

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
NOAA Diving Program
OMB Control No. 0648-0822

Abstract

This submission requests the revision and extension of a currently approved information collection. Minor edits were made to remove demographic information, clarify instructions, and simplify terminology on some of the forms associated with this collection.

Headquartered at the NOAA Western Regional Center (WRC) in Seattle, Washington, the NOAA Diving Program (NDP) is managed under the U.S. Department of Commerce's National Oceanic and Atmospheric Administration (NOAA). The NDP establishes training, policy, and operational guidelines for the entire NOAA diving community—which encompasses NOAA staff, contractors, volunteers, and other affiliated personnel conducting diving activities. The forms in this collection gather the information required to verify diver proficiency and ensure compliance for all NOAA-sanctioned diving operations.

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 employees and NOAA Corps officers), as well as contractors, and volunteers, among others, who conduct diving operations.

With more than 350 divers, 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](#)¹; [NAO 209-123 NOAA Diving Program](#)²; 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](#)³. Additional authorities include 5 CFR Part 293, Personnel Records and Part 297, Privacy Procedures for Personnel Records; Occupational Safety and Health Standards, Health Insurance Portability and Accountability Act (HIPAA), Pub. L. 104-191, and 29 CFR 1911. Information gathered via various NDP forms covers medical monitoring (in full compliance with HIPAA regulations), gear maintenance, training, and proficiency. Without access to this critical data, for which no viable alternatives exist, many NOAA divers would be subjected to significantly increased risks.

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

NOAA Diving forms are engineered for digital execution, leveraging fillable PDF files with digital signature capabilities to guarantee document integrity. Data collection relies mainly on electronic formats, though paper versions remain available upon request. If electronic transmission is not possible, respondents may mail printed copies as an alternative.

These operational collections have modernized progressively in response to technological updates. Initial workflows required paper forms completed by hand and sent via physical mail to the NOAA Diving Center. Submissions subsequently shifted to facsimile transmission, and current procedures prioritize transmission via secure email.

Submissions are expected to adhere to standardized protocols, with an emphasis on electronic documentation delivered through secure email or direct input into NOAA databases. In rare cases where standard digital systems cannot be used, tailored methods for data transfer and entry are determined on an individual basis.

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 become divers for NOAA. Most forms are only completed once in a lifetime,

¹ <https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1910/subpart-T>

² <https://www.noaa.gov/organization/administration/nao-209-123-noaa-diving-program>

³ <https://www.google.com/url?q=https://www.oma.noaa.gov/diving-program/resources-divers&sa=D&source=docs&ust=1790002871477687&usg=AOvVaw3YfGIFaHTqoHLADq3dm3O2>

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 specific types of information include the diver's activity resume, 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. Personally identifiable information (PII) is collected 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).

NOAA Diving policies are continuously monitored for compliance through collected operational data, which also allows for the analysis of dive site trends, mission types, and field techniques to inform safety enhancements. Diving leadership strictly restricts access to individual diver profiles for internal administrative management only. Higher-level statistical summaries—such as total cumulative dives, annual diver counts, and total bottom time—are compiled into public annual reports and shared with program partners, but individual-level records are never disclosed publicly.

Dive records logged within the NDL system are aggregated across all active NDP divers to support program administration, guide NDCSB policy revisions, and inform OMAO Leadership Team briefings, including the published [Annual Reports](#)⁴. Furthermore, aggregated certification metrics enable the NDC and NDP to plan the timing and location of upcoming training sessions.

To facilitate strategic planning and budgeting discussions throughout NOAA, the Department of Commerce, and external stakeholder groups, comprehensive summary metrics regarding NOAA diving missions, geographic locations, and activities are compiled into formal Annual Reports. Pulled once per year from the NDL database, these aggregated summary metrics constitute the only information released outside of NOAA.

Collection Intervals & From Whom

Information collection intervals depend on the specific nature of the data requested. Certain documentation, such as dive training forms, may be required only once throughout a diver's career. Conversely, volunteer divers must complete a NF 57-03-11 Volunteer Diver Service Agreement every two years.

⁴ <https://www.oma.noaa.gov/diving-program/resources-divers>

The submission schedule for the NF 57-03-52 Report of Diving Physical is determined by the diver's age:

- 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
- Annually after age 60

Because divers over age 60 complete the NF 57-03-52 physical exam annually, they are exempt from submitting the NF 57-03-54 Report of Medical History — Annual, which remains mandatory for all other NOAA Divers.

Report of Diver Physical Exam (NF 57-03-52): Both the applicant and their examining healthcare provider record medical information on this form. The NOAA Diving Medical Officer (DMO) evaluates these records to assess whether the diver can operate safely in hyperbaric conditions. During years when a full physical examination is not required, divers submit the NF 57-03-54 Report of Diver Medical History - Annual (Annual Medical Update) directly to the DMO to verify that their medical status remains unchanged. Provider completion is not required for the annual medical update.

External applicants outside the NDP—such as non-NOAA federal employees and military personnel—submit training applications solely to coordinate course registration. These submissions collect essential details, including contact info, elective selections, justification for enrollment, supervisor contact information for billing purposes, and formal supervisor approval. Additionally, they incorporate liability releases along with relevant medical background to verify fitness for diving activities. Such forms are submitted exclusively upon course request. NOAA summarizes these data regarding participant counts, institutional affiliations, and prior experience to compile internal statistics, manage administrative workflows (like billing and issuing completion certificates), refine training curricula, and publish Annual Reports. Standard training application forms are described below.

Required NOAA Diver Training forms (required to enter the NDP and to take the course as an external diver):

- NF 57-03-38 Training Request and Authorization Form
- NF 57-03-39 Initial Swim Test Evaluation
- NF 57-03-09 Liability Release and Assumption of Risk (non-federal applicants only)
- Copies of CPR, AED, and First Aid certificates, valid through the end of class
- Basic Open Water Diver certification from an agency vetted by the Recreational SCUBA Training Council (example agencies: SSI, TDI, PADI, NAUI, etc.).
- NF 57-03-52 Report of Physical Examination (Initial exam)
 - Upon submitting the “Initial Exam” selection on this document for entry into the NDP, subsequent examination due dates are calculated based on diver age: every 5 years through age 47, at age 48 (4-year interval), at age 49 (3-year interval), every 2 years for ages 51–60, and annually for individuals over 60. Our automated system manages this schedule, designating subsequent submissions as “Periodic Exams”.
- External divers only: include service records showing that diving equipment being used during class has been serviced within the last 12 months.
 - Optionally, internal divers (including contractors and volunteers) may participate in the

Standardized Equipment Program (SEP) to receive NOAA-issued gear. Entry into the SEP requires two additional forms: the NF 57-03-65 SEP Measurement Form and the NF 57-03-67 SEP User Agreement. These are submitted only upon initial equipment issuance, so most divers complete them a single time.

If a diver wishes to complete additional training, the following pathways are common:

NOAA Divemaster (DM) course forms:

- NF 57-03-38 Training Request and Authorization Form
- NF 57-03-09 Liability Release and Assumption of Risk Form (non-federal applicants only)
- Copies of their CPR, AED, First Aid, and Oxygen Administration certificates, valid through the end of class.
 - NOAA staff who are currently active NOAA Divers with up-to-date safety certifications logged in the NOAA Dive Log can skip this requirement.
- NF 57-03-52 Report of Physical Examination (Initial exam)
 - Existing NOAA Divers should review their NOAA Dive Log profile to verify whether this document is required or if submitting the NF 57-03-54 Annual Update is appropriate. The DMO medical clearance must remain valid through the conclusion of the course. If their current medical clearance extends past the end of the training period, they may exclude these medical forms from their application package.

Diving Medical Technician (DMT) course:

- NF 57-03-38 Training Request and Authorization Form
- A copy of their EMT certificate, valid through the end of training
- Copies of their basic life support (BLS) certificates, valid through the end of training
- NF 57-03-09 Liability Release and Assumption of Risk Form (non-federal applicants only)
- NF 57-03-52 Report of Physical Examination (Initial exam)
 - Existing NOAA Divers should review their NOAA Dive Log profile to verify whether this document is required or if submitting the NF 57-03-54 Annual Update is appropriate. The DMO medical clearance must remain valid through the conclusion of the course. If their current medical clearance extends past the end of the training period, they may exclude these medical forms from their application package.

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 is collected electronically through email, digital forms, and online platforms, with hard-copy paper forms available upon request. Since 2023, all responses (100%) have been received digitally. Processing and response times remain comparable regardless of whether submissions are made electronically or on paper.

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 (NDP) is to supply robust safety oversight and operational support for individuals exposed to hazardous hyperbaric conditions while furthering scientific progress and vital federal objectives. Ensuring diver safety requires a comprehensive, multi-faceted approach that relies on collecting data across specialized training, equipment maintenance, medical monitoring, and operational reporting. Without rigorous collection and continual evaluation of these records, the agency cannot effectively verify diver readiness or mitigate the inherent hazards of underwater operations.

This collected information is necessary to determine both the baseline eligibility and specific qualifications of all applicants and active divers. Curtailing or eliminating this data collection would severely compromise NOAA's capacity to recruit, authorize, and retain divers with the essential educational backgrounds, medical clearances, and technical qualifications required for agency operations. Ultimately, reducing the scope or frequency of these disclosures would expose personnel to elevated operational risks and impair NOAA's mission capabilities.

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 12, 2026 (91 FR 52046), solicited public comment on this collection. No comments were received.

NOAA emailed seven stakeholders to obtain their views on the need for and practical utility of the data collected, the accuracy of the burden and frequency of collection, suggestions to minimize the burden, and ways to improve the clarity of instructions and forms. 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 system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

HIPAA ensures an individual's privacy by establishing strict federal regulations through the [HHS Privacy Rule](https://www.hhs.gov/hipaa/for-professionals/privacy/index.html)⁵ that limit how healthcare providers and health plans can use and share personal health information. NOAA adheres to all HIPAA requirements. The collection of this information is authorized pursuant to system of record notice [COMMERCE/NOAA-10 NOAA Diving Program File](https://www.commerce.gov/node/4984)⁶. A current Privacy Impact Assessment for [NOAA2200](https://www.commerce.gov/sites/default/files/2026-07/NOAA2220%20PIA%20FY26_SAOP_Approved_Delegated.pdf)⁷ 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](https://www.ecfr.gov/current/title-29/chapter-I/subchapter-B/part-1910/section-1910.269) 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.

⁵ <https://www.hhs.gov/hipaa/for-professionals/privacy/index.html>

⁶ <https://www.commerce.gov/node/4984>

⁷ https://www.commerce.gov/sites/default/files/2026-07/NOAA2220%20PIA%20FY26_SAOP_Approved_Delegated.pdf

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 NF 57-03-07	Contractor, Volunteer, Scientist, Underwater Archaeologist	143	1	143	15 min	36	\$33.92	\$1,221
Liability Release and Assumption of Risk NF 57-03-09	Contractor, Volunteer, Scientist, Underwater Archaeologist	20	1	20	5 min	2	\$33.92	\$68
Volunteer Diver Service Agreement NF 57-03-11	Volunteer/Scientist	27	1	27	15min	7	\$32.68	\$229
NOAA Diving Program Training Request and Authorization NF 57-03-38	Contractor, Volunteer, Scientist, or other	40	1	40	5min	3	\$32.68	\$98
Initial Swim Test Evaluation NF 57-03-39	Contractor, Volunteer, Scientist, or other	40	1	40	60min	40	\$32.68	\$1,307
Diving Activity Resume NF 57-03-41	Contractor, Volunteer, Scientist, Underwater Archaeologist	20	1	20	60min	20	\$33.92	\$678
Report of Physical Examination NF 57-03-52	Contractor, Volunteer, Scientist, or other	50	1	50	2hr	100	\$32.68	\$3,268
Report of Medical History - Annual Update NF 57-03-54	Contractor, Volunteer, Scientist, Underwater Archaeologist	143	1	143	10min	24	\$33.92	\$814
Totals		483		483		232		\$7,683

The mean hourly wage listed in the May 2025 National Occupational Employment and Wages Estimates (<https://www.bls.gov/bls/blswage.htm>) was used to calculate the costs using the following for BLS Occupational Codes:

- 19-3091 - Archaeologist (\$36.35) and 19-4099 - Physical Scientist (\$31.86)
- Contractors, Volunteers, and Others were calculated using 00-0000, All Occupations, since these individuals could hold any occupation. This wage rate is \$33.54.
- The Hourly Wage Rate for each line was determined by averaging the appropriate occupational wage rates as listed above.

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 Physical Exam	50	1	50	234	\$11,700
Report of Medical History - Annual Update	143	1	143	0	0
TOTALS	483		483		\$ 11,700

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	\$88,547	0.4%		\$354
	ZS-3	\$88,547	1%		\$885
	USPHS PA-C	\$331,056	3.2%		\$10,594
Contractor Cost		\$100,000	1%		\$1,000
Travel					
Other Costs:					
TOTAL					\$12,833

The Commerce Alternative Personnel System (CAPS) pay tables⁸ for the Rest of U.S. locality rates were used to determine the base salary. The Rest of U.S. locality was used since NOAA staff are geographically dispersed. The upper bound for Interval 3 of each Pay Band was used as the base salary

⁸ <https://www.commerce.gov/sites/default/files/2026-01/CAPS%20Standard%20Pay%20Table>

and a multiplier of 1.5 was used to calculate the loaded salary.

The estimated average salary for a Physician Assistant at US Public Health Service is \$220,704 per year or \$106 per hour. The typical pay range is between \$173,030 (25th percentile) and \$285,841 (75th percentile) annually. This is based on 4 salaries submitted by US Public Health Service Physician Assistant professionals on Glassdoor, as of Aug 2026⁹. A multiplier of 1.5 was applied to the estimated average salary to calculate the loaded salary.

As a diving medical specialist, the PA-C evaluates each diver's self-assessment alongside medical records from their physician to assess medical fitness for diving operations. Upon determining that a diver is medically fit, the PA-C notifies the training ZS-3 staff of the clearance. The ZS-3 then logs this clearance date into a spreadsheet with restricted access.

Data from non-medical forms is compiled by ZS-3 staff into spreadsheets and/or memos for supervisory review. Supervisors evaluate this information to determine the applicant's acceptance into the program. Upon approval, the data is entered into our database to form the diver's profile.

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

There are no changes to the burden for this collection.

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.

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.

NOAA will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Although the information collected is not expected to be disseminated directly to the public, results may be used in scientific, management, technical or general informational publications. Should NOAA decide to disseminate the information, it will be subject to the quality control measures and pre-dissemination review pursuant to Section 515 of Public Law 106-554.

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.

⁹ https://www.glassdoor.com/Salary/US-Public-Health-Service-Physician-Assistant-Salaries-E591048_D_KO25,44.htm

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).