

**Supporting Statement
For
U.S. Coast Guard Non-Appropriated Fund Employment Application**

A. Justification.

1) Circumstances that make the collection of information necessary.

This information collection covers the documentation related to the employment application process for the U.S. Coast Guard Non-Appropriated Fund (NAF) employment. The USCG Non-Appropriated Fund (NAF) Human Resources Information System (HRIS) will collect applicant qualification information associated with vacancy announcements. The form will allow individuals to apply for employment opportunities with the Coast Guard NAF workforce and will fill the gap created by the cancellation of the Optional Application for Federal Employment, Form OF-612, OMB No. 3206-0219.

The Optional Application for Federal Employment, Form OF-612, was cancelled and the information is now collected in USA Jobs. The NAF personnel system does not utilize USA Jobs because of the high cost and high turnover rate and thus relied exclusively on form OF-612 for applicants.

Non-Appropriated Fund (NAF) employment is Federal employment but does not confer civil service status. The funds used to pay the salaries of NAF employees are self-generated by the Coast Guard Exchange and other Coast Guard Non-Appropriated Fund Instrumentalities (NAFI).

The online HRIS capture the essential information Federal agencies require to evaluate applicants for Federal jobs under the authority of sections 1104, 2103, 3301, and 3320 of Title 5 United State Code. The Commandant of the Coast Guard's Instruction, Coast Guard Nonappropriated Personnel Manual, COMDTINST M12271.1 (series) under the auspices of 5 USC §301 provides the direction for the collection of the information.

2) By whom, how and for what purpose the information is to be used.

The individual enters the information electronically into the USCG NAF Human Resources Information system. The information is used to capture the essential information required to evaluate applicants for USCG NAF jobs under the authority of sections 1104, 2103, 3301, and 3320 of Title 5 United State Code as well as the Commandant of the Coast Guard's Instruction, Coast Guard Nonappropriated Personnel Manual, COMDTINST M12271.1 (series) under the auspices of 5 USC 301. The information collected will be used by the NAF Human Resources recruiter and the hiring manager to determine applicant qualifications in relation to the vacancy announcement.

3) Considerations for the use of improved information technology.

The collection of information involves the use of the USCG NAF HRIS technology to apply for positions and upload their application or resume.

4) Efforts to identify duplication. Why similar information cannot be used.

The collection of information is not a duplication of any other collection. The CG NAF HRIS is the one-stop collection point for all CG NAF job postings.

5) Methods to minimize the burdens to small business if involved.

This information collection does not have an impact on small businesses or other small entities.

6) Consequences to the Federal program if collection were not done or conducted less frequently.

If the collection of information is not conducted there could be a violation of the Title 5 USC Sections. The online application captures the essential information that Federal agencies require to evaluate applicants for Federal job.

7) Explain any special circumstances that would cause the information collected to be conducted in a manner inconsistent with the guidelines.

This information collection is conducted in manner consistent with the guidelines in 5CFR 1320.5(d)(2).

8) Consultation.

A 60-Day Notice (See [USCG-2017-0009], October 20, 2017, 82 FR 48836) and 30-Day Notice (January 30, 2018, 83 FR 4227) were published in the *Federal Register* to obtain public comment on this collection. Both notices elicited five comments that were unrelated to the information collection. Accordingly, no changes have been made to the collection.

9) Explain any decision to provide any payment or gift to respondents

USCG does not provide payments of gifts to respondents in exchange for a benefit sought.

10) Describe any assurance of confidentiality provided to respondents.

There are no assurances of confidentiality provided to the respondents for this information collection. This information collection request is covered by the DHS/USCG/PIA-024 Direct Access and DHS/ALL/PIA-043 DHS Hiring and On-Board Process Privacy Threshold Analysis (PIA). This collection request is also covered by the DHS/USCG-014 Military Pay and Personnel System of Records Notice (SORN). Link to the PIA and SORN is provided below:

- <https://www.dhs.gov/sites/default/files/publications/privacy-pia-uscg-direct%20access-november2016.pdf>
- <https://www.dhs.gov/sites/default/files/publications/privacy-pia-dhs-all043-hiring%20and%20onboarding-april2017.pdf>
- <https://www.gpo.gov/fdsys/pkg/FR-2011-10-28/html/2011-27881.htm>

11) Additional justification for any questions of a sensitive nature.

There are no questions of sensitive language.

12) Estimates of reporting and recordkeeping hour and cost burdens of the collection of information.

Annual Burden of Collection of Information

Requirement	Respondents	Responses	Burden (hours)	Hourly Rate (dollars)	Burden (dollars)
Employment Application	5755	5755	3856	\$10.12	\$38,946

The Coast Guard estimates that applicants will spend approximately 40 minutes completing the application and that 5755 applicants a year will apply at the median hourly earnings of \$10.12 per hour.¹ The cost burden is estimated to be \$3,856 = 5755 applications x .67 hour x \$ 10.12 per hour. The number of applicants is based on NAF applicant data for 2016. The wage rate used is in accordance with https://www.bls.gov/oes/current/oes_nat.htm#35-0000 May 2017 National Occupational Employment and Wage Estimates United States. Rate updated for 2017 to \$10.12, occupation cashier 41-2010. The USCG NAF workforce is largely engaged in retail (Coast Guard Exchange System) with a turnover rate of 30%.

13) Estimates of annualized capital and start-up costs.

There are no record keeping, capital, start-up or maintenance costs associated with this information collection.

14) Estimates of annualized Federal Government Costs.

It is expected that, on average it will take a Coast Guard Personnel Assistant (NF-3, at \$25.92/hour including benefits) 5 minutes to review each submission. Therefore, the annual hour burden is 480 hours (5755 submissions x .083333 hours/submission). The annual cost burden is \$12,442. The rate shown, pay schedule 033-60 for the Norfolk/Portsmouth/VA Beach, VA Wage Area where the NAF NF-3 Personnel Assistant in charge of recruitment an selection is located: <https://www.cpms.osd.mil/Subpage/NAFWageSchedules/>. Please note: The rate was determined by factoring in the incumbent's actual salary and adding 30% for NAF benefits.

15) Explain the reasons for any program changes or adjustments reported in items 13 or 14 of the OBM form 83-I.

The change in the burden is an ADJUSTMENT due to a change (i.e., decrease) in the estimated annual number of respondents. Item 13 – Previous submission was an estimate of the number of respondents. The CG NAF HRIS provides an accurate count of actual applications. Previous submission overestimated the number of applications received. The reporting requirements and the methodology for calculating burden, remain unchanged.

Item 14 – Cost incurred not listed on previous 83-I.

¹ The hourly wage rate is based on the Department of Labor, Bureau of Labor Statistics, May 2017 National Occupational Employment and Wage Estimates United States. Rate updated for 2017 to \$10.12, occupation cashier 41-2010

16) For collections of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis and publication.

This information collection will not be published for statistical purposes.

17) Approval to not display expiration date.

USCG will display the expiration date for OMB approval of this information collection

18) Explain each exception to the certification statement.

USCG does not request an exception to the certification of this information collection."

B. Collection of Information Employing Statistical Methods.

This information collection does not employ statistical methods.