

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
NOAA Diving Program
OMB Control No. 0648-XXXX

SUPPORTING STATEMENT PART A

Abstract

This is a request for approval of a collection currently in use without OMB approval.

The NOAA Diving Program (NDP) is administered by the U.S. Department of Commerce, National Oceanic and Atmospheric Administration (NOAA), and is headquartered at the NOAA Western Regional Center (WRC) in Seattle, Washington. The NDP provides the guidelines, policy, and training for all NOAA Divers, which includes all NOAA employees who dive, as well as contractors and volunteers, among others, who conduct diving operations. This collection covers the forms that are required to ensure proficiency in order to dive for NOAA.

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The NOAA Diving Program (NDP) is administered by the U.S. Department of Commerce, National Oceanic and Atmospheric Administration (NOAA), and is headquartered at the NOAA Western Regional Center (WRC) in Seattle, Washington. The NDP provides the policy, guidelines, training, in addition to supplying and servicing diving safety equipment for all NOAA Divers, which includes all NOAA employees who dive (both FTEs and NOAA Corps officers), as well as contractors, and volunteers, among others, who conduct diving operations.

With more than 300 divers, the National Oceanic and Atmospheric Administration (NOAA) has the largest complement of divers of any civilian federal agency. NOAA Divers conduct operations in our nation's waters and beyond in support of NOAA's scientific research and operations. They are called upon to work in various conditions ranging from the warm, clear waters of a marine sanctuary, to the cold, murky waters of a commercial harbor. The tasks NOAA Divers complete are as varied as the waters they dive in, with most divers supporting projects and research of the National Ocean Service (NOS), the National Marine Fisheries Service (NMFS), and the Office of Marine and Aviation Operations (OMAO).

NOAA Divers are required to maintain a high level of proficiency, both in practice (in the water) and in theoretical understanding (academic learning) in order to continue to dive for NOAA. In addition, NOAA Divers must maintain medical fitness to dive and are required to send their diving equipment out for maintenance as scheduled. If requirements are not met, divers may become unauthorized to dive or suspended. In order to become NOAA Divers, candidates must first submit a diving physical to the NOAA Diving Medical Officers to determine if they are medically fit to dive. After that, divers must complete medical documentation annually to maintain authorization to dive. To maintain fitness to dive, it is imperative that divers recognize the need for a continual and aggressive exercise program that exceeds basic health maintenance standards.

The NDP exists to ensure the safety and wellbeing of all NOAA Divers as they engage in NOAA scientific missions. The NDP does so via policy, guidelines, training, in addition to supplying and

servicing diving safety equipment. To that end, the NOAA Diving Program collects information under the following authorities: [29 CFR Subpart T, Commercial Diving Operations](#); [NAO 209-123 NOAA Diving Program](#); the NOAA Diving Safety and Control Board (NDCSB), including the NOAA Diving Medical Officer (DMO); the Director of OMAO; the NOAA Office of Health Services; the [NOAA Diving Standards and Safety Manual](#). Information requested through various NDP forms addresses gear maintenance, training, proficiency, and medical monitoring (all HIPAA rules are adhered to). Without this information, many NOAA divers would be placed at greater risk as we have no other alternatives this needed data.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

How the NOAA Diving Program Collects Data

The information is collected via forms submitted primarily by electronic means, however respondents may request paper forms. All NOAA Diving forms are electronic in nature. We utilize fillable PDF forms which allow digital signatures to document authenticity. Very occasionally, a diver may choose to print a completed form and submit data via hard copy if electronic means are unavailable.

These are ongoing collections which have changed over time to reflect improvements in technology. At one time forms were printed, filled out by hand and mailed to the NOAA Diving Center. Then we changed to submission via fax, and now we prefer secure email.

Respondents do not generally have options for providing information. We prefer standardized electronic forms transmitted via secure email or directly input into NOAA databases. If a unique situation arises which prevents use of the standardized electronic forms, we will develop individualized methods to transmit and record the data, but there is no standard procedure for this.

Respondents

Non-NOAA respondents are either other government employees who dive as part of their job description, and so are only submitting forms to attend our training courses; or they are prospective NOAA Divers entering the NDP as contractors, volunteers, or interns, and are submitting forms to both attend training, and to become divers for NOAA. Most forms are only completed once in a lifetime, whereas some forms must be completed every two or more years, or each time they request a different NOAA Diving Center (NDC) training course.

What Data are Collected

The data collected is generally confined to non-PII information. The specific types of information include service dates on diving equipment, training dates and names of entities providing training for diving safety certifications (e.g., first aid, CPR, oxygen administration), dive plans, records of actual dives completed (e.g., location, depth, breathing gas, bottom time, dive buddy), training requests and sizing information for NOAA-provided diving gear. We do collect PII via diving medical forms, however those data are transmitted and maintained through a separate HIPAA-compliant process.

Data is collected for all members of the NOAA Diving Program. Non-NOAA divers who participate on NOAA missions may be asked to provide a much less detailed set of data, generally limited to metrics of

dives completed (e.g., location, depth, breathing gas, bottom time, dive buddy).

How The Data Is Used

Information about individual divers, including their training level, certifications, when their diving medical status was updated, and the date of their last training in diving emergency response will be used at their local units and at the NDC for administrative and training purposes, as well as to assess whether they have adequate proficiency to dive. Once collected, this information is maintained and updated via our secure online database called the NOAA Dive Log (NDL).

Data will be used to monitor compliance with NOAA Diving policies, to track trends in diving missions, locations and techniques to allow policy changes for the improvement of diver safety. All data on individual divers is only used internally by the NOAA Diving leadership. Grossly aggregated data may be shared with diving partner entities (e.g., total number of dives by NOAA each year, total bottom time, total numbers of divers). Annual reports are available on publicly viewable websites, but no direct dissemination to the public occurs.

Information about the dives logged in the NDL is collected and combined with the dives from all divers in the NDP for administrative purposes, for NDCSB policy changes or updates, and for OMAO Leadership Team reports such as the [Annual Reports](#). Aggregate certifications data are used by NDC and the NDP for administrative purposes, such as determining when certain training should occur, and where.

Aggregate data about NOAA dives, missions, and their locations are combined into [Annual Reports](#) for use in leadership and funding discussions with NOAA, Department of Commerce, and beyond. This is collected once per calendar year from our NDL database, and is the only collected information that is shared outside of NOAA.

Collection Intervals, & From Whom

Different types of information are collected at different intervals depending upon the type of data being sought. For example, dive training may only be requested once during a diver's entire career, whereas volunteer divers must submit a Volunteer Diver Service Agreement every 2 years. Dive physical periodicity varies with the diver's age: once every 5 years up to age 47, every 4 years for divers aged 48, every 3 years for divers aged 49, every 2 years for ages 51-60, and annually after age 60.

Medical information is collected by both the respondent and their provider (who performs the diving medical physical exam), and then used by the NOAA Diving Medical Officer (DMO) to determine whether the diver may safely work in a hyperbaric environment. This physical exam occurs periodically; when an exam is not due, divers submit an Annual Medical Update form directly to the DMO to verify that there has been no negative change to the diver's medical status (no physician needs to use/record data on this form).

New diver training forms for divers who do not join the NDP — such as police, fire departments, state employees, military, and some other federal agencies — are collected only to facilitate their attendance at the course they applied for. These forms collect medical information (to determine medical suitability to dive), a liability release, name/address/phone number/reason for requesting the course/what electives/supervisor approval, and the supervisor's information (to collect payment for the course at a later date). The aggregate data about how many attendees of which type and their prior experience levels are used for the [Annual Reports](#), internal metrics, administrative purposes such as issuing certifications and collecting course payment, and to plan or improve training in the future. These forms are only

collected when the diver requests training.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

Information will be collected electronically via email, electronic form, or other digital platforms. Paper forms are available upon request.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2

This program is unique to NOAA and there is no duplication with other efforts.

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

This collection of information does not involve any small business or other small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The primary mission of the NOAA Diving Program is to provide safety oversight for individuals subjecting themselves to hazardous conditions for the sake of advancing science and federal interests. Diver safety can only be maintained by a holistic approach to the mission which incorporates information on training, equipment, medical monitoring and operational reporting.

The information collected is used for identifying both minimum eligibility and level of qualification of applicants for the NOAA Diving Program. Reducing the frequency of collection or eliminating the collection would severely hinder the ability of the NOAA to recruit divers with the educational background and qualifications required to serve NOAA.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with OMB guidelines.

This collection will be conducted in a manner consistent with OMB guidelines.

8. If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A *Federal Register* Notice published on August 17, 2023 (88 FR 56010), solicited public comment on

this collection. No comments were received.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payments or gifts will be provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

This information collection is a Privacy Act Systems of Records, [COMMERCE/NOAA-10 NOAA Diving Program File](#). A current Privacy Impact Assessment for NOAA2200 is on file.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Medically pertinent information is collected by the individual's medical provider, the individual then submits this directly to the NOAA Diving Medical Officer (DMO). The DMO will then use that information to determine if diving is a safe activity for that individual, and to create a health baseline in case of a diving injury. In case of a diving-related emergency or injury, the DMO will liaise with the onsite response team and the receiving hospital to ensure the best possible care is provided for that individual or individuals. Submission of this information is voluntary for the individual; however, due to [29 CFR 1910, Subpart T, Commercial Diving Operations](#) as well as the NOAA Diving Standards and Safety Manual and the Diving Medical Standards and Procedures Manual, divers who do not complete this information will not be allowed to dive with NOAA. Incoming divers are informed that this information is required to be permitted to dive with NOAA. All HIPAA rules are adhered to with this collection. No other questions of a sensitive nature are asked.

12. Provide estimates of the hour burden of the collection of information.

Information Collection	Type of Respondent (e.g., Occupational Title)	# of Respondents / Year (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden mins/ Response (d)	Total Annual Burden Hrs (e) = (c) x (d)	Hourly Wage Rate (for Type of Respondent) (f)	Total Annual Wage Burden Costs (g) = (e) x (f)
Verification of Liability Coverage	Contractor, Volunteer, Scientist, Underwater Archaeologist	143	1	143	10min	24	\$30.31	\$727.44
Liability Release and Assumption of Risk	Contractor, Volunteer, Scientist, Underwater Archaeologist	20	1	20	10min	3	\$30.31	\$90.93
Volunteer Diver Service Agreement	Volunteer/Scientist	27	1	27	15min	7	\$27.78	\$187.53
NOAA Diving Program Training Request and Authorization	Contractor, Volunteer, Scientist, Firefighter, Police Officer, or other	40	1	40	5min	3	\$30.70	\$92.10
Initial Swim Test Evaluation	Contractor, Volunteer, Scientist, Firefighter, Police Officer, or other	40	1	40	60min	40	\$30.70	\$1,228.00
Diving Activity Resume	Contractor, Volunteer, Scientist, Underwater Archaeologist	20	1	20	60min	20	\$30.31	\$606.20
Report of Physical Examination - Diver	Contractor, Volunteer, Scientist, Firefighter, Police Officer, or other	50	1	50	2hr	100	\$30.70	\$3,070.00
Report of Medical History - Annual Update	Contractor, Volunteer, Scientist, Underwater Archaeologist	143	1	143	10min	24	\$30.31	\$727.44
Totals				483		221		\$6,729.64

The median hourly wage for BLS Occupational Codes 19-1091 (Archaeologist) and 19-4099 (Physical Scientist) were averaged to obtain an hourly wage rate of \$30.31.

BLS Occupational Code 19-4099 for Physical Scientists

BLS Codes 33-2011, Firefighters, and 33-3050, Police Officers were averaged to obtain the \$30.70 hourly wage rate.

<https://www.bls.gov/bls/blswage.htm>

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

Information Collection	# of Respondents / Year (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Cost Burden / Respondent (h)	Total Annual Cost Burden (i) = (c) x (h)
Verification of Liability Coverage	143	1	143	0	0
Liability Release and Assumption of Risk	20	1	20	0	0
Volunteer Diver Service Agreement	27	1	27	0	0
NOAA Diving Program Training Request and Authorization	40	1	40	0	0
Swim Test Evaluation	40	1	40	0	0
Diving Activity Resume	20	1	20	0	0
Report of Medical History - Diver	50	1	50	702	35100
Report of Medical History - Annual Update	143	1	143	0	0
TOTALS			483		35,100

https://www.debt.org/medical/doctor-visit-costs/#Average_Doctor_Visit_Costs

Office Visit, Established Patient, Level 5 – Complex medical problem(s) requiring comprehensive evaluation- approximately 40 minutes with the doctor – \$234

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Staff	ZS-3	\$71,001	0.4%		\$284.00
	ZS-3	\$71,001	1%		\$710.01
	USPHS PA-C	\$215,318	3.2%		\$6,890.18
Contractor Cost		\$100,000	1%		\$1,000.00
Travel					
Other Costs:					
TOTAL					\$8,884.19

"The estimated total pay for a Physician Assistant at US Public Health Service is \$143,545 per year. This number represents the median, which is the midpoint of the ranges from our proprietary Total Pay Estimate model and based on salaries collected from our users. The estimated base pay is \$143,545 per year. The "Most Likely Range" represents values that exist within the 25th and 75th percentile of all pay data available for this role."

https://www.glassdoor.com/Salary/US-Public-Health-Service-Physician-Assistant-Salaries-E591048_D_KO25,44.htm

15. Explain the reasons for any program changes or adjustments reported in ROCIS.

This is a new collection of information.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

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

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18. Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

The agency certifies compliance with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).