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HSWLSCTD 2020-015

HEALTH, SAFETY AND WORK-LIFE SERVICE CENTER TECHNICAL DIRECTIVE 2020-015

Subj: MEDICAL GUIDANCE FOR COMPLETION OF THE SEPARATION HEALTH ASSESSMENT

- Ref:
- (a) ACN 127/20 Veterans Affairs Separation Health Assessments
  - (b) Coast Guard Medical Manual, COMDTINST M6000.1 (series)
  - (c) Military Separations, COMDINST M1000.4 (series)
  - (d) Physical Disability Evaluation System COMDINST M1850.2 (Series)
  - (e) Reserve Policy Manual COMDINST M1001.28 (series)
  - (f) Coast Guard Periodic Health Assessment, COMDTINST 6450.3 (series)
  - (g) The Separation History and Physical Examination (SHPE) for the DoD Separation Health Assessment (SHA) Program, DoDI 6040.46
  - (h) Memorandum of Agreement between Department of Veterans Affairs and Department of Defense on implementation of SHA for separating/retiring service members
  - (i) Title 10, U.S.C Section 1145(a)(5)(a) and 1074n
  - (j) DHA-IPM 18-019 Interim Procedures Memorandum 18-019, Guidance for Service Implementation of Separation Mental Health Assessments (MHAs)

1. PURPOSE. As per the authority in reference (a), this publication provides standardized technical directives (TD) issued by the Health, Safety, and Work-Life Service Center (HSWL SC) that address the roles, responsibilities, procedures, and guidelines for the completion of the Veterans Affairs provided Separation Health Assessment (SHA) with Mental Health Assessment (MHA) in lieu of a military provided Separation History and Physical Evaluation (SHPE) and MHA.
2. ACTION. This TD publication applies to all the HSWL SC organizational elements at all types of Coast Guard (CG) units. HSWL SC retains the authority to provide technical direction over all HSWL SC organizational elements. This TD is used to clarify policy that falls under the responsibilities and authorities of the HSWL SC. Internet release is authorized.
3. DIRECTIVES AFFECTED. None.
4. DISCUSSION. Reference (b) through (h) delineate requirements for the completion of the SHPE for most service members (SM) separating from a period of active service. The SHPE is critical for documenting conditions that were incurred or aggravated by service and to verify medical fitness for

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separation or retirement. Reference (i) establishes the requirement for the completion of an MHA in conjunction with the SHPE. For Service members who are filing disability claims with the VA, the separation exam performed by the VA, the SHA, may be used to meet the SHPE requirements.

5. DISCLAIMER. This TD is not a substitute for applicable legal guidance, nor is it itself a rule. It is intended to provide operational guidance for CG personnel and is not intended to nor does it impose legally-binding requirements on any party outside the CG.
6. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS.
  - a. The development of this TD and the general policies contained within it have been thoroughly reviewed by the originating office in conjunction with the Office of Environmental Management, 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 TD 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 TD must be individually evaluated for compliance with the National Environmental Policy Act (NEPA), Council on Environmental Policy NEPA Regulations at 40 CFR Parts 1500-1508, DHS and CG NEPA policy, and compliance with all other environmental mandates.
7. DISTRIBUTION. No paper distribution will be made of this TD. An electronic version will be located on the CGPortal: <https://cgportal2.uscg.mil/units/hswlsc/SitePages/Unit%20Directives.aspx>.
8. PROCEDURE. See enclosure (1).
9. RECORDS MANAGEMENT CONSIDERATIONS. This TD 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 changes to existing records management requirements.
10. FORMS/REPORTS. DD-2807 Report of Medical History; DD-2808 Report of Medical Examination.

11. REQUEST FOR CHANGES. Recommendations for improvements to this TD are encouraged and should be submitted to [HSWL SC \(om\)](#); 300 East Main Street; Suite 1000; Norfolk, VA 23510-9109.

/P. J. KREMER /  
Captain, U.S. Coast Guard  
Coast Guard Health, Safety, & Work-Life  
Service Center

Encl: (1) Medical Guidance for completion of the Separation Health Assessment

## **MEDICAL GUIDANCE FOR COMPLETION OF THE SEPARATION HEALTH ASSESSMENT**

### **1. INTRODUCTION**

- a. Generally, when a service member is separating or retiring from active service they must undergo a physical exam and mental health assessment. The type of assessment is based on the length of service and in the case of reserve members, the type of activation orders.
- b. Comprehensive Separation History and Physical Evaluations (SHPE) and Mental Health Assessments (MHA) at separation or retirement are required. Any current or past health status and medical history incidental or aggravated by service will be documented as part of the longitudinal health history. The SHPE also ensures the SM is medically fit to separate or retire from the service. A SHPE is performed in a military facility or via Reserve Health Readiness Program (RHRP) using the DD-2807/DD2808 forms.
- c. A separation exam performed within the VA as part of the VA Benefits Delivery at Discharge (BDD) program is called a Separation Health Assessment (SHA). The VA performed SHA will, at minimum, include all the same information as the SHPE, though may contain additional elements required for VA rating purposes. The SHA may be utilized to meet the requirements for a SHPE as per procedural guidance contained herein.
- d. A Mental Health Assessment (MHA) is required within 180 days of the date of separation in accordance with reference (j). If the member has not completed a MHA as part of an annual PHA or Post-deployment assessment within six months prior to separation, one will be completed as part of the SHPE or SHA, as applicable. If an MHA was not completed as part of the SHPE or SHA, the member will be directed to complete the MHA prior to separation.
- e. All SHAs completed with the VA must be administratively reviewed by a servicing USCG clinic Medical Officer (MO). The clinic must validate that the SM meets medical requirements for separation or retirement, to include the completion of an MHA, and make an entry into the Service Treatment Record (STR), via an encounter note, documenting this review. A separate exam/visit is not required unless required by the reviewing MO in order to validate readiness to separate. If a condition is detected that would be disqualifying for continued service if the member were not separating, then the member may be referred to the Physical Disability Evaluation System (PDES) process in accordance with (IAW) references (b, c, d, and e).

### **2. ACTIVE COMPONENT MEMBERS RETIRING OR SEPARATING FROM SERVICE**

- a. All members in this category require a SHPE/MHA.
- b. Members filing a claim with VA via the Veterans' Benefit Delivery at Discharge (BDD) process shall file a disability compensation claim with the VA between 90-180 days prior to separation/retirement. The SHA provided during this process may be utilized to meet the requirements for a SHPE.
- c. Members not planning on filing a VA claim or have not completed the SHA within 90 days of separation, shall schedule SHPE with supporting USCG or DoD medical facility capable of performing this exam IAW reference (b). For members in remote areas, the

SHPE can be scheduled with the RHRP. This exam will be forwarded to VA with the service member's STR after separation.

3. RESERVE COMPONENT SEPARATING WITH  $\geq$  180 DAYS OF CONTINUOUS ACTIVE DUTY OR  $>$  30 DAYS FROM CONTINGENCY OPERATIONS
  - a. All members in this category require a SHPE/MHA.
  - b. Members filing a claim with VA via the Veterans' Benefit Delivery at Discharge (BDD) process shall file a disability compensation claim with the VA between 90-180 days prior to separation/retirement. The SHA provided during this process may be utilized to meet the requirements for a SHPE.
  - c. Members that are not filing a VA claim or have not completed the SHA within 90 days of separation, shall schedule a SHPE with supporting USCG or DoD medical facility capable of performing this exam IAW reference (b). For members in remote areas, the SHPE can be scheduled with the RHRP. This exam will be forwarded to VA with the service member's STR after separation.
4. RESERVISTS WITH 30 TO 179 DAYS OF CONTINUOUS ACTIVE DUTY OR RELEASED FROM  $\leq$  30 DAYS IN SUPPORT OF CONTINGENCY OPERATIONS
  - a. All members in this category require a Limited Health Assessment (LHA) IAW reference (b); follow guidance in HSWL SC TD 2019-20 for guidance on the completion of a LHA.
  - b. The SHPE/MHA is not required.
  - c. A PHA may be completed if the member is within 3 months or overdue for their annual assessment.
5. SERVICE MEMBERS POTENTIALLY UNFIT FOR CONTINUED MILITARY SERVICE
  - a. IAW reference (a), Member will be referred for PDES physical examination and processing; PDES examinations meet SHPE requirements.
  - b. Members will need a MHA if not performed in the last 6 months
6. SERVICE MEMBERS NOT UNDER THE CONTROL OF THE COMMANDANT OF THE COAST GUARD (such as unauthorized absence or civilian incarceration)
  - a. No SHPE/ SHA will be performed.
7. CLINIC PROCESS FOR COORDINATING COMPLETION OF THE SHPE AND/OR SHA
  - a. Member contacts supporting USCG clinic or Health Record Custodian (HRC), if not empaneled to a USCG clinic, up to one year prior to separation. For members in remote areas the SHPE can be scheduled with the Reserve Health Readiness Program. The RHRP portal is utilized to track the progress and retrieve forms for health services staff review.
  - b. Member indicates if they plan to file with VA disability process.
  - c. If not filing with VA, member will complete forms and complete DD 2807/2808 with supporting military facility within one year prior to separation. Additionally, member will be scheduled to complete a MHA within 6 months of separation if not already scheduled and/or completed in that time frame. Forms will be filed in the STR.

- d. If filing a VA claim and the SM elects to have the SHA serve in lieu of the SHPE:
- (1) Member will be advised by clinic/HRC to complete VA claim request between 90-180 days prior to separation. For specific information on filing a claim, seek the latest guidance at: <https://www.va.gov/disability/how-to-file-claim/when-to-file/pre-discharge-claim/>.
  - (2) Member must create and/or acquire a copy of their STR for submission with the claim request. The CG is unable to provide the STR to the VA, on the member's behalf, until after the service member has separated.
  - (3) Member will be advised to complete a MHA including provider contact during this time if not already completed by other means (such as during a Periodic or Deployment Health Assessment).
  - (4) Once VA evaluation is completed and the MHA is completed, member will notify the supporting HRC or clinic that provides CG health services support/ guidance.
  - (5) The HRC or clinic staff shall prepare the SHA and MHA documents for review by the USCG Medical Officer (MO). SHA documents are accessible via Joint Longitudinal Viewer (JLV), and MHA documents are accessible via the Electronic Deployment Health Assessment (EDHA) system. Any outstanding health issues should be identified, documented, and resolved, as appropriate. Once the MO determines the SM is fit to separate, they shall document "Fit for Separation/ Retirement IAW DoDI 6040.46." The MO shall document completion of these requirements in an encounter note within the STR.