MRAG Americas’
Monitor and Observer Team Action Plan

September 16 2013

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1 Introduction

MRAG Americas has developed this Monitor and Observer Team Action Plan (MOTAP) to enhance our NEFOP and ASM programs through improved observer and monitor team management and personnel retention. MRAG Americas has experienced higher than expected attrition of observer personnel that has reduced the number of certified observers available to undertake deployments in NEFOP. This threatens the satisfactory achievement of sea-day and coverage requirements under NEFOP and ASM. The purpose of the MOTAP is to address the root causes of the higher attrition, and create an operational environment that leads to improved observer retention, enhanced communication, higher productivity and increased observer morale, thereby achieving deployment targets efficiently and effectively into the future.

The MOTAP is organized in two main parts: a context section that explains the issues that need to be addressed and MRAG Americas’ firm commitment to meet this need both now and into the future; and the action plan to address these issues, including the expected results and milestones for monitoring progress.

2 Context and Commitment from MRAG Americas

There are two main issues to be addressed in the MOTAP: (i) short term achievement of sea-day and coverage requirements with a reduced observer workforce; and (ii) longer term program stability and observer retention to ensure there is no repeat of the current short term crisis.

MRAG Americas has recently experienced a much higher than normal attrition of certified observers qualified for deployments in NEFOP. The current observer roster is provided in Table 1.

The loss of observers has come at a time when there is a substantial increase in the number of tasked sea-days, particularly in September. Added to this are sea-days required for NEFOP PTNS, CA1 Herring and ASM. This could total in excess of 800 sea-days total in September. Sea-day requirements for October, November and December are substantially lower.

There is a limit to how much can be done to mitigate the short term situation, due to the time it takes to train and certify new observers. Nevertheless, MRAG Americas has committed to do everything possible to achieve the highest number of sea-days over the next few months and to meet all sea-day and coverage obligations in the future. MRAG Americas understands its responsibility to fulfil all Contract obligations, including those regarding sea-days.
There are factors that affect actual fishing effort, resulting in a variable number of vessel trips that observers can actually embark on. This may result in the number of sea-days on the schedule specified for specific months not being achievable within that month. MRAG Americas is responsible for advising NOAA when this is the case, so that NOAA can re-assign those sea-days to a time when they can be achieved by, for example, rolling over days between months or among quarters, shifting regions or expanding gear specifications in order to use the days towards another fishery. Temporary variability in fishing effort should not be a reason for not achieving tasked days overall.

There are two main ways that MRAG Americas can improve its capacity for achieving tasked sea-days and coverage levels in the short term: (i) increasing the number of days achieved by observers available for deployment; and (ii) increasing the number of personnel available for deployment. The essence of the strategy for the longer term is improved project management and a sound comprehensive observer recruitment and retention strategy. An Action Plan for implementing these options is provided in the following section.

Table 1 Current Observer Roster (following page). Yellow rows indicate less certain expectations (at this time). Red rows indicate observers who have left and have provided no indication of returning.
3 Action Plan

3.1 Meeting near-term sea-day and coverage requirements

3.1.1 Increasing the number of sea days achieved by current observers

During MRAG Americas' survey of current observers, they were asked to assess their capacity for increasing the number of sea-days they can undertake over the next several months. We estimate that our observers can increase their sea days by approximately 20 to 40% with some being as high as 80%. This potential increase is entirely voluntary, and MRAG Americas did not pressure any observers to undertake extra days.

3.1.1.1 Interim Performance Incentive Package

To provide sufficient incentive for observers to achieve these levels of productivity, MRAG Americas has developed an interim performance incentive package covering the period September to December 2013. This is expected to result in observers achieving a significantly higher number of sea-days. The incentive focuses on areas where we have special needs, and applies to all currently certified observers.
3.1.1.2 Expected outcome of the Interim Performance Incentive Package

MRAG Americas is confident that the proposed incentive package will result in observers achieving additional sea-days in line with expectations (see observer roster in Table 1).

NOAA has expressed concern that observers/monitors do not respond well to interim changes, unpredictability, and inconsistency in respect to pay and treatment. What MRAG Americas is now offering to the observers is clearly an interim package and has been presented as such. It is not forced on the observers but is available to them if they should choose to increase their sea-days. In fact, some observers to qualify for the incentive payment will have only to maintain their current productivity level.
NOAA has also expressed concern about observer burnout resulting from observers undertaking additional sea-days, and the potential for this to adversely impact data quality. MRAG Americas takes the risk of observer burnout and the importance of maintaining data quality very seriously. Although we cannot monitor data quality directly, we do operate a policy that we expect helps to minimize the risk of adverse impacts. We have a standing policy regarding frequency of deployments. This policy includes some flexibility because the level of productivity that observers can achieve varies between observers. We recognize that some can cope with more sea-days than others. We monitor the time it takes for observers to turn in their data following a deployment and also take note of observers fatigue level. During the next few months, we will very closely monitor observer performance and ensure that burnout does not occur.

The increased workload for current observers is temporary as MRAG aggressively recruits and trains new observers. Through the use of incentives, any observers performing increased trips will be acting voluntarily. There will be no "pressure" of anyone to work more than they are comfortable. Our records indicate that there is room for improvement without appreciably increasing the risk of observer burn out.

If NOAA detects any issues with respect to data quality, we ask that this is conveyed to MRAG Americas at the earliest opportunity to enable us to take immediate remedial action.

3.1.2 Increasing the number of certified observers available to NEFOP and ASM in the near term

Training new observers is not an option for increasing the numbers of observers and monitors in the short term. The training in September will contribute additional certified observers to the roster in late October at the earliest due to the time it takes to complete training and qualification trips. The training scheduled to start in early December will likely not contribute additional further observers until late January or February. These trainings are therefore discussed as part of MRAG Americas’ comprehensive observer recruitment and retention strategy in Section 3.2.2. In this section we describe to strategies for increasing the number of certified observers available to NEFOP and ASM in the near term: (i) co-opting certified observers from outside MRAG Americas; and (ii) re-employing observers who have previously left.
3.1.2.1  Co-opting certified observers from outside MRAG Americas

MRAG Americas has contacted [redacted] to discuss the possibility of subcontracting at-sea monitors and/or observers from these companies. These observers would need additional training to qualify as ASM or NEFOP observers.

We have begun coordination at the NE manager-Area coordinator level to set a protocol for MRAG Americas to subcontract [redacted]. The amount of sea-day coverage per month is uncertain at this time, but early indications are that we may be able to obtain the services of [redacted]. Actual days achieved will depend on a number of factors including fishing effort and the location of available [redacted] monitors. The majority of ASM trips are in the Northeast, generally Rhode Island to Maine. Trips do occur in Connecticut, Long Island and New Jersey, but ASM assignments are extremely seasonal and sporadic in these areas as they involve groundfish vessels in the sector management program.

We are currently in discussion with the Fisheries Sampling Branch (FSB) Chief regarding the possibility of arranging training for [redacted] observers to determine how soon they could become qualified and hence contribute to the sea-day schedule. If feasible, [redacted] These observers are expected to be on an accelerated program for training trips by virtue of their existing experience. Therefore they should become available for full deployments as certified observers in October 2013. It is uncertain how many additional sea-days this will yield, however, we anticipate gaining a further [redacted] from these sub-contracted observers.

3.1.2.2  Re-employing observers who have previously left

MRAG Americas has been working on options to persuade observers contemplating departure and observers who have exited to stay with or return to the program. We have recently published a new short term incentive package (Section 3.1.1.1) that would apply to previous observers who return to the program. We have targeted several observers available to work in key areas [redacted] and who have above-average monthly sea day rates. The results of this effort are shown in the current observer roster in Table 1. This effort is continuing.
3.2 Long term strategies to meet all sea-day and coverage obligations

3.2.1 Project management and communication

3.2.1.1 Management personnel

Dr. Robert Trumble and Dr. Graeme Parkes, have taken a more active role in the operations of the programs. Going forward, MRAG senior management will monitor the programs’ performance with a set of management indicators (Section 3.3). Senior management is committed to having the programs operate in a more efficient manner and will invest the time and effort to make it happen.

NOAA has expressed a desire to see more Contractor local support and presence and is seeking a solution that includes the Program Manager residing locally (in respect to major fishing ports, New Bedford, Point Judith, Gloucester, etc.) in order to reinforce the Contractor’s commitment to the program and provide the observers necessary support and a more secure foundation on a full-time basis. They have been recognized for the level of commitment and availability they have shown despite neither of them being located within a specific fishing port served by the Programs. Nevertheless, we recognize NOAA’s point with respect to the likely benefit of having a senior manager being more physically accessible to our coordination staff, our observers and the FSB staff. We are therefore currently looking at the overall management structure to determine how this requirement can be best accommodated. We anticipate starting a recruitment process for a locally based senior manager to work alongside our existing management before the end of October, once a position announcement can be prepared.

In the meantime, we have been working actively on our project coordination structure
NOAA has questioned whether MRAG Americas integrated approach to jointly managing the NEFOP and ASM programs is the most effective and whether some benefit might be gained by having separate management structures. We have considered this, and have concluded that our approach helps to maximize knowledge sharing and create efficiency. While we recognize that there are significant differences in the observer/monitor duties between the two programs, combining management resources allows us to have a holistic view of the monitor/observer resource demand as well as the available trip capacity for those who serve both programs. By using an integrated management approach, we can plan for and accommodate the fluctuation in seasonal fisheries and quickly respond to assignments as they are made available through PTNS rather than deferring to a specialized entity. It is important for our management staff to be completely familiar with the protocols of both programs and be aware of which of our observer/monitors are single or dual certified so that when the trips come up, they are better able to assign the appropriate resource and efficiently utilize our staff. This also allows us to maximize deployment opportunities for our observers, hedging against slow fishing seasons and assisting us with employee retention and satisfaction by providing knowledgeable support where and when it is needed.

3.2.1.2 Communication

Communication is an essential element of the smooth and efficient running of the NEFOP and ASM programs, both with respect to the Client-Contractor relationship and the Contractor’s relationship with its observer and monitor team. The changes in management personnel described in the previous section are intended to significantly improve those lines of communication. In addition, there are a number of strategies that MRAG Americas will utilize to enable an improved flow of accurate information in all directions. Over the past few weeks, MRAG Americas has arranged a series of webinars with our observers and monitors and also our coordination team. We therefore intend to build on these webinars and also continue to enable observers to ask questions of our management team on an individual basis at any time.

We would also like to have the opportunity to conduct regular program reviews with the COTRs and other FSB Personnel outside of the regular sea-day meetings to discuss any programmatic issues that arise. Having a local program manager in place will obviously make this more logistically feasible. In addition, our company senior management is planning to travel to the region to meet with our coordination staff and our observer candidates currently going through NEFOP training. At this time, it would also present an opportunity for senior management to meet the COTRs and FSB staff to discuss program implementation and ways in which this can be done better. We further request that the COTRs and FSB personnel encourage observers to bring comments directly to MRAG Americas management staff for resolution.
Following the recent webinars\textsuperscript{2} we sent an open letter to the observers addressing comments raised, during the webinars MRAG Americas was asked about the following issues and we summarized our responses as follows:

Aside from improving the traditional means of communication and being more responsive to developing situations, we have also considered establishing other means of keeping in contact with our staff and fostering a community and team spirit. We are also actively looking into the options for on-line communications, including the setting up an MRAG Americas Facebook page focused on the NEFOP and ASM projects. The structure and function of such a facility needs careful consideration and management, but we hope it will encourage more productive interaction with our staff, who by the nature of their work are not always available to engage in scheduled events like webinars. We hope that this will provide them with a convenient opportunity for raising issues that might otherwise go unresolved for a period of time.
3.2.1.3 Observer morale

The measures set forth in this MOTAP, particularly the commitment to improved observer communications and the bolstering of the coordination and management staff situated locally will improve our relationship with our monitors and observers and encourage a more positive atmosphere in the programs generally. We have strong working relationships with our current employees, and it is this positive professional environment into which the incoming classes of observers and monitors will be entering. A senior company manager will be visiting the current class of trainees during their training to meet with them and talk about the company philosophy and culture and make them feel both valued and part of the team.

Regarding NOAA's expectation that "observer attrition will continue over the next two months," our surveying of our current staff indicates that increased attrition rates will subside in the near term (Table 1). We will keep the situation under close review as the term of the interim incentive package comes to a close to ensure that we will not be suffering an increase in exiting observers in the New Year and we have sufficient resources to meet all sea-day and coverage requirements into 2014.

3.2.1.4 Project Administration Database (PAD)

The Project Administration Database (PAD) is an Access database designed by MRAG's in-house IT group to automate many of the administrative functions currently handled through a series of spreadsheets and paper forms. This is expected to yield significant benefits in terms of operational efficiency and accuracy of reimbursements and invoicing. It will therefore benefit the Government, Observers, Monitors and the Consultant.
3.2.2 Observer Recruitment and Retention Strategy

3.2.2.1 Recruiting and training new observers

Selecting and retaining qualified, professional observers is key to MRAG’s success. All monitor and observer candidates are thoroughly vetted. MRAG recruits candidates with previous time at sea, experience in the Northeast Region, knowledge of fisheries management, and former work collecting data in the field. References are questioned about candidates’ work habits, ability to adapt and improvise, ability to work alone and complete work in a timely manner, physical fitness, capacity to live in potentially hostile environments, and ability to maintain standards of conduct. College transcripts are reviewed in an attempt to determine overall scholastic performance, areas of strength or lack of knowledge, and detailed course of study. Finally, candidates complete one or more phone or in-person interviews with office personnel to address specific questions and concerns. We try to ensure that all candidates meet the minimum requirements set in the solicitation.

MRAG Americas has a NEFOP training class of 14 candidates scheduled for September 9, running for three weeks. As we have applied rigorous selection criteria, we anticipate that all candidates will achieve certification. By the end of October or early November, we anticipate that the new observers will achieve certification and become eligible for full participation in the program. This will add substantially to our observer corps from November onwards. A second training class has been scheduled for December 2013. MRAG Americas will ensure that the maximum possible number of qualified candidates is available for that training. We anticipate that this class will achieve certification by the end of January or early February 2014.

3.2.2.2 Observer Retention Strategy

MRAG Americas has a comprehensive monitor and observer retention strategy that was set out in our proposals for the ASM and NEFOP contacts. This strategy and our observer retention performance have remained under review since they were first established. Other than the recent upsurge in departing observers, our observer retention has been good. We have introduced an interim performance incentive package, in part to mitigate this recent event and our expectations regarding the results of this package are discussed in Section 3.1.1.2. When this interim incentive package comes to an end in January 2014, NOAA has expressed a concern that we will once again experience a reduction in our observer retention. This concern is also addressed in Section 3.1.1.2. As we explain in that Section, the important difference in our current strategy is that we are managing the expectations among our observers properly.

Another issue that has been raised by observers is the complexity surrounding their compensation, and particularly the reimbursement of expenses. We are endeavouring to make improvements in the payroll process that will reduce the risk of mistakes and enable observers to more easily understand their payments. The PAD (Section 3.2.1.4) is an important part of this.

Aside from these improvements, we have retained in place the original employment package described in our original proposals. This includes a competitive salary with an experienced-based incremental pay scale, holiday pay, vacation days, and bonuses for loyalty and data quality (see details below). MRAG
Americas recognizes that our greatest asset is our outstanding group of talented and dedicated employees. Benefits are tailored to our employees' particular needs and are reviewed and revised periodically.

Once observers are successfully participating in NEFOP, MRAG's retention strategy comes into focus. A great many resources go into the selection and training of observers. Retaining those observers in the program for a minimum of a year is crucial to training cost control and data reliability. There is always a learning curve for observers working in a new program and experience in the NEFOP program is required before observers can be proficient in their duties. MRAG understands the importance of retention and creating an established observer core. MRAG understands the value of individual observer experience, professionalism and industry knowledge provides to the success of an observer program. It is our goal to aid in that success by maintaining a retention strategy adequate to keep a stable core of observers in both the ASM and NEFOP.

Prior and current observers express a desire for defined plans in five key aspects of observer compensation and deployments:
- Clear and consistent statement of wage structure with easy to understand paystubs;
- Regularly scheduled pay dates with option for direct deposit;
- Deployment rules to assure an equal opportunity of placement for all observers;
- Reliable, standardized communication of trip information in a timely manner; and
- Flexible scheduling to allow for a life outside of observing.

MRAG Americas has sought to establish a large, diverse group of observers capable of working in multiple programs. MRAG strives to make a career of observing, providing a supportive, responsive environment for observers to reside in between assignments. MRAG believes in an open, transparent management plan. Employees are part of a team that is working towards a common goal. MRAG's staff is there to support the observers and provide an environment where observers can succeed in their difficult mission.

MRAG understands an observer who is not mentally ready to deploy should not be placed on a vessel. This is just as true on a 12-hour shoreside trip as it is for longer multi-day trips. MRAG builds flexibility into our management structure. This flexibility improves our ability to adapt in emergency situations, but it serves our employees daily. MRAG's management plan allows Area Coordinators to reliably schedule observer requests for time off with a week or more notice. It is important in the NEFOP program, when work is available year round and observers are expected to work throughout the year, to provide an opportunity for a life outside of observing. In addition to these integrated management concepts, below we set out the employment package that we believe supports a high level of stability and observer retention.

**Observer compensation**

MRAG has established an observer pay scale that includes fair remuneration for new monitors and observers, and incremental salary increases for monitors and observers who continue with the program. The pay scale has 8 levels, starting with new monitors and observers in training and increasing to the most experienced monitors and observers. An incremental increase to base pay is applicable as monitors and observers pass into higher grades.
Observers are paid a daily rate for each actual full deployed day. In order to match observer wages with the actual hours worked to the best of our ability, MRAG uses a partial sea-day system for paying observers based on the Quarter day billing structure required by the government.

Although the majority of these sea-days result in short deployments, the actual effort required to complete the trip is often significantly more than a normal trip. The Solicitation Day rate is slightly higher than the full sea-day rate and is consistent with pay grade status. The Solicitation Day rate includes deployed time, as well as time spent soliciting vessels. The debriefing and travel hours are paid in addition to the Solicitation Day rate in the same manner as paid under the partial and full sea-day rates. Actual time worked is tracked and additional overtime applies if actual hours worked are greater than hours paid under the Solicitation Day rate.

Observers are paid at the hourly rate for their pay grade for reimbursable travel, travel to debriefings and OLE interviews, debriefing time, and exit interviews.

Trainees: Observers in training begin at a pre-determined pay grade designated training pay. In order for NEFOP Observer trainees to advance from training pay to the next pay grade they must first receive NEFOP certification status. If an observer becomes certified, MRAG reserves the right to prevent that individual from advancing to Grade 1 if MRAG is informed by NMFS training staff that the observer needs close supervision for reasons including, but not limited to, challenges related to data quality, assignment protocol/procedures, or professional attitude. A trainee may advance to Grade 1 once all issues have been resolved to NMFS’ satisfaction.

Certified NEFOP Observers: Once certification status is achieved, Grade 1 base pay is applied and reflected in the observer’s pay. However, a higher base rate can be obtained if an observer can show documented proof of experience in the Northeast ASM/DSM Program, Northeast Fisheries Observer Program, North Pacific Groundfish Observer Program, ADF&G Shellfish Observer Program, Alaska Marine Mammal Observer Program, Hawaii Longline Observer Program, and/or IATTC/ICCAT/IOTC Transshipment Observer Programs. In addition MRAG considers some or all MMO experience. An internal review by MRAG staff determines pay grade status. Once a base pay grade is established, an observer’s performance must be reviewed before advancing to the next pay grade.

Prior Observers: Observers who are currently certified in NEFOP are eligible to qualify for a base pay grade equal to their previously achieved sea-days provided they present proof of sea-days and currently maintain a status of good standing from NMFS.
Where possible, MRAG pays monitors and observers by direct bank transfer so that the funds are immediately available to the employee. Prior employees have commented that when payments are made by posted checks, lengthy delays can ensue.

An additional comprehensive benefits package is offered to staff hired under the NEFOP contract, including:

**Medical and disability coverage**

Medical and disability insurance is provided through the services of a negotiated contract with the payroll company POA, which MRAG has engaged. This approach offers considerable advantages to the client and to the employee.

MRAG Americas offers full health care and medical insurance for the duration of the contract for full time employees.

**Advancement opportunities**

As a company with wide-ranging activities that go far beyond providing observers, MRAG undertakes numerous projects every year. Those observers who show initiative and competence will have an opportunity to compete for participation in other observer programs and in non-observer projects. Many of our non-observer projects do not require physical presence at one of the MRAG offices. We give preference for project-specific work to members of our pool of observers who desire to participate. If expansion by the company requires adding additional full time staff, current employees will have the first consideration.

**Performance related bonus package**

Each observer has the opportunity to receive annual bonuses based upon the average number of sea-days per month, internal MRAG review criteria, NMFS Species Verification Program and the Bi-Annual
The tiers of bonus depend on the monitor achieving a minimum level of expectation in each criterion. The following table outlines the bonus potential for a NEFOP observer:

MRAG uses the following standards when determining the score for each Criterion.

- Average Sea-days –
- MRAG Internal Review score –
- NMFS Data Quality Rating -
- Species Verification Report –

**Bunkhouses**

The use of bunkhouses to provide stable accommodations for observers in strategic locations is an important part of MRAG Americas’ overall support for our monitor and observer team.
Bunkhouses act as hubs in the major ports for ASMs and observers. The benefits of the bunkhouses include housing, communication with co-workers, office resources, technical support and gear storage. All bunkhouses provide free housing to MRAG employees for the long and short term. The long term housing allows for ASMs and observers to live in their assigned ports close to their primary deployments. Short term housing is available to observers covering trips outside of their ports. This allows the ASMs and observers to travel to the port the night before a trip and also gives them a place to rest after a deployment before having to travel back home. Bunkhouses are fully stocked with toiletries and laundry essentials. In addition to being convenient for the observers, the presence of bunkhouses in major ports significantly cuts down on travel expenses for MRAG and NMFS.

The convenient location and comfortable accommodation of the bunkhouses has resulted in many observers utilizing them. They have become centers for observer communication and mentoring with new observers requesting to stay at the bunkhouses during their training trips for the support and open communication with co-workers that helps maximise mentoring opportunities. All houses are fully equipped with desktop PC’s, printers and scanners, wireless internet and long distance phone service.

An Area Coordinator is in charge of each bunkhouse with most having an Area Coordinator or Assistant Area Coordinator living in the bunkhouse. The presence of a coordinator in-house allows MRAG Americas to maintain the bunkhouses to a high standard. ACs are also available to the observers at all times.

3.3 Performance Monitoring

Sea-day requirements for NEFOP and ASM are set in the Sea-day Schedule and coverage levels for PTNS and CA1 herring. By increasing our observer sea-day productivity and expanding our observer roster in line with our estimates, we expect to achieve the sea-day totals shown in Table 1. In November our observer roster will be boosted by newly certified observers from the September training, and the sea-day requirement drops by approximately 200 days compared to September and October. At this stage, we will be in a position to boost PTNS coverage.

Expected sea-day achievements based on available observers and sea-day rates per observer (from Table 1)

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Target: increase in average sea-days accomplished per observer per month compared to June/July period: 25% by October through December
Target: retention rate in line with expectations from Table 1
Target: maximum net loss of 2 currently certified observers through Dec 2013
Target: maximum net loss of 10 certified observers through 2014
Target: Diminishing number of sea days rolling over to following month as new observers come on board
Target: no rollover days resulting from shortage of available observer/monitor personnel by November 2013
Target: for improved communication with NOAA: Monthly or more frequent meetings and/or calls between MRAG Americas senior staff and NOAA (FSB) senior management.
Target: Local senior manager appointed by end of October 2013
Target: MRAG Americas NEFOP/ASM Facebook page established in October