



**Jennifer Ferdinand**

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Jennifer,

Since the difficult recruiting environment currently faced by Observer Providers was discussed during the recent FMAC meeting, I thought now would be a good time to put down in writing some of the steps the Observer Program might take to help all of us move toward improving an increasingly difficult situation:

- 1) The subject matter during training for our new observers should be limited to providing coverage on trawl vessels only. Brian Mason suggested this as an approach worth considering in a conversation with Pam Gale a couple weeks ago, and we think it's a great idea. No observer working for AOI, SWI, or TechSea will work on a fixed gear vessel until at least five or six months post-training. Trainees consistently report that the transition from trawl to fixed gear instruction during training is confusing, and we believe including fixed gear in the initial training contributes to the unacceptably high rate of trainee failures. Trawl-only training for observers destined for half a year of trawl coverage could be shortened to something less than 15 days. We recognize that AIS trainees need to receive fixed gear instruction during their initial training, but this could be accomplished by maintaining a three-week training for this group—in effect, they would stay on for fixed gear training after the trawl-only trainees have finished up.
- 2) Accept qualified Canadian and Mexican citizens into training. The non-immigrant NAFTA Professional (TN) Visa still exists, and we have verified with a local attorney who specializes in immigration law that the TN visa-approach continues to be reliable. Recruiting in Canada and Mexico will increase the pool of applicants from whom Providers can select, both increasing the quality of applicants who get hired and helping to prevent coverage shortfalls for industry.
- 3) Change the following practices so that qualified applicants are not shut out of training due to bureaucratic hurdles that in no way improve the caliber of trainees:
  - a) Allow degree verification by the last day of training, rather than requiring it before training begins. Different universities follow different timelines so far as issuing degrees following graduation, and currently some well-qualified candidates are prevented from attending the training they prefer due to this "before training" requirement. In the past these applicants were often willing to wait a month or two for a subsequent training, but in the current recruiting environment we face, they will likely

have competing job offers—offers that don't come with frustrating requirements over details they can't control.

b) The number of classes that satisfy the dichotomous key requirement that **do not** require supporting documents should be expanded to include: vertebrate zoology, natural history of vertebrates, herpetology, mammalogy, and aquatic ecology. During the 1990's and early 2000's these courses were routinely accepted, and as a result Providers could more often hire biology majors from smaller liberal arts colleges throughout the country. As NMFS has narrowed down the list of acceptable key courses, Providers have ended up more and more focused on recruiting at larger universities offering undergraduate students more specialized degrees in marine biology and fisheries biology. Again, as with the exclusion of Canadian and Mexican citizens, as a result the applicant pool shrinks, with predictable results.

Also, whatever courses NMFS decides it will accept for this requirement should be public knowledge and visible to both candidates and providers on the qualifications webpage. This page should also provide a description of the supporting documents required from candidates who have not taken one of the accepted courses but nonetheless have used keys in the classroom.

c) The training registration deadline should be changed to two business days before a class, rather than the current five days.

The recruiting environment we face is unlikely to change in the near future. The Observer Program can find a way through the next few years without consistent coverage shortfalls, but accomplishing this will require a renewed sense of partnership between Program staff and Providers, a sense that we are involved in a common undertaking. This letter does not represent an effort to water down NMFS qualifications. In fact, we believe the changes we are requesting here can result in both more and more-qualified applicants entering the classroom at Building 4.

Sincerely,

Michael Lake  
President