

## Fitness for Certification

Fitness for certification determinations require that medical practitioners understand the underlying physical condition, how that condition is impacted by service in the maritime environment, and how the condition itself can impact maritime and public safety.

- Seafarers work in a multitude of environments and conditions that can impact their physical condition and may prevent them from obtaining timely medical care. Remote locations with minimal, if any, medical resources are common and the loss of a functioning mariner on a vessel can significantly impact the rest of the crew, both in regards to routine and emergency duties.
- Medical conditions need to be considered with respect to functional impairments, stability, need for surveillance, and the risk of incapacitation.
- Medical practitioners should consider medication needs, possible impairment or incapacitation from required medications, and the consequences of missed dosages or lost medication.
- Physical ability requirements are discussed in [Merchant Mariner Medical Manual, Commandant Instruction Manual \(COMDTINST M16721.48\), Chapter 6](#), and must be considered in relation to the seafarer's medical condition. It should be understood that mariners must be able to perform both routine and emergency procedures. It should be noted that [Merchant Mariner Medical Manual, Commandant Instruction Manual \(COMDTINST M16721.48\)](#) is not all-inclusive, and additional medical information may be requested to clarify status and stability of the condition.
- Medical conditions that preclude performance of these duties increase the risk to remaining crew, property, and public safety.
- Recommendations for fitness for certification by treating practitioners are taken into consideration by the National Maritime Center (NMC) personnel evaluating the medical condition of the mariner. It should be noted, however, that treating practitioners often make recommendations without fully understanding fitness for certification guidelines and the marine transportation system (MTS) safety needs. Final determination will be made in accordance with the overriding safety needs of the MTS.

The determination of whether or not a mariner is fit for certification is based on a medical evaluation of the physical examination form and supporting documentation submitted by the applicant. The medical evaluation is a three-step process; however, not all applicants are subject to all three steps:

- 1) **Medical Screening:** Certified Medical Assistant (CMA) or Registered Medical Assistant (RMA) review every physical examination arriving at the NMC. The CMAs/RMAs have limited ability and clear approximately 85 percent of the files without any further review required.
- 2) **Initial Medical Review:** Any medical condition deemed outside the scope of the CMA or RMA is then reviewed by a mid-level medical provider, a physician assistant (PA). PAs review all application files that require a more comprehensive assessment. These evaluators have the ability to grant waivers, request additional information, and are authorized to speak with the applicant's physician when there are questions with regards to fitness for certification requirements or requested information.
- 3) **MD Review:** If a physical examination has been evaluated and determined that the mariner may not be fit for certification, the file is then submitted to our senior evaluation staff for final determination.

## Medical Screening

The medical screening process is a review of the CG-719K or CG-719K/E Merchant Mariner Credential (MMC) Medical Evaluation Report submitted to the NMC. Medical screeners review the physical examination form and determine if the applicant's file requires a medical evaluation or operational limitation. The scope of the medical screener's ability to grant an operational limitation is delegated pursuant to guidance in NMC work instructions and guidance from the Medical Division chief. This process allows for up to 85 percent of applications processed through the medical division to move on to the next credentialing step without further medical review.

## Medical Evaluations

The medical evaluation process is a consultative review of the Merchant Mariner Credential Medical Evaluation Report submitted to the NMC. This review follows an unsuccessful screening due to medical history, condition, medications, or any contradicting information noted on the physical examination form or supporting documentation submitted with the application.

Mariners applying for entry level positions (Ordinary Seaman, Wiper, or Food Handler) are not held to the same medical standards as mariners applying for qualified rating positions.

## Medical Waivers

Medical waivers are granted for conditions documented on the physical examination form or supporting documentation submitted by the applicant when the condition has been identified as not posing a significant risk to maritime safety. The waiver is an acknowledgement by the NMC that the condition was identified and places a responsibility on the mariner to report any change in the identified condition. Conditions that have progressively worsened may potentially affect a mariner's fitness for certification.

When granting a waiver, the NMC may apply a requirement or limitation to the waiver. It is the mariner's responsibility to read the waiver letter and any applicable requirements/limitations in order to maintain the waiver. 46 CFR does not specifically address the innumerable diagnoses with possible associated requirements. [Merchant Mariner Medical Manual, Commandant Instruction Manual \(COMDTINST M16721.48\)](#), however, does state that one of the outcomes of the NMC medical review may result in a determinate that "the application does not possess the vision, hearing or general physical condition necessary, but a credential may be issued with appropriate limitation, waivers and/or other conditions for issuance of the credential specified by the NMC."

The mariner should carry this waiver letter at all times while acting under the authority of the credential.

Waivers may be rendered invalid due to changes in a mariner's medical condition and/or if a mariner fails to comply with waiver requirements.

## Supporting Medical Documentation

Frequently, a mariner's medical examination will indicate treatment for an illness, injury, or prescription medication which requires further clarification in order to make a fitness for medical certification determination. Awaiting information (AI) refers to additional information requested by the medical evaluation staff to complete the medical evaluation.

## Physical Examination Checklist

When completing the CG-719K or CG-719K/E form, ensure that all blocks are filled in. Forms with missing information will incur delays in processing.

**Section III (a) Medical Conditions:** Review and verify the medical history as reported by the mariner. The medical practitioner should provide details of conditions as indicated on the form (Page 5, Section III (b)) and aid the mariner in submitting the supporting medical documentation needed for the noted conditions. The requirements for this supporting documentation are listed in [Merchant Mariner Medical Manual, Commandant Instruction Manual \(COMDTINST M16721.48\)](#).

- See the **TOP 10 MEDICAL CONDITIONS** section of the NMC website for more information, including supporting documentation requirements and evaluation information. For information and requirements for other conditions, see [Merchant Mariner Medical Manual, Commandant Instruction Manual \(COMDTINST M16721.48\), Table of Contents, Chapters 9 – 25](#).
- Failure to provide the supporting medical documentation for noted conditions can lead to **significant** delays in processing and evaluation.

**Section IV Medications:** Verify that ALL medications, vitamins, dietary supplements, and/or performance-enhancing substances are listed with dosage and frequency. This includes both prescription and non-prescription substances.

**Section V Physical Examination:** Ensure that all sections are complete, including items 1 through 16.

**Section VI (a) Visual Acuity:** Ensure that both corrected AND uncorrected visual acuity is recorded, if applicable.

**Section VI (b) Color Vision:** Ensure that test name and results are clearly marked. Use of color-sensing lenses is not authorized. Please contact the NMC for any questions regarding the tests listed or to determine if an alternative test is acceptable prior to submitting the form.

**Section VII Hearing:** Instructions are as follows:

- **Hearing Test:** If the medical practitioner conducting the general medical exam has concerns that an applicant's ability to hear may impact maritime safety, the examining medical practitioner, if not qualified to conduct the appropriate examinations, must refer the applicant to an audiologist or other hearing specialist to conduct an audiometer test and/or speech discrimination test, as appropriate.

- The audiometer test should include testing at the following thresholds: 500 Hz, 1,000 Hz, 2,000 Hz, and 3,000 Hz. The frequency responses for each ear should be averaged to determine the measure of an applicant's hearing ability. Applicants must demonstrate an unaided threshold of 30 decibels or less in at least one ear.
- The functional speech discrimination (FSD) test should be carried out at a level of 65 decibels. For issuance of an original MMC or endorsement, the applicant must demonstrate functional speech discrimination of at least 90 percent. For renewal or raise of grade, the applicant must demonstrate functional speech discrimination of at least 80 percent. An applicant who is unable to meet the standards of the audiometer test but who can pass the functional speech discrimination test may be eligible for a medical waiver in accordance with paragraph (g) of this section.

## **Section VIII Demonstration of Physical Ability:**

- If the examining medical practitioner doubts the applicant's ability to meet the guidelines contained within this table, the practitioner should require that the applicant demonstrate the ability to meet the guidelines.
- All demonstrations of ability should be performed by the applicant without assistance.
- Any prosthesis normally worn by the applicant and other aid devices such as prescription glasses may be used by the applicant in all physical demonstrations except when the use of such would prevent the proper wearing of mandated personal protective equipment (PPE).
- If an applicant is unable to meet any of the guidelines contained within the table on page 2 CG-719K instructions, the examining medical practitioner should provide information on the degree or severity of the applicant's inability to meet the guidelines.
- Ensure Physical Ability Results are entered at the bottom of the page. Use the comments field for any additional information.

**Section IX Summary:** Ensure all sections are completed, including the medical practitioner section.

**Section X Application Certification:** Ensure applicant signature and date have been entered.

## Denial of Medical Certification

**If your application has been denied for medical reasons, consider:** In accordance with [46 CFR 1.03-40](#), you may request reconsideration of this decision. Your request for reconsideration should address any possible errors, provide new facts or information, and/or provide extenuating circumstances in order to mitigate the decision. The request for reconsideration must be made in writing and postmarked no later than 30 days after the date of the denial letter. The request for reconsideration will be reviewed and the applicant will be notified that the NMC has either:

- (1) reversed/modified the initial decision, or
- (2) upheld the decision to deny your application. If you disagree with the reconsideration decision, then you may make a formal appeal to the Director of Prevention Policy (CG-5P) at Coast Guard Headquarters within 30 days of the date of the reconsideration denial letter. While a request for reconsideration is pending, the original decision or action remains in effect unless otherwise stated. Failure to submit a formal request for reconsideration in accordance with the noted procedures and time limits will result in the decision or action becoming final agency action. It is recommended you retain copies of all material you send with any request for reconsideration. Attach a copy of the denial letter received to any documentation you provide to the NMC in response to the notification.

**Requests for Reconsideration of Medical Denials:** A team of qualified medical practitioners reviews all reconsideration requests to determine if your eligibility has changed.

**Reconsideration Approvals:** Reconsideration approvals will be forwarded to the Professional Qualifications Evaluation division for processing of your MMC, if applicable. A medical waiver may be included with your medical certificate (see [Medical Waivers](#)).

- [Reconsideration Denials](#)
- [Appeals](#)