



Policy Letter 2-20 COVID-19 License Renewal

October 7, 2020

From: Brian J. Downey, Administrator

To: Maine Pilotage Commission

References: a) [MSIB 8-20 Change 4](#)

1. **Purpose:** This outlines the Maine Pilotage Commission's policy to continue to maintain licensure of state pilots during the COVID-19 Pandemic which continues to grip the United States and major portions of the globe.

2. **Background:** During the COVID-19 pandemic the United States has responded with extensive closures or reduced service of vital business and regulatory offices and functions to establish a mass quarantine to fight the impacts of the COVID-19 virus. Among the regulatory services that have been impacted include the U.S. Coast Guard Regional Examination Centers and National Maritime Center which process and issue Federal pilotage license. The closures/reduced services have impacted the ability to facilitate administrative functions of the pilot licensing program requiring alternative measures.

The Coast Guard issued MSIB 08-2020 Change 4 to update their continuously evolving guidance concerning mariner credentials, medical certificates and course approvals, as well as the action being taken by the Coast Guard due to the COVID-19 virus. They did this to apply consistent national guidance to meet the challenge of the disease and in response to a number of questions and concerns raised by the maritime industry and mariners. The provisions in the MSIB are consistent with the Executive Order on Regulatory Relief to Support Economic Recovery issued on May 19, 2020.

3. **Policy:** The MSIB essentially extends the validity of all Coast Guard issued licenses, domestic endorsements and Coast Guard issued medical cards. Merchant Mariner Credentials (MMC) (National Endorsements only) that expire between **March 1, 2020 and December 31, 2020** are extended until the EARLIER of:

- **June 30, 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.

While it has no particular relevance to State pilotage licensure, the Coast Guard is offering a similar extension window and policy for STCW endorsements.

- **Temporary Renewal Policy** - In maintaining consistency (for those pilot routes requiring a Federal pilot license as a prerequisite) state pilot licenses expiring within this same window, the Maine Pilotage Commission will renew state pilot licenses (upon proper application) with the pilot's "extended" Coast Guard license. In other words, the Commission is not extending

State licenses but rather re-issuing full term state licenses (upon a proper renewal application) based on an extended Federal Coast Guard license.

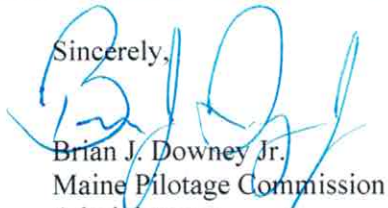
- **Federal/State Alignment** - State licenses will be renewed for a full five-year term but will be void without a valid Federal license (whether extended within the Coast Guard extension window or fully renewed after the Coast Guard closes the extension window).

The pilot must be aware that the State Pilot license is only valid with a valid Federal Coast Guard license (made valid through the authorized extension by the Coast Guard). If the Federal license exceeds the authorized Coast Guard extension or otherwise expires, then the State pilot license becomes void.

- **Initial License Applications** - None of the Maine Pilotage Commission's temporary renewal policies will apply to initial license applications.
- **Coast Guard 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 national emergency and the lack of medical care. This measure ONLY relaxes the requirement for an annual physical and not the actual medical standards. This posture applies until **December 31, 2020** irrespective of when the medical certificate expires. It is important that pilots with disqualifying medical conditions do not sail.

- *Maine Pilotage Commission Physical Examination Interpretation* - *Since the Maine Pilotage Commission utilizes the Coast Guard medical card as evidence of meeting physical standards, the Maine Pilotage Commission will adopt the temporary Coast Guard policy. It is emphasized that this interim policy does not relieve pilots of meeting physical standards, only the requirement to complete an annual examination during the pandemic. If a pilot is injured, contracts the COVID-19 virus, or otherwise determines or suspects in good faith that they do not meet the minimum physical standards required by the Coast Guard, then their condition should be immediately reported to the Maine Pilotage Commission.*

Sincerely,



Brian J. Downey Jr.
Maine Pilotage Commission
Administrator