



OFFICE OF THE UNDER SECRETARY OF DEFENSE
4000 DEFENSE PENTAGON
WASHINGTON, D.C. 20301-4000

APR 12 2005

PERSONNEL AND
READINESS

MEMORANDUM FOR: SEE DISTRIBUTION

SUBJECT: Human Resources Policy to Assist DoD Employees Called to Active
Military Duty

The National Defense Authorization Act for Fiscal Year 2005, Section 1101 (Pub. L. 108-375), October 28, 2004, amended title 5, United States Code (U.S.C.), Section 8905a to provide for an extension of continued coverage under the Federal Employees Health Benefits Program (FEHBP) and 5 U.S.C. 8906(e)(3) that allows agencies to pay the employee's share, in addition to the government's share, of the FEHB premium. Both the continuation of the FEHB coverage and the full premium payment begin the date the employee is placed on leave without pay or separated from service to perform active duty and may continue for up to 24 months. The extension of these benefits applies to employees called or ordered to active duty in support of a contingency operation on or after September 14, 2001.

The attached guidance reissues and updates the Human Resources Policy to Assist DoD Civilian Employees Called to Active Military Duty issued by the Office of the Assistant Secretary of Defense (Force Management Policy) memorandum, May 17, 2002, to incorporate the amended provisions of 5 U.S.C. 8905a and 8906(e)(3) providing for continued coverage and payment of FEHB premiums up to 24 months. Additionally, Defense Civilian Personnel Data System (DCPDS) procedures are provided for new data elements that automate processes for reporting current and prospectively eligible employees to the Defense Finance and Accounting Service. This policy will be incorporated in the appropriate Civilian Personnel Manual subchapter.

To ensure consistent treatment for DoD Nonappropriated Fund (NAF) employees called to support a contingency operation, NAF employers will pay premiums for employees covered by the DoD NAF Health Benefits Program in the same manner as required for DoD civil service appropriated fund employees.



This policy is in keeping with the DoD standard to set the example as a model employer in supporting Federal employees called or ordered to active duty. These actions exemplify our continuing commitment to provide the greatest possible assistance to these deserving individuals and their families.

A handwritten signature in black ink, appearing to read "John C. Moseley".

John C. Moseley
Acting Deputy Under Secretary
Civilian Personnel Policy

Attachment:
As stated

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Department of Defense

Federal Employees Health Benefits Coverage and Premium Payment For Civilian Employees Called to Active Duty In Support of Contingency Operations Guidance and Procedures

A. General Information

1. Section 1101 of the National Defense Authorization Act (NDAA) for Fiscal Year 2005, Pub.L.108-375 (October 28, 2004) amended section 8905a of title 5, United States Code (U.S.C.) to provide for an extension of continued coverage under the Federal Employees Health Benefits (FEHB) Program for up to 24 months. This provision also amended 5 U.S.C. 8906(e)(3) allowing agencies to pay the employee's share, in addition to the government's share, of the FEHB premium for 24 months. These amendments apply to employees called or ordered to active duty on or after September 14, 2001.
2. To be eligible to continue FEHB coverage under 5 U.S.C. 8905a and for payment of the employee's share of the FEHB premium under 5 U.S.C. 8906(e)(3) the employee must:
 - a. Be enrolled in FEHB and elect to continue that enrollment.
 - b. Be a member of a Reserve component of the armed forces. The Reserve components are: The Army National Guard of the United States, the Army Reserve, the Naval Reserve, the Marine Corps Reserve, the Air National Guard of the United States, the Air Force Reserve, and the Coast Guard Reserve.
 - c. Be called or ordered to active duty (voluntarily or involuntarily) in support of a contingency operation as defined in 10 U.S.C. 101(a)(13).
 - d. Be placed on leave without pay (LWOP) or separated from service to perform active duty.
 - e. Serve on active duty for a period of more than 30 consecutive days.
3. The beginning date for continued coverage and agency full premium payment provided by Pub. L. 108-375 is the date the employee is placed on LWOP or separated from service to perform active duty. The

maximum period of eligibility for each period of active duty is 24 months after the date the employee is placed on LWOP or separated from service to perform active duty.

4. The contingencies and operations covered are provided in the following chart. Due to mission changes, this list may not be comprehensive over time.

Contingency	Authority	Effective Date	Status
Bosnia <ul style="list-style-type: none"> • Operation Joint Endeavor • Operation Joint Guard • Operation Joint Forge 	Executive Order 12982	Dec 8, 1995	Ongoing
Iraqi Crisis <ul style="list-style-type: none"> • Operation Southern Watch • Operation Northern Watch 	Executive Order 13076	Feb 24, 1998	Ongoing
Kosovo <ul style="list-style-type: none"> • Operation Allied Force 	Executive Order 13120	Apr 27, 1999	Ongoing
9/11 Terrorist Attacks <ul style="list-style-type: none"> • Operation Enduring Freedom • Operation Noble Eagle • Operation Iraqi Freedom 	Executive Order 13223	Sep 14, 2001	Ongoing

5. Some employees performing military service are not eligible for the full FEHB premium payment by the agency. Title 38 U.S.C. 4317 (a)(1)(A), the Uniformed Services Employment and Reemployment Rights Act (USERRA), provides for continued health coverage for employees called to duty under title 32 or title 10 (whether or not they are called in support of a contingency operation). These are:
 - a. Members of the Army National Guard or Air National Guard performing Full-Time National Guard Duty (FTNGD) under title 32, U.S.C., or any provision of state, territorial, or District of Columbia code.

- b. Employees called to active duty under title 10, U.S.C., but not in support of a contingency operation.
6. This policy applies to the Office of the Secretary of Defense (OSD), the Military Departments, the Chairman of the Joint Chiefs of Staff, the Combatant Commands, the Office of the Inspector General of the Department of Defense, the Defense Agencies, the DoD Field Activities, and all other organizational entities in the Department (hereafter collectively referred to as the "DoD Components").

B. Approval Procedures

1. Employees must provide written notification to the supporting Human Resources Office (HRO) of their election to retain FEHB coverage during the period of LWOP or separation to perform active duty. The employee must submit proof of qualifying service by providing a copy of written orders to the supporting HRO that specify he or she has been called to active duty in support of a contingency operation. Examples of acceptable written orders include:
- a. If the statutory authority listed on the orders is 10 U.S.C. 12301(a), 12302, or 12304, the employee has provided proof of qualifying service. It is not necessary for the orders to specifically state the words "contingency operation" when any of these statutory authorities are shown.
- Or
- b. If the orders do not specifically provide one of the three statutory authorities shown above, the orders must state that the duty is in support of one of the named contingencies/operations and the statutory authority is a provision of 10, U.S.C. for proof of qualifying service to be provided.
2. Human Resources Offices will:
- a. Notify employees concerning the benefit and the eligibility requirements.
 - b. Give eligible employees the opportunity to elect to continue FEHB coverage and submit the required documents.

- c. Review military orders provided and employee records to determine eligibility.
- d. Follow documentation procedures for approved requests.
- e. Employees who have requested full FEHB premium payment, but are determined by the supporting HRO to be ineligible, should be notified and provided counseling regarding their FEHB options.

C. Documentation

1. Department of Defense (DoD) Components will use the Defense Civilian Personnel Data System (DCPDS) to document continued coverage and agency full FEHB premium payment.
 - a. For current and prospectively eligible employees, enter appropriate data in DCPDS according to FEHB LWOP Contingency instructions provided to DoD Components on December 7, 2004. These instructions are available at:
http://www.cpms.osd.mil/fas/benefits/pdf/dcpds_instructions.pdf
 - b. Update DCPDS by NOA 292, Return to Duty (RTD) Request for Personnel Action (RPA) to flow notification to the Defense Civilian Pay System (DCPS) of the eligibility end date.
2. Upon data flow from DCPDS to DCPS providing notification of the employee's eligibility and eligibility end date, the supporting Payroll Office will:
 - a. Withhold the employee's share of the FEHB premium in addition to the government share, from the agency's current appropriations.
 - b. Terminate the collection of the full premium payment from the agency and resume withholding the employee's share of the FEHB premium from the employee and the government share from the agency.
 - c. For those employees who remain in a pay status prior to being placed on LWOP, or return to a pay status intermittently while on LWOP, deduct FEHB premiums from the employee's pay during any period pay is sufficient to cover the cost of the premiums. Employees will not be eligible to be reimbursed for premiums deducted while in a pay status.

D. Accountability

1. The Heads of DoD Components shall ensure appropriate and effective use of this authority to support mission requirements.
2. DoD Component supporting HRO's shall develop internal procedures for processing employee request to expedite actions.

Department of Defense

Federal Employees Health Benefits Coverage and Premium Payment For Civilian Employees Called to Active Duty In Support of Contingency Operations Questions and Answers

The Field Advisory Services, Benefits and Entitlements Branch, may be contacted at (703) 696-6301 or DSN 426-6301 or via e-mail at benefits@cpms.osd.mil for further assistance with the following questions or to provide answers to issues not specifically addressed.

- Q1.** When does the 24-month period of eligibility begin if an employee uses paid leave before being placed on leave without pay (LWOP)?
- A1.** The 24-month period begins the date the employee is initially placed on LWOP or separated from his or her civilian position to perform active military duty. For example, an employee is called to active duty on December 1st and uses a combination of paid military and annual leave for 30 days. The LWOP (Nature of Action (NOA 473)) action is prepared with an effective date of January 1st, the period of eligibility begins January 1st and continues for no more than 24 months.
- Q2.** Does the use of paid leave intermittently following the date of the LWOP or separation date extend the 24-month period of eligibility?
- A2.** No. The maximum period of eligibility ends 24 months from the date the LWOP or separation to perform active military duty begins. Use of intermittent paid leave during a period of military service does not extend the 24-month period.
- Q3.** Are there any restrictions on the 24-month period for continuing Federal Employees Health Benefits (FEHB) enrollment when an employee is called to active military service? For example, could an employee serve on active duty for 14 months, exercise restoration rights under part 353 of title 5 of the Code of Federal Regulations, return as a civilian for 2 weeks, and then return to active military service and be entitled to continue FEHB for up to 24 additional months coverage and premium payment? (The 4-month rule requires that the employee have at least 4 consecutive months in pay status to begin a new 24-month period).

- A3.** No. There are no restrictions and the 4-month rule does not apply. Therefore, in the example given above, the employee would be eligible to begin a new period of continued FEHB coverage and agency payment of the full premium for up to 24 months.
- Q4.** Should the Human Resources Office (HRO) automatically take corrective actions to void terminations of FEHB coverage at 18 months (the maximum length of time previously permitted) for those employees who are retroactively eligible for 24 months of coverage and full agency premiums due to the retroactive effective date of September 14, 2001 established in Public Law (Pub. L.) 108-375?
- A4.** No, the HRO should not take any automatic actions. The employee could be detrimentally affected by a reinstatement of FEHB coverage since FEHB will become the primary provider, thus allowing TRICARE providers to seek reimbursement from the employee for claims previously paid. The employee would then be responsible for filing a claim with their FEHB provider for this reinstated period of coverage. The FEHB provider could feasibly pay a lower amount than the TRICARE provider for the same claim.
- Q5.** Would an employee, meeting all eligibility requirements established by National Defense Authorization Act (NDAA) Fiscal Year 2002, Section 519, on active duty on September 14, 2001, be eligible for 18 or 24 months of continued coverage and full premium payment by the agency?
- A5.** An employee already on active duty on September 14, 2001, meeting all eligibility requirements established by NDAA FY 02 section 519, would be eligible for 18 months of continued coverage and full premium payment by the agency. To be eligible for 24 months established by Pub. L. 108-375 of continued coverage and full premium payment, the employee must have been called to active duty on or after September 14, 2001.
- Q6.** Can employees request that the FEHB coverage previously terminated at 18 months be reinstated for a period up to 24 months?
- A6.** Employees called to active duty on or after September 14, 2001, who meet all other eligibility requirements may request in writing that the FEHB coverage terminated at the end of 18 months be reinstated and terminated at the end of their eligibility period, not to exceed 24 months. If the HRO requires documentation to support the request, such as military orders or other proof that their eligibility period continued, the employee is responsible for providing the proof of qualification as appropriate. However, before submitting a request, employees should consider the potentially negative

effect reinstatement of FEHB might have on TRICARE claims previously paid.

- Q7.** Prior to the amendments in 5 U.S.C., Section 8905a and Section 8906 (e)(3)(C) that established the beginning date of the continued coverage and payment of premiums as the first day of LWOP, 38 U.S.C., Section 4317 (a)(1)(A) provided that the beginning date of the period of continued FEHB coverage started the date the employee's absence from their civilian position began. If, due to the amendments, an employee's beginning date for continued coverage and full premium payment is different from the 1st day of LWOP, must the HRO and supporting payroll office automatically adjust the beginning date?
- A7.** The Defense Civilian Personnel Data System (DCPDS) records for employees *currently* on active duty should be updated as described in the Guidance and Procedures, paragraph "C. Documentation." Updating the appropriate data elements in DCPDS will set the beginning date as the date of the LWOP NOA 473 and the ending date of eligibility will automatically be set 24 months (minus one day) from that day. This information will flow to the Defense Civilian Pay System (DCPS). Records for employees who have already returned to duty should not be adjusted (for reasons described in Q&A 4 and 6) unless requested by the employee and determined by the HRO to be an appropriate action.
- Q8.** Can employees request to be allowed to retroactively reenroll in FEHB coverage if they elected the coverage be terminated at the time of the call to active duty or at anytime prior to reaching the maximum time limit for continued coverage?
- A8.** No. The amendments to 5 U.S.C., Section 8905a and Section 8906(e)(3)(C) do not provide an event that will allow reinstatement of coverage terminated at the request of the employee.
- Q9.** What are the tax consequences of this benefit?
- A9.** The FEHB premiums paid currently and prospectively on behalf of employees serving in support of contingency operations are not considered taxable wages and will have no additional tax withholding liability.

Q10. What happens to the FEHB coverage and full agency premium payment when an eligible employee dies while on active duty during the 24-month period?

A10. The full premium will be paid from current employing agency funds through the date of death. The HRO should notify the designated payroll office contact of the death as soon as possible after receiving notification.

**DoD Payment of
FEHB Premium for LWOP Contingency Operations**

Memorandum dated May 17, 2002 issued by the Office of the Assistant Secretary of Defense (Force Management Policy) provided the procedures for continued coverage and payment of FEHB premiums of up to 18 months. Additionally, the National Defense Authorization Act for Fiscal Year 2005, extended these benefits to 24 months. Guidance regarding DCPDS processing follows.

SCR 03-10117-DoD was written to establish new data fields under People>Enter and Maintain>Assignment>Entries>FEHB element and Pay500 transactions to document when employees are entitled for DoD to pay their share of their FEHB premiums. This SCR was implemented in two phases – Patch 54.8 (fielded on October 23, 2004) established two new data fields and Patch 54.11 (fielded on November 21, 2004) established Pay500 transactions and the appropriate business rules.

To be entitled to DoD payment of the employee’s share of the FEHB premium, employees must be (1) enrolled in a health benefits plan, (2) a member of a reserve component (Reserve Category code other than “Y”), (3) called or ordered to active duty in support of a contingency operation and (4) placed on leave without pay. **Users should check employee records prior to updating the LWOP Contingency Dates via direct update or NOA 473 LWOP-US transaction.**

- A. Under People > Enter and Maintain > Assignment > Entries > Health Benefits (FEHB) element, two new data elements were established:

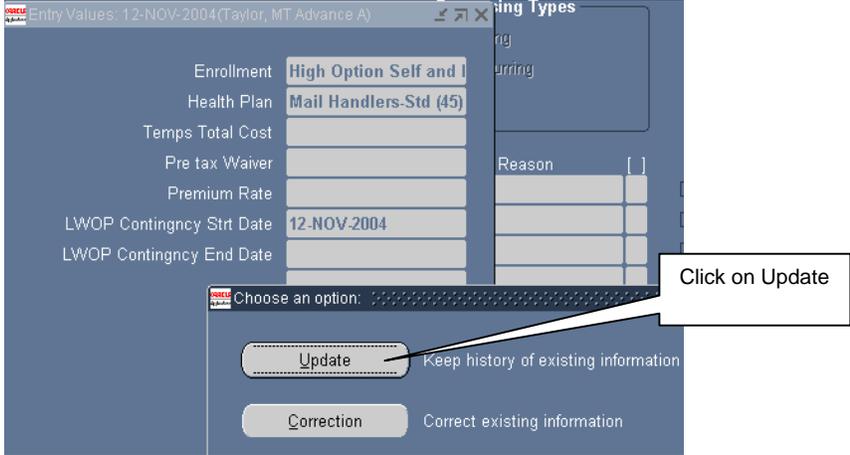
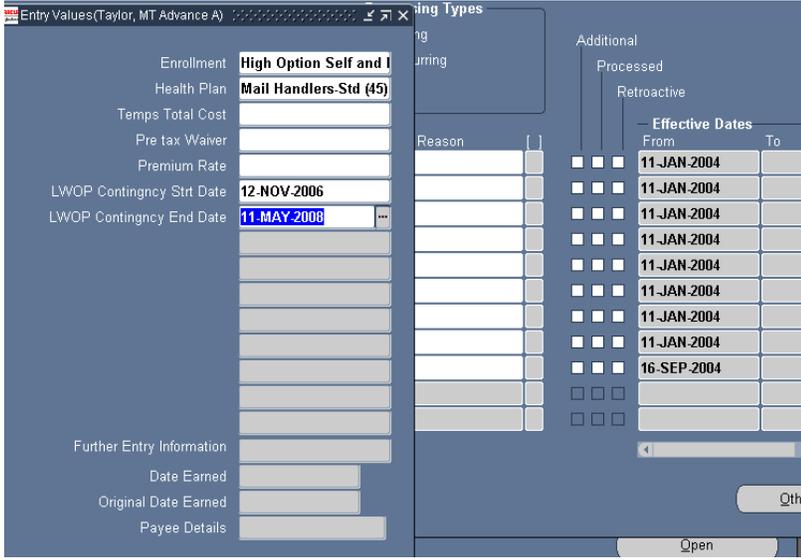
Data Name	Value Type	
LWOP Contingency Start Date	Date	Can be updated through direct element update, IVRS/EBIS interface or RPA Process for LWOP and Return to Duty.
LWOP Contingency End Date	Date	Will be auto-populated regardless of the source of entry. The populated value will be the entered start date plus 24 months minus 1 day.
<i>Note (1): A new Health Benefits element will be created, end-dating the previous entry. All other FEHB information will populate from the prior entry.</i>		
<i>Note (2): The element Effective Date From will reflect the value entered to LWOP Contingency Start Date.</i>		

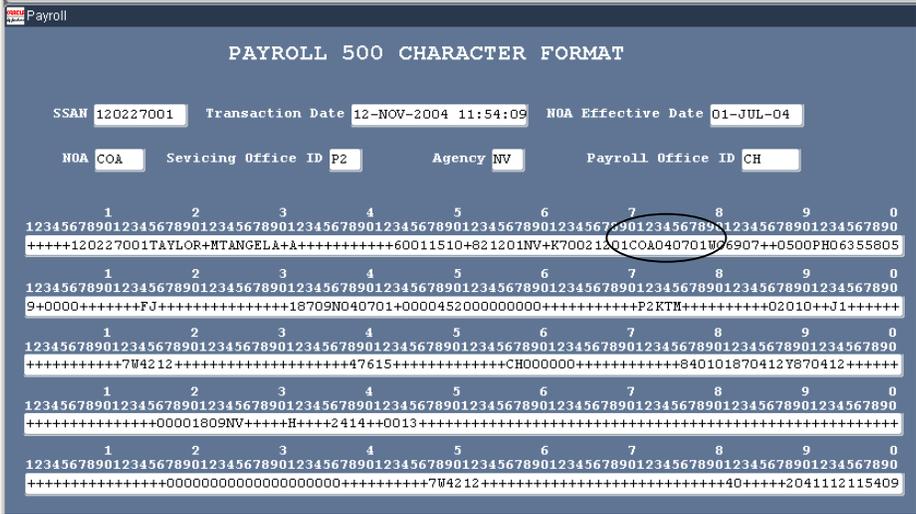
These two new data elements have been added to the CSU refresh extract and are available for display on the Benefits Data screen under “HEALTH/LIFE” section.

- B. To update the new data elements through direct element, please follow these steps:

Steps	Action
1	Query the employee under People>Enter and Maintain (F11, enter employee’s name or SSAN, CTRL-F11).
2	Click on Assignment>Entries and date-track to the effective date of the LWOP Contingency Start Date.
3	Click on Health Benefits Element.
4	Enter the start date in data element LWOP Contingency Start Date.

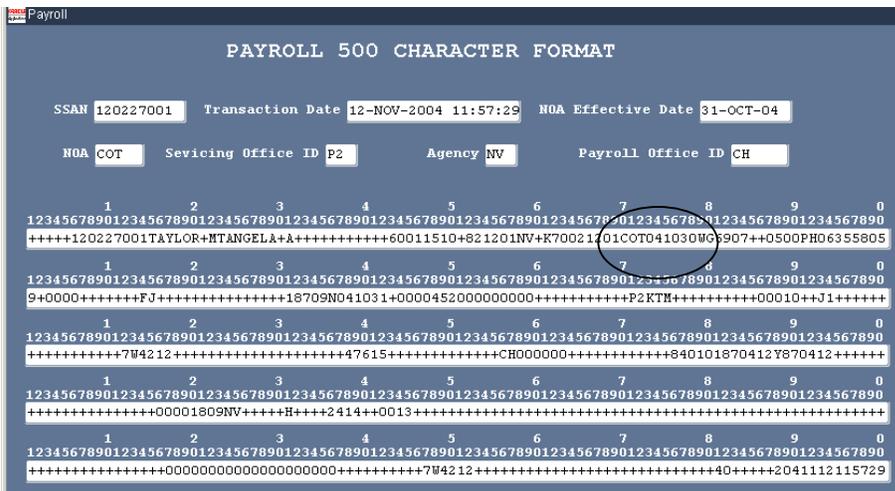
Steps	Action
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Steps	Action
5	 <p>Click on Update.</p>
6	 <p>Data Element LWOP Contingency End Date will auto-populate.</p>
7	Click SAVE .

Steps	Action
4	 <p>In addition to NOA 473 Pay500, NOA COA Pay500 will also generate and the effective date written to positions 73-78 will be the value of LWOP Contingency Start Date formatted as YYMMDD.</p>
	<p>Note (1): A new Health Benefits element will be created, end-dating the previous entry. All other FEHB information will populate from the prior entry.</p>
	<p>Note (2): The element Effective Date From will reflect the value entered to LWOP Contingency Start Date.</p>

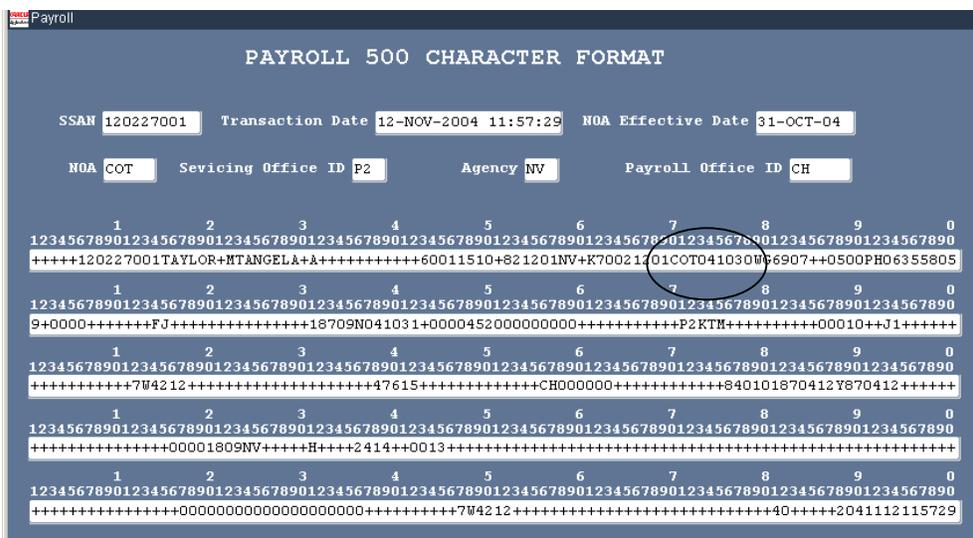
If NOA 473 LWOP-US NPA is cancelled and the NOA 473 LWOP-US RPA had contained the LWOP Contingency Dates, **NOA 001 Pay500 with "COA"** in positions 305-307 will generate and the effective date will be the same value from LWOP Contingency Start Date formatted as YYMMDD.

- D. When **NOA 292 Return to Duty** RPA is updated and the employee's record reflects values in LWOP Contingency Start Date and End Date, DCPDS will update the Return to Duty Effective Date minus one day to the existing LWOP Contingency End Date and end-date the FEHB element with the same date as the new LWOP Contingency End Date. DCPDS will then create a new FEHB element with the NOA 292 RPA effective date as the Effective Date From and populate the FEHB values (minus the LWOP Contingency Start and End Dates) from the prior entry. In addition to NOA 292 Pay500, **NOA COT Pay500** will also generate with the effective date of the Return to Duty action in positions 73-78.



If NOA 292 Return To Duty (RTD) NPA is cancelled and the NOA 473 LWOP-US RPA had contained the LWOP Contingency Dates, **NOA COA Pay500** will generate and the effective date will be the effective date of the cancellation of the Return to Duty (RTD) action formatted as YYMMDD.

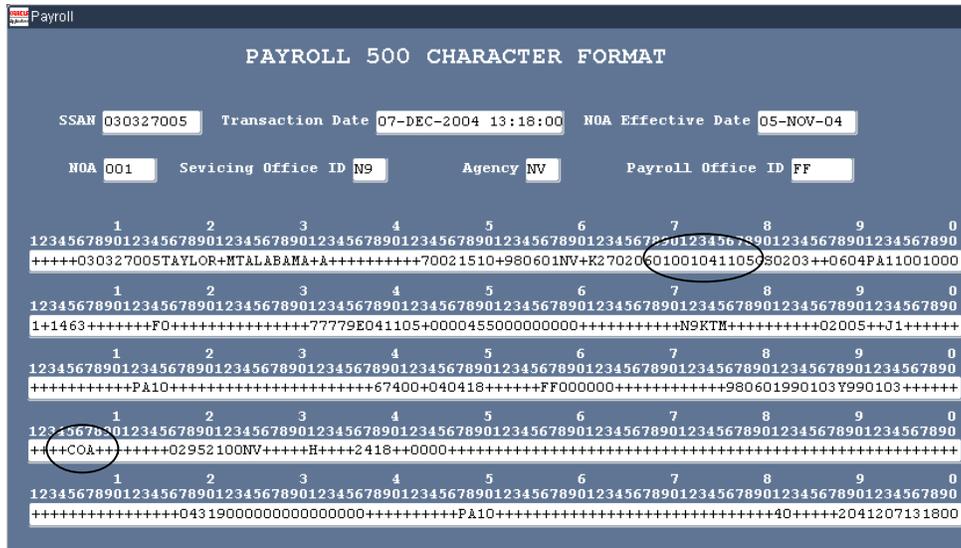
- E. DCPDS Suspense routines will automatically end the FEHB element when the LWOP Contingency End Date is reached. The FEHB element end date will reflect the same value stored in LWOP Contingency End Date. A new FEHB element will be opened reflecting all FEHB related data EXCEPT LWOP Contingency Start Date and LWOP Contingency End Date. **NOA COT Pay500** will also generate with the effective date of the LWOP Contingency End Date in positions 73-78.



- F. To resolve an invalid entry when the LWOP Contingency dates entered should have been later or earlier than the original dates, please follow these steps:

Steps	Action
1	After navigating to Assignment>Entries>Element Entries, date-track to the LWOP Contingency Start Date (this is generally the same date as in Effective Date From).
2	Space out LWOP Contingency Start Date and hit TAB key.
3	<p>At the pop-up screen "Choose an option", click Correction.</p>

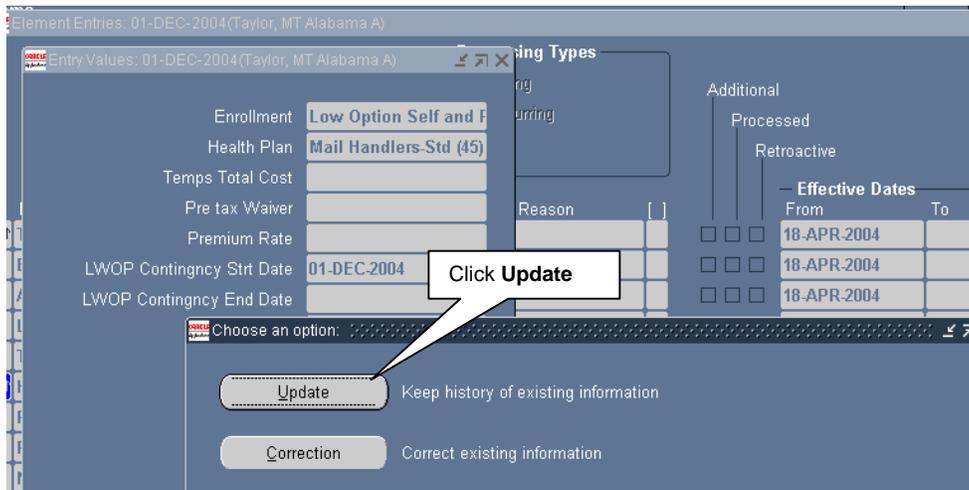
Steps	Action
4	Space out LWOP Contingency End Date .
5	Click Save . (Note: Effective Date To will NOT change, even though the LWOP Contingency dates were spaced out).



6 **NOA 001 Pay500** will generate with “COA” in positions 305-307 and the effective date will be the same value as LWOP Contingency Start Date formatted as YYMMDD.

If LWOP Contingency Start Date is later than the original LWOP Contingency Start Date:

7	Date-track to the correct LWOP Contingency Start Date.
8	Enter LWOP Contingency Start Date .



9	At the pop-up screen “Choose an option”, click Update .
10	Click Save (Note: LWOP Contingency End Date will auto-populate).
11	NOA COA Pay500 transaction will generate and the effective date written to positions 73-78 will be the value of LWOP Contingency Start Date formatted as YYMMDD.

Steps	Action
If LWOP Contingency Start Date is earlier than the original LWOP Contingency Start Date:	

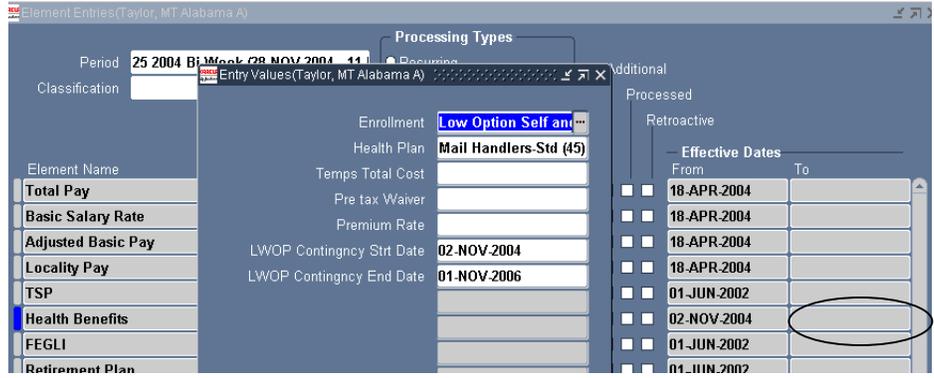
12	<p>Date-track to the correct LWOP Contingency Start Date. Effective Date To will reflect a date since spacing out the LWOP Contingency Dates in steps 01-06 does not delete the Health Benefits row entry.</p>
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13	Enter LWOP Contingency Start Date.
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14	<p>At the pop-up screen "Choose an option", click Update.</p>
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15	<p>At the pop-up screen "Choose an Option", click Replace (this will delete the erroneous row).</p>
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16	Click Save (<i>Note: LWOP Contingency End Date will auto-populate</i>).
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Steps	Action
17	NOA COA Pay500 transaction will generate and the effective date written to positions 73-78 will be the value of LWOP Contingency Start Date formatted as YYMMDD.
18	 <p>When the Element Entries screen is re-queried, the Effective Date To will reflect spaces.</p>

G. Pay500 Rules:

Condition	Pay500 Generation
If LWOP Contingency Start Date is initiated through element update, IVRS/EBIS process or as a result of NOA 473 LWOP-US RPA update	NOA COA and effective date will be the value of LWOP Contingency Start Date formatted as YYMMDD
If LWOP Contingency is being terminated as a result of NOA 292 Return to Duty (RTD) RPA	NOA COT and effective date will be the NOA 292 Return to Duty (RTD) effective date formatted as YYMMDD
If LWOP Contingency expires and DCPDS suspense routines end-dates the FEHB element	NOA COT and effective date will be the same value from LWOP Contingency End Date formatted as YYMMDD
If NOA 473 LWOP-US RPA is cancelled and LWOP-US action had contained the LWOP Contingency Data	NOA 001 with "COA" in positions 305-307 and effective date will be the same value from LWOP Contingency Start Date formatted as YYMMDD
If NOA 292 Return to Duty (RTD) RPA is cancelled and the LWOP-US action had contained the LWOP Contingency Dates	NOA COA and the effective date will be the effective date of the cancellation of the NOA 292 Return to duty (RTD) action formatted as YYMMDD
If LWOP Contingency Dates are spaced out to resolve an invalid entry	NOA 001 with "COA" in positions 305-307 and effective date will be the same value from LWOP Contingency Start Date formatted as YYMMDD