W H I T E   P A P E R

# Extending My Career Advancement Account (MyCAA) Scholarship Benefits to Spouses of Title 32 Active Guard and Reserve (AGR) Members

*A Case for Equitable Spouse Education Benefits Across the Total Force*

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# Executive Summary


The My Career Advancement Account (MyCAA) scholarship program, administered by the Department of Defense (DoD), provides up to $4,000 in tuition assistance to eligible military spouses pursuing portable career credentials. Since its inception, the program has served as a critical workforce development tool for military families navigating the unique employment challenges of service life. However, a significant gap in eligibility persists: spouses of National Guard members serving on full-time Active Guard and Reserve (AGR) duty under Title 32 of the United States Code are currently excluded from the program.

This white paper presents a comprehensive case for extending MyCAA scholarship eligibility to spouses of Title 32 AGR service members across both the Army National Guard (ARNG) and Air National Guard (ANG). The core argument is straightforward: AGR service under Title 32, Section 502(f) constitutes full-time active federal military duty. Whether serving as an ARNG Soldier or an ANG Airman, AGR members receive the same pay, allowances, healthcare, and retirement benefits as their active-component counterparts. Their spouses face the same employment barriers—including relocations, caregiving demands, and career interruptions—as spouses of service members on Title 10 orders. The current distinction in MyCAA eligibility based solely on duty status authority creates an inequitable and unjustifiable gap in support for families who bear equivalent burdens of military service.

This paper examines the legal and operational parallels between Title 10 and Title 32 AGR service, details the current eligibility framework and its shortcomings, presents data on military spouse employment challenges, analyzes the readiness implications of the benefits gap, identifies existing legislative momentum toward parity, and offers specific policy recommendations for closing this gap.


# 1. Background: The MyCAA Scholarship Program

## 1.1 Program Overview

The My Career Advancement Account (MyCAA) scholarship is a workforce development program established by the Department of Defense under the Spouse Education and Career Opportunities (SECO) initiative. The program provides up to $4,000 in financial assistance ($2,000 per fiscal year cap) to eligible military spouses pursuing licenses, certifications, or associate degrees in portable, high-demand career fields. The program is designed to address the persistent unemployment and underemployment challenges that military spouses encounter due to the unique demands of military life.

MyCAA funds may be used at any academic institution approved for participation in the scholarship program. Eligible expenses include tuition for coursework and examination fees leading to credentials in approved career fields such as healthcare, information technology, education, financial services, and skilled trades. The program cannot be used for bachelor’s or graduate degrees, books and supplies, fees, or continuing education credits.

## 1.2 Current Eligibility Requirements

As of October 1, 2024, the DoD expanded MyCAA eligibility to include spouses of service members in pay grades E-1 through E-9, W-1 through W-3, and O-1 through O-3 (previously limited to E-1 through E-5, W-1 through W-2, and O-1 through O-2). However, one critical requirement has remained unchanged: the military sponsor must be on qualifying Title 10 military orders.

For spouses of National Guard and Reserve members, the eligibility requirement is explicitly stated in the MyCAA Spouse Frequently Asked Questions: spouses of service members who are on qualifying Title 10 military orders are eligible. This includes spouses of deployed National Guard and Reserve members who are activated on qualifying Title 10 orders, not pre- or post-deployment. All spouse participants must have their financial assistance documents approved while their military sponsor is on qualifying Title 10 orders.

The following categories of National Guard and Reserve spouses are explicitly excluded from eligibility: spouses whose military sponsor is in warning orders or alert status; spouses in post-deployment or demobilization status; spouses in transition status; and—critically—spouses of AGR members serving under Title 32 authority. If a National Guard member is an AGR member, they must be on federal Title 10 active duty orders for their spouse to qualify.

## 1.3 Eligibility at a Glance

| Duty Status | MyCAA Eligible? | Full-Time Active Duty? |
|---|---|---|
| Active Component (Title 10) | YES | YES |
| AGR – Title 10 Orders | YES | YES |
| National Guard/Reserve – Title 10 Activation | YES | YES |
| AGR – Title 32 (Full-Time) | NO | YES |
| Traditional Guard/Reserve (Part-Time) | NO | NO |

The table above illustrates the central inequity: Title 32 AGR members serve full-time, receive full active-duty pay and benefits, and their families experience all the demands of active-duty life—yet their spouses are the only full-time active-duty spouse population categorically excluded from MyCAA.

# 2. Understanding Title 10 and Title 32: A Legal and Operational Analysis

## 2.1 Title 10: Federal Active Duty

Title 10 of the United States Code governs the Armed Forces of the United States. When National Guard members are activated for federal service under Title 10 authority, they are placed under federal command, their duty is federally funded, and they are subject to the Uniform Code of Military Justice (UCMJ). Title 10 activations are ordered by the President and typically involve deployments in support of national defense, overseas operations, or other federal missions. Service members on Title 10 orders are classified as performing "active duty" as defined in 10 U.S.C. § 101(d)(1).

## 2.2 Title 32: Full-Time National Guard Duty

Title 32 of the United States Code outlines the role of the National Guard. Under Title 32, National Guard members remain under the command and control of their state's governor (through The Adjutant General), but their service is federally funded and federally authorized. Title 32 service encompasses several categories, including Active Guard and Reserve (AGR) duty under 32 U.S.C. § 502(f), which places both Army and Air National Guard Soldiers and Airmen on full-time duty for periods of 180 consecutive days or more for the purpose of organizing, administering, instructing, training, and recruiting within National Guard units and wings. The AGR program is governed by AR 135-18 for the Army National Guard and ANGI 36-101 for the Air National Guard, both of which recognize AGR service as full-time active federal military duty.

## 2.3 AGR Under Title 32: Active Duty in Every Meaningful Respect

The distinction between Title 10 and Title 32 is primarily a legal and jurisdictional one—not an operational one. For the individual service member and their family, the day-to-day reality of Title 32 AGR service is functionally indistinguishable from Title 10 active duty, whether the member is an ARNG Soldier serving at a readiness center or an ANG Airman assigned to a fighter wing. The Military Officers Association of America (MOAA) has explicitly stated this point: "Active duty members of the National Guard, whether activated under Title 10 or 32 (in many cases for Title 32) receive the same benefits and service credit as federal active duty servicemembers." This applies equally to Army and Air National Guard AGR personnel across all 54 states and territories.

Title 32 AGR service members—whether ARNG Soldiers or ANG Airmen—receive the same basic pay based on rank and time in service, Basic Allowance for Housing (BAH) and Basic Allowance for Subsistence (BAS), comprehensive TRICARE healthcare coverage for themselves and their dependents, access to Thrift Savings Plan (TSP) retirement accounts, commissary and exchange privileges, and eligibility for active-duty retirement after 20 years of qualifying service. They hold active-duty identification cards, are subject to the same physical fitness standards (ACFT for Soldiers, Air Force fitness assessments for Airmen), attend the same professional military education courses as their active-component peers, and serve under the same regulatory frameworks.

Furthermore, 10 U.S.C. § 12602 explicitly extends many Title 10 “active duty” benefits to those performing full-time National Guard duty (FTNGD). Title 37 (Pay and Allowances) and Title 38 (Veterans’ Benefits) both define “active duty” to include full-time National Guard duty. AGR members on Title 32 orders of 30 days or more receive the same basic pay, special pays, BAH, healthcare coverage (for themselves and dependents), and TDY benefits as Title 10 active-duty personnel.

## 2.4 Comparative Analysis: Title 10 vs. Title 32 AGR

| Attribute | Title 10 Active Duty | Title 32 AGR |
|---|---|---|
| Full-Time Service | Yes | Yes |
| Federal Pay & Allowances | Yes | Yes |
| TRICARE (Member + Family) | Yes | Yes |
| BAH / BAS | Yes | Yes |
| Active-Duty Retirement | Yes | Yes |
| TSP Participation | Yes | Yes |
| Commissary / Exchange | Yes | Yes |
| Active-Duty ID Card | Yes | Yes |
| VA Benefits Eligibility | Yes | Yes |
| PME Requirements | Yes | Yes |
| Subject to UCMJ | Yes | Yes |
| MyCAA Spouse Eligibility | Yes | NO |

This comparison demonstrates that the only meaningful difference between Title 10 and Title 32 AGR service for the purposes of MyCAA eligibility is the legal authority under which the orders are issued—not the nature, duration, or demands of the service itself. The AGR member’s family experiences the same lifestyle, the same sacrifices, and the same career disruptions as any other active-duty family.

# 3. The Military Spouse Employment Crisis

## 3.1 Persistent Unemployment and Underemployment

Military spouse unemployment represents one of the most enduring and well-documented challenges within the military community. Despite decades of research, hundreds of millions of dollars in DoD programming, and numerous legislative initiatives, the unemployment rate for military spouses has remained stubbornly high—consistently hovering around 21 to 24 percent, which is approximately five times the national civilian unemployment rate (National Military Family Association, 2025; Blue Star Families Military Spouse Employment Initiative, 2022). Census Bureau data from 2023, as analyzed by the D'Aniello Institute for Veterans and Military Families at Syracuse University, placed the unemployment rate for active-duty military spouses at 8.83 percent, nearly four times higher than the civilian spouse rate of 2.48 percent. However, this figure does not capture the full scope of the problem, as many military spouses are employed in positions far below their qualifications.

The underemployment picture is equally stark. According to the D'Aniello Institute for Veterans and Military Families (Syracuse University, "Military Spouse Employment Landscape," 2023), active-duty military spouses reported a median income of $35,000—42 percent lower than their civilian counterparts. For those who relocated within the past year, average income dropped to $31,222 compared to $45,793 for those who stayed in place. More than half of employed military spouses report being underemployed, working in positions that do not reflect their education or experience (Deloitte Insights, "Military Spouse Unemployment," 2020). Nearly half of military spouses hold a bachelor's degree or higher, yet their professional talents are chronically underutilized (Air & Space Forces Association, 2025).

## 3.2 Root Causes: The Same Challenges Regardless of Title

The primary barriers to military spouse employment are structural and apply equally to spouses of Title 10 and Title 32 AGR service members. Military families relocate 3.6 times more often than civilian families (D'Aniello Institute for Veterans and Military Families, Syracuse University, 2023). Each move forces spouses to restart job searches, potentially re-license in a new state, rebuild professional networks, and re-establish childcare arrangements. Sixty-seven percent of spouses report that lack of childcare has impacted their ability to pursue employment or educational opportunities (U.S. Department of Labor, Military Spouses Fact Sheet, 2024).

While Title 32 AGR members may PCS less frequently than traditional active-duty members, their spouses still face significant career disruptions. AGR Soldiers and Airmen serve full-time with demanding schedules that often require the non-serving spouse to assume primary caregiving responsibilities. ARNG AGR families may be stationed at remote armories, readiness centers, or Joint Force Headquarters facilities, while ANG AGR families may be assigned to Air National Guard bases, wings, or geographically separated units—many with limited spousal employment support infrastructure compared to major active-duty installations. Critically, AGR spouses across both components face the additional barrier of being excluded from the very programs—like MyCAA—designed to address these challenges.

### 3.3 The Economic and Readiness Cost

The broader social cost of military spouse unemployment has been estimated between $710 million and $1.07 billion annually (Federal News Network, “Invisible Sacrifices: The Billion-Dollar Social Cost of Military Spouse Unemployment,” 2024). Financial insecurity driven by spouse un- and underemployment directly affects service member retention. Nearly one in five military families cite challenges with spousal employment as a factor when considering leaving active-duty service (Executive Order, White House, 2023; National Military Family Association, 2025). The National Military Family Association further notes that the social cost of adverse military spouse employment conditions ranges up to $1.07 billion per year when factoring in recruitment, retention incentives, and lost economic productivity. Research consistently demonstrates that spouse employment satisfaction is among the strongest predictors of whether a service member will reenlist.

For the National Guard specifically, retention of AGR personnel is critical. Across both the Army National Guard (ARNG) and the Air National Guard (ANG), AGR Soldiers and Airmen form the full-time backbone of Guard operations—they are responsible for organizing, administering, instructing, training, and recruiting the part-time force. Losing experienced AGR noncommissioned officers (NCOs), senior enlisted leaders, and commissioned officers creates cascading readiness gaps that affect entire units and wings. Excluding their spouses from career development programs like MyCAA undermines the very retention goals that the program was designed to support.

# 4. Legislative and Policy Momentum Toward Parity

## 4.1 The Benefits Parity Movement

There is growing bipartisan recognition in Congress and across the DoD that the benefits gap between Title 10 and Title 32 service is unjustifiable. Multiple legislative initiatives demonstrate momentum toward closing these gaps. The Guard and Reserve GI Bill Parity Act, introduced in both the 118th and 119th Congresses (S. 3873 / S. 649 / H.R. 1423), seeks to extend Post-9/11 GI Bill eligibility to National Guard members performing full-time National Guard duty under Title 32. The National Guard and Reserves Benefits Parity Act has also been circulated within DoD, seeking to align benefits across components.

In a landmark decision in 2024, the Department of Defense expanded Flexible Spending Account (FSA) eligibility to Title 32 AGR personnel for the first time, allowing them to participate in both Dependent Care FSAs and Health Care FSAs. The National Guard Association of the United States (NGAUS) applauded this decision, with NGAUS President Maj. Gen. (Ret.) Francis M. McGinn stating that benefits parity across the components remains a continuing NGAUS priority. This decision set a clear precedent: DoD recognizes that Title 32 AGR members perform equivalent service and deserve equivalent benefits.

## 4.2 The MyCAA Expansion Precedent

The DoD itself has already demonstrated willingness to expand MyCAA eligibility. Effective October 1, 2024, the program expanded eligible pay grades from E-1 through E-5 to E-1 through E-9, from W-1 through W-2 to W-1 through W-3, and from O-1 through O-2 to O-1 through O-3, with the first 1,250 approved applicants in the newly eligible grades receiving assistance based on available funding. Additionally, the program was expanded in 2020 to include Coast Guard spouses. These expansions signal an institutional understanding that broader access to spouse career development benefits strengthens the Total Force.

## 4.3 Executive and Legislative Support for Military Spouse Employment

Military spouse employment has received significant attention at the highest levels of government. Executive Order 13832 (2018) enhanced noncompetitive civil service appointment authority for military spouses. The Military Spouse Hiring Act has been introduced with bipartisan support to incentivize private-sector hiring through the Work Opportunity Tax Credit. The NDAA has directed improvements to the MyCAA program and required assessments of how frequent relocations affect military spouses. These actions collectively underscore that military spouse career support is a national priority—one that should extend to all spouses of full-time service members, regardless of their sponsor's duty status authority.

# 5. The Case for Extending MyCAA to Title 32 AGR Spouses

## 5.1 Equity and Fairness

The most fundamental argument for extending MyCAA to Title 32 AGR spouses is one of basic equity. Whether married to an ARNG Soldier or an ANG Airman, a spouse whose service member works full-time in uniform, receives full active-duty pay, carries a Common Access Card, maintains TRICARE coverage for the family, and will retire under the same provisions as any other active-duty member should not be denied a $4,000 educational scholarship simply because of the statutory authority printed on their sponsor’s orders. The distinction between Title 10 and Title 32 AGR is a bureaucratic one that has no bearing on the family’s lived experience of military service.

## 5.2 Title 32 AGR Is Active Duty

The Department of Veterans Affairs itself defines full-time National Guard duty under Title 32 as active service, specifically describing it as “duty performed for which you are entitled to receive pay from the Federal government, such as responding to a national emergency or performing duties as an Active Guard Reserve (AGR) member.” Federal law, through 10 U.S.C. § 12602, extends active-duty benefits to those performing full-time National Guard duty. Title 37 (governing military pay) and Title 38 (governing veterans’ benefits) both include full-time National Guard duty in their definitions of active duty. AGR members on Title 32 orders earn active-duty retirement credit, qualify for VA benefits, and are treated as active-duty personnel for virtually every other purpose. MyCAA eligibility stands as an anomalous exception.

## 5.3 Retention and Readiness Impact

The National Guard depends on its AGR workforce to maintain unit readiness. Across both the ARNG and ANG, AGR Soldiers and Airmen handle day-to-day operations that enable the larger part-time force to train and deploy effectively. When an experienced AGR NCO, senior enlisted Airman, or officer leaves service because their family’s needs are not being met—including their spouse’s career development—the organizational impact ripples across the entire unit or wing. Providing MyCAA access to AGR spouses represents a relatively low-cost investment with potentially significant retention returns for both components of the National Guard.

## 5.4 Minimal Cost, Maximum Impact

The cost of extending MyCAA to Title 32 AGR spouses would be modest relative to the overall defense budget. The maximum benefit per spouse is $4,000 over the lifetime of the program, capped at $2,000 per fiscal year. The Army National Guard’s AGR end-strength has historically been approximately 27,000 to 30,000, and the Air National Guard maintains thousands of additional AGR positions supporting ANG wings and squadrons across all 54 states and territories. Combined, ARNG and ANG AGR personnel represent a substantial full-time workforce, yet not all eligible spouses would apply—participation rates in existing MyCAA are well below 100 percent of the eligible population. Even conservative estimates suggest the incremental cost would be minimal compared to the billions spent annually on recruitment and retention incentives across the Total Force.

## 5.5 Alignment with Total Force Policy

The Total Force Policy, established in 1973, recognizes the National Guard and Reserve as integral components of the nation's defense. Under this policy, Guard and Reserve forces are not supplementary—they are essential. Treating AGR spouses differently from active-component spouses contradicts the foundational principle that all components serve as one force. Extending MyCAA eligibility aligns DoD's spouse support programs with its own Total Force doctrine.

# 6. Policy Recommendations

Based on the analysis presented in this white paper, the following policy actions are recommended to close the MyCAA eligibility gap for spouses of Title 32 AGR service members:

1. **Amend MyCAA Eligibility Criteria Through DoD Policy Directive**

The Secretary of Defense should issue a policy directive expanding MyCAA eligibility to include spouses of National Guard and Reserve members performing full-time Active Guard and Reserve (AGR) duty under Title 32, U.S.C. § 502(f) for periods of 180 consecutive days or more. This change can be accomplished administratively without requiring new legislation, following the precedent set by the 2024 FSA eligibility expansion for Title 32 AGRs.

2. **Include MyCAA Parity in NDAA Language**

Congress should include language in the annual National Defense Authorization Act (NDAA) directing the Secretary of Defense to extend MyCAA eligibility to spouses of all service members performing full-time military duty, regardless of whether such duty is authorized under Title 10 or Title 32 of the United States Code. This codification would ensure the change is durable and not subject to future administrative reversal.

3. **Leverage Existing Parity Legislation**

Advocates should coordinate with sponsors of the Guard and Reserve GI Bill Parity Act and the National Guard and Reserves Benefits Parity Act to include MyCAA spouse eligibility parity provisions within these broader legislative packages. Attaching the MyCAA provision to existing parity bills increases the likelihood of passage and demonstrates the breadth of the benefits gap.

4. **Engage NGAUS, EANGUS, and Military Family Advocacy Organizations**

The National Guard Association of the United States (NGAUS), the Enlisted Association of the National Guard of the United States (EANGUS), the National Military Family Association (NMFA), Blue Star Families, and other military family advocacy organizations should be engaged to build a unified advocacy coalition supporting this eligibility extension. These organizations have established relationships with Congressional defense committees and can amplify the message through their advocacy networks.

5. **Conduct and Publish a Cost-Benefit Analysis**

DoD should commission and publish a formal cost-benefit analysis examining the projected costs of extending MyCAA to Title 32 AGR spouses against the retention and readiness benefits. Given the modest per-spouse investment ($4,000 maximum) and the high cost of replacing experienced AGR personnel, the analysis is expected to demonstrate a favorable return on investment.

# 7. Conclusion

The My Career Advancement Account scholarship program exists to help military spouses build portable careers in the face of the unique challenges that accompany military life. Spouses of Title 32 AGR service members—both ARNG Soldiers and ANG Airmen—face every one of those challenges. Their sponsors serve full-time. Their families carry active-duty identification. They receive active-duty pay, allowances, healthcare, and retirement benefits. They are, by every functional measure, active-duty military families.

The exclusion of Title 32 AGR spouses from MyCAA eligibility is an artifact of a statutory distinction that has no relevance to the family's experience of service. It is inconsistent with the Total Force Policy, at odds with the growing legislative and DoD momentum toward benefits parity, and contrary to the program's own stated purpose of supporting military spouse career development.

Extending MyCAA to Title 32 AGR spouses is not a new benefit—it is the correction of an oversight. It is the right thing to do for military families, the smart thing to do for retention and readiness, and an achievable policy change that can be accomplished through existing administrative and legislative channels. The time for this correction is now.

# References


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- 32 U.S.C. § 502(f) – Full-Time National Guard Duty
- AR 135-18 – The Active Guard Reserve (AGR) Program
- NGR 600-5 – The Active Guard Reserve (AGR) Program (ARNG)
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