



COMDTINST 1780.2C
19 NOV 2014

COMMANDANT INSTRUCTION 1780.2C

Subj: COAST GUARD NONPAY COMPENSATION PROGRAM INTERNSHIP PROGRAM

- Ref: (a) Coast Guard Nonappropriated Fund (NAF) Personnel Manual, COMDTINST M12271.1 (series)
(b) Title 10, United States Code Section 1588
(c) Title 5, United States Code Section 3111
(d) Information and Life Cycle Management Manual, COMDTINST M5212.12 (series)

- PURPOSE.** This Instruction establishes policy and procedures for the Coast Guard Nonpay Compensation Program Internship Program. The purpose of this program is to provide a positive learning environment for students pursuing degrees in the field of resale, recreation, merchandising, or other related fields in the operation of Coast Guard nonpay compensation programs of the Coast Guard Exchange System (CGX), Coast Guard Morale, Well-Being, and Recreation (MWR) program, Cadet Activities, and Cadet Athletics. Coast Guard nonpay compensation programs benefit from this program by gaining students recently educated in the disciplines associated with these programs, while the students benefit from opportunity to gain broad experience while earning credit toward their degrees in related fields of study. Internships offered through Paragraph 15 of this Instruction must be educational for the student, benefit the intern, and not displace regular employees. This Instruction provides policy guidance in those areas where people are employees in NAF positions and where student interns have agreed to provide in-kind services under the Coast Guard nonpay compensation program Payment-In-Kind Internship.
- ACTION.** All Coast Guard unit commanders, commanding officers, officer-in-charge, deputy/assistant commandants, and chiefs of headquarters staff elements shall comply with the provisions of this Instruction. Internet release authorized.
- DIRECTIVES AFFECTED.** Coast Guard Nonpay Compensation Program Internship Program, COMDTINST 1780.2B, is cancelled.

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NON-STANDARD DISTRIBUTION:

4. DISCLAIMER. This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. It is intended to provide operational guidance for Coast Guard personnel and is not intended to nor does it impose legally-binding requirements on any party outside the Coast Guard.
5. MAJOR CHANGES. Internships offered through Paragraph 15 of this Instruction are for the educational experience of the intern, not the benefit of the receiving command.
6. IMPACT ASSESSMENT. Commands are not required to participate in this program. Commands that voluntarily participate in this program shall follow the policy outlined in this Instruction.
7. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS.
 - a. The development of this Instruction and the general policies contained within it have been thoroughly reviewed by the originating office and are categorically excluded (CE) under current USCG CE # 33 from further environmental analysis, in accordance with Section 2.B.2. and Figure 2-1 of the National Environmental Policy Act Implementing Procedures and Policy for Considering Environmental Impacts, COMDTINST M16475.1 (series).
 - b. This Instruction will not have any of the following: significant cumulative impacts on the human environment; substantial controversy or substantial change to existing environmental conditions; or inconsistencies with any Federal, State, or local laws or administrative determinations relating to the environment. All future specific actions resulting from the general policies in this Instruction must be individually evaluated for compliance with the National Environmental Policy Act, Council on Environmental Policy NEPA regulations at 40 CFR Parts 1500-1508, DHS and Coast Guard NEPA policy, and compliance with all other environmental mandates.
8. DISTRIBUTION. No paper distribution will be made of this Instruction. An electronic version will be located on the following Commandant (CG-612) web sites. Internet:
<http://www.uscg.mil/directives/>, and CGPortal:
<https://cgportal2.uscg.mil/library/directives/SitePages/Home.aspx>.
9. RECORDS MANAGEMENT CONSIDERATIONS. This Instruction has been evaluated for potential records management impacts. The development of this Instruction has been thoroughly reviewed during the directives clearance process, and it has been determined there are no further records scheduling requirements, in accordance with Federal Records Act, 44 U.S.C. 3101 et seq., National Archives and Records Administration (NARA) requirements, and the Information and Life Cycle Management Manual, COMDTINST M5212.12 (series). This policy does not have any significant or substantial change to existing records management requirements.
10. AFFILIATION AGREEMENT. As the Program Manager for the Coast Guard Nonpay Compensation Program Internship Program, the Coast Guard Community Services Command (CSC) shall ensure affiliation agreements are established between institutions of higher learning and the Coast Guard. No intern shall be selected for these programs without a signed affiliation agreement being in effect.

11. **CRITERIA.** Intern positions available through Coast Guard Nonpay Compensation Program Internship Program shall be awarded based on academic achievement, accomplishments, student interest, and demonstrated leadership in school-oriented and outside activities. The Coast Guard Nonpay Compensation Program Internship Program is a unique opportunity for Coast Guard commands to gain a short term personnel resource currently being educated in the field of resale, recreation, merchandising, or other field related to the Coast Guard nonpay compensation programs, while providing a learning environment for the student. Internship positions shall only be available to those commands that can provide a substantive and appropriate educational experience, all about the intern, with the ability to support them. Funding support for pay and allowances associated with the Coast Guard Nonpay Compensation Program Internship Program shall be supported through the local command with NAF funds. Other expenses, as authorized in the Coast Guard Morale, Well-Being, and Recreation Manual, COMDTINST M1710.13 (series), may be supported with appropriated funds (APF) for MWR interns only. Other expenses, as authorized in the Coast Guard Nonappropriated Fund Instrumentalities (NAFI) Manual, COMDTINST M7010.5 (series), may be supported with APF for other nonpay compensation program interns.
12. **ELIGIBILITY.** Applicants for the Coast Guard Nonpay Compensation Program Internship Program shall be students in good standing, pursuing an undergraduate/graduate degree in resale, recreation, merchandising or other related fields to the operation of Coast Guard nonpay compensation programs, and identified as such by an institution of higher learning having an affiliation agreement with the Coast Guard.
13. **THE COAST GUARD NONPAY COMPENSATION PROGRAM PAID INTERNSHIP PROGRAM.** Any student hired under the provisions of the Coast Guard Nonpay Compensation Program Paid Internship Program shall be hired in a pay band, NF-01 position, at the minimum rate. Students may work up to 8 hours per day, but no more than 20 hours per week when school is in session, and up to 8 hours per day and 40 hours per week, when school is not in session. Commands hiring students under this program shall comply with all other provisions of reference (a).
14. **PROCEDURES FOR PARTICIPATION IN THE COAST GUARD NONPAY COMPENSATION PROGRAM PAID INTERNSHIP PROGRAM.** Commands shall comply with the competitive procedures outlined in reference (a) when using the Coast Guard Nonpay Compensation Program Paid Internship Program. All vacancy announcements posted for the purpose of hiring under the Coast Guard Nonpay Compensation Program Internship Program shall include the following statement for Qualifications Required: “All candidates must meet minimum requirements in accordance with Office of Personnel Management Qualification Standards Operating Manual and shall be students in good standing who are pursuing an undergraduate/graduate degree in resale, recreation, merchandising, or other related fields to the operation of Coast Guard nonpay compensation programs.” The institution with the internship affiliation agreement with the Coast Guard will typically identify those students in good standing desiring internship opportunities. In the event that there are more potential interns than a command’s ability to place them, the command shall use the following criteria to select the best potential candidate(s):
- a. the official academic transcript from freshman to first semester of the junior year, if available. The transcript should reflect the applicant’s exact or approximate class ranking;

- b. a short essay from the applicant, explaining what the applicant hopes to achieve in his/her college career, including educational, professional, and personal goals; and
- c. letter(s) of recommendation from instructors, administrators, or community leaders.

15. THE COAST GUARD NONPAY COMPENSATION PROGRAM PAYMENT-IN-KIND

INTERNSHIP. The purpose of the Coast Guard Nonpay Compensation Program Payment-In-Kind Internship is to actively recruit students from colleges or universities throughout the year, and offer them the opportunity to gain professional experience and in some situations offer students the opportunity to obtain academic credit. The Coast Guard Nonpay Compensation Program Internship Program may accept these intern services under the authority of reference (b). Individuals who participate in this program do so with the agreement and understanding that they are entitled to neither pay nor benefits and their services are offered freely and without pressure or coercion, direct or implied, from the Coast Guard in accordance with reference (c). A copy of the Payment-In-Kind Intern Agreement shall be executed prior to accepting an intern under this program (See Enclosure (1)). Payment-In-Kind interns are considered employees of the Coast Guard Nonpay Compensation Program Internship Program when providing services to that program only for the purposes of:

- a. compensation for injuries occurring during the performance of approved payment-in-kind services, pursuant to 5 U.S.C. § 8171;
- b. claims for damages or losses pursuant to 10 U.S.C. § 2733 and 28 U.S.C. §2671 et seq.; and
- c. access to Coast Guard automated systems.

For the purpose of the Coast Guard Nonpay Compensation Program Payment-In-Kind Internship, the reimbursement is not assigned a dollar value. Incidental expenses may be reimbursed (See paragraph 16, below).

16. REIMBURSEMENT OF EXPENSES UNDER THE COAST GUARD NONPAY
COMPENSATION PROGRAM PAYMENT-IN-KIND INTERNSHIP. An intern may be

authorized reimbursement for certain incidental expenses as described below. Funding support for intern incidental expenses shall be paid by the local command with NAF at the discretion of the commanding officer. The following is a list of expenses that may be reimbursed to volunteer interns participating in this program:

- a. travel for training to improve effectiveness in assigned roles or to enable interns to accept increasingly greater challenges;
- b. travel for training, to include enrollment expenses, travel, and per diem, held at another site, if it is determined that the supported organization would benefit from the off-site training. Interns may receive an advance of travel and transportation allowance upon presentation of an approved travel request; and
- c. use of privately owned vehicle (POV) to perform Payment-In-Kind duties. Lodging, subsistence, and travel incident to the period of internship may be reimbursed or provided in-kind. Commands may request a waiver to assign interns to transient unaccompanied personnel housing

(UPH) rooms on a space available basis, not to exceed ninety days. Interns shall not be assigned to watch stander rooms, permanent party rooms, unaccompanied personnel leased housing, or converted family homes. Individual waiver requests for interns to occupy transient UPH spaces shall be submitted to Commandant (CG-1223) for determination prior to assignment. Current Federal Travel Regulations shall apply.

17. PROCEDURES FOR PARTICIPATION IN THE COAST GUARD NONPAY COMPENSATION PROGRAM PAYMENT-IN-KIND INTERNSHIP. To participate in the Coast Guard Nonpay Compensation Payment-In-Kind Internship the following criteria shall be met:

- a. the student shall be a member in good standing at an institution of higher education;
- b. the student shall have permission from his/her institution before participating in the program;
- c. the area of work shall be directly related to the student's academic field of studies and the student shall perform services that are of benefit to his or her career and/or academic studies;
- d. there is no displacement of employees; the student is not doing work associated with vacant positions and employees have not been relieved of assigned duties;
- e. the command and student both agree that the student shall not receive pay while participating in an internship offered through Paragraph 15 of this Instruction; and
- f. the command and student both agree that there exists no entitlement or guarantee of future employment for participating in this program; and
- g. the student participating in an internship offered through Paragraph 15 of this Instruction shall sign an agreement acknowledging the conditions set forth under subparagraph e. and f. above (see Enclosure (1)).

18. RESPONSIBILITIES.

- a. CG CSC shall:
 - (1) act as Program Manager for the Coast Guard Nonpay Compensation Program Internship Program;
 - (2) maintain active affiliation agreements with institutions of higher learning desiring to place students at Coast Guard commands;
 - (3) identify commands that desire to use nonpay compensation program interns at their units and match these commands with institutions of higher learning that have eligible interns for placement; and
 - (4) receive and screen student application packages identified by the institutions of higher learning for consideration in the Coast Guard Nonpay Compensation Program Internship Program.

b. CG CSC for CGX activities and unit commanding officers for MWR and other NAFI activities desiring to use the Coast Guard Nonpay Compensation Program Internship Program shall:

- (1) evaluate and screen students identified by CG CSC for consideration in their Coast Guard Nonpay Compensation Program Internship Program;
- (2) comply with the applicable requirements of reference (a) and the provisions of this Instruction in selecting interns, as necessary;
- (3) establish a local agreement among the command, the institution, and the student as to the specific responsibilities of each while the intern is on site;
- (4) provide feedback to CG CSC on the internship experience;
- (5) ensure that interns are assigned a mentor. In many instances the individual assigned as the intern's supervisor and responsible for the intern's curriculum may also serve as the mentor. Management shall recognize that although these interns are either volunteers or NAF employees and will be with the Coast Guard for a short period of time, it does not obviate management's responsibilities to ensure that these interns are mentored on Coast Guard core values, traits and characteristics that will make them successful in their chosen occupation;
- (6) ensure the primary purpose of an internship offered through Paragraph 15 of this Instruction is for the educational experience of the intern, not the benefit of the receiving command; and
- (7) ensure all activities involved in Nonpay Compensation Program Internship Program comply with the applicable requirements of reference (d).

19. FORMS/REPORTS. None.

20. REQUEST FOR CHANGES. Units and individuals may recommend changes via the chain of command to the Community Services Command.

D. R. CALLAHAN /s/
Assistant Commandant for Human Resources

Encl: (1) Coast Guard Nonpay Compensation Program Payment-In-Kind Internship Program Agreement.

**Coast Guard Nonpay Compensation Program
Payment-In-Kind Internship Program
Agreement**

I desire to provide in kind my services to (Name of CG Unit) _____ as a Coast Guard Nonpay Compensation Program Payment-In-Kind Intern during:

(describe anticipated date/hours/day(s) of week at unit)

I expressly agree that my services are being provided as a Coast Guard Nonpay Compensation Program Payment-In-Kind Intern and that I am not an employee of the United States Government or any instrumentalities thereof except for certain purposes relating to compensation for injuries occurring during the performance of approved payment-in-kind services and liability for tort claims as specified in 10 U.S.C. § 1588(d)(2). I expressly agree that I am neither entitled to nor expect any present or future salary, wages, or other benefit for these Payment-In-Kind services. I agree to be bound by the laws and regulations applicable to payment-in-kind service providers, and agree to participate in any training required by the organization to which I am working, to enable me to perform the Payment-In-Kind services that I am offering.

I have been provided a copy of the Affiliation Agreement between _____ and the
(name of school)
Coast Guard, and agree to adhere to all provisions.

(typed or printed name and signature of Payment-In-Kind Intern) _____
(date)

Contact Information: _____
(address and phone numbers)

(typed or printed name and signature of accepting official: local command) _____
(date)

For agency use only: Provide general description of the Payment-In-Kind services to be provided by the intern student:

PRIVACY ACT STATEMENT

AUTHORITY: Executive Order 9397, 10 U.S.C. § 1588, 5 U.S.C. § 3111.

PRINCIPAL PURPOSE: To document participation in the Coast Guard Nonpay Compensation Program Internship Program.

ROUTINE USES: None.

DISCLOSURE IS VOLUNTARY. However, failure to provide the information requested could result in the Coast Guard's inability to place a potential student in the Coast Guard Nonpay Compensation Program Internship Program.