



2 December 2016

Dan Hull, Chairman
North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, AK 99501-2252

Dear Dan Hull,

We want to bring to your attention the effects of a persistent staff shortage in the Observer Program offices in Seattle. The Program has struggled for years to move Observers efficiently through the debriefing process, and Providers have brought this problem to the attention of the Council before. In the fall of 2016, though, staffing shortages at the Program are creating further inefficiencies that are imposing unnecessary costs on the fishing industry and hardships on observers. The purpose of this letter is both to point out the problems as we see them and to offer possible solutions.

When the Anchorage Observer Training Center (OTC) closed in 2012, the Program's Director at the time pledged that his Seattle staff would be capable of carrying the OTC's workload. It is unlikely that he foresaw, however, that increased numbers of Observers required by Industry would collide with today's ongoing Program staff shortages. This situation will only grow worse in the event of a hiring freeze in the future.

To give you an idea as to how things stand currently, on November 15 we briefed Observers for deployments that will begin in mid-January of 2017. We briefed those people two months early (and we will continue briefing people for mid-January deployments throughout December) because there are not enough seats in early January for all the Observers who will make deployments later that month because a shortage of staff precludes another briefing when it's needed.

And just before Thanksgiving, NMFS considered cancelling a late December training for new Observers due to what it considered low enrollment. They argued that cancelling a training for half a dozen people would allow them to use their resources more efficiently. Since we employ every available experienced Observer before hiring trainees, though, come January this efficiency would have created a shortage equal to the number of trainees signed up for the class. This time NMFS reconsidered, but the subject only came up because of their staffing challenges. Next time around, they may feel they have no choice.

The most desirable solution to a shortage of available training seats would be an increase in staff at the Program's offices in Seattle, and to the extent the Council can pursue that result it should do so. We believe, however, that other avenues should also be explored. Some thought should be given to resurrecting the OTC. Another possibility would be to outsource Observer trainings to a contractor not involved in deploying observers. Either approach would place new demands on the Program, since oversight would bring its own challenges, but either would buttress the Program's ability to perform its mission and would free up Program staff for management, planning, and more strategic tasks.

Likewise debriefings. Debriefings still last two weeks, and sometimes longer, during the three to four months a year that the Program is overwhelmed by large groups of Observers returning from the field. The majority of debriefings take place during these periods, when over several weeks an Observer typically works only two days—the first day after returning from Alaska they complete vessel surveys and hand in data, and then a couple weeks or so later they attend a debriefing interview that lasts one day. These delays create housing, salary, and reimbursement costs that are passed on to industry, while observers

interested in re-deploying suffer opportunity costs and those looking forward to time-off between contracts face idle time that does nothing positive for observer retention.

If the Program were to outsource trainings and briefings, then they would be in a position to devote more staff time to debriefings, and a debriefing problem that now seems endemic might disappear. In fact, performing debriefings when a third party was responsible for trainings would provide the Program with valuable feedback as to the quality of training Observers were receiving. As strengths and weaknesses in the training became evident, the Program could provide direction to their training Contractor and hold them to account. We recognize, though, that any change to the current in-house training approach will be a long time coming if it comes at all.

There are more immediate steps the Program can take to address the debriefing timeline. As mentioned, Observers in debriefing spend a lot of time standing by in Seattle; we submit that it would be better to put them to work checking data. NMFS should develop a data checking manual that provides step-by-step instructions about how to review each of the data forms Observers complete, and Observers in debriefing could work at NMFS, under Program supervision, for several hours a day while they await their own debriefing interviews.

We know this is possible, because during the early 1990's, when Program policies permitted us to review Observer data for completeness and correctness, we did something similar. Regardless of whether there's a staff shortage, it's never been good use of a debriefer's time to check page after page of data. Freed from this task, debriefers would be able to focus on more important concerns during debriefing interviews, taking time to determine if an observer's sampling decisions were appropriate given a vessel's catch and whether these decisions were informed by an understanding of random sampling. Evaluations could both improve in quality and come much more quickly, as debriefings return to being the five-day affairs they were historically. It's worth noting that recently NMFS decided to call on observers who were in Seattle awaiting debriefing to help check scales in pre-packed sets of gear. What we're suggesting is simply that NMFS expand the list of tasks for which they seek observer assistance.

There are still other changes that would be easily and quickly accomplished. For instance, Observers could send some of their data to NMFS after their first four to six weeks in the field. NMFS staff (or other Observers awaiting their debriefing interviews) could begin reviewing the data while the Observers who collected it finished their contracts. When Observers arrive in Seattle following the completion of their deployments, a portion of their data could already be reviewed, allowing a quicker route to their debriefing interviews.

The current approaches NMFS takes to training, briefing, and debriefing are unsustainable; Industry requirements for more observers are on a collision course with persistent and growing staff shortages. We don't claim to have exhausted the options for new approaches in this letter, and in fact we look forward to hearing other ideas that might improve the current situation. Regardless, it is past time to consider innovative approaches that would truly increase Program efficiency in the years ahead.

Sincerely,

ALASKAN OBSERVERS, INC.



Michael Lake
President