



March 18, 2009

## Relationship between the MMC and TWIC

The Merchant Mariner Credential (MMC) rule was published in the Federal register on March 16, 2009 ([MMC Final Rule](#)). The information bulletin, "[MMC Final Rule Released](#)" posted on the National Maritime Center's (NMC) website outlines some key features of the rule, which becomes effective April 15, 2009. This bulletin focuses on the relationship between the MMC and Transportation Worker Identification Credential (TWIC). Please refer to the previously posted "[TWIC Information Bulletin](#)" for additional details. If you hold a Merchant Mariner Credential you are required to obtain a TWIC by April 15, 2009. Additionally, after April 15, 2009 you are required to hold a valid TWIC in order to serve under the authority of your merchant credential.

### **Important Information about the MMC Final Rule**

- The Coast Guard will use TWIC data received directly from TSA to determine the status of your TWIC. No mariner credentials will be issued without confirmation from TSA that an applicant has been approved to hold a TWIC.
- If you are applying for a merchant mariner credential you must have at least applied for your TWIC before the Coast Guard will accept your application. Your credential will not be issued until your TWIC is approved. There may be a minimal delay between the time you apply for your TWIC and the time that data is received by the Coast Guard. Therefore, you should:
  - Apply for your TWIC in advance of your application for your merchant credential.
  - If you are applying for your TWIC and mariner credential simultaneously, provide a copy of your TWIC application receipt with your credential application.
- A TWIC is not required in order to apply for or receive a document of continuity.

### **Important information about TWIC enrollment**

- You will need to ensure that the biographical data that you supply to TSA is the same as what you provide the Coast Guard on your Merchant Mariner Credential Application. If the Coast Guard can not reconcile the data provided by TSA, you may be asked to work with TSA to update your information. Visit TSA's website to begin the application process for a Transportation Worker Identification Credential:  
[http://www.tsa.gov/what\\_we\\_do/layers/twic/index.shtm](http://www.tsa.gov/what_we_do/layers/twic/index.shtm)

- You will need to be identified as a Merchant Mariner in the TWIC system. This triggers TSA to provide your TWIC data to the Coast Guard.
  - When you enroll/Pre-enroll for a TWIC with TSA you need to select Merchant Mariner as your occupation.
  - Sometime this month TSA will be adding a radio button to their kiosks that will force the TSA employee to ask you if you are or contemplate becoming, at any time in the next 5 years, a Merchant Mariner. Additionally, the disclosure form that you will fill out at the enrollment center will ask you the same question.
  - For those that have already received their TWIC and did not “Self Identify” as a Merchant Mariner, or do not remember whether or not you self-identified, the NMC is working with TSA to automatically change your occupation field. The NMC anticipates that this will cover the vast majority of current mariners. It is, unfortunately, inevitable that there will not be matching data for every mariner due to variances in the data contained in either system (such as using slightly different name spellings to apply for your TWIC and your mariner credential). Therefore, TSA is setting up a help desk number that you will be able to call in order to manually switch your occupation field. This should only impact a small percentage of mariners and only when applying for their next Coast Guard issued credential. At that point, if the NMC does not have matching data from TSA regarding a valid TWIC you will be asked to call the TSA help desk.

If you carry a valid TWIC while serving on a valid Merchant Mariner Credential you will not be impacted while sailing regardless of whether you hold any of the four previously issued credentials, the MMC or any combination thereof.

Sincerely,

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