

**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 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 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 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) 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 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) 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 5 CFR § 1320.5(d)(2).

**8) Consultation.**

A 60-day Notice was published in the Federal Register to obtain public comment on this collection (See [USCG-2021-0185]; March 26, 2021, 86 FR 16231) and 30-Day Notice (June 17, 2021, 86 FR 32273) 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) 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 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) 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	6500	6500	4333.33	\$13.27	\$57,503.29

The Coast Guard estimates that applicants will spend approximately 40 minutes completing the application and that 6500 applicants a year will apply at the median hourly earnings of \$13.27 per hour.<sup>1</sup> The cost burden is estimated to be \$57,503.29. The number of applicants is based on NAF applicant data for 2020 and the rate is based on the retail rate within the following website [https://www.bls.gov/oes/current/oes\\_nat.htm#35-0000](https://www.bls.gov/oes/current/oes_nat.htm#35-0000).

**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 \$26.44/hour including benefits) 5 minutes to review each submission. Therefore, the annual hour burden is 541.67 hours (6500 submissions x .083333 hours/submission). The annual cost burden is \$14,321.75. This rate is based on the current salary of the recruiter and there is a pay range that can be located at <https://www.cpms.osd.mil/Subpage/NAFWageSchedules/>.

**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., increase) in the estimated annual number of respondents. Item 14 was an accurate number in the past, however the CG NAF has increased their footprint (added a store in Centreville VA) and therefore has increased the number of requisitions and applicants from the time the last applicant was filed

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and this one was filed. The reporting requirements and the methodology for calculating burden, remain unchanged.

**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.