

**SUPPORTING STATEMENT
FISHERY OBSERVER RETENTION SURVEY
OMB CONTROL NO. 0648-XXXX**

INTRODUCTION

This document is submitted in accordance with the Paperwork Reduction Act, in support of an investigation of marine fishery observer retention in the National Oceanic and Atmospheric Administration's (NOAA's) National Marine Fisheries Service (NMFS). This request is for a new information collection.

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

The National Marine Fisheries Service (NMFS) utilizes observers to collect information on catch, bycatch, fishing efforts, biological characteristics, interactions with protected species, as well as socioeconomic information, from U.S. commercial fishing and processing vessels. More information on the observer population is needed to support the Agency's conservation and management goals, to strengthen and improve fishery management decision-making, and to satisfy legal mandates under the Reauthorization of the [Magnuson-Stevens Fishery Conservation and Management Act](#), the [Regulatory Flexibility Act](#), the [Endangered Species Act](#), and the [National Environmental Policy Act](#), [Executive Order 12866](#), and other pertinent statutes.

Observers are usually the only independent data collection source for NMFS to collect at-sea data and are crucial in fishery management. The National Observer Program (NOP) is conducting a survey of fishery observers in order to identify and respond to the incentives and disincentives of observers to continue in the field and to identify their subsequent career choices. Improving the retention of qualified and experienced observers may help to reduce training efforts and costs, and at the same time, improve data quality as shown by Williams et al. (2006). The survey data will be considered, in order to attempt to improve observer recruitment and retention by regional fishery observer programs. Without an accurate understanding of the motivations of observers, these management programs would suffer.

2. Explain how, by whom, how frequently, and for what purpose the information will be used.

Data will be collected via a voluntary survey. The NOP plans to distribute the surveys to current and former observers, including at-sea monitors. Because the universe of former observers is unknown, NOP will encourage observers to share the survey with former observers. The participation of former observers will help to evaluate the program over time.

We propose that this survey would be a one-time data collection, which would allow a comprehensive understanding of observers' attitudes toward their observer program(s). A

follow-up collection may be conducted in the future, as needed, to identify the effects of any changes to incentives to retain observers.

The proposed use of the information from the each section is provided below. The survey is designed only for observers who have been deployed in a U.S. fishery. Corresponding information will be collected at the beginning of the survey. Questions No. 1 - No.4 of the survey, “Facts about observer” is intended to identify the demographic information, including the gender, age group, and education level of the respondent. This information is important to classify perceptions of observers with different gender, age, and education categories. The comparison between initial degree and most recent educational degree will be helpful to understand if the observer pursued a higher degree and if they returned to work as observer after obtaining a higher educational degree.

Questions No. 5 - No. 12, “Background of observing experience”, are intended to identify the start/end time of the observing period, sea days, region and program type, motivation, and initial time span intended to work as observer. All observers are grouped into one of five categories: (1) Northeast, (2) Southeast, (3) West Coast, (4) Pacific Island and (5) Alaska. Next, fishery types are put into categories. Because of the large variation of fishery type in each region, no general subcategory is used here. For the Northeast, observers are divided into observer, at-sea monitor, and industry funded scallop observer. For Alaska, observers are divided into groundfish and halibut full coverage and partial coverage. For the West Coast, there are four subcategories: groundfish non catch-share, groundfish catch-share, California gillnet fisheries, and California longline fishery. For the Pacific Islands, observers are divided into Hawaii pelagic longline and Samoa longline fisheries. For the Southeast, there are five types: pelagic longline, shark bottom longline, gillnets, reef fish and shrimp trawl. Because former observers are also included in the survey and some programs changed or were eliminated over time, there will be another subcategory ‘Not listed above’ available for each region. This method of stratification results in 23 strata including total populations for current observer and unknown populations for former observers. Answers to these questions will describe fundamental information about the working history of observers by observer program.

Questions No. 13 - No. 26, “Working condition and satisfactory level”, are intended to identify basic working conditions, identify the level of satisfaction by observers to certain aspects of the observer experience and their experience regarding harassment during deployment. These aspects are the major complaints that have been reported over time. These aspects are further divided into three categories: observer program, provider company, and captain/crew. Answers to these questions will aid the observer programs to address observer dissatisfaction.

Questions No. 27 - No. 32, “Recognition as an observer and attitude for future”, are intended to investigate the category of the observer’s current job, motivations for remaining or leaving their observer positions, the role of observer experience in their career paths, and their attitudes towards using electronic monitoring/electronic data collection systems as tools for observing.

Questions No. 33 - No. 49, “International and Regional Questions”, is intended to investigate some specific questions regarding observers’ experiences in international fisheries and observer programs in three regional fisheries. For international fisheries, the questions are designed to

gauge how many observers have experience working on foreign fisheries and through which international organization the observer has been deployed. Additional questions are designed to gauge their preference between foreign and U.S. fishery for certain aspects. For North Pacific observers, additional questions are designed to gauge the satisfaction for longline lead level 2 versus non-lead level 2 observers. For Northeast observers, additional questions address the difference between “observer” and “at-sea monitor” positions. For West Coast observers, satisfaction of observers between catch-share fisheries and non-catch-share fisheries are surveyed.

Questions No. 50 - No. 52, “Comment and follow-up interview”, are intended to collect contact information of former or current observers who want to share their experience or give additional comments. A separate link will be provided to collect name and contact information so that their information are not linked to their survey responses. A sample of observers who provide their contact information will be contacted by NOP to share their thoughts. The sample size depends on how many observers are willing to be contacted. See response to Question 10 of this Supporting Statement for more information on privacy.

A final report of the results of the survey will be posted on the NMFS website. The report will include descriptive statistics (such as mean and standard deviation) by region and observer program. No identification information will be revealed via this report. Aggregated results may also be reported through journal publications, presentations at conferences, and policy guidelines.

The information collected through this survey will be disseminated to the public or used to support publicly disseminated information. The NMFS Office of Science and Technology will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to Section 515 of Public Law 106-554.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

NMFS is proposing to collect the information identified above by providing intended survey respondents (former and current observers) with a web link to the survey. The surveys will be completed via ‘Survey Monkey’ and automatically will be transferred into a database for analysis. Using electronic means to transfer the responses will reduce the burden on the public since they will not have to take the time to mail a paper form in order to respond. Data entered online will be saved in real time.

The survey will be pretested with nine former observers who currently are NOAA Fisheries staffs. The feedback obtained from pretesting will not be included in the database for analysis, because necessary changes may take place afterwards.

The survey offers an opportunity for observers to indicate their willingness to be contacted by NOP for follow-up phone interviews. A sample of observers who provide their contact information will be contacted by NOP for follow-up interviews. The interview would allow observers to expand on their opinions and comments and provide examples of issues that concern them.

A telephone number will be provided in pre-notice and survey emails to provide potential respondents with a way to ask general questions (e.g., purpose, need, and privacy) or specific questions about the survey.

4. Describe efforts to identify duplication.

NOAA/NMFS is the only agency/bureau/line office that utilizes fisheries observers, and all observer program employees are aware of the survey.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

The collection of this information will not have a significant impact on small entities such as small businesses, organizations, or government bodies, as the participants will be individuals. The estimated time to complete the survey is 20 minutes per person. Participation in the survey is voluntary.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

The collection of this information is essential to increase observer retention that will optimally decrease the training costs and increase the quality of data collected in regional observer programs. Lack of information on observer retention severely limits the ability of regional observer programs to evaluate observers' behavioral responses to changes in regulations, recruitment, and observing conditions. Lack of information, actions that attempt to increase observer retention and performance as a whole may be incomplete and inaccurate.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

The collection will be conducted in a manner consistent with OMB Guidelines.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice published on March 3, 2016 [81 FR 12472] solicited public comments. One comment was received from one former observer as following:

Thank you for the opportunity to comment on the National Observer Program (NOP)'s request to conduct a survey of fishery observers in order to investigate incentives and disincentives for remaining an observer and to identify their subsequent career choices. I was a periodic observer in the North Pacific Groundfish Observer Program from 1991-2000 and 2005 and may have continued to be an observer had incentives been different. In addition, as a researcher, I have analyzed observer data while working on several projects to reduce seabird bycatch in Alaska fisheries.

The proposed collection of information is necessary as changes to current recruitment and retention systems improve the quality of data inputs needed by NOAA Fisheries to manage our public resource. Observer data is utilized by National Marine Fisheries Service regional offices to manage fisheries in real time as well as hundreds of scientists at the science centers for stock assessment, catch-at-age relationships, and general ecology. Observers are the best source of independent fisheries-dependent data that is collected globally. Not only does NOAA Fisheries depend on observer-collected data, several other agencies (e.g. US Fish and Wildlife Service) and hundreds of university researchers have used observer data for various fisheries-related projects. The observer job is difficult and can take many deployments to become proficient. Any steps the agency can take to retain observers who collect high-quality data are worthwhile. Any time the quality of observer data is called into question, the integrity of fisheries management as well as any other research based on that data can be called into question.

If the agency wants substantive information, the survey will need to take more than 10 minutes. It could take 5 minutes just to get the relevant and necessary background information.

Within the U.S. there is a range of observer employment scenarios ranging from extremely temporary to full-time with benefits. Data collected should be summarized by program or program model at the very least. The NOP should also mandate that each region make every effort to contact observers from their programs for the last decade in order to get an adequate sample size per region/program or alternatively, provide all of the contact information to the NOP. Questions will need to be designed well and it will be useful for respondents to be assured that the information collected will actually be utilized to instigate changes such as the creation of 'best practices' the regional programs should utilize to increase retention. The NOP contracted the Association for Professional Observers to perform a recruitment and retention study in the early 2000's which should have some valuable ideas for a new survey (see also Appendix VII of this document where they suggested a longitudinal survey on this topic to be deployed in 3 phases). Unfortunately, the final submitted report met with so much resistance

from the regional programs that the report was never made public by the agency. In addition, there was a 2nd survey effort done by a professional survey outfit which also seemed to go nowhere.

Ideally, the survey would be web-based so that current and former observers have access to it from anywhere.

Thank you for your time.

The commenter identified the difficulty of working as an observer and the proficiency that could be achieved after several deployments. Thus retaining observers within the program is important to improve data quality. The comment also noted the proposed time span for data collection may not sufficient for responding. The amount of time estimated for survey completion for each individual was modified from 10 minutes to 20 minutes. See response to Question 12 of this Supporting Statement for more information on estimation of individual responding time. The comment regarding summarizing the result by program is consistent with the design of the survey. Observers from all programs will be contacted to voluntarily respond to the survey.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

There are no plans to provide any payment or gift to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

NMFS will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for privacy and electronic information and this assurance is included in the survey. In particular, data concerning observer retention will be collected anonymously and will not be released for public use. Contact information collected for follow-up interview will not be linked to their survey responses. See response to Question 2 of this Supporting Statement for more information on collecting contact information.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

There are no questions of a sensitive nature included in the survey.

12. Provide an estimate in hours of the burden of the collection of information.

In the year 2015, there were 974 observers. There are no major changes to the program; therefore, we expect the number to remain about the same. The response rate for current observer is estimated around 60%, which would result in 585 returned surveys. Because of an unknown number of former observers, the universe of participants is not available. An estimate of 500 former observers may receive the survey. The corresponding response rate for former observers

is expected around 40%, which would result in 200 returned surveys. We estimate that approximately 785 surveys will be returned in total. The estimate to complete the survey is 20 minutes per respondent. This includes the time required to read the introductory statement and gathering information necessary to complete the survey. As a result, the survey is expected to impose a total of 262 hours. An hourly rate of \$25.20 is based on the average for all civilian workers from the National Compensation Survey (preliminary, October 2015; <http://data.bls.gov/cgi-bin/surveymost>). There are no other costs to the respondent. Because the survey is a one-time collection, the total of 262 burden hours is anticipated, resulting in a cost to the public of approximately \$6,602.40.

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

The collection would be conducted through an internet web-based survey tool, so no additional cost burden would be incurred in purchasing equipment.

14. Provide estimates of annualized cost to the Federal government.

No additional full-time equivalent government employees were hired to conduct the survey. A Knauss Fellow was contracted to perform the survey and analysis, along with other assignments. The associated cost is \$13,500. Up to an additional \$500 could be spent to print the final report. Total estimated cost to the federal government is \$14,000. A table of itemized costs is presented below.

Description	Estimated Cost
<i>Data Collection</i>	
Printing	\$500
<i>Data preparation</i>	
Project management	\$13,500

15. Explain the reasons for any program changes or adjustments.

This is a new collection.

16. For collections whose results will be published, outline the plans for tabulation and publication.

Numerical and textual survey information will be a product of this study. Survey data will be analyzed using standard data analysis methods. A final report will be posted on the NMFS website. Survey results may be released as a NMFS Technical Memorandum or submitted for publication in a peer-reviewed journal.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

Not Applicable.

18. Explain each exception to the certification statement.

Not Applicable.