

# The HAVEN Act: Understanding the Intricacies of the Act and its Application to Military and Nonmilitary Clients

ABI Consumer Bankruptcy Committee Webinar  
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# ABI Task Force on Veterans & Servicemembers Affairs

[veterans.abi.org](http://veterans.abi.org)

## **Mission**

To unite and effectively deploy the best of the varied talent resources within the American Bankruptcy Institute (ABI) to understand, respond to, and coordinate with other institutions and organizations to educate, remediate, and prevent adverse debt concerns and impacts on veterans and service members to ensure that we financially strengthen those that strengthen us with the respect and dignity they deserve.

## **Initiatives**

- Issues related to mental health, financial distress, and discharge upgrades
  - The HAVEN Act
- Education, Legislation, Outreach, Pro Bono, and Tribal Affairs

# HAVEN Act: Background

## **Pre-BAPCPA**

- Pre-BAPCPA the definition of “disposable income” was income received by the debtor which is not reasonably necessary for maintenance and support debtor and debtor’s dependents (or for continuation, preservation or operation of the debtor’s business).
- This definition left bankruptcy judges to exercise their discretion on inclusion of income as disposable income under Section 1325(b)(2) and veteran’s disability pay was generally excluded from disposable income in Chapter 13 plans without question.



# HAVEN Act: Background

## Post-BAPCPA

- Interpreted to have created inflexibility when determining types of income to be included in and excluded from “current monthly income” (CMI), leading to decisions such as *In re Brah*, 562 B.R. 922 (Bankr. E.D. Wis. 2017)
- Only three income types were excluded from CMI:
  - funds received under the Social Security Act and certain funds paid to victims of war crimes, crimes against humanity, and terrorism.
  - Thus, funds received in connection with military service-related disabilities, injuries, and death were required to be a part of the means test and included in income to be used to repay creditors.



## ABI Task Force – The HAVEN Act

- Identified need to amend definition of CMI to protect certain military service-related disability and death benefits in bankruptcy
- Drafted, educated and advocated for bankruptcy reform legislation, including **H.R. 2938**, which became **Public Law No. 116-52**, effective upon 8/23/2019 signing

HAVEN Act:  
Background

## SEC. 2. DEFINITION OF CURRENT MONTHLY INCOME.

Section 101(10A) of title 11, United States Code, is amended by striking subparagraph (B) and inserting the following:

“(B)(i) includes any amount paid by any entity other than the debtor (or in a joint case the debtor and the debtor’s spouse), on a regular basis for the household expenses of the debtor or the debtor’s dependents (and in a joint case the debtor’s spouse if not otherwise a dependent); and

“(ii) excludes—

“(I) benefits received under the Social Security Act (42 U.S.C. 301 et seq.);

“(II) payments to victims of war crimes or crimes against humanity on account of their status as victims of such crimes;

“(III) payments to victims of international terrorism or domestic terrorism, as those terms are defined in section 2331 of title 18, on account of their status as victims of such terrorism; and

“(IV) any monthly compensation, pension, pay, annuity, or allowance paid under title 10, 37, or 38 in connection with a disability, combat-related injury or disability, or death of a member of the uniformed services, except that any retired pay excluded under this subclause shall include retired pay paid under chapter 61 of title 10 only to the extent that such retired pay exceeds the amount of retired pay to which the debtor would otherwise be entitled if retired under any provision of title 10 other than chapter 61 of that title.”.

# HAVEN Act: Text

## Amends 11 U.S.C. § 101(10A)

### “Current Monthly Income”

- Strikes and replaces prior subparagraph (B)
- Divides prior text into clauses and subclauses
- Adds fourth category that is excluded from CMI

# HAVEN Act: New CMI Exclusion Text

**“Current Monthly Income” now “excludes”:**

**any monthly compensation, pension, pay, annuity, or allowance paid under title 10, 37, or 38 in connection with a disability, combat-related injury or disability, or death of a member of the uniformed services**, except that any retired pay excluded under this subclause shall include retired pay paid under chapter 61 of title 10 only to the extent that such retired pay exceeds the amount of retired pay to which the debtor would otherwise be entitled if retired under any provision of title 10 other than chapter 61 of that title.

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**The payment source and basis are key – not an individual’s status such as “veteran.”**

- Title 10 Armed Forces
- Title 37 Pay and Allowances of the Uniformed Services
- Title 38 Veterans’ Benefits

# HAVEN Act: Application

## **Payment Sources**

- Department of Defense (DOD) pays under Titles 10 and 37
- Department of Veterans Affairs (VA) pays under Title 38

## **Payment Type Terminology**

- DOD and VA often use confusingly similar terminology for different payment types.
- Informal names for payment types can further complicate matters.

# HAVEN Act: Application

## Examples of Excludable Payment Types

- **VA Disability Compensation**
  - Paid monthly under Title 38 to veterans who have a service-connected disability
  - Also known as “Service-Connected Disability Compensation” and “Veterans Compensation”
  - Payment amount varies depending upon disability rating (10% to 100%) and whether veteran has “dependents”
- **VA Dependency and Indemnity Compensation (DIC)**
  - Paid monthly under Title 38 to eligible survivors after a servicemember’s in-service or service-connected death or a veteran’s death due to a service-connected disability (or circumstances that are equated as such)

**Additional examples are provided on a chart that is available at [veterans.abi.org](https://veterans.abi.org).**

# HAVEN Act: Application

## Defining “**Service-Connected Disability**” for VA Purposes

- The VA’s definition of “disability” is **not** the same as [the one used by the Social Security Administration](#). That is, here, a person need not be unable to engage in substantial gainful activity.
  - Instead, “disability” generally refers to a decrease in overall health and ability to function. The decrease is expressed as a percentage, referred to as the “disability rating.” A higher percentage indicates a more significant decrease in overall health and ability to function.
    - That is, the disability rating indicates severity, with a 100% disability rating indicating the highest severity.
- The VA disability rating determines the amount of VA Disability Compensation to which a veteran is entitled. Whether the veteran has certain “dependents” can also affect the amount.
- The VA Disability Compensation rate tables are available [online](#), showing the monthly amount to be paid under Title 38 based upon disability rating and, if applicable, dependents.



# HAVEN Act: Application

## Examples of Potentially Excludable Payment Types

- **Hostile Fire Pay/Imminent Danger Pay (HFP/IDP)**
  - Paid monthly under Title 37 to servicemembers based upon the actual or potential for exposure to hostile fire and imminent danger situations
    - Such conditions alone would not qualify for CMI exclusion because not being paid “in connection with a disability, combat-related injury or disability, or death of a member of the uniformed services”
  - Also paid under Title 37 to servicemember who is “killed, injured, or wounded by . . . hostile action” with payments continuing for up to three months during hospitalization
    - Would be excludable from CMI when paid under such circumstances

# HAVEN Act: Application

## Examples of Potentially Excludable Payment Types

- VA Veterans Pension

- Paid monthly as a subsistence benefit to veterans who meet low income and net worth criteria, among other requirements, and are either at least age 65 or “permanently and totally disabled”
  - Excludable from CMI if paid based on disability
  - If eligible based upon age and, separately, based upon disability, should be able to rely upon disability for CMI exclusion

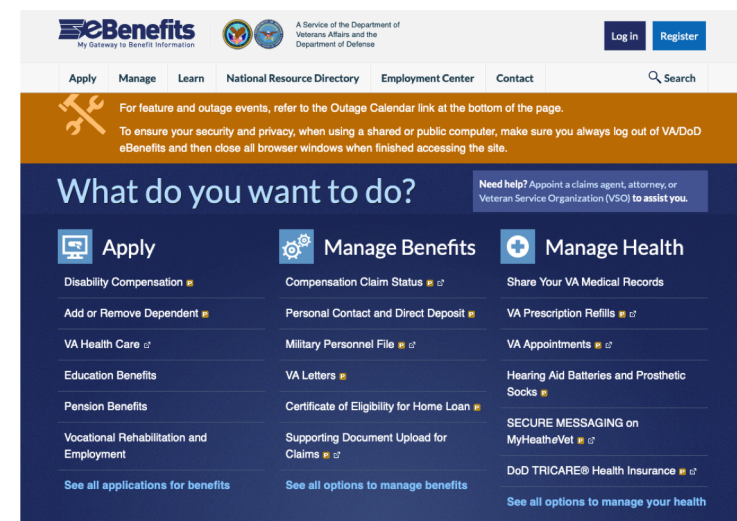
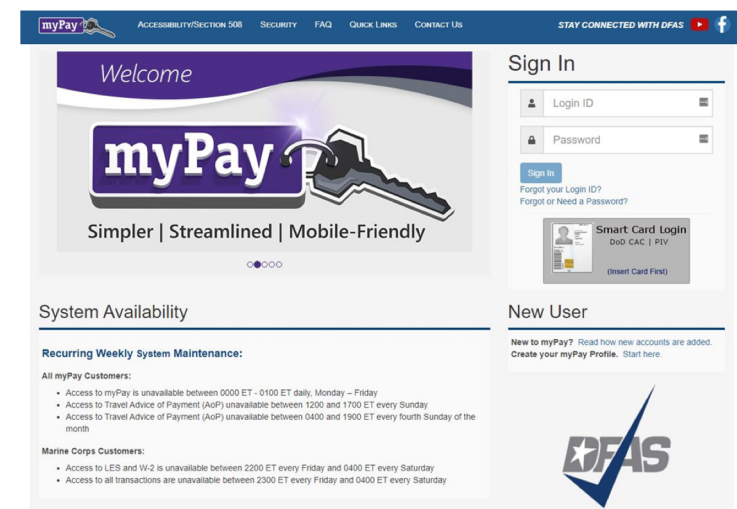
# HAVEN Act:

## Application

### Payment Type Confirmation and Documentation

Documentation to confirm payment type is generally available.

- ✓ Award Letters & Payment History
  - DOD & VA's eBenefits website (ebenefits.va.gov)
- ✓ Leave and Earnings Statements
  - DFAS's MyPay website (mypay.dfas.mil)
- ✓ Military Discharge Document (e.g., DD Form 214) and Records
  - DOD & VA's eBenefits website (ebenefits.va.gov)
- ✓ Bank Statements



# VA Benefit Summary Letter (Excerpt)

## **Military Information**

Your most recent, verified periods of service (up to three) include:

<b>Branch of Service</b>	<b>Character of Service</b>	<b>Entered Active Duty</b>	<b>Released/Discharged</b>
Army	Honorable	February 27, 2008	October 20, 2014

(There may be additional periods of service not listed above.)

## **VA Benefit Information**

<b>You have one or more service-connected disabilities:</b>	Yes
<b>Your combined service-connected evaluation is:</b>	70%
<b>Your current monthly award amount is:</b>	\$1590.71
<b>The effective date of the last change to your current award was:</b>	July 01, 2017
<b>You are considered to be totally and permanently disabled due solely to your service-connected disabilities:</b>	No

Source: National Association of Consumer Bankruptcy Attorneys Webinar: Recent Bankruptcy Code Amendment: Learn How the New HAVEN Act Can Help Your Clients (Sept. 25, 2019).

# HAVEN Act: Application

## The **USTP Position** on Documentation:

- “The USTP will limit its requests for documents related to income excluded from CMI under the HAVEN Act to avoid unduly burdening debtors.”
- “The USTP does not routinely request from debtors documents not otherwise required by the Bankruptcy Code or Rules without a specific need for additional information.”
- “The USTP will advise chapter 7 and 13 trustees, as a best practice, to similarly limit their HAVEN Act-related document requests to what is necessary for proper administration of the case.”

# HAVEN Act: New CMI Exclusion Text

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- Title 10 Armed Forces
  - Chapter 61: retirement and separation due to disability

Note: Disability Severance Pay, resulting from separation (not retirement) due to disability, is not implicated by the HAVEN Act's Chapter 61 limiting language.

# HAVEN Act: Application

## Military Retirement & Retired Pay Overview

- Retired after serving on active duty for at least the minimum time necessary for retirement, typically 20 years but can be as few as 15 years
- Retired due to disability
  - “retired pay paid under chapter 61 of title 10” is Disability Retired Pay
    - Disability Retired Pay is initially calculated under two formulas, and the most favorable amount is paid.
      - One formula considers disability severity
      - One formula considers time in service

Note: Military retirement can be complex but has been simplified here to provide background information needed to understand the limiting language in the new CMI exclusion.



# DOD/DFAS Letter (Excerpt)

**Service for Percent: 06 Years, 08 Months, 14 Days**

**In accordance with 10 USC 1401, you are entitled to receive retired pay computed using your Percentage of Disability (Method A) or, using your Years of Active Service (Method B), as follows:**

	<b>Method A</b>	<b>Method B</b>
<b>Active Duty Base Pay</b>	<b>2,651.37</b>	<b>2,651.37</b>
<b>Percentage of Disability</b>	<b>70%</b>	
<b>Percent Multiple</b>	<b>70.00%</b>	<b>16.68%</b>
<b>(Maximum Percent Multiple is 75%)</b>		
<b>Method A Calculation( 2,651.37 x 0.7000)</b>	<b>1,855.00</b>	
<b>Method B Calculation( 2,651.37 x 0.1668)</b>		<b>442.00</b>
<b>Cost of Living Adjustment</b>	<b>.00</b>	<b>.00</b>
<b>Gross Monthly Retired Pay</b>	<b>1,855.00</b>	<b>442.00</b>
<b>*Method A is most beneficial</b>		

Source: National Association of Consumer Bankruptcy Attorneys Webinar: Recent Bankruptcy Code Amendment: Learn How the New HAVEN Act Can Help Your Clients (Sept. 25, 2019).

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# HAVEN Act: Application

## Retirement-related Examples

- Retired after serving 25 years (not chapter 61) and receives Retired Pay
  - Cannot exclude Retired Pay from CMI because it is not “paid . . . in connection with a disability, combat-related injury or disability, or death of a member of the uniformed services”
- Retired due to disability (chapter 61) after serving 25 years and receives Disability Retired Pay based upon time-in-service calculation
  - Because Disability Retired Pay does not exceed “**the amount of retired pay to which the debtor would otherwise be entitled if retired under any provision of title 10 other than chapter 61 of that title,**” cannot exclude Disability Retired Pay from CMI

# HAVEN Act: Application

## Retirement-related Examples

- Retired due to disability (chapter 61) after serving 25 years and receives \$3,000 per month Disability Retired Pay based upon severity-of-disability calculation but would have received \$2,500 per month based upon time-in-service calculation
  - Can exclude \$500 of Disability Retired Pay from CMI because that is **“the extent that such retired pay exceeds the amount of retired pay to which the debtor would otherwise be entitled if retired under any provision of title 10 other than chapter 61 of that title”**

# HAVEN Act: Application

## Retirement-related Examples

- Retired due to disability (chapter 61) after serving 6 years, 8 months, 14 days, and receives \$1,855 per month Disability Retired Pay based upon severity-of-disability calculation but would have received \$442 per month based upon time-in-service calculation
  - Arguably, can exclude entire \$1,855 of Disability Retired Pay from CMI because with only 6 years in service, could not have “**retired under any provision of title 10 other than chapter 61**” and would not “**otherwise be entitled**” to receive retired pay under title 10

Service for Percent: 06 Years, 08 Months, 14 Days

In accordance with 10 USC 1401, you are entitled to receive retired pay computed using your Percentage of Disability (Method A) or, using your Years of Active Service (Method B), as follows:

	Method A	Method B
Active Duty Base Pay	2,651.37	2,651.37
Percentage of Disability	70%	
Percent Multiple (Maximum Percent Multiple is 75%)	70.00%	16.68%
Method A Calculation( 2,651.37 x 0.7000)	1,855.00	
Method B Calculation( 2,651.37 x 0.1668)		442.00
Cost of Living Adjustment	.00	.00
Gross Monthly Retired Pay	1,855.00	442.00
*Method A is most beneficial		

Source: National Association of Consumer Bankruptcy Attorneys Webinar: Recent Bankruptcy Code Amendment: Learn How the New HAVEN Act Can Help Your Clients (Sept. 25, 2019).

# HAVEN Act: Application

## Retirement-related Examples

- Retired after serving 25 years (not chapter 61) and is eligible to receive \$2,500 per month Retired Pay (taxable and paid by DOD under Title 10) but is separately entitled to receive \$617.73 per month VA Disability Compensation (nontaxable and paid by VA under Title 38) based upon a 40% service-connected disability rating and having no dependents
  - Is not one who qualifies to receive both payments in full concurrently and has waived \$617.73 Retired Pay to instead receive VA Disability Compensation (reducing tax liability)
    - Cannot exclude \$1,882.27 Retired Pay from CMI
    - Can exclude \$617.73 VA Disability Compensation from CMI

# HAVEN Act: Application

## Retirement-related Examples

- Retired after serving 25 years (not chapter 61) and is eligible to receive \$2,500 per month Retired Pay (taxable and paid by DOD under Title 10) but is separately entitled to receive \$1,113.86 per month VA Disability Compensation (nontaxable and paid by VA under Title 38) based upon a 60% service-connected disability rating and having no dependents
  - Although waiving Retired Pay to receive VA Disability Compensation, this retiree qualifies to receive both original payment amounts in full concurrently through eligibility for Concurrent Retirement and Disability Pay (CRDP) (taxable and paid by DOD under Title 10 based upon various criteria including a VA disability rating of at least 50%)
    - Cannot exclude \$1,386.14 Retired Pay from CMI
    - Can exclude \$1,113.86 VA Disability Compensation from CMI
    - Can exclude \$1,113.86 CRDP from CMI

# HAVEN Act: Application

## The **USTP Position** on Resolving Ambiguities:

- “[T]he USTP will work to ensure that its approach is faithful to the language of the statute and, if ambiguities arise, will generally resolve them in favor of the recipients of benefits covered by the Act.”



# HAVEN Act: Application

- **New Cases:** Applies to cases filed on or after 8/23/2019.
- **Cases Filed Before 8/23/2019:**
  - No express legislative command.
  - Not aware of any cases directly addressing the issue.
  - One court indirectly addressed the issue:
    - *In re Price*, 609 B.R. 475 (Bankr. N.D. Tex. 2019).
    - Indicated HAVEN Act could apply to unconfirmed Chapter 13 cases but did not actually come to that holding.
    - Debtor voluntarily included VA benefits, which court found to support good faith because, under HAVEN Act, debtor may have been able to exclude VA benefits.
- Arguments can be made that HAVEN Act applies to pending cases filed before 8/23/2019, including confirmed Chapter 13 cases.
  - Stephen C. Matthews & William J. Diggs, *Protecting Disabled Veterans in Need of Financial Assistance*, Am. Bankr. Inst. J., Dec. 2019, at 34.

# HAVEN Act: Application

## Arguments for Application to Pending Cases Filed Before 8/23/2019

- Court should “apply the law in effect at the time [court] renders its decision.”
  - *Bradley v. School Bd. of Richmond*, 416 U.S. 696, 711 (1974).
- No retroactive effect because HAVEN Act would not “impair rights a party possessed when he acted, increase a party’s liability for past conduct, or impose new duties with respect to transactions already completed.”
  - *Landgraf v. USI Film Prod.*, 511 U.S. 244, 277–80 (1994).
- HAVEN Act “authorizes or affects the propriety of *prospective* relief.”
  - *Id.* at 273 (emphasis added).
- “Changes in procedural rules may often be applied in suits arising before their enactment without raising concerns about retroactivity.”
  - *Id.* at 280.
- HAVEN Act should even apply to confirmed Chapter 13 cases with ongoing repayment plans because they are:
  - Subject to modification up until completion; and
  - Can be converted to a Chapter 7 case “at any time.”

# HAVEN Act: Application

## Practice & Procedure

- Excluding and Disclosing Excluded Income
  - Schedules, forms, local rules and programs are being revised
  - Excluded income should be disclosed, as would be done when excluding, for example, income under the Social Security Act



- H.R. 2336, the Family Farmer Relief Act
  - H.R. 3311, the Small Business Reorganization Act (SBRA)
  - H.R. 3304, the National Guard and Reservist Debt Relief Extension Act (NGR – DREA)
- 
- All also introduced on May 23, 2019, and signed into law on August 23, 2019
    - 3 were effective immediately
    - SBRA effective in 180 days (2/19/2020)
  - Approximately 1% of bills this session (January 2019-present) have become law

Other 2019 Bankruptcy  
Code Amendments

# Identifying Clients Who Have a History of Military Service

## Why else should you identify clients who have served in the military?

- Might be eligible for financial resources
- Might have additional legal protections
- Might require special considerations before bankruptcy

## How should you ask the question?

- “Have you ever served in the military?”

Asking, “Are you a veteran?” is often insufficient because, among other reasons, “veteran” is inconsistently defined by federal and state government programs, nonprofit organizations, and individuals, leading some who have served in the military not to self-identify as a “veteran.”

### Intake Form to Screen for History of Military Service<sup>1</sup>

Name: \_\_\_\_\_

Have you ever served in the military? Yes No

If yes, please provide the information requested below.

If no but a loved one or household member has served in the military, please provide that person's service information below. Include that person's name and your connection to that person here:

1. Branch of Service (select all that apply):

Air Force Army Coast Guard Marine Corps  
Navy Other: \_\_\_\_\_

2. Active and/or Reserve Component and Dates of Service (please be as specific as possible):  
\_\_\_\_\_  
\_\_\_\_\_

3. Did the service include a mobilization or deployment? Yes No

If yes,

did the service relate to combat? Yes No  
did the service relate to homeland defense activities? Yes No

4. Did the service end due to medical reasons or death? Yes No

5. If you have ever received disability-related income from the Department of Defense, when did you last receive that income? \_\_\_\_\_

6. If you have ever received any income from the Department of Veterans Affairs, when did you last receive that income? \_\_\_\_\_

7. If you are the person who served, do you have any ongoing health issues, regardless of whether those health issues are service-related? Yes No

8. If you are not the person who served, do you have conditions that are or that might be disabling? Yes No

If yes, are you the child of the person who served? Yes No

9. If you are not the person who served, is that person deceased? Yes No

10. Are you working with or would you like to be connected to someone who helps with claims for benefits or issues with military discharges? Yes No

<sup>1</sup> Military service can lead to eligibility for financial resources, opportunities, and legal protections for those who have served and their families. To evaluate your case more completely, we seek to identify each person who has served in the military and then gather information about that military service.

Legal Office File No.: \_\_\_\_\_

# Common Direct and Indirect Financial Resources

## Cash & Cash Equivalent Benefits

- VA Disability Compensation
- VA Veterans Pension
- SNAP
- State Veterans' Benefits

## Housing Subsidies and Supports

- HUD-VASH (Section 8)
- SSVF
- DRRTP/DCHV
- Soldiers' Homes

## Health Care

- VA Health Care
- Vet Centers
- Tricare
- Medicaid/Medicare

## Education & Training

- Forever GI Bill
- Post-9/11 GI Bill
- Montgomery GI Bill
- Vocational Rehabilitation

# Legal Protection Examples

## **Servicemembers Civil Relief Act (SCRA)**

- Definitions (50 U.S.C. §§ 3911, 3920)
- Default Judgments (50 U.S.C. § 3931)
  - Affidavit Requirement
    - Defense Manpower Data Center SCRA Website
      - <https://scra.dmdc.osd.mil>
    - Appointment of Attorney
  - Stays
  - Vacating Decisions
- Private Right of Action (50 U.S.C. § 4042)

## **Chapter 53, Title 38: Special Provisions Relating to [Veterans'] Benefits**

- Non-assignability and Exempt Status of Benefits (38 U.S.C. § 5301)
- Waiver of Recovery of Claims by the United States (38 U.S.C. § 5302)

# Examples of Pre-Bankruptcy Special Considerations

## **Is bankruptcy truly necessary?**

- “Collection Proof” Debtors
- Disability-Based Student Loan Forgiveness
- Benefit Overpayment Disputes, Waivers, and Payment Plans
- Currently Not Collectible (Hardship)

## **Could bankruptcy raise or create unusual issues?**

- Security Clearance
- VA Home Loan Guaranty
- VA Fraud-Related Overpayment



# Helpful Resources

## Legal

- ABI Task Force on Veterans and Servicemembers Affairs, <https://veterans.abi.org>.
- Stateside Legal, <https://statesidelegal.org>.

## Benefits

- U.S. Dep't of Def. Warrior Care, <https://warriorcare.dodlive.mil/benefits/compensation-and-benefits>.
- U.S. Dep't of Veterans Affairs, <https://www.va.gov>.
  - Office of Gen. Counsel's Accreditation Search, <https://www.va.gov/ogc/apps/accreditation/index.asp>.
- Def. Fin. & Accounting Serv., Retired Military & Annuitants, <https://www.dfas.mil/retiredmilitary.html>.
  - Types of Retirement, <https://www.dfas.mil/retiredmilitary/plan/retirement-types.html>.
  - Estimate Your Retirement Pay, <https://www.dfas.mil/retiredmilitary/plan/estimate.html>.

Questions?