Tab F, No. 4(b)

SEFHIER - Equipment Failure Exemption (EFE) Implementation Plan

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Purpose

- Behind the scenes view into implementing a simple data collection form

EFE Guiding Goals

- Develop easy to understand process
- Automate the process to the extent possible
  - Online submission with rapid approval not dependent on NMFS staff
- Compliance/enforcement integrity
  - Mechanism to show initial approval to OLE
  - Create mechanism to submit documentation of equipment failure
- Ensure program data integrity
  - Information collected sufficient to be analyzed for exemption and potential impact on final SEFHIER catch and effort estimates
- Ensure awareness of EFE requirements

Working Groups

- Utilized working group of various subject matter experts
- Working Group Topics
  - Agency definition of failure
  - Exemption form design
  - Exemption submission & notification processes
  - Documentation of failure
  - Effects on permit renewal/transfer process
  - Tracking and sharing EFE information

Implementation Tasks

- Definition of equipment failure
  - Working with national VMS staff to define an equipment failure as units differ by vendor and gathering information vendor warranties (e.g., replacement timeline, process, unit failure indications)

- Develop online form
  - Balance collecting information burden with program needs
  - Ensure collected data can be effectively analyzed
    - For example: tracking submissions to comply with regulations, categorizing failures by vendor or type, annual summaries, patterns of behavior
  - Utilize power -down exemption form as template to begin EFE form

Implementation Tasks

- Agency develops database structure
  - Provides mechanism to track and evaluate exemptions
  - Link information gathered to SEFHIER compliance database, Permits system, and Enforcement systems

- Agency develops validations to confirm/deny submission
  - Verify vessel exists in Permits system
  - Determine if vessel is dual permitted with Reef Fish – automatic denial
  - Determine previous exemptions used – based on vessel and permit holder before approval or denial

Implementation Tasks

- Agency develop mechanism to notify of approval/denial
  - Create confirmation and denial email text
  - Create mechanism to auto reply with confirmation or denial

- Agency defines process to document failure
  - Establish timeline for submission of failure documentation
  - Establish mechanism to submit failure documentation
  - Establish process to upload and store failure documentation
  - Create database structure to link failure documentation to specific exemption requested
  - Establish trouble -shooting actions to try before submitting EFE

Implementation Tasks

- Modify permit renewal/transfer process
  - Create mechanism to share current EFEs to Permit system
  - Determine rules for renewal/transfer when under EFE
  - Create code to end EFE upon transfer

- Develop mechanism share current EFEs with enforcement
  - Create mechanism to add to VMS database system
  - Create views to query existing EFEs

- Develop outreach materials around EFE
  - Develop FAQ for submission process, submission of proof, and explanation of approval/denial, suggestions to troubleshoot unit

Implementation tasks

- Short-term storage due to rapid nature of task
  - Utilize SEFSC portal to submit EFE with an online form
  - Merge data with SEFHIER database
  - Share data with other systems
- Long-term storage for effective storage in one system
  - Utilize permits system to submit online form
    - Reduces data entry for stakeholder
    - Improves QA/QC of submitted data
  - Increased data security for transmission and storage
- Short-term solution may require updated regulations and PRA when long-term PIMS solution is available

Exemption Comparisons

	Power Down Exemption	Equipment Failure Exemption
Vessel move on water?	No	Yes. For (7,10,14) days with unit not transmitting
Power off the unit?	Yes, after approval received. Must remain powered off for 72 hours	Yes, after approval
Submission Process	PDE Online form	EFE Online form
Submission limitations	None	Limited to (1, 2, 3) times per year
Approval	From OLE – working on automation of approvals	Conditional approval from OLE upon later providing documentation of failure
Documentation	Submitted form	Submitted form and documentation of failure within time frame specified by NMFS

Questions

Electronic Technologies Implementation Plan highlights past successes and current challenges for Electronic Technologies in the region. Current plan covers 2021-2025 and is updated each spring. Plans are available at https://www.fisheries.noaa.gov/national/fisheries-observers/electronic-technologies-implementation-plans