

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

OMB No.: 1625-0120

COLLECTION INSTRUMENTS: Instruction

A. JUSTIFICATION

1. Need for the Information Collection

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 continue to allow individuals to apply for employment opportunities with the Coast Guard NAF workforce.

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 captures 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 Non-Appropriated Personnel Manual, COMDTINST M12271.1 (series) under the auspices of 5 USC §301 provides the direction for the collection of the information.

2. Use of the Information

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 Non-Appropriated Personnel Manual, COMDTINST M12271.1 (series) under the auspices of 5 U.S.C. § 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. Use of 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.

Regarding Usability Testing, this ICR—

- Public-facing instructions were tested by the Coast Guard Community Services Command to ensure the use of plain language. No changes were needed.

- Is not related to a public benefit program as detailed in OMB M-22-10 (titled “Improving Access to Public Benefits Programs Through the Paperwork Reduction Act” dated April 13, 2022).

- The Coast Guard Community Services Command conducted Usability testing to determine if the Non-Appropriated Fund Employment Application form used plain language. All participants were members of the United States Coast Guard but were not affiliated with the program office. The Coast Guard Community Services Command found that respondents understood the form and had no questions regarding the content. As such, no changes were made to the collection.

- Is required by statute, and/or regulation as noted in section 1 of the Supporting Statement.

4. Non-duplication

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. Burden on Small Business

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

6. Less Frequent Collection

If the collection of information is not conducted there could be a violation of the Title 5 USC Sections additionally the organization would not have a way to procure qualified applicants for hiring purposes. The online application captures the essential information that federal agencies require to evaluate applicants.

7. Paperwork Reduction Act Guidelines

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

8. Consultation and Public Comments

A 60-day Notice was published in the Federal Register to obtain public comment on this collection (See [USCG-2024-0782]; September 18, 2024, 89 FR 76486) and 30-Day Notice (December 17, 2024 89 FR 102153) were published in the Federal Register to obtain public comment on this collection. The Coast Guard has not received any comments on this information collection.

9. Gifts or Payment

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

10. Confidentiality

There are no assurances of confidentiality provided to the respondents for this information

collection. This information collection request is covered by the Direct Access (PIA) November 9, 2016. This information collection request is also covered by the Military Pay and Personnel (October 28, 2011), and Exchange System and Morale Well-Being and Recreation System Files System of Records Notices (10/31/2014) (SORNs). Links to the aforementioned PIAs and SORNs are provided below:

- <https://www.dhs.gov/sites/default/files/publications/privacy-pia-uscg-direct%20access-november2016.pdf>
- <https://www.govinfo.gov/content/pkg/FR-2014-10-31/html/2014-25907.htm>
- <https://www.govinfo.gov/content/pkg/FR-2011-10-28/html/2011-27881.htm>

11. Sensitive Questions

There are no questions of sensitive language.

12. Respondent Burden, and its Labor Costs

Annual Burden of Collection of Information

Requirement	Respondent	Responses	Burden (hours)	Hourly Rate (dollars)	Burden (dollars)
Employment Application	6810	6810	4333.33	\$13.27	\$57,503.29

The Coast Guard estimates that applicants will spend approximately 40 minutes completing the application and that 6810 applicants a year will apply at the median hourly earnings of \$13.27 per hour.¹ The cost burden is estimated to be \$57,503.29. The number of applicants is based on NAF applicant data for 2024

13. Respondent Costs Other Than Burden Hour Costs

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

14. Cost to the Federal Government

It is expected that, on average it will take a Coast Guard Personnel Assistant (NF-3, at \$26.44/hour including benefits) 5 minutes to review each submission. Therefore, the annual hour burden is 567.47 hours (6810 submissions x .083333 hours/submission). The annual cost burden is \$15,004.09.

¹

15. Reasons for Change in Burden

The estimated burden remains 4,333 a year. The reporting requirements and the methodology for calculating burden, remain unchanged.

16. Publication of Results

This information collection will not be published for statistical purposes.

17. Non-Display of OMB Expiration Date

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

18. Exceptions to "Certification for Paperwork Reduction Submissions"

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

