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## MEMORANDUM

From: Verne B. Gifford  
CG-BSX-2

Reply to: CG-BSX-21  
Attn of: Kristin Williams  
(202) 372-1067

To: CG-BSX-2

Subj: POLICY # 2020-1 - IMPLEMENTATION OF TITLE 33 CFR 174.16  
VERIFICATION OF HULL IDENTIFICATION NUMBER (HIN)

Ref: (a) 33 CFR Subchapter S

1. On March 28, 2012, the Coast Guard published a Final Rule in the Federal Register entitled “Changes to Standard Numbering System, Vessel Identification System and Boating Accident Report Database” (77 FR 18689). A portion of that rule revised 33 CFR 174, “State Numbering and Casualty Reporting Systems,” by adding 33 CFR 174.16, “Verification of Hull Identification Numbers (HINs).” Since the rule was published, states and territories have raised numerous questions about the HIN verification process.
2. To assist states with implementing the regulation, CG-BSX-2 worked with the National Association of State Boating Law Administrators (NASBLA) to create the 2018 HIN Validation & Verification Guideline PowerPoint (VVGP), which was posted to the NASBLA webpage. In 2020, the HIN VVGP was revised to address issues raised by the states and USCG.
3. In order to comply with the provisions of 33 CFR 174.16, State issuing authorities must:
  - a. Verify whether a vessel has a primary HIN meeting the requirements of 33 CFR 181 subpart C, including if the Manufacturer’s Identification Code (MIC) is valid. The issuing authority can determine how the HIN can be presented for verification. Acceptable methods include:
    - Pencil tracing;
    - Photographs;
    - Physical inspection by a state official;
    - Signed affidavit by the owner attesting to accuracy of the HIN;
    - Contacting the manufacturer;
    - Checking the USCG MIC website to confirm the validity of the HIN; and
    - Checking the National Insurance Crime Bureau (NICB) database.

Information in the HIN VVGP will assist the issuing authority in determining if the HIN format is correct.

- b. If the HIN is determined to be valid, no further action needs to be taken.
- c. If the HIN is determined to be invalid, either because of improper format or because it has too many characters, or if the boat does not have a HIN, then the following steps should be taken:
  - If the boat is less than ten years old and the manufacturer is still in business, the state issuing authority should contact the USCG (CG-BSX-23) and the USCG will authorize the manufacturer to correct the HIN discrepancy.
  - If the boat is less than ten years old and either the manufacturer is out of business or if the boat does not have a HIN, the state should issue a state-assigned HIN using the current format.
  - If the boat is more than ten years old, the state should issue a state-assigned HIN using the current format.

Information in the HIN VVGP will instruct the issuing authority on the proper format of a state-issued HIN.

- d. Verify that the owner of the vessel has permanently affixed the assigned primary HIN to the vessel in compliance with 33 CFR 181 subpart C. The issuing authority may determine appropriate methods of verification based on their specific circumstances.
4. This memo establishes the policy communicated in the HIN VVGP and provides guidance on how to implement the regulations in reference (a). Effective immediately, each State Recreational Boating Safety Program Coordinator should ensure their assigned states and territories are adhering to this policy utilizing the 2020 HIN VVGP, attached as enclosure (1). An updated 2020 HIN VVGP will be posted to the [USCGBoating.org](https://www.uscgboating.org) and [NASBLA.org websites](https://www.nasbla.org).
  5. Questions or concerns with this policy should be directed to the State Recreational Boating State Program Coordinator (SPC) assigned to each state and territory.

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Enclosure: (1) 2020 HIN Validation & Verification Guideline PowerPoint

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