



Merchant Mariner Credential Processing

October 2, 2024

Fiscal Year 2024 Report to Congress



**Homeland
Security**

United States Coast Guard

Foreword

October 2, 2024

I am pleased to present the following report, “Merchant Mariner Credential Processing,” prepared by the U.S. Coast Guard.

This report was compiled in response to the Fiscal Year 2024 Department of Homeland Security Appropriations Act (P.L. 118-47), which directs the Coast Guard to identify any existing performance gaps in the system for Merchant Mariner Credentialing evaluation and approval and suggest changes to address such gaps, including those related to system performance and extended application turnaround times.



Pursuant to congressional requirements, this report is provided to the following Members of Congress:

The Honorable Mark Amodei
Chairman, House Appropriations Subcommittee on Homeland Security

The Honorable Lauren Underwood
Ranking Member, House Appropriations Subcommittee on Homeland Security

The Honorable Chris Murphy
Chair, Senate Appropriations Subcommittee on Homeland Security

The Honorable Katie Britt
Ranking Member, Senate Appropriations Subcommittee on Homeland Security

Should you require additional assistance, please do not hesitate to contact my Senate Liaison Office at (202) 224-2913 or House Liaison Office at (202) 225-4775.

Sincerely,

A handwritten signature in blue ink that reads "LL Fagan".

Linda L. Fagan
Admiral, U.S. Coast Guard
Commandant



Merchant Mariner Credential Processing

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I. Legislative Requirement

This report was compiled in response to direction in Senate Report 118-85 accompanying the Fiscal Year (FY) 2024 Department of Homeland Security Appropriations Act (P.L. 118-47):

Senate Report 118-85 states:

The Committee is concerned about the turnaround time for Merchant Mariner Credentials. The Coast Guard reports no significant delays in credentialing; however, mariners and maritime transportation employees report delays up to 6 months between submitting applications and receipt of their MMC. Within 90 days of the date of enactment of this act, the National Maritime Center shall provide a report to the Committee reviewing the system for evaluating and approving Merchant Mariner Credentials. The report should identify any existing performance gaps and suggest changes to address such gaps, including those related to system performance and extended application turnaround times.

II. Background

The U.S. Marine Transportation System (MTS) accounts for more than \$5.4 trillion of annual economic activity and supports over 31 million American jobs.¹ Our Nation's security and prosperity are inextricably linked to a safe and efficient MTS which connects consumers, producers, manufacturers, and farmers to domestic and foreign markets and enables critical sealift capabilities directly supporting our national security and economic prosperity. The merchant mariners who navigate our waterways are vital to the safety and security of the MTS. Supporting those well-trained and qualified merchant mariners is the focus of the Coast Guard's Mariner Credentialing Program (MCP).

The mission of the MCP is to issue merchant mariner credentials (MMC) to the approximately 200,000 U.S. professional mariners in the most efficient manner possible. The MCP is governed by domestic laws and regulations and the International Convention on Standards for Training, Certification, and Watchkeeping for Seafarers (STCW), 1978, as amended. These mariners serve on thousands of U.S.-flagged vessels operated by more than 900 marine employers. The MCP issues approximately 125,000 MMCs and medical certificates, annually, at a cost of approximately \$36 million.²

The MCP is comprised of the Coast Guard's Office of Merchant Mariner Credentialing and the National Maritime Center (NMC) with its 17 Regional Examination Centers (RECs) and two Monitoring Units. The NMC and RECs are responsible for processing and evaluating applications for the issuance of MMCs. Credentialing applications and supporting information are received by the Coast Guard through an application process which is primarily paper-based, complex, and highly dependent on mariners providing timely and complete supporting documentation.

Since the mid-1990s, the Coast Guard MCP has used the Merchant Mariner Licensing and Documentation (MMLD) database to process MMCs. MMLD was originally designed for workflow tracking and retention of credentialing information. Applications are still paper-based and submitted by mail, hand, or as electronic attachments, without an automated method to validate information. Some improvements enabling scanned images of paper applications have led to decreased application approval times but have not significantly changed the application process. Significant reductions in application approval times are not possible until MMLD is replaced with a modern interactive information technology (IT) system.

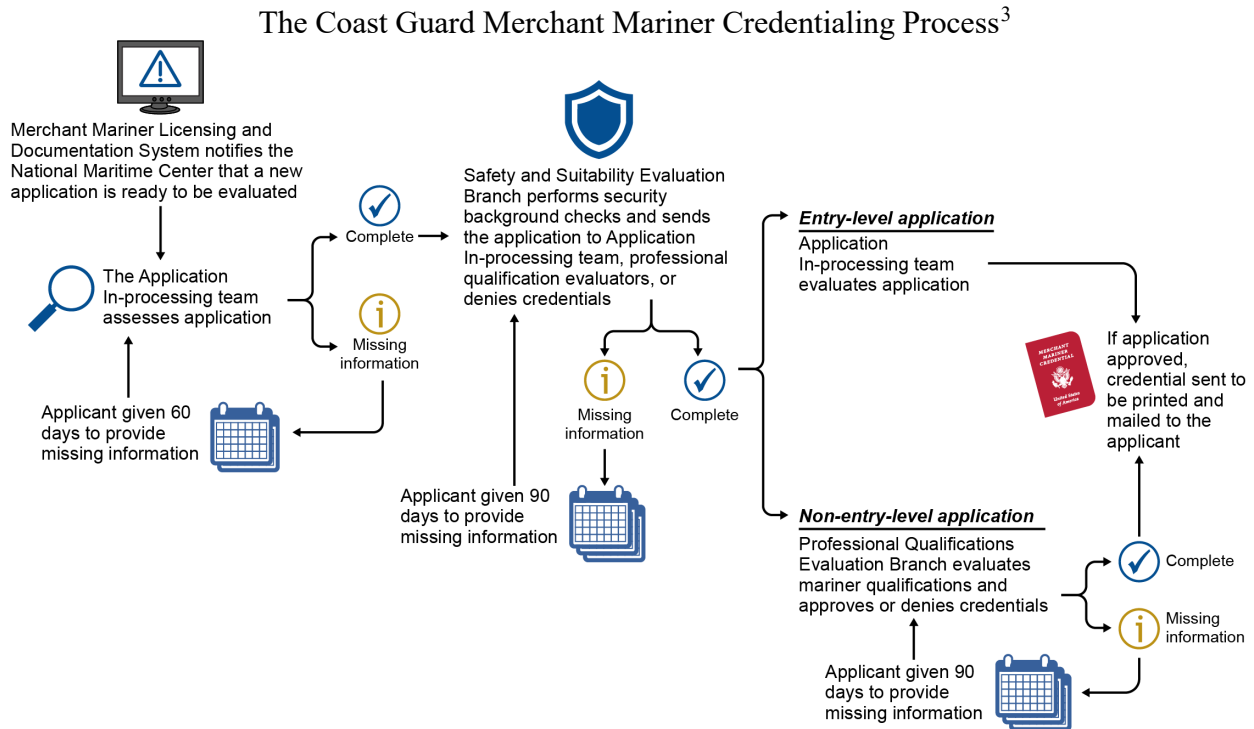
Improving service to the mariner and reducing the credential processing time are the objectives of the Coast Guard but can only be accomplished with a new IT system. The new system known as Navita, meaning "sailor" in Latin, is proposed to provide direct mariner and customer interface, automation, and data analysis. Navita will improve the Coast Guard's ability to manage the credentialing process, decrease credential review and approval times, and provide real-time services to the maritime industry.

¹ DHS (February 21, 2024), FACT SHEET: DHS Moves to Improve Supply Chain Resilience and Cybersecurity Within Our Maritime Critical Infrastructure, <https://www.dhs.gov/news/2024/02/21/fact-sheet-dhs-moves-improve-supply-chain-resilience-and-cybersecurity-within-our>, downloaded June 3, 2024.

² United States Coast Guard Mariner Credentialing Program Biennial User Fee Review FY2023.

III. Report

The issuance of a MMC is a twofold process. First, the applicant or mariner completes the required application and provides supporting documentation such as sea service letters and course completion certificates. The Coast Guard then evaluates the application package to determine if the mariner meets the professional and safety and suitability requirements for the requested credential and endorsements. The below diagram provides an overview of the credentialing process.



Source: GAO analysis of Coast Guard merchant mariner credentialing information; GAO (illustrations). | GAO-23-106629

The current paper-based process to properly evaluate a mariner’s application for adherence with established requirements and ensure mariners are properly credentialed to work in the maritime industry is lengthy and cumbersome. The total time (or “turnaround time”) for issuing an MMC to a qualified mariner is comprised of two primary elements. The first is the time for the Coast Guard to conduct the evaluation of the application; the second is the time an applicant spends providing additional information and successfully completing any required examinations.

Depending on the credential level and endorsements required, documentation can vary significantly, resulting in a range of processing times to complete a thorough evaluation and pass required examinations. This is mainly a paper-based process with little to no automation, requiring intervention by NMC personnel and the mariner. Two key metrics during the application process are Government Time and Applicant Time.

³ U.S. Government Accountability Office (GAO), *Merchant Mariner Credentialing: Coast Guard Performance Measures Could Better Address Mariners’ Needs* (GAO-23-106629) <https://www.gao.gov/products/gao-23-106629>.

Government Time (GT)

Government Time commences when an application is entered into the MMLD system and concludes when the credential is issued. The application entry into MMLD also triggers the recorded time that an application is being processed. The recorded time is segmented into “states” representing the steps of the credentialing process:

- 1) *Requested*: Receipt and initial screening of an application and entry into MMLD.
- 2) *Safety & Suitability*: Screening for Transportation Worker Identification Credential (TWIC)⁴ status as well as sexual assault, criminal convictions, and national driver registry history.
- 3) *Professional Qualifications*: Evaluation of sea service, competency, and experience for requested endorsement (officer or rating – National or STCW).
- 4) *Approved to Print*: After the applicant has successfully completed examinations (when necessary) or after an approved Professional Evaluation, the credential is ready for printing.
- 5) *Printed*: The time for printing, assembly, and delivery to the U.S. Postal Service.
- 6) *Issued*: The applicant’s request becomes issued (closed) after the credential is delivered to the U.S. Postal Service.

The complete application timeframe also includes unrecorded time before and after the above listed states in GT. This unrecorded time adds to the overall credentialing process and is as follows:

- 1) The time from physical receipt (paper or electronic) of an application to entry into MMLD. The Coast Guard’s goal to enter an application in MMLD is no more than five business days.
- 2) The time from U.S. Postal Service receiving a daily batch of outgoing metered credential envelopes to delivery at the applicant’s stated address. Delivery time typically ranges between two to five days depending on applicant location.

Applicant Time (AT)

Applicant Time is any period of time after an application has been received and entered into MMLD, where the mariner is responsible for providing additional information in order for the NMC to continue processing the application.

During the application screening and evaluation, it may be determined the application is incomplete and additional information is required, at which point the mariner is given the opportunity to provide the additional information to the Coast Guard. The application evaluation process is delayed until the mariner is notified, obtains the information, and returns it to the NMC. Although notification letters can be sent by email (some are still mailed), it still requires a mostly paper-based process and time for the mariner to respond. The following are additional information categories and timeframes allowed for responding to each:

⁴ TWIC issued by Transportation Security Administration.

- 1) Initial Application screening – If the application is initially determined to be incomplete, the applicant is notified and allowed up to 60 days (AI60) to provide the requested information.
- 2) Safety & Suitability Evaluation Branch (SSEB) screening – If the application is missing information necessary for safety and suitability screening, the applicant is notified and allowed up to 90 days (AISSEB) to provide the requested information. This allows for the potentially lengthy process to obtain court or law enforcement related documents.
- 3) Professional Qualification Evaluation Branch (PQEB) screening – If the application is missing information related to professional qualifications, the applicant is notified and allowed up to 90 days (AIPQEB) to provide the request information.

In 2023, a total of 33,977 MMC applications required additional information during the evaluation process. For example, during the Professional Qualifications evaluation, 69 percent of the requested additional information was for missing sea service documentation. Of the 33,977 applications from 2023, 5,574 (16 percent) required the applicant provide additional information more than once during the evaluation process.

It should also be noted that applicants control the pace of the process once they have been approved for an examination. Applicants who have met the Safety & Suitability and Professional Qualifications requirements are issued an Approved to Test letter detailing the examination(s) they must complete. Title 46 Code of Federal Regulations (CFR) 11.217(a) and 46 CFR 12.205(c) require all credentialing examinations and retests “be completed within 1-year of approval for examination.” Credentials cannot be issued until the required examinations are successfully completed. Several factors contribute to the time allowed and actual time required to complete examinations. Preparation and experience are needed to complete the examinations, and the 1-year timeframe allows for this and any retesting, if required. Although some examinations are open book and mailed to the mariner, most are conducted in-person at REC. Examination times are limited and can be difficult to schedule if a mariner is working or underway on a vessel. The Coast Guard maximizes opportunities by allowing testing at all RECs and works with mariners to complete the requisite examination within timeframe requirements.

Overall Processing Time (OPT)

OPT is the sum of GT and AT for a credential, represented in calendar days. When examinations are required, this additional time is also added to GT and AT to represent an additional category know as OPT (exam). Overall processing time is measured and captured in MMLD.

Performance Goals

Credentialing processes are regularly reviewed and audited to address concerns and make improvements. Key performance indicators and gaps are analyzed by NMC to plan for changes within the maritime industry, make updates, and address risk and variations in the credentialing process. Variations such as seasonal surges (for example, January through April to prepare for summer maritime operations), government vacancies and required training, and implementation of new regulations all impact the credentialing process.

The amount of time an applicant takes to provide additional information varies and is ascribed to the applicant and recorded as AT. As such, the primary performance goal for the NMC is focused on GT.

The performance goal for GT is no more than 30 calendar days. This goal is supported by the maritime industry including the Coast Guard's Federal Advisory Committees – the National Merchant Marine Personnel Advisory Committee (NMERPAC) and the National Merchant Mariner Medical Advisory Committee (NMEDMAC). This goal and monthly credentialing results are published on the NMC website. Annual metrics for calendar years 2019-2023 are included in Appendix A, providing an overview of credential applications, examinations, and processing time.

Performance Gaps

The Coast Guard has identified gaps within the GT and AT processes to improve credentialing processing time. These gaps cannot be immediately mitigated and have been included in the functional and operational requirements of the new IT system mentioned in the background section. The gaps include the following:

- 1) *Outdated Technology* – The MMLD database is based on 1990s programming and was never designed to process credential applications electronically. It was designed only to track the workflow of paper-based processes.
- 2) *Application Entry* – Manual entry of an application into the current MMLD database can take up to five days depending on workload. This could be alleviated with direct entry into an electronic system with the ability for applicants to directly interact with the Coast Guard.
- 3) *Training* – Coast Guard evaluators are currently staffed at different General Schedule (GS) pay grades; training and responsibilities are commensurate with those grades. Additionally, the training for evaluators to become fully proficient in the credentialing process can take months or years due to the complexity of certain applications. As such, evaluators are limited to the type of application assigned to them.
- 4) *Fees* – User fees are required for evaluation, examinations (if needed), and issuance of an MMC but do not cover the entire cost of the credentialing program. Funding for several program components, such as IT system updates or improvements, is provided through other Coast Guard appropriations.
- 5) *OPT* – A July 2023 Government Accountability Office report recommended the Coast Guard establish a performance measure for assessing overall processing of credentials and, after establishing it, use it regularly to assess the credentialing program.⁵ However, while OPT can be measured, the Coast Guard's inability to control AT hinders its ability to control OPT as a measure of performance. For that reason, the Coast Guard continues to use GT as a performance measure as discussed above. When Navita, the replacement for the MMLD database, is developed and implemented it is expected to significantly decrease the instances and amount of AT.
- 6) *Acceptance of Incomplete Applications* – Although Federal regulations allow the Coast Guard to refuse to process incomplete applications, the Coast Guard chooses to provide the mariner time to provide missing or incomplete information. If the Coast Guard refused to evaluate an incomplete application, the OPT would fall precipitously but mariners would experience additional delays in obtaining their credentials.

Improvements

The Coast Guard has made improvements to, and provides tools for, the credentialing process to assist the mariner and decrease MMC processing time. These improvements and tools were made within MMLD database limitations and current staffing levels. Although the improvements and tools have provided some additional benefits, more changes are needed and planned for in the U.S. Coast Guard Navita system. Both the current resources and some more significant proposed changes are listed below. Current resources include:

- 1) *Checklist* – On the NMC website, checklists are available to help determine professional qualifications needed for various officer and rating endorsements. The checklists are based upon the Code of Federal Regulations and Coast Guard policies. The checklists provide a listing of requirements used to evaluate the mariner for the requested credential. This helps the mariner ensure the proper information is submitted with an application reducing delays.
- 2) *Video Guides* – The NMC website includes video guides showing a step-by-step process for completing the credentialing application forms. These simple tutorials show what is required on the form, helping to eliminate missing information when the form is submitted.
- 3) *Email Submission* – Applications may be submitted by mail, fax, in-person, or other “electronic means” to RECs in accordance with current regulations. The Coast Guard implemented email submission by allowing attachments and scanned documents to be sent by a mariner to an REC. This reduces some unrecorded time and administrative processing time since applications are not mailed. The Coast Guard email system does not accept compressed files (zipped) and is limited to 35 megabytes in size, creating some issues.
- 4) *Early Submission* – Renewal application packages may be submitted up to eight months before credential expiration date without impacting the validity period of an MMC. Early submission avoids delays caused by the credentialing process from impacting a mariner’s ability to remain employed.
- 5) *New Credential* – In March 2024, the Coast Guard implemented a new MMC, replacing the “passport-style” booklet that required unique, complex, high maintenance printers. The new credential is a single page, high-security, Government Publishing Office pre-printed document printed on low-cost, reliable, and easily supported laser jet printers. The new credential and printers have eliminated backlogs that previously existed.
- 6) *Electronic Payment* – Credentialing fees are accepted using electronic means through the government-wide Pay.gov website; this avoids mariners having to pay in person at an REC. Although in-person or mailed payments are still accepted, over 90 percent of fees are received by electronic payment.
- 7) *Regulatory Changes* – The Coast Guard has initiated regulatory changes to update and improve the credentialing process. These include electronic submission of mariner course completion data from training providers, reducing the time it takes the Coast Guard to receive this information, requiring the use of Pay.gov for credentialing fees, and updating other application requirements reducing burdens on the mariner. These regulatory changes will assist with reducing the credentialing time and improving service to the mariner.

Information Technology (IT) System Proposed Changes

Replacing MMLD with the U.S. Coast Guard Navita system is the primary path to address the credentialing process, but it is only partially funded. Additional funding will be required to reach

its full operating design and meet the needs of the credentialing program beyond just the application process. Operational and functional requirements have already been developed based on regulatory requirements, Coast Guard processes, and input from partner federal agencies and maritime stakeholders. Through the Coast Guard federal advisory committees, NMERPAC and NMEDMAC, over 70 functional recommendations were provided to improve interaction with the maritime public and improve credentialing processes. To address the identified gaps, U.S. Coast Guard Navita is proposed to have the following attributes:

- 1) *Web-based System* – MMLD is an internal Coast Guard database. Mariners, marine employers, and training providers cannot access credentialing records to review or determine requirements to maintain or upgrade endorsements. A web-based system will provide access without the need to visit an REC, submit a request for information, or call/email the NMC to get the information. Web-access improves accessibility to records, allowing the mariner to properly obtain information and prepare their credentialing application.
- 2) *Electronic Applications* – As noted in this report, applications are often submitted without all required information necessary to complete evaluations. The Coast Guard credentialing vision is to embrace an internet transaction process like banking, e-commerce, or tax filing that prevents incomplete applications from being submitted.
- 3) *Electronic Mariner Records* – The Coast Guard maintains mariner records in the MMLD database, but they are not accessible to maritime stakeholders. Creating an accessible electronic mariner record will provide the opportunity to review, update, and verify the mariner's information prior to submitting an application or when updates are needed, such as a change to a mailing address. An electronic record will also facilitate verification of information prior to and after submission to the Coast Guard. This will help prevent the submission of incomplete or inaccurate applications that result in delays.
- 4) *Notifications* – Automatic notifications to mariner through their chosen method (such as text or email) will provide notice without paper letters and the postal service. Although official letters or notification will still be required, mariners notified through automated text or email will receive almost immediate notification, allowing them to access their electronic mariner record, view the letter or document, and address any requirement in a timely manner.
- 5) *Third Party Entry* – Third parties and marine employers may currently assist a mariner with an application primarily through submitting paper records or contacting the NMC on the mariner's behalf. Additionally, marine employers cannot submit information directly on behalf of the mariner to the database such as sea service time from employment or payroll systems. Allowing third party or a marine employer to submit information on behalf of the mariner through the new system will improve record management and reduce application times. This will be accomplished by obtaining separate accounts and log-on authority, and limiting information access to meet personal identification, health, and security requirements.
- 6) *Reports and Data Queries* – MMLD data is not readily accessible by the individual mariner or the maritime industry. For example, it is difficult to search a mariner's completed training courses or amount of sea service, or the number of credentialed mariners with a certain endorsement. Providing reports to assist mariners and the maritime industry, such as the amount of accumulated individual sea service or a listing of credential expiration dates for a company's employees, will improve customer service and planning for application submission.

Additional Proposed Changes

The Coast Guard has identified additional changes to improve the credentialing process. The Coast Guard is reviewing these in conjunction with the development of U.S. Coast Guard Navita to determine their feasibility and implementation timeframe.

- 1) *Application Forms* – The proposed electronic application is based on the Office of Management and Budget approved paper versions. Simply making paper forms electronic does not meet the future needs of the Coast Guard, mariners, or cooperating agencies. The Coast Guard is working to update the credentialing forms to remove outdated and redundant information, obtain new information, and assist across the whole of government for critical data collection.
- 2) *Personnel* – As included in the Coast Guard FY 2025 Congressional Justification, there is a need for approximately 40 additional personnel, along with other personnel initiatives, to enhance the MCP and leverage quality management systems principles. These personnel would close gaps in the credentialing application process, examination development, course approvals, and oversight to prevent fraud and increasing programmatic capacity to conduct quality management and oversight.
- 3) *Fees Analysis* – A review of fees is required for the overall credentialing program transformation and as part of the implementation on the new IT system. This is planned after the deployment of the new IT system and part of the mandated biennial user fee review.
- 4) *Examinations* – Paper-based examinations limit the Coast Guard’s ability to expand operations and provide additional services to mariners seeking a credential. The possibility of electronic examinations, remote testing centers, and online proctored exams are being considered pending funding and further IT capabilities.
- 5) *Electronic Credentials* – The Coast Guard is exploring the use of electronic or e-credentials in addition to the traditional physical credential. This long-term goal is only possible with a new IT system and with continued developments in national and international regulations and standards.

IV. Conclusion

The Coast Guard is committed to improving the merchant mariner credentialing application process and service to the maritime industry. Improvements are necessary to ensure mariners who receive credentials are qualified and capable of performing their duties for a safe and secure MTS. To do this, the Coast Guard must move from the traditional paper-based application process to a modern credentialing system supporting the needs of the 21st century mariner and maritime public.

This requires the replacement of the MMLD database with an electronic credentialing system, eliminating the slower, paper-based processes and providing for an interactive web-based application significantly reducing the time required to receive and approve applications. In FY 2024, the Coast Guard was provided \$11 million to modernize the mariner credentialing program and implement a new credentialing system to replace MMLD. This funding will enable the system to reach initial operating capability, currently scheduled for late FY 2026, but additional funding is required to fully implement all the proposed improvements and functionalities of U.S. Coast Guard Navita and reach full operating capability.

Although the Coast Guard's primary requirement is the replacement of MMLD database, additional personnel are required throughout the MCP workforce to support the credentialing process. Included are policy efforts to enhance the MCP and leverage quality management oversight within the Coast Guard with our external customers.

Implementing the U.S. Coast Guard Navita system is a dynamic change to the way the Coast Guard conducts the credentialing program and will be a meaningful transformation for the maritime industry. Supporting mariners, maritime employers, and partner agencies, such as the U.S. Maritime Administration, is essential for the overall success of the credentialing program and the prosperity of the MTS. The Coast Guard will continue to implement process improvements to enhance the application process and reduce processing times where possible.

The Coast Guard looks forward to continued coordination with industry, interagency partners, Congress, and thousands of individual mariners to successfully implement the new merchant mariner credentialing system.

Appendix A: Metrics

This Appendix provides credentialing performance metrics for calendar years 2019 through 2023. Additionally, credential performance metrics are provided in the Maritime Prevention Program annual report required by Office of Management and Budget Circular A-11. Along with performance metrics, the average customer satisfaction rating is published monthly to satisfy Executive Order 14058 et seq.

Government Time (GT). GT includes the time spent processing an application by Coast Guard personnel once entered in MMLD.

Additional Information. During the application screening, additional information may be required if it is determined the application is incomplete or does not contain sufficient supporting documentation.

Applicant Time (AT). Not every application requires additional information and not every applicant is required to sit for an examination. AT, when added to GT, creates the OPT metric.

Overall Processing Time (OPT). The OPT is the combination of GT and AT for a credential represented in calendar days. When examinations are required, this additional time is added to GT and AT to represent the separate category OPT (exam). OPT is measured and reportable from MMLD.

Table 1 represents the annual average GT, AT, OPT, and OPT (exam) time in calendar days for issued credentials for calendar years 2019 through 2023. OPT (exam) in the last column represents the population requiring an examination demonstrating the difference between OPT for all applications and the longer OPT for the examination group.

Table 1 – 2019-2023 Annual Count of Credential Applications and Average Processing Times in Calendar Days

Year	Issued (count)	GT (All)	AT (All)	OPT (All)	Exam (count)	Exam (avg)	OPT (exam)
2023	62,916	34.41	25.51	59.92	6,973	95.07	145.82
2022	59,639	38.31	23.87	62.18	6,498	92.60	143.24
2021	57,632	27.65	28.38	56.03	6,825	107.02	152.23
2020	46,072	27.91	26.09	54.00	4,818	113.13	153.19
2019	61,779	22.35	24.69	47.04	6,613	95.41	131.66

Table 2 represents the count and average annual additional information time for each state count which includes the Initial Application screening for *60 days* (AI60), Safety & Suitability Evaluation Branch screening for *90 days* (AISSEB), and Professional Qualification Evaluation Branch screening for *90 days* (AIPQEB). The last column is the count of applications that went through more than one additional information state.

Table 2 – 2019-2023 Annual Count of Additional Information States and Average Times in Calendar Days

Year	AI60 (count)	AI60 (avg days)	AISSEB (count)	AISSEB (avg days)	AIPQEB (count)	AIPQEB (avg days)	Count in more than 1 AI state
2023	17,664	17.41	423	40.25	15,890	38.86	5,574
2022	17,045	14.73	446	34.49	15,125	36.68	5,532
2021	16,696	14.53	265	36.68	16,239	40.20	6,036
2020	11,935	13.58	212	46.00	10,698	40.45	3,678
2019	14,777	14.08	364	38.80	15,835	33.86	4,959

Table 3 represents the difference of application processing times between the OPT from Table 1 compared to the OPT when an application enters an additional information state. Just as Table 1 demonstrated a variance between OPT and OPT (exam), Table 3 indicates a variance between OPT all and OPT for applications that entered an additional information state. The higher OPT for additional information applicants has a direct impact on turnaround time for these individuals. Approximately 50 percent of MMC applications received in 2023 went into an additional information state at least once. The goal is to reduce this to as closely near zero as possible.

Table 3 – Annual OPT in Calendar Days Comparing All Applications (OPT all) with Applications that Entered an Additional Information State

Year	OPT all (from Table 1)	AI60 OPT (avg)	AISSEB OPT (avg)	AIPQEB OPT (avg)
2023	59.92	78.11	123.03	92.50
2022	62.18	70.19	109.66	93.54
2021	56.03	75.17	116.41	89.23
2020	54.00	73.16	112.00	86.87
2019	47.04	67.23	100.55	75.16

Appendix B: Abbreviations

Abbreviations	Definition
AI	Additional Information
AIPQEB	Additional Information Professional Qualification Evaluation Branch
AISSEB	Additional Information Safety and Suitability Evaluation Branch
AT	Applicant Time
CFR	Code of Federal Regulations
FY	Fiscal Year
GS	General Schedule
GT	Government Time
IT	Information Technology
MCP	Mariner Credentialing Program
MMC	Merchant Mariner Credential
MMLD	Merchant Mariner Licensing and Documentation
MTS	Marine Transportation System
NMC	National Maritime Center
NMEDMAC	National Merchant Mariner Medical Advisory Committee
NMERPAC	National Merchant Marine Personnel Advisory Committee
OPT	Overall Processing Time
REC	Regional Exam Center
STCW	International Convention on Standards for Training, Certification, and Watchkeeping for Seafarers