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| EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210 | CLASSIFICATION Unemployment Insurance |
| | CORRESPONDENCE SYMBOL OUI/DUIO |
| | DATE September 24, 2020 |

ADVISORY: UNEMPLOYMENT INSURANCE PROGRAM LETTER NO. 30-20

TO: STATE WORKFORCE AGENCIES

FROM: JOHN PALLASCH /s/
Assistant Secretary

SUBJECT: “Acceptable” Narrative Reasons for Separation Used in the Unemployment Compensation for Ex-servicemembers (UCX) Program and Processing Discrepancies.

1. **Purpose.** To provide an updated consolidated list of “acceptable” narrative reasons for separation from military service for UCX qualifying purposes; and to provide states with procedures to follow when unable to clarify narrative reasons for separation with the military.
2. **Action Requested.** Administrators should distribute this directive and the attachment to appropriate staff.
3. **Summary and Background.**
 - a. **Summary** – The attachments to this Unemployment Insurance Program Letter (UIPL) provide the acceptable narrative reasons for separation from military service for UCX qualifying purposes.
 - b. **Background** – States administer the UCX program on behalf of the Federal government under agreements with the U.S. Department of Labor (the Department). Under these agreements, States must follow the Department’s guidance in operating the program. In general, ex-servicemembers must be honorably discharged and complete their first full term of service in order to qualify for UCX. Effective October 1, 1993, all military branches began using a standard list of narrative reasons for separation from service, which is reflected on the Certificate of Release or Discharge from Active Duty (DD Form 214). This standard list is used when an ex-servicemember does not complete a first full term of service, but has met the other requirements for "Federal service" under 5 U.S.C. 8521(a)(1). The list ensures states use the same terminology used by all military branches to simplify and expedite the processing of UCX claims. Periodically, the U.S. Department of Defense (DOD) updates its separation reasons. When this happens, the Department publishes an updated list of “acceptable” narrative reasons for separation that states must use in making determinations of UCX eligibility.

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| RESCISSIONS UIPL NO 09-10 | EXPIRATION DATE Continuing |
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DOD has recently updated its narrative reasons for separation. The Department, in consultation with the DOD, has finalized the standardized list of “acceptable” narrative reasons for separation for UCX qualifying purposes that states should use when determining UCX eligibility.

The Department instructs states, in ET Handbook No. 384, *Handbook on Unemployment Compensation for Ex-servicemembers* (HB No. 384), that the narrative reasons for separation listed on the DD Form 214 must match, verbatim, with one of the “acceptable” narrative reasons for separation published by the Department. However, to ensure ex-servicemembers are paid benefits when due and to expedite resolution of discrepancies on the narrative reason listed on the DD Form 214, the Department is modifying the instruction in HB No. 384. The new instructions address instances when the narrative reason provided on the DD Form 214 is not “verbatim,” but substantially matches an “acceptable” narrative reason for separation for UCX qualifying purposes provided in this UIPL. We anticipate completing the handbook updates in the near future.

In this context, a narrative separation reason will substantially match if:

- the reason on the DD Form 214 has the same meaning as one of the “acceptable” narrative reasons for separation (i.e., different words are used, but the meaning appears to be the same);
- there the reason the narrative separation reason does not match is due to typographical errors in the narrative reason on the DD Form 214, but the errors do not change the meaning;
- the narrative separation reason contains “extra” words that do not make sense or appear to have been included by mistake (e.g., both “officer” and “enlisted” are used when it is clear only one of them apply based on the pay grade); or
- the narrative separation reason appears to be missing obvious words (e.g., DD Form 214 indicates “Early Retirement” but does not include “From Service”) that can be inferred.

4. Instructions.

- a. New “Acceptable” Narrative Reasons for Separation. DOD has advised the Department that there are several new or modified reasons used for military separations. Block 28 of the DD Form 214 contains the narrative reason for separation. After consultation with the DOD, the Department has determined which reasons should be included in the list of “acceptable” narrative reasons for separation for UCX purposes. There are two attachments to this UIPL. Attachment I provides the new “Acceptable” Narrative Reasons for Separation along with a summary of whether or not the narrative is new or modified. Attachment II provides a comparison of the “Acceptable” Narrative Reasons for Separation found in UIPL No. 09-10 and the “Acceptable” Narrative Reasons for Separation found in this UIPL.

b. New Procedures for Resolving Minor Discrepancies between the Narrative Reasons for Separation Entered on the DD Form 214 and the Official “Acceptable” Narrative Reasons for Separation Provided by the Department.

If the narrative separation reason provided on the DD Form 214 substantially matches a reason on the “acceptable” narrative reasons for separation UIPL provided by the Department, states are to follow the instructions below:

1. Send a message to the military branch (via the 843 process or the process in the Military-State Data Exchange Service) to advise the military that:
 - a. The narrative reason provided on the DD Form 214 does not match verbatim one of the reasons listed on the “acceptable” narrative reasons for separation agreed upon by DOD and the Department;
 - b. The reason listed on the DD Form 214 must match verbatim one of the reasons on the “acceptable” narrative reasons for separation UIPL that the DOD and the Department agreed to, or the ex-servicemember will be unable to use the military wages to establish a UCX claim;
 - c. There is an “acceptable” narrative reason that closely matches the reason provided on the DD Form 214 and provide the military with the proposed “acceptable” narrative reason for separation that most closely matches the narrative separation reason provided on the DD Form 214; and
 - d. The state is requesting the military branch to confirm whether the proposed narrative separation reason in, “c” above, can be used (instead of the narrative reason provided on the DD Form 214) to process the UCX claim.
2. If the military branch authorizes the state to use the proposed “acceptable” narrative reasons for separation (provided from the UIPL) in place of the one on the DD Form 214, process the UCX claim using the “acceptable” narrative reason for separation authorized by the military. Document on the claim that the military agreed to the use of a different “acceptable” narrative reason for separation.
3. If the military branch does not authorize the state to use the “acceptable” narrative reasons for separation (provided in the UIPL), contact the Department’s UCX Regional Office program lead and request that the Department follow up with the military branch. The Department will follow up with the military branch and provide a final response regarding whether or not the proposed “acceptable” narrative reason for separation can be used to determine eligibility for that individual case.

5. **Inquiries.** Please direct inquiries to the appropriate Regional Office.

6. **References.**

- 5 U.S.C. 8521(a)(1) (<https://www.law.cornell.edu/uscode/text/5/8521>);

- 20 Code of Federal Regulations, Chapter V, Part 614 (<https://www.ecfr.gov/cgi-bin/text-idx?SID=ac956c6fb4f551913075bed00aa183ba&mc=true&node=pt20.3.614&rgn=div5>);
- ET Handbook No. 384, *Handbook on Unemployment Compensation for Ex-Servicemembers (UCX)* (https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=465);
and
- UIPL No. 09-10, *Acceptable Narrative Reasons for Separation for the Unemployment Compensation for Ex-servicemembers (UCX) program*, issued January 15, 2010, (https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2845).

7. Attachments.

- Attachment I: “Acceptable” Narrative Reasons for Separation for UCX Qualifying Purposes
- Attachment II: Explanation of changes to “Acceptable” Narrative Reasons for Separation from UIPL No. 09-10