EXAMPLES AND/OR AN EXPLANATION FOR EACH PROPOSAL:

(1) D12-02 – INCREASE CLAIMANT'S WORK SEARCH REQUIREMENTS FROM TWO TO FOUR EACH WEEK AND INCREASE FLEXIBILITY FOR DEPARTMENT TO REQUIRE FUTURE ACTIONS BY CLAIMANTS.

No Examples.

According to Department of Labor Compilation of State Laws:

	No Specific Number	One	At Least One	Two	Three	Four	Five	One to Three	Varies based on urban versus rural location	Range between 1 to 3
# of States	20	1	5	13	8	2	1	1	1	1

JOB SEARCH REQUIREMENTS OF OTHER MIDWESTERN STATES:

State	**Number of Weekly Required Work Search Activities of Claimants**
Illinois	No Specific Number
Indiana	3
Iowa	2
Michigan	2
Minnesota	At least 2

(2) D12- 01 – CREATION OF TWO-TIER STANDARD TO DETERMINE IF A CLAIMANT'S ACTIONS THAT RESULTED IN DISCHARGE DISQUALIFY HIM FOR BENEFITS.

The current standard of misconduct to disqualify a claimant for benefits is open to many interpretations. Therefore, in providing examples of what might be covered under the new substantial fault standard it is important to realize that some adjudicators and administrative law judges may have already viewed these examples as actions that would have disqualified a claimant for benefits under the current misconduct standard.

- **EXAMPLES OF SUBSTANTIAL FAULT:**

  - **Example 1.** Poor customer service: employee worked as a mover and was discourteous to a customer. He admitted getting upset with her when she called his boss to complain. He had warnings in the past about having a bad attitude.

  - **Example 2.** Sleeping on the Job: Claimant was caught sleeping on the job. Had one previous warning and was aware of employer policy against sleeping on the job.

  - **Example 3.** Poor performance: Claimant failed to make appointments for drug testing for co-workers and had told the employer that she had.

- Requalification framework for both misconduct and substantial fault:

  - Under current law, when an employee is discharged for misconduct, (s)he is not eligible to receive benefits until 7 weeks have elapsed after the week of the discharge and (s)he has earned wages in covered employment equal to at least 14 times the weekly benefit rate that would have been paid had the discharge not occurred. This proposal keeps this same requalification framework for misconduct and uses the same requalification framework for substantial fault. In addition,
  - The main difference between the misconduct and substantial fault standard is with respect to how the claimant's earned wages from the discharging employer are treated if the claimant requalifies for benefits under the requalification framework. Under the misconduct standard, any wages earned from the discharging employer are permanently removed from the claim so the employer would not be liable for benefits even if the claimant qualifies again. Yet, if the discharge resulted from substantial fault of the employee, the wages earned from the employer if the employee requalifies for benefits, would not be excluded from the employee's base period wages.

(3) D12-19 – REDUCE NUMBER OF QUIT EXCEPTIONS FROM EIGHTEEN TO SEVEN AND CHANGE REQUALIFICATION FRAMEWORK FROM 4 BY 4 TO 10 TIMES THE WEEKLY BENEFIT RATE

No examples. Instead, comparison of surrounding states done. These are attached at the end of this document.

- **ARRA FUNDING ISSUE:**

There were three quit exceptions that were impacted by federal funds:

- Section 108.04(7)(s) - quit due to domestic abuse. This quit exception is not modified in the Department's proposal.
- Section 108.04(7)(t) - quit to relocate with spouse.
- Section 108.04(7)(c) – A portion of this exception was modified by adding a piece to it regarding the health of a family member. This quit exception is not modified in the Department's proposal.

Officials at the Department of Labor stated that they would like us to keep these quit exceptions in the law, but it was not required.

- **EXPLANATION OF REQUALIFICATION ISSUE:**

  - Currently if someone quits and it is not within any exceptions that would allow benefits, in order to requalify 4 weeks need to have elapsed after the week of the quit and (s)he has earned wages in covered employment equal to at least 4 times the weekly benefit rate that would have been paid had the quit not occurred
  - The change would simply be that the claimant would need to have earned wages in covered employment equal to at least 10 times the weekly benefit rate that would have been paid had the quit not occurred.

(4) D12-03 – CODIFICATION OF RESPONSIBILITY OF CLAIMANTS TO NOT DIVULGE THEIR PIN, USERNAME AND PASSWORD.

EXAMPLE:

A claimant is in jail and gives PIN (or security credentials) to another to file his claim. Department becomes aware claimant incarcerated and thus not able and available and requires claimant to pay back the unemployment benefits obtained and finds fraud. Claimant then turns around and says he did not file the claim. Adjudication finds the claimant to be at fault as he gave his PIN to another. Case is appealed and ALJ remands back to the department or waives recovery of overpayment stating the claimant was not at fault as he did not file the claim.

Note – the Department sees this most often with incarcerated individuals, but it does happen in other situations, i.e. wife calling in for husband who has returned to work, etc.

This change will be particularly important as the Department moves forward with payments being made using debit cards.

(5) D12-06 – ENABLE DEPARTMENT TO RECOVER BENEFITS PAID IN ERROR THROUGH REDEFINING DEPARTMENTAL ERROR FOR PURPOSES OF WAIVER OF RECOVERY OF IMPROPERLY COLLECTED BENEFITS.

The biggest factor in this proposal is preventing possible issues that may unexpectedly arise and cannot be foreseen and preventing claimants from being unjustly enriched as a result of an inadvertent mistake made by the Department.

EXAMPLES:

- **Example 1.** Some UI payments are done manually to correct claims or issue replacement checks. Due to a keying error, a $99 payment is keyed as $999 and sent to the claimant. The department will seek to recover the erroneous overpayment made to the recipient.
- **Example 2.** In 2006 Medicare erroneously issued $50 million in refunds to 230,000 beneficiaries due to a computer glitch. If a similar situation happened at UI, the department would seek to recover the erroneous payment made to the unintended recipients.
- **Example 3.** Claimant sends in money to repay an overpayment, but it is incorrectly applied to another person's overpayment creating a credit balance. The money is then refunded to the incorrect person. The department will credit the payment to the correct recipient who is still entitled to the credit, and seek to recover the erroneous payment made to the unintended recipient.

This change will be particularly important as the Department moves forward with payments being made using debit cards.

(6) D12-05 – PREVENT CLAIMANTS FROM SIMULTANEOUSLY COLLECTING UI & SSDI

EXAMPLE:

The Government Accountability Office report has examples of individuals inappropriately collecting unemployment insurance and social security disability insurance. For example, one individual began receiving SSDI benefits in 2004 originally due to disorders of the back, and received overlapping SSDI and UI payments, which totaled over $107,000, in 36 different months from 2008 to 2011. During that period, this individual worked for construction companies and received UI benefit payments from New Mexico in 2008, Wisconsin in 2009, Kansas in 2010, and Montana in 2011.

This individual admitted to concealing work activity in order to receive UI benefits from Wisconsin in 2010. Wisconsin subsequently determined this individual would forfeit more than $2,900 in UI benefits as a result of this activity.

Others states, including Minnesota, have provisions to address the simultaneous collection of SSDI & UI.

(7) D12-08 – WITH GOOD CAUSE EXCEPTION, DISQUALIFY A CLAIMANT WHO FAILS TO SUPPLY THE DEPARTMENT WITH DEMOGRAPHIC AND/OR ELIGIBILITY INFORMATION.

One of the effects of this proposal is that it may reduce the potential for improper payment rates.

Every day we have examples where a claimant is to return information to the Department and fails to do so.

We issued 23,869 decisions from 1/1/12 to 11/15/12 where the claimant failed to provide information when requested.

It can be for a variety of reasons Discharge, Quit, AA, Family Corporation, really any eligibility issue where information from the claimant is required.

The Department then issues a determination based on the best available information. In some cases benefits are paid (for example Discharge--ER does not respond or provides limited information) and we have no idea if they really are due the money.

EXAMPLES:

- Example 1: Claimant calls in his claim and states he was discharged for a work rule violation. An adjudicator contacts the claimant and employer for detailed information regarding the discharge. The parties fail to respond. In the absence of any information, the department does not know whether or not there is misconduct. Rather than simply issuing a decision based on very little information, the proposal would compel the claimant to contact the department to provide information and to potentially obtain benefits.

- Example 2: The claimant reported missing work in a week they claimed. They are contacted for further information to determine if they are eligible for a partial unemployment payment for the week. They fail to provide the information. Currently, the department would just deny the claimant one week assuming they were not eligible. The Department is unaware if the claimant has restrictions to working that go beyond one week, what the correct issue is, or why the claimant is not responding to the request for information. To avoid potential improper payments, it would be best to suspend payment until claimant provides information.

- Example 3: The claimant files an initial claim and reports working for a family business. The claimant does not provide any additional information regarding the ownership interest and the status of the

business. The Department is not sure if the claimant should be eligible for all the benefits or subject to a benefit reduction under UI law.

In these circumstances, with minimal to no information from the claimant, the department cannot determine if the payment or non-payment of benefits is proper. It is to the claimant's benefit to ensure payments are correctly made, so they do not have to pay the department back. By holding the claim and requiring the claimant to respond to a request for information, we strengthen the quality of our decisions, the trust fund by paying benefits when due and reduce our improper payment rate. The proposal will allow for retroactive payment of benefits if the claimant establishes they had good cause for failing to respond if otherwise qualified.

(8) D12-10 – USE OF FINANCIAL RECORD MATCH PROCESS TO IDENTIFY DEBTS OF DELINQUENT DEBTORS:

No examples for this proposal.

Instead, proposal simply represents an additional tool that could be used to collect from delinquent employers and claimants. Department of Revenue and Department of Children and Families already have statutory authority to use this program for individuals who are behind in paying taxes or child support to it.

(9) D12-17 – AUTHORIZE THE DEPARTMENT TO REQUIRE LICENSE HOLDERS TO BE CURRENT ON THEIR UI TAXES OR FACE NON-RENEWAL, DISCONTINUATION, SUSPENSION OR REVOCATION.

No examples for this proposal.

Instead, proposal simply represents an additional tool that could be used to collect from delinquent employers and claimants. Department of Revenue and Department of Children and Families already have statutory authority to use this program for individuals who are behind in paying taxes or child support to it.

(10) D12-23 – ALLOWS FOR A FASTER WAY TO SEARCH FOR A NEWER ADDRESS FOR CLAIMANTS AND TAXPAYERS USING INFORMATION FROM DOT/DMV DATABASE OF DRIVER'S LICENSE INFORMATION.

No examples for this proposal.

The Department is currently accessing these databases, but our inability to use social security numbers decreases the inefficiency by which the Department is able to do this. This proposal simply increases the efficiency by which the Department can accomplish a task.

DWD & DOT/DMV already have a data sharing agreement, but statutory authority does not exist to enable DOT/DMV to provide DWD the ability to enable the Department to look up an individual by their social security numbers.

(11) D12-28 – DISCONTINUE TREATING LIMITED LIABILITY COMPANIES WITH THE SAME MEMBERS AS A SINGLE EMPLOYER.

No examples for this proposal.

This is a federal conformity issue.

(12) D12-31– INCREASE MAXIMUM WEEKLY BENEFIT RATE PAID OUT TO CLAIMANTS TO $370.

No examples for this proposal.

We have chart that shows historically when the Legislature has done this in the past going back to 1975. Historically and for administrative reasons this has always either been done the first Sunday of the calendar year or the first Sunday of the twenty-eighth week of the year (mid point in the year).

Law provides that when increase the maximum rate must increase the minimum rate by 15% (s. 108.05 (2) (c)). As a result, this proposal will also increase the minimum weekly benefit rate to $55.

There were 120,136 claimants at the current maximum weekly benefit rate of $363 in 2011. This represents a total of 35.6% of the claimant population.

MIDWESTERN STATES MINIMUM AND MAXIMUM WEEKLY BENEFIT RATES

State	Minimum Weekly Rate Paid to Claimants	Maximum Weekly Rate Paid to Claimants
Illinois	$51	$534
Indiana	$50	$390
Iowa	$56	$459
Michigan	$117	$362
Minnesota	$38	$561

ESTIMATED EMPLOYER CONTRIBUTION RATES CALENDAR YEAR 2012

State	Taxable Wage Base ($)	Percent of Taxable Wages	Percent of Total Wages
Illinois	$13,560	4.00	1.10
Indiana	$9,500	3.41	0.84
Iowa	$25,300	2.39	1.30
Michigan	$9,500	6.65	1.52
Minnesota	$28,800	2.65	1.21

(13) D12-04 – PROVIDE DEPARTMENT FLEXIBILITY WITH RESPECT TO THE GRANTING OF SUCCESSORSHIP APPLICATIONS WHEN AN EMPLOYER IS LATE IN FILING ITS APPLICATION

Example:

On July 20, 2009 the department issued an initial determination which held that ABC Bank was NOT a successor to XYZ Bank. The reason was that ABC Bank had not submitted a timely successorship application. Generally, companies submit a successorship application when they desire to have the positive unemployment insurance account balance and experience rating of the predecessor company.

ABC Bank had submitted a UCT-115 (Report of Business Transfer), but had not checked the box indicating that ABC Bank wanted to be a successor. As the law is clear that there is no "good cause" provision which could excuse the failure to file a timely successorship application the department's position was dictated as a matter of law.

The July 20, 2009 ID was timely appealed by ABC Bank.

An appeal tribunal hearing was held in Milwaukee on June 9, 2010. Testimony was taken from the individual who had completed the UCT-115 on ABC Bank's behalf. She testified that her failure to have checked the box indicating that ABC Bank wanted to be a successor to XYZ Bank was simply a "clerical error" on her part.

The ALJ was seconds from closing the hearing when ABC Bank's representative, one of ABC Bank's officers, raised, for the first time, the issue of whether ABC Bank was actually a MANDATORY successor to XYZ Bank. The representative then proceeded to produce numerous documents with respect to the mandatory transfer issue.

Only later was it determined that ABC Bank should be the mandatory successor to the unemployment insurance account of XYZ Bank. This enabled the Department to not, as it has with countless other businesses, be forced to deny ABC Bank’s successorship application due to an inadvertent mistake made by a company official.

If ABC Bank had not appealed the initial determination, a clerical error would have resulted in substantial negative consequences to ABC Bank. Yet, if the Department had some discretion within the law, it could prevent companies from being adversely impacted when their employees make clerical or other mistakes when there is a good cause for those mistakes.

(14) D12-30 – ELIMINATE CONSIDERATION OF TIME AND INCREASE AMOUNT OF WAGES (FROM 4 BY 4 TO A 10 TIMES THE WEEKLY BENEFIT RATE) THAT MUST BE EARNED FOR CLAIMANTS TO REQUALIFY FOR BENEFITS WHEN THEY FAIL TO ACCEPT SUITABLE WORK.

No examples.

Below is a chart that shows the number of claimants who refused a job without good cause.

	SW Denials	
2008	579	
2009	687	
2010	792	
2011	677	
Total	2735	

Under current law, to again be eligible for benefits four weeks needs to elapse from when they did not accept the suitable work and the claimants have had to earn wages after not accepting the suitable work that are equal to at least four times the employee's weekly benefit rate. This proposal would change the current four by four frame work to a ten times the weekly benefit rate.

(15) D12-15 – ENABLE DEPARTMENT TO WRITE-OFF INTEREST WHEN AN EMPLOYER'S REPORT OR PAYMENT WAS LATE DUE TO CIRCUMSTANCES BEYOND THE EMPLOYER'S CONTROL.

Example:

The most common examples are agricultural and non-profit employers who are truly unaware of the unemployment laws and their legal liability with regard to UI taxes. For instance, an agricultural employer was found subject going back to 2007, with $20K in taxes, interest, penalties and other fees assessed. Under current law, we were only able to waive $800 in penalties. They have since brought the account current.

Receivable Type	**Original Amount**
Admin Fee	$16.17
Collection Cost	$10.00
Interest[2]	$3,354.10
Late-Filing Wage Penalty[1]	$750.00
Non-Filing Wage Penalty[1]	$50.00
Reserve Fund	$12,355.38
Solvency	$4,372.79
Total	$20,908.44

[1]All Penalties Waived

[2]Interest Updates Monthly

(16) D12-16 – RESTRICT PAYMENTS TO CAFETERIA PLANS FROM BEING INCLUDED IN BASE PERIOD WAGES FOR DETERMINATION OF AMOUNT OF BENEFITS PAID TO A CLAIMANT.

No examples.

- **Estimate of weekly requests to add cafeteria plan to increase benefit rate:**

Claims estimates they get anywhere from 5-20 requests a week to have the former employers contribution to a cafeteria plan added as part of the claim made by the former employee. On average, they receive around 10 requests a week.

- **Explanation of issue:**

Currently, we exclude employer payments to employees for cafeteria benefits from wages for tax purposes under 108.02(26)(c)3. This is consistent with FUTA section 3306(b)5(G) and 26 USC 125.

However we do include the wages in base period wages for benefit calculation purposes under 108.02(4m)g.

This proposal is to exclude payments for cafeteria benefits from base period wages for benefit calculation purposes.

If the cafeteria plan is qualified under Internal Revenue Code Section 125 and meets the section's requirements, the benefits within the plan are not subject to federal income tax withholding, Social Security tax, Medicare tax, or federal unemployment tax.

Under Section Internal Revenue Code (IRC) Section 125, certain benefits can be paid for with "pretax" dollars, such as health insurance, short term disability insurance, long term disability insurance, group term life insurance, legal services coverage, adoption assistance, 401 K plan contributions medical and child care reimbursements.

❖ **Treatment of Cafeteria Plans for Midwestern States:**

State	Cafeteria Plan Inclusion in Wages Counted to Determine Claimant's Benefit Amount	Cafeteria Plan Inclusion in Wages Counted to Determine Taxable Payroll for Employers
Illinois	Yes	Yes
Indiana	No	No
Iowa	Yes	Yes
Michigan	Yes	Yes
Minnesota	Yes	Yes

(17) D12-20 – ELIMINATE ADMINISTRATIVE CODE PROVISION THAT ENABLES AN INDIVIDUAL TO NOT FILE A NOTICE OF A CLAIM BASED ON THE PHONE SYSTEM BEING OVERLOADED WITH CALLS.

This proposal is to remove an antiquated provision within the administrative code that allows a claimant to not file a notice of a claim based on the phone system being overloaded with calls. This provision is not necessary due to the fact:

- A claimant can file online and, therefore, the system being overloaded with calls does not prevent the filing of a notice of a claim; and,
- Technological advances to the Department's hardware no longer make this administrative code provision work with the current technology used by the system.

(18) D12-27– INCREASE THE TARDY FILING FEE FOR EMPLOYERS LATE IN FILING QUARTERLY WAGE REPORTS.

No examples for this proposal.

- In a query of 2011:

  - 21,486 employers were assessed wage non-filing penalties for 1 or more quarters. Total assessed was $2,100,650.

  - 4,935 employers were assessed wage late filing penalties for 1 or ore quarters. Total assessed was $421,650.

- **For employers who do not file quarterly wage reports their tax is determined by using two different formulas.**

  - Formula 1 is used when we have at least two previous quarters to use as a baseline. It's 130 percent of the highest previous corresponding quarter (i.e. first quarter estimate looks for at least two previous first quarters, second quarter estimate looks for at least two previous second quarters, etc.)
  - Formula 2 is used when we don't have two previous corresponding quarterly reports but we do have some employee counts for previous corresponding quarters. It looks at employee counts for corresponding quarters and multiplies that by $4,000 to estimate wages. This gives us fairly reasonable taxable wages.
  - If we don't have any historical data the system defaults to taxable wages of $17,777. Going back to 2008 the system was automatically estimating 4 employees per quarter in these cases.

- **For QCEW reporting purposes, if there is an employer who has not filed its quarterly contribution report the system handles it as follows:**

  - To ensure that the department picks up as much information as possible, the department runs a nightly interface, which is then subject to further review and edits. If the UCT-101 is missing (no quarterly contribution report), the department's system is triggered to produce an estimate when reporting both wages and employment for two quarters. If not replaced with actual data from the employer by the third quarter department's system replaces the estimate with zero. Should the firm be flagged by the automated edits the department then tries to contact the employer to see if there has been a business transfer or it has gone out of business.

MIDWEST STATES AND THEIR QUIT EXCEPTIONS

Illinois

Disqualification: Earnings in covered employment equal to or in excess of his or her current weekly benefit amount in each of four calendar weeks after the quit.

Quit Exceptions:

- Quit due to own health or health of a family member, verified by a physician. (similar to our 7(c))
- Quit to take-the individual is either not unemployed in each of 2 weeks, or earns remuneration for such work equal to at least twice his or her current weekly benefit amount (similar to 7(L))
- Inverse seniority (similar to 7(am))
- Quit due Quit o sexual harassment
- Quitting unsuitable work (similar to (7)(e))
- Quit due to domestic violence (similar to (7)(s))
- Quit to relocate with spouse (military and non-military) (similar to (7)(t))

Indiana

Disqualification: Until the individual has earned remuneration in employment equal to or exceeding the weekly benefit amount of the individuals claim in each of the eight weeks. For each disqualifying separation, the maximum benefit amount of the individual's current claim is reduced.

Quit Exceptions:

- Quit to take (similar to 7(L))
- Quit to accept recall (similar to 7(d))
- Quit due to health of claimant (similar to (7) (c))
- Quit to enter Armed Forces
- Compulsory retirement (similar to (7)(j))
- Quit to enter training under the Trade Act (similar to (16)(d))
- Quit to relocate with spouse (similar to (7)(t))
- Quit due to domestic violence (similar to (7)(s))

Ohio

Disqualification:

Return to work in employment covered by UI law, work in at least 6 separate weeks and earn or be paid wages equal to 6 times the average weekly wage needed to qualify for benefit rights (AWW of $215 x 6 to equal $1290.00)

Quit Exceptions:

- Quit due to Family Obligations, i.e. If a claimant quits to marry or quits because of marital, parental, filial or domestic obligations, benefits are suspended until the claimant obtains work with a covered employer, earned wages equal to ½ of the average weekly wage or $60, whichever is less, and becomes separated for a non-disqualifying reason from new employments. (WI does not have)
- Quitting with Just Cause (similar to Good cause attributable- (7)(b))
- Quit to accept recall (similar to 7(d))
- Inverse seniority (similar to 7(am))
- Quit to enter training under the Trade Act (similar to (16)(d))

Michigan:

Disqualification: Requalify after the week in which the disqualifying act occurred by earning in covered employment at least 17 times weekly benefit rate and ER is noncharged.

Quit Exceptions:

- Quit with good cause attributable (similar to (7)(b))
- Quit due to health of claimant (similar to (7) (c))
- If the individual has an established benefit year in effect and during that benefit year leaves unsuitable work within 60 days after the beginning of that work (sort of like (7)(e), but more restrictive)
- Quit to relocate with spouse, military only (similar to (7)(t))
- Concurrently working part time for an employer and for another employer and voluntarily leaves the part time work while continuing work with the other employer. (Similar to (7)(k))

Iowa

Disqualification: was paid wages for insured work equal to ten times the claimant's weekly benefit amount.

Quit Exceptions:

- Quit with good cause attributable to the employer (similar to (7)(b))
- Quit due to health of claimant (similar to (7) (c))
- Compulsory retirement (similar to (7)(j))
- Inverse seniority (similar to 7(am))
- Quit of part–time employment and requalification: An individual who voluntarily quits without good cause part–time employment and has not

requalified for benefits following the voluntary quit of part–time employment, yet is otherwise monetarily eligible for benefits based on wages paid by the regular or other base period employers, shall not be disqualified for voluntarily quitting the part–time employment. The individual and the part–time employer which was voluntarily quit shall be notified on the Form 65–5323 or 60–0186, Unemployment Insurance Decision, that benefit payments shall not be made which are based on the wages paid by the part–time employer and benefit charges shall not be assessed against the part–time employer's account; however, once the individual has met the requalification requirements following the voluntary quit without good cause of the part–time employer, the wages paid in the part–time employment shall be available for benefit payment purposes. For benefit charging purposes and as determined by the applicable requalification requirements, the wages paid by the part–time employer shall be transferred to the balancing account.

Minnesota

Disqualification: Ineligibility from the payment of all unemployment benefits under subdivisions 1(Quit) and 4 (discharge) is for the duration of the applicant's unemployment and until the end of the calendar week that the applicant had total wages paid in subsequent covered employment sufficient to meet one-half of the requirements of section 268.07, subdivision 2, paragraph (a).

Quit Exceptions:

- Quit with good cause attributable to the employer(similar to (7)(b))
- Quit to take (similar to 7(L))
- Quit due to own health or health of a family member (similar to our 7(c))
- The job was part-time work, and the wages in your base period are from full-time work that was lost through no fault of your own.
- Quitting unsuitable work within first 30 days (similar to (7)(e))
- Quit to enter training under the Trade Act (similar to (16)(d))
- Quit due to domestic violence (similar to (7)(s))
- Quit due to loss of childcare with reasonable efforts to find new child care
- Quit to re
- Quit to relocate with spouse (similar to (7)(t))