

**INTERNSHIPS IN
NONAPPROPRIATED FUND
INSTRUMENTALITIES (NAFI)**



**COMDTINST 1780.2D
December 2024**

THIS PAGE INTENTIONALLY LEFT BLANK



COMDTINST 1780.2D
DD DEC 2024

COMMANDANT INSTRUCTION 1780.2D

Subj: INTERNSHIPS IN NONAPPROPRIATED FUND INSTRUMENTALITIES (NAFI)

- Ref:
- (a) Morale, Well-Being, and Recreation, COMDTINST 1710.13 (series)
 - (b) Coast Guard Nonappropriated Fund Instrumentalities (NAFI), COMDTINST 7010.5 (series)
 - (c) Coast Guard Nonappropriated Fund (NAF) Personnel Manual, COMDTINST M12271.1 (series)
 - (d) Authority to Accept Certain Voluntary Services, 10 U.S. Code §1588
 - (e) Acceptance of Volunteer Service, 5 U.S. Code. § 3111
 - (f) Information and Life Cycle Management Manual, COMDTINST M5212.12 (series)
 - (g) Invitational Travel Authorizations, COMDTINST 12570.3 (series)

1. PURPOSE. This Instruction establishes policy governance for internships in Coast Guard Nonappropriated Fund Instrumentalities (NAFI), both paid and payment-in-kind.
2. ACTION. All Coast Guard unit commanders, commanding officers, officers-in-charge, deputy/assistant commandants, and chief of headquarter directorates must comply with the policies contained.
3. AUTHORIZED RELEASE. Internet release is authorized.
4. DIRECTIVES AFFECTED. Coast Guard Nonpay Compensation Program Internship Program, COMDTINST 1780.2C is hereby cancelled.
5. BACKGROUND.
 - a. This Instruction creates a supportive learning environment for college students pursuing academic degrees in resale, recreation, merchandising, and other fields relating to Coast Guard NAFI being: the Coast Guard Exchange System (CGX), the Morale, Well-Being, and Recreation (MWR) program, the Coast Guard Marathon Organization (CGMO), the Coast Guard Academy (CGA) Cadet Activities Fund (CAF), the CGA Athletic Activity Fund (AAF), and the CGA Dean of Academic's Academic Activities Fund (AAAF).

- b. Coast Guard NAFI benefit from this Instruction by gaining students recently educated in the disciplines associated with these Coast Guard entities, while students benefit from the opportunity to gain broad experience and potentially earn academic credit toward their degrees in related fields of study. Internships offered through Paragraph 17 of this Instruction must be educational for the student, benefit the intern, and not displace regular employees.
6. DISCLAIMER. This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. It is intended to provide administrative guidance for Coast Guard personnel and is not intended nor does it impose legally-binding requirements on any party outside the Coast Guard.
7. MAJOR CHANGES. The official title of this Instruction has been changed to reflect Coast Guard NAFI entities. Staff symbols and formatting were updated.
8. SCOPE AND AUTHORITIES. It is recommended the reader become familiar with the directives and publications noted throughout this Instruction and are listed in numerical series order:
 - a. Acceptance of Volunteer Service, 5 U.S. Code. § 3111.
 - b. Authority to Accept Certain Voluntary Services, 10 U.S. Code §1588.
9. IMPACT ASSESSMENT. Commands are not required to participate in the internship program. Commands that voluntarily participate, shall follow the policy outlined in this Instruction.
10. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS. The Office of Environmental Management (CG-47) reviewed this Commandant Instruction and the general policies contained within, and determined that this policy falls under the Department of Homeland Security (DHS) categorical exclusion A3. This Commandant Instruction will not result in any substantial change to existing environmental conditions or violation of any applicable federal, state, or local laws relating to the protection of the environment. It is the responsibility of the action proponent to evaluate all future specific actions resulting from this policy for compliance with the National Environmental Policy Act (NEPA), other applicable environmental requirements, and the U.S. Coast Guard Environmental Planning Policy, COMDTINST 5090.1 (series).
11. DISTRIBUTION. Electronic distribution in the Directives System Library. Intranet/Pixel Dashboard: Directives Pubs, and Forms - PowerApps (appsplatform.us). If Internet released: Commandant Instructions (uscg.mil), Coast Guard Forms (uscg.mil).
12. RECORDS MANAGEMENT CONSIDERATIONS. Records created as a result of this Instruction, regardless of format or media, must be managed in accordance with Records & Information Management Program Roles and Responsibilities, COMDTINST 5212.12 (series) and the records retention schedule located on the Records Resource Center Microsoft SharePoint site at: <https://uscg.sharepoint-mil.us/sites/cg61/SitePages/CG-611-RIM.aspx> .

13. AFFILIATION AGREEMENT. The Coast Guard Community Services Command (CSC) and the CGA shall ensure affiliation agreements are established between institutions of higher learning and the Coast Guard for their respective NAFI. No intern shall be selected for Coast Guard NAFI without a signed affiliation agreement being in effect.
14. CRITERIA. Coast Guard NAFI internships shall be awarded based on academic achievement, accomplishments, student interest, and demonstrated leadership in school-oriented and outside activities. These internships are 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 Coast Guard NAFI, 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 with the ability to support them. Funding for pay and allowances associated with a Coast Guard NAFI shall be supported through the local command with NAF. Other expenses, as authorized in Reference (a), may be supported with appropriated funds (APF) for MWR interns only. Other expenses, as authorized in Reference (b), may be supported with APF for other interns within Coast Guard NAFIs.
15. ELIGIBILITY. Applicants for internships in a Coast Guard NAFI shall be students in good standing, pursuing an undergraduate/graduate degree in resale, recreation, merchandising or other related fields to the operation of a Coast Guard NAFI, and identified as such by an institution of higher learning having an affiliation agreement with the Coast Guard.
16. PAID INTERNSHIPS. Any student hired under the provisions of a paid internship 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 (c).
17. PARTICIPATION IN PAID INTERNSHIPS. Commands shall comply with the competitive procedures outlined in Chapter 3 of Reference (c) when selecting paid internship participants in Coast Guard NAFI. All vacancy announcements posted for the purpose of hiring 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.

18. PAYMENT-IN-KIND INTERNSHIPS. The purpose of a Coast Guard NAFI 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 may accept these volunteer intern services under the authority of Reference (d). Individuals who participate in this internship 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 (e). A copy of the Payment-In-Kind Intern Agreement template shall be executed prior to accepting an intern under this program (See Appendix A). Payment-in-kind interns are considered employees of the Coast Guard when providing services to a Coast Guard NAFI 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.

NOTE: For the purpose of the Coast Guard NAFI payment-in-kind internship, the reimbursement is not assigned a dollar value. Incidental expenses may be reimbursed (See paragraph 18, below).

19. REIMBURSEMENT OF EXPENSES ACCRUED UNDER PAYMENT-IN-KIND INTERNSHIPS. A payment-in-kind intern may be authorized reimbursement for certain incidental expenses as described below in accordance with Reference (g). 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 duties in a payment-in-kind internship. 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.

20. PARTICIPATION IN PAYMENT-IN-KIND INTERNSHIPS. To participate in the Coast Guard NAFI 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 this internship;
- 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 17 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 internship;
- g. The student participating in an internship offered through Paragraph 17 of this Instruction shall sign an agreement acknowledging the conditions set forth under subparagraphs e and f above (See Appendix A).

21. RESPONSIBILITIES.

- a. Coast Guard CSC and CGA shall:
 - (1) Act as Program Manager for internships under the following NAFI: CSC (CGX, MWR, CGMO) and CGA (AAF, CAF, AAAF);
 - (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 Coast Guard NAFI 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 Coast Guard NAFI internships.

- b. Coast Guard CSC for CGX activities and unit commanding officers for MWR and other Coast Guard NAFI activities desiring to use internships shall:
- (1) Evaluate and screen students identified by Coast Guard CSC for consideration in their Coast Guard NAFI internship;
 - (2) Comply with the applicable requirements of Reference (c) 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 Coast Guard 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 17 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 Coast Guard NAFI internships comply with the applicable requirements of Reference (f).

22. FORMS. None.

23. SECTION 508. This policy is created to adhere to accessibility guidelines and standards as promulgated by the U.S. Access Board with consideration of Information and Communications Technology (ICT) requirements. If accessibility modifications are needed for this artifact, please communicate with the Section 508 Program Management Office (PMO) at Section.508@uscg.mil. Concerns or complaints for non-compliance of policy and/or artifacts may be directed to the Section 508 PMO, the Civil Rights Directorate (<https://www.uscg.mil/Resources/Civil-Rights/>) for the Coast Guard, or to the U.S. Department of Homeland Security at accessibility@hq.dhs.gov.

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

Z. MERCHANT
Rear Admiral, U. S. Coast Guard
Commander, Personnel Service Center

Appendix A. Coast Guard Nonpay Compensation Program Payment-In-Kind Internship Program Agreement Template

Appendix A. Coast Guard Nonpay Compensation Program Payment-In-Kind Internship Program Agreement Template

I desire to provide in kind my services to (Name of Coast Guard Unit) _____ as a 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 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 Coast Guard, and agree to adhere to all provisions.

(name of school)

(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 payment-in-kind internship.

ROUTINE USES: None.

DISCLOSURE IS VOLUNTARY. However, failure to provide the information requested could result in the Coast Guard's inability to place a student in a potential Coast Guard payment-in-kind internship.