1) Mariners who were not eligible for exemption of fees at the time of application who subsequently become eligible for a fee exemption may be provided a refund for services that have not yet been performed.
  - 2) Once a service has been performed, a refund of the associated fee(s) may not be issued. A refund may be provided for the examination fee if the applicant has not started testing. Similarly, a refund of the issuance fee may be provided if the MMC has not been issued.

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6. DISTRIBUTION. An electronic version of this policy letter will be located at [Coast Guard Merchant Mariner Credentialing policy website](#).
7. DISCLAIMER. This guidance is not a substitute for applicable legal requirements, nor is in 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 complying with these requirements may be acceptable if the approach satisfies the requirements of the applicable statutes and regulations.
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](mailto:MMCPolicy@uscg.mil).

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