



U.S. Army Inspector General Agency
Special Inspection of Arlington National Cemetery
Final Report

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U.S. Army Inspector General Agency

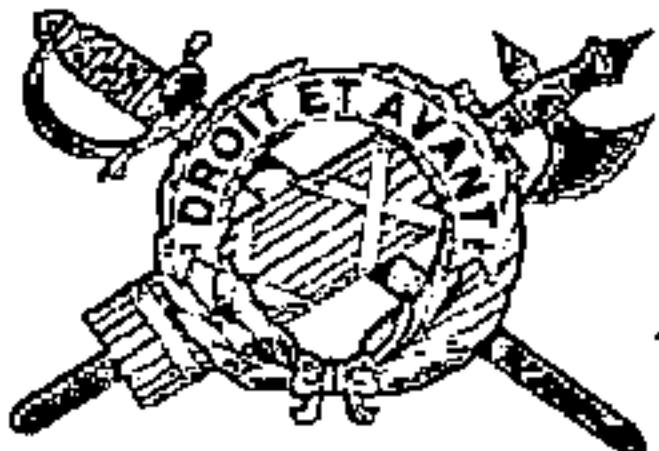
Special Inspection of Arlington National Cemetery Final Report

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Special Inspection of Arlington National Cemetery

TAB A Cover Letter



DEPARTMENT OF THE ARMY
OFFICE OF THE INSPECTOR GENERAL
1700 ARMY PENTAGON
WASHINGTON DC 20310-1700

JUN 09 2010

SAIG-ZA

MEMORANDUM FOR SECRETARY OF THE ARMY

SUBJECT: Department of the Army Inspector General Agency, Inspections Division,
Inspection Results for Arlington National Cemetery (ANC) Assessment, February 2010

1. The U.S. Army Inspector General Agency conducted an inspection of the ANC from 17 August 2009 to 28 January 2010. The Secretary of the Army directed the inspection on 17 August with three objectives; the directive was amended on 12 November to include two additional objectives.

2. Summary of Inspection Results: Arlington National Cemetery is unique among national cemeteries in the scope of its mission and visibility of its operations. Our findings and recommendations for this inspection are based on interviews with over 100 military members, civilian government employees, and other individuals involved with cemetery operations. The inspection team compared operations at the two Army National Cemeteries, consisting of ANC and the Soldiers' and Airmen's Home National Cemetery (a subordinate cemetery of ANC), with standard and best business practices found at cemeteries managed by the Department of Veterans Affairs, National Park Service, American Battle Monuments Commission (ABMC), and other Army installations. Inspectors also visited two private cemeteries for additional points of reference. The inspection team determined that, while the staff is dedicated to accomplish the cemetery's three primary tasks of funerals, ceremonies and tourism support, there are issues that the Army must address to improve the effectiveness of operations at ANC. There are 76 findings and 101 recommendations which are summarized below and further discussed in the inspection report. Some findings are repeat deficiencies from a 1997 Military District of Washington IG inspection of ANC.

a. Inspection Objective One (Assess policy and procedures for operation of Arlington National Cemetery). The inspectors noted that all governing documents concerning operations at ANC are outdated and the cemetery has codified very few aspects of daily operations. Inspectors also looked specifically at existing policies concerning the overall supervision of the cemetery (General Order 13, Army National Cemeteries), commemorative items/mementos and funeral honors; each of these policies must be updated to reflect current needs and trends. Updating and codifying processes and procedures will make ANC more effective.

b. Inspection Objective Two (Assess management, administration and coordination processes as well as training of personnel involved with operation of ANC). The major

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issues associated with this objective are that resourcing for the cemetery does not appear to match requirements, in terms of being able to fund upgrades and improvements and potentially meet personnel requirements for an increased mission. Training and information technology programs do not enable performance improvements or efficiencies. In addition, the IG team discovered an unhealthy work environment while assessing the management effectiveness of the cemetery. Employees report that they get job satisfaction through helping veterans and Families; but they do not enjoy the organizational climate promoted by cemetery leadership.

c. Inspection Objective Three (Assess the effectiveness, coordination, and synergy of command and leadership structures and other entities involved in the operation of ANC and attendant activities). The most significant findings identified by the team were within this objective. As the team compared the Army's management structure for ANC to other government agencies that manage national cemeteries, it found that the Army lacks a single operational or strategic level organization that has responsibility and accountability for the future direction of ANC. In addition to handling its day-to-day "tactical" level challenges, ANC interacts with many different "bosses" within the Army structure, as well as with the Congress, to conduct long term planning and visioning. The team also found that there are no formalized programs to assess operations at ANC. They are not part of a formal organizational inspection program (OIP). Additionally, funding for ANC and the Soldier's and Airmen's Cemetery is appropriated by the Military Construction Veterans Affairs Committees (under Cemeteries Expense-Army). The ANC budget is "no year money", which limits the Army from shifting resources (money and personnel) to assist both cemeteries. The Army should identify an appropriate command structure for ANC, explore legislative options for funding the cemeteries, and periodically inspect operations.

d. Inspection Objective Four (Assess ANC's compliance with Army information assurance (IA) requirements). The inspection of ANC's information assurance program revealed that inadequate workforce training on information assurance combined with a lack of properly trained information management personnel and staff oversight undermines the ability of the cemetery to achieve regulatory compliance. ANC is not in compliance in all 12 IA areas inspected. ANC's Information Assurance Manager (IAM) position is currently vacant and the Information Technology Specialist position is graded as GS-11, low by National Capital Region standards, making it very difficult to hire and retain a skilled individual. Additionally, the existing system administrators are contractors and are not familiar with Army and Department of Defense IA regulations and policies. The detailed results of the IA inspection are in Tab E of the inspection report.

e. Inspection Objective Five (Assess contracting procedures at ANC). The inspection team found that procurements for ANC are not in compliance with applicable Federal, Defense, and Army acquisition regulations. ANC has not developed an acquisition strategy or Information Technology plan. Untrained and unqualified personnel are

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developing requirements and providing contract oversight with no internal or external oversight. A summary of the contracting challenges at ANC is found at Tab B, paragraph 5 of the inspection report. Issues pertaining to oversight of ANC contracts, and related recommendations, are found at Tab D. The complete compliance report with associated recommendations that would help ANC resolve its procurement processes are found at Tab F.

3. Other Matters: The inspection team found two matters that did not specifically fall within the scope of an assessment of ANC, but are appropriate for discussion in this report. First, the Army does not have one entity responsible for the management of all Army cemeteries. The Army is responsible for ANC, the Soldiers' and Airmen's Home National Cemetery, 28 post cemeteries, and three Army-managed plots on civilian cemeteries (not including installation cemeteries affected by Base Realignment and Closure (BRAC)). This leads to different levels of maintenance, oversight, and control of those cemeteries. The team received a report that some Families have complained about the poor maintenance of former Army post cemeteries affected by BRAC. Second, the assessment of contracting at ANC identified some possible systemic issues in the agencies responsible for contract preparation and oversight (the US Army Corps of Engineers and the Contracting Center of Excellence).

4. Key Recommendations:

a. Assign one Army organization/activity the authority, responsibility, and accountability for Arlington National Cemetery; codify this command structure in a new GO that replaces GO 13. ~~Based on the character of the issues, I recommend the Assistant Chief of Staff, Installation Management/Installation Management Command be assigned this responsibility as this would provide synergy of effort and oversight from the full Department of the Army staff.~~ *OW*

b. ~~Assign Commander, Military District of Washington command and control of Arlington National Cemetery in coordination with Installation Management Command.~~ *OW*

c. Direct a manpower survey, to include a desk audit of position descriptions, to document necessary structure and manpower authorizations and grades for ANC.

d. Direct Army Chief Information Officer/G6 to review, evaluate and provide recommendations for Arlington National Cemetery and Soldiers' and Airmen's Home National Cemetery's current and future information technology plans for cemetery management and maintenance of servers and IT data storage.

e. Direct the ^{ASA ALT} ~~Army Audit Agency~~ to conduct a full audit/review of the US Army Corps of Engineers construction contracts for ANC. *OW*

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Inspection Results for Arlington National Cemetery Assessment (ANC), February 2010

f. Direct ~~the Assistant Chief of Staff, Installation Management, in coordination with~~ the Assistant Secretary of the Army for Acquisition, Logistics and Technology (if 4a is approved), to conduct a review of Arlington National Cemetery contracting procedures and actions and to provide appropriate training and systems to ensure the Cemetery has the capabilities required to perform its three primary tasks of funerals, ceremonies, and tourism support.

*14
15 JUL 2010*

g. Consider establishing a senior working group to study and recommend longer term options for executing operations at Arlington National Cemetery and broaden that review to include operations of the Soldiers' and Airmen's Home National Cemetery and Army post cemeteries.

5. Follow-up. The deficiencies enclosed in this report will be entered into the USAIGA Corrective Action Oversight System. Designated responsible entities will provide monthly status updates. I recommend the Inspector General Agency conduct an interim review in six months from approval of this report with a full follow-up inspection in 12 months to determine the effectiveness of cemetery operations subsequent to implementation of the recommendations in the report.

R. STEVEN WHITCOMB
LTG, USA
The Inspector General

Tab

- B Objective 1 (Policies and Procedures)
- C Objective 2 (Management, Administration & Training)
- D Objective 3 (Command & Leadership Structures)
- E Objective 4 (Information Assurance Compliance)
- F Objective 5 (Contracting Compliance)
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- H Other Matters (Army Post Cemeteries & Contracting Oversight)

CF:
UNDER SECRETARY OF THE ARMY
CHIEF OF STAFF, ARMY
VICE CHIEF OF STAFF, ARMY

APPROVED _____
DISAPPROVED _____
SEE ME _____

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Special Inspection of Arlington National Cemetery

TAB B Objective 1 - Policies & Procedures

OBJECTIVE 1: Assess policy and procedures for operation of Arlington National Cemetery.

DEFICIENCY 1.1: The Army has not identified a single regulatory proponent for the regulations and policies governing Army National Cemeteries (consisting of Arlington National Cemetery and Soldiers' and Airmen's Home National Cemetery)

DISCUSSION: Army Regulation (AR) 290-5, Army National Cemeteries, 1 September 1980, identifies the US Army Adjutant General Center as the proponent agency (changed from the US Army Mortuary Affairs Agency, discontinued in 1976). The draft update to AR 290-5 currently identifies the Arlington National Cemetery (ANC) Superintendent as the proponent; the IG disagrees with this proposed action because the current lack of a robust staff within ANC would prohibit the timely updating of the regulation. Department of the Army Pamphlet (DA Pam) 290-5, Administration, Operation, and Maintenance of Army Cemeteries, 1 May 91, lists the "U.S. Total Army [Personnel] Command" as the proponent. Finally, General Order 13, Army National Cemeteries, October 29, 2004, tasks the office of the Assistant Secretary of the Army for Manpower and Reserve Affairs to formulate and oversee interment and inurnment policy for Army national cemeteries and the Office of the Chief of Public Affairs to formulate and oversee public affairs policy for Army national cemeteries. There are numerous points of input, some no longer in existence in their previous capacities, but no single organization or official is responsible for the regulations and policies governing Army National Cemeteries.

RECOMMENDATION 1.1: The Secretary of the Army, identify and designate a single proponent for developing, promulgating, and overseeing the implementation of regulations and policies governing Army National Cemeteries.

DEFICIENCY 1.2: General Order (GO) 13 altered Military District of Washington's (MDW) responsibility, authority and accountability to provide operational oversight of Arlington National Cemetery (ANC), contributing to the formation of an insular environment within the cemetery.

DISCUSSION: A DA General Order is a written directive containing information of general interest (permanent and semi-permanent in duration) on establishment, redesignation, inactivation, or discontinuance of Army commands, installations, agencies, and activities. (AR 25-30, Glossary, Section II, Terms). Since 1955,

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numerous memoranda, general orders, and other writings were issued with the intent of ensuring that a cooperative and meaningful arrangement existed between Arlington National Cemetery (ANC) and the Military District of Washington (MDW). A memorandum dated 3 March 1978 outlined delegated functions from a 1955 memorandum of understanding (MOU) between Quartermaster General and Commanding General, MDW to provide supervision of the administration, operation and maintenance, including repairs and utilities of ANC. Past and present memorandums and general orders, with the exception of GO 13, provided for the Commander, MDW to exercise operational oversight of ANC. Department of the Army (DA) General Orders No. 20 dated 12 May 1972 established the United States Army Memorial Affairs Agency (USAMAA). USAMAA Memorandum 10-1, dated 1 July 1972, outlined the mission, functions, and structure of the organization. The Commander, USAMAA exercised command authority over three National Cemetery Supervising Offices and, via MOU with three military commands (U.S. Army Pacific Command, U.S. Army Alaska, and MDW), command authority over National Cemeteries within those regions. The National Cemeteries Act of 1973 (Public Law 93-43) transferred all Army cemeteries to the Veteran's Administration with the exception of Arlington National Cemetery, the Soldiers' Home National Cemetery (now named the Soldiers' and Airmen's Home National Cemetery) and Army post cemeteries. Effective 30 October 1985, responsibility for the administration, operation, and maintenance of Army National Cemeteries, consisting of Arlington National Cemetery, Arlington, Virginia, and the Soldiers' and Airmen's Home National Cemetery, Washington, D.C. was transferred from the Commander, United States Army Military Personnel Center (MILPERCEN), to the Commander, Military District of Washington (MDW). The Army National Cemeteries were assigned to MDW and remained under the jurisdiction of the Department of the Army as a civil works activity. The Assistant Secretary of the Army for Civil Works (ASA(CW)) retained direct responsibility to the Secretary of the Army for policy formulation in the administration of these cemeteries (AR 290-5).

The chart on page 4 (General Order Comparison of ANC 1972-2004), displays the slow derogation of MDW responsibilities for the administration, operation, and maintenance of ANC. A major flaw of GO 13 is that it allows ANC direct coordination authority to Army Secretariats along with special staff agencies without coordination with or through Commander, MDW. GO 13 has resulted in perplexity over who has operational oversight of ANC – senior leadership within the cemetery commented, "I would like to understand GO 13." One interviewed General Officer opined that GO 13 created a "bifurcated chain of command" that "puts [the ANC Superintendent] in a hard place because he does not know who his boss is." Under current practices, ANC monitors and oversees itself for many functions, creating an insular environment. ANC sees itself

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as so unique that it should not be under the supervision of MDW. In order to maintain ANC's prestige as the Nation's premier cemetery, ANC needs to be subject to the operational oversight of an external organization or official to ensure that standards are maintained, that improvements in policies and processes are implemented with a view to maintaining relevance with changing times and technology, and that working environments are professional. DA Pam 290-5 paragraph 2-1a dated 1991 was not rescinded by GO 13 and maintains that the Commander, MDW under the direction of the ASA(CW), administers, operates, and maintains the Arlington and Soldiers' and Airmen's Home National Cemeteries. Furthermore, AR 10-87, paragraph 19-3i, dated 2007, states MDW provides oversight of the Army National Cemetery Program in compliance with guidance provided by the ASA(CW) and is not consistent with GO 13.

RECOMMENDATION 1.2: Secretary of the Army identify and designate an Army organization/activity to exercise authority, responsibility, and accountability for Arlington National Cemetery; codify this command structure and the associated authorities and responsibilities in a new General Order to replace GO 13. As required, update AR 290-5 and DA Pam 290-5 to support this command structure.

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General Order Comparison of ANC 1972 - 2004

| GENERAL ORDER | USAMAA | SUPERINTENDENT ANC | ASA M&RA | ASA (CW) | PAO |
|---|--|---|--|--|---|
| General Order 20, dtd 12 May 72 | Effective 15 May 72, The Commanding General United States Army Memorial Affairs Agency (USAMAA), a class II activity of the DCOs for Logistics HQDA, is responsible for the procurement of Govt headstones and markers; direction and control of the National Cemetery System; care and disposition of remains and personal effects of deceased personnel; and supervision of the operation of post cemeteries. The CG USAMAA is directly responsible to the Secretary of the Army | | | | |
| General Order 14, dtd 27 May 74 | | | | Policy formulation; Budget guidance, review and approval; Resolution of controversial cases regarding eligibility for interment in ANC. | |
| General Order 9, dtd 1 Apr 75 | | | | Army component of the National Cemetery Program | |
| General Order 12, dtd 30 Jun 78 | | | | Army component of the National Cemetery Program | |
| General Order 15, dtd 16 Dec 80 | | | | Civil functions for Arlington and Soldiers Home National Cemeteries | |
| General Order 25, dtd 30 Jun 88 | Responsibility for Admin, Operations, Maintenance of Army National Cemeteries consisting of ANC & US Soldiers and Airmen's Home National Cemetery. Transferred from MILPERCEN to Commander MDW. | | | The ASA (CW) retains direct responsibility to the SA for policy formulation in the administration of both ANC & US Soldiers and Airmen's Home National Cemetery. | |
| General Order 3, dtd 9 Jul 02 | | | Developing and overseeing the interment/inument policy at Arlington National Cemetery. Coordinating and overseeing military burial honors. | Formulating and overseeing the program and budget of the Arlington National Cemetery and US Soldiers and Airmen's Home National Cemetery. | |
| General Order 11, dtd 16 Sep 04, (Supersedes GO 25) | 1. Coordinate all official ceremonies at ANC, including public wreath laying ceremonies and State Funerals. 2. Provide Army military honors for private memorial services and Army ceremonial support for the Army National cemeteries. (MDW Cdr rates the ANC Superintendent) | 1. Oversee day-to-day execution of Army National Cemeteries Program, to include Admin, Operation and Maintenance. 2. Responsible for private ceremonies at the Army National Cemeteries, including funerals and memorial services for interment and inument and public ceremonies other than those official ceremonies assigned to the Commander MDW. | Formulate and oversee interment and inument policy for the Army National Cemeteries. | Formulate and oversee the program and budget for the Army National Cemeteries, including proposals for placement of memorials and monuments. (ASA(CW) hires the ANC Superintendent) | Formulate and oversee the public affairs policy for the Army National Cemeteries. |
| General Order 13, dtd 29 Oct 04, (Supersedes GO 11) | | | | | |

General Order 13 is identical to General Order 11

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DEFICIENCY 1.3: All regulatory guidance for the Army Cemeteries Program is outdated and Arlington National Cemetery (ANC) has not codified its procedures in Standard Operating Procedures (SOP) or Memorandums of Agreement/Understanding (MOA/MOU).

DISCUSSION: ANC lacks current regulations at all levels. Part 553 of Title 32 CFR (32 CFR 553), which pertains to ANC, was last updated in 1997. AR 290-5 was last updated in 1980 and the accompanying pamphlet in 1991. Also, ANC has not codified its procedures in SOPs or MOAs/MOUs, but rather operates based on the recollections of its mid-level and senior management honed over years of experience.

ANC's current operational posture has outpaced the primary regulations and policies that govern the administration and operation of the cemetery. As discussed in the following paragraph, responsibility for the management and oversight of ANC has moved between various Army agencies over the past 30 years. This shifting of Army supervisory control, coupled with the "stovepipe" responsibilities identified in GO 13, has resulted in the Army losing sight of regulatory proponentcy for ensuring Army National Cemetery regulations and guidance maintain currency and relevance. Without a clear and relevant proponent for regulatory and policy guidance pertaining to ANC, the Army regulations and pamphlets have not been updated in accordance with AR 25-30, The Army Publishing Program, dated 27 March 2006.

Currently, the ASA(M&RA) has assumed the role of regulatory proponent and has drafted proposed updates to the CFR and AR 290-5. The proposed revision to 32 CFR 553 will codify current ANC operational standards, and the updates to the AR 290-5 will prescribe procedures to ensure uniform compliance with those standards. Because the ASA(M&RA) has taken the initiative and has been working on updating the applicable guidance, the IG recommendation keeps them as the responsible agency.

The Administrative Procedure Act (APA) (PL 79-404), establishes a rigorous and time consuming process that governs how the federal agencies, the Army among them, may propose and establish regulations. Because the AR 290-5 and the DA PAM 290-5 will provide further guidance based on the standards and procedures codified in the CFR, the CFR must be finalized before the AR and DA PAM are rewritten. Vetting of the proposed CFR through the necessary Army and DoD channels must be completed; the process, to date, has taken years due to the sensitive nature of the subject. The proposed rule must then be published to allow for a 60-day public notice and comment period. Only after the Army addresses the public comments can it finalize the rule.

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In the October 1, 2008, issue of the Federal Register (73 FR 57017), DA issued for public comment a proposed rule to revise 32 CFR Part 553. The final rule addressing public comments was forwarded to the Office of the Secretary of Defense (OSD), Director of Administration and Management (DA&M) for the Regulation and Policy Officer's (RPO) approval. Currently the rule is with Department of Defense (DoD) General Counsel, who is working with Office of the Army General Counsel (OGC). Once DoD General Counsel approves the final rule it will be sent back to DA&M for their approval. ANC, together with the ASA(M&RA), the ASA(CW), and OGC have worked for more than three years on this update to the CFR which was last reviewed on July 1, 1990. If the RPO approves the final rule, the documents will be forwarded to the Office of Management Budget (OMB)/White House (WH) for their approval. After OMB/WH review, OMB will inform the United States Army Records Management Division Agency (USARMDA) whether or not the Army may publish the final rule. If approved, USARMDA will publish the final rule.

Another regulation that requires update is AR 600-25, Salutes, Honors, and Visits of Courtesy, 24 September 2004. Paragraph 6-13 in that regulation pertains to military funeral honors. The Secretary of the Army approved a change to the funeral honors policy at ANC effective 1 January 2009, authorizing all Soldiers who die as a result of wounds received in combat to be afforded the additional funeral honors of elements of a band, an escort platoon, caisson section, and a colors team. These honors are in addition to the normally provided firing party, casket team, chaplain and bugler. The policy change established a new paradigm for rendering military funeral honors – one that recognized the ultimate nature of the sacrifice in service to this Nation as opposed to a rank-oriented model. As a result of the Army's leadership in this area, all other Services followed suit and adopted similar policies in honoring their fallen. The next update to AR 600-25 must incorporate the Secretary of the Army's guidance.

A third challenge to ANC's operational efficiency is a lack of internal organizational SOPs and published policy guidance. Interviews with the cemetery's upper and mid-level management revealed that Arlington has only a few outdated SOPs and policy letters. Most of the ANC staff stated that there were no SOPs and that policy was disseminated circumstantially and verbally, never captured on paper. Due to the vast experience of the staff at Arlington and low turnover rate, the cemetery has been able to function under the principles of "OJT [on-the-job training]" and "this is how we've always done it." In the absence of written SOPs to provide a record of established policies and promote consistency in their application, the age of the ANC workforce is of concern.

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Many ANC employees are nearing retirement; significant knowledge gaps will likely result when they depart ANC.

RECOMMENDATIONS:

1.3.1. Assistant Secretary of the Army for Manpower and Reserve Affairs (ASA(M&RA)), in conjunction with the Superintendent, Arlington National Cemetery, continue to pursue the publication of a revised Title 32 Code of Federal Regulations (CFR), Part 553, followed by publication of an updated Army Regulation 290-5 and Department of the Army Pamphlet 290-5. Revision of the CFR should not codify command structure of ANC (as draft currently does).

1.3.2. Superintendent, ANC, codify procedures in SOPs and policy letters to ensure consistency, continuity, and to maintain relevance.

DEFICIENCY 1.4: Arlington National Cemetery leaders and grounds personnel selectively enforced the memento policy due to current social trends pertaining to section 60.

DISCUSSION: The Cemetery's floral policy, which addresses mementos/commemorative items, is conspicuously posted and readily visible to the public. The policy is also provided to the decedent's representative the day of the funeral service.

In accordance with DA Pam 290-5, floral arrangements accompanying the casket or urn at the time of burial are placed on the completed grave. Natural cut flowers may be placed on graves at any time of the year and are removed when they become unsightly. Metal, plastic and paper temporary flower containers are permitted. Temporary plastic containers are provided free of charge. Glass containers are not allowed. Artificial flowers may be placed on graves during the period of October 10 through March 15. Potted plants are permitted on graves 10 days before and 10 days following Easter Sunday. Christmas wreaths and grave blankets are permitted on graves during the Christmas season, but are removed no later than January 10 of each year. Plantings are not permitted on the graves at any time. Statues, vigil lights, balloons, breakable objects of any nature and similar commemorative items are not permitted on graves. Items are not to be secured on the headstones or markers; this prohibition extends to floral items or other decorations.

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Cemetery personnel remove floral items from the graves as soon as they become faded and unsightly. In practice, the Superintendent reserves the right to remove and destroy without notice, anything left on graves that violates the intent of these regulations, offends the sensibilities of the public or the dignity of the cemetery, or is an eyesore or a threat to the safety of the public or personnel of ANC. The ANC floral policy is consistent with other Department of Veterans Affairs and American Battle Monuments Commission cemeteries.

Despite the clearly written guidance set forth in the ANC floral policy, the nature of private and public grieving has changed over the past decade. Sometimes attributed to the practice of leaving personal mementos at the Vietnam Veterans' Memorial, cemeteries – particularly national cemeteries – are finding more and more personal items left graveside. Military uniform accoutrements, "challenge coins", photos, and other items left on graves pose a challenge to cemetery officials. Per current guidance, these items should be immediately disposed of because they detract from the uniform appearance expected of national cemeteries and are a potential safety hazard if struck by mowers or trimmers. Another potential problem associated with relaxing the current standard and allowing personal mementos and other items to remain graveside is the unintended public expectation that the cemetery has the responsibility to pass on such gifts from one person to another or to ensure that the gift is picked up by the intended receiver. For example, in a recent incident, a bag of three white teddy-bears was placed on a Soldier's gravesite, with the intent that the Soldier's three young daughters would later retrieve the teddy bears from the grave. When the daughters arrived at their father's grave, the teddy bears were missing. Despite valid reasons for collecting and disposing of mementos left on graves, the public and media have recognized and appear to approve of the precedent set by the National Park Service's Vietnam Veterans Memorial Collection; all items left at "the Wall" are catalogued and saved as "living history".

The Office of the Assistant Secretary of the Army for Civil Works asked the Army's Center for Military History (CMH) to start a pilot program that collects, documents, and photographs mementos in Section 60 of ANC. The CMH stores the items in their archives. This effort has proven to be a very resource intensive. One senior Army official likened the collection efforts as "treating the mementos like evidence" in that all items are saved, placed in bags, and tagged with a tracking number. Because the CMH is an Army-owned resource that would be needed to continue this pilot program, this pilot program may violate fiscal law. Funding for ANC comes from a different appropriation account than the Army, so using Army assets to complete this mission

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requires that ANC reimburse the Army on an actual costs basis for services rendered – something the cemetery is not currently budgeted to do. Any decision that would involve collecting and maintaining mementos should clearly state that ANC is solely responsible for performing this effort. Furthermore, ANC leadership and the OASA(CW) needs to provide the CMH disposition instructions for the items that the CMH has collected, catalogued, and stored during the pilot program.

Since the DA Pamphlet also directs the Superintendent to maintain historical data of importance to the cemetery, the cemetery leadership does have the discretion to keep items of historical significance (for example, a Presidential Coin left graveside). With this in mind, the clarification of the written floral/memento policy (i.e. include the word "mementos" and add the frequency of when gravesites will be policed), strict enforcement of the policy, and a marketing campaign that explains why the cemetery must police commemorative items (safety and aesthetic reasons) will encourage visitors not to leave items and/or make them understand why the cemetery picks them up. The Superintendent would still have the ability to collect and store historically significant items without the resource-intensive requirement to collect and document everything.

RECOMMENDATIONS:

1.4.1. Assistant Secretary of the Army for Civil Works, Assistant Secretary of the Army for Manpower and Reserve Affairs, and Superintendent, Arlington National Cemetery, codify an updated floral and memento policy to include the word "mementos" and add the frequency at which gravesites will be policed. Include updated policy in future revision to AR 290-5 and DA Pam 290-5.

1.4.2. Superintendent, ANC, enforce floral/memento policy by policing grounds and disposing of items as required. "Historical" items may be kept at the discretion of superintendent or his representative.

1.4.3. Superintendent, ANC, develop a strategic messaging campaign to explain ANC's floral and memento policy and why ANC must enforce it (e.g., safety of cemetery maintenance workers and visitors, requirements for the appearance of the cemetery).

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DEFICIENCY 1.5: The leadership of ANC has not established procedures to immediately report Commander's Critical Information Requirements (CCIR) and does not adhere to CCIR reporting requirements.

DISCUSSION: Field Manual 7-30 outlines the command concept of commander's critical information requirements (CCIR), defined as *previously unknown but needed information of such critical importance to a commander's decision making process that they directly affect the successful execution of operations* (FM 7-30 paragraph 3-6). During the assessment of ANC, the inspection team found that the leadership there has not codified any internal CCIR, and in some instances, ANC leaders have not followed reporting procedures for MDW requirements of CCIR. ANC would be expected to adhere to MDW CCIR requirements both as a tenant unit of the National Capital Region and because GO 13 states that ANC will "remain assigned to the Commander, Military District of Washington." Although the concept of CCIR may not seem applicable to the successful operation of a cemetery, recent events that have reached media outlets prove otherwise. The inspection team found that the VA National Cemetery Administration has a codified procedure to report information through its chain of command. ANC could benefit from the development and regular reporting of CCIR as a means of identifying potential flash-points and ensuring that issues of concern or potential concern are immediately forwarded to the appropriate level of command or authority.

As stated previously, the inspection team identified an unclear chain of responsibility for ANC and also found that the cemetery lacks current, written standard operating procedures. Both of these shortfalls contribute to the lack of CCIR reporting. Under GO 13, ANC has many different "bosses" with specific responsibilities, and although the order assigns ANC to the Commander, Military District of Washington, the reality indicates that information does not always flow through ANC to MDW as it should. Regardless, since ANC does not have an internal written SOP that defines CCIR and outlines reporting procedures, critical information sometimes does not reach appropriate levels of leadership within the cemetery. A recent AR 15-6 investigation about a 2003 incident of a mismarked gravesite found that the Superintendent may not have been informed about the issue – he stated in sworn testimony that he first became aware of the situation in July 2009 when the ANC public affairs officer asked him about it. This is an indication that ANC does not have clear guidance about a requirement to immediately inform management about critical incidents.

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The MDW CG has published CCIR, including the requirement to report "... [any] incident involving DoD forces ... that would draw national media attention or have a potentially adverse effect on JFHQ-NCR's mission and image." Recent news articles involving mismarked gravesites clearly indicate that these are incidents that drew media attention and had an adverse effect on the Army's image, yet the report of the event may not have reached the ANC Superintendent, let alone been forwarded to the MDW CG. When the inspection team asked an ANC senior leader, he was unaware of any requirement to report incidents to higher headquarters.

In contrast to Arlington, the inspection team found that cemeteries within the VA National Cemetery Administration have robust SOPs at the tactical (cemetery) level that outline nearly all daily operations, and they also have a clear reporting chain for passing critical information. The below excerpt from the Jefferson Barracks National Cemetery Interments SOP demonstrates the level of detail provided to workers:

Guidance: If you are required or need to contact a supervisor about an interment situation this is the priority sequence for you to follow.

1. Interment Foreman; if he's not available then
2. Interment Work Leader; if he's not available then
3. Grounds Foreman; if he's not available then
4. Grounds Work Leader; if he's not available then
5. Assistant Cemetery Director; if he's not available then
6. Cemetery Director

If there is a possibility that burials were done incorrectly, the Interment Foreman or Work Leader will be notified immediately so a determination can be made about staying late to correct the burial. In the absence of the Interment Foreman or Work Leader use the priority list above for contacting a supervisor.

The interviewed VA NCA cemetery directors stated that critical information would not stop at their levels – they would pass on key information to their organizational level leadership in their memorial service network or at NCA if appropriate.

ANC leadership needs to address the lack of codified procedures within the cemetery and comply with the CCIR reporting requirements and procedures applicable to the cemetery.

RECOMMENDATION 1.5: Superintendent, ANC, codify CCIR, develop internal reporting procedures, and comply with MDW CCIR reporting requirements.

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OBSERVATION 1.6: The average wait time at ANC for the interment/inurnment of service members killed in action is 10 - 14 days; average wait time for veterans is 4 - 6 weeks. The wait time depends on multiple factors, to include, family desires for their convenience as well as the availability of the chapel, chaplains, and caissons for full military honors.

DISCUSSION: In 1972, Arlington National Cemetery held 2,740 funerals or an average of 11 funerals a day, five days a week. In 1998, the number increased to 5,980 funerals, an average of 23 funerals a day. Today an average work day at Arlington National Cemetery is 27-33 funerals (6,970 funerals a year), four to five funerals occurring at the same time (with eight of the 27-33 funerals involving full military honors with caisson) eight chapel services, eight wreath laying ceremonies at the Tomb of the Unknowns, and thousands of visitors. World War II and Korean War veterans and their spouses are dying at a fast rate, the death rate of Vietnam War veterans and their spouses is increasing, and the burials of service members as a result of today's conflicts (Operations Enduring Freedom and Iraqi Freedom) add to the workload. Eleven percent of today's wartime casualties are buried at ANC. During the recent major snowstorm (February 2010) in which the Federal Government suspended operations for several days, ANC continued operations with 38 burials.

ANC's goal is to schedule all funerals as close as possible to the earliest date requested by the surviving Family. Depending on the resources necessary to conduct the funeral service, the wait time (waiting period) can be from five days to as long as two months or more. A funeral's requirement for certain limited resources, commonly referred to as the "Three Cs" by ANC: use of the chapel, a chaplain of a certain religious affiliation, and/or a caisson for full military honors, will generally extend the waiting period. The Superintendent and staff stated that specific obstacles to reducing the wait time include limited availability of Catholic chaplains (both in the Army and a general shortage), limited availability of chapels (of the two on Fort Myer, ANC controls only one), and the limited number of caissons (two primary and one reserve, although adding more may not allow the conduct of more funerals due to cemetery space limitations). ANC's current web page mentions that the use of the chapel will generally extend the waiting period for funeral services, as will the conduct of military honors.

Despite the cemetery management's assertion that the "Three Cs" are the source of long wait times, the inspection team found that the uniqueness of ANC's graveside funerals may be an even greater factor, in that, simply stated, there is a limit to the number of funerals that can be conducted at any given time. Generally, funerals are

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kept as isolated as possible from other funerals and tourists in reverence and respect to the families. This unofficial policy allows each funeral to appear to be "the only and most important funeral." Concurrent funerals present a challenge in that there is limited land space within the cemetery grounds to ensure the isolation and privacy of individual services. Therefore, even assuming an unconstrained ability to add more chapels, chaplains, or caissons, the wait time still would likely be the same—if only because there is a limit to the number of funerals that can be done in one day. The cemetery staff reported that they had implemented a pilot program in the late 1980s, offering non-graveside funerals, but that the adverse backlash from Families and the public was significant. Clearly, part of the experience of burying a loved one at ANC is the graveside service and the Family's sense that its funeral is the only one occurring at that time.

In the past, conducting funerals on the weekends also was also considered as a means of reducing the wait time; however, due to limited manpower, budget constraints, and the increased numbers of tourists and Family members who visit their loved one's gravesite on weekends, the idea was not pursued.

The Families whose loved ones are to be buried at ANC generally want all of the honors to which their Veteran is entitled, and, as a result, Families are willing to wait, particularly once they understand the reason for any delay. Casualty Assistance Officers (CAOs) report that Families are willing to wait once ANC personnel explain the reasons for longer wait times, but that the reasons are not immediately clear to Families or CAOs. ANC leadership could improve this situation by developing a fact sheet that outlines the reasons for the wait time. This effort at "expectation management" should help to alleviate many misconceptions and misunderstandings held by the public, the media, and political leadership concerning extended wait times of up to three months for burial at ANC.

RECOMMENDATION 1.6: ANC develop a fact sheet for expectation management that details the elements, to include the availability of resources, which impact a Family's average wait time for interment/inurnment. Proactively disseminate ANC fact sheet to the VA, funeral homes, Retirement Services Offices, Casualty/Mortuary Affairs Offices for each of the military services, and PAO channels.

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Special Inspection of Arlington National Cemetery

**TAB C Objective 2 - Management,
Administration & Training**

OBJECTIVE 2: Assess management, administration and coordination processes as well as training of personnel involved with operation of Arlington National Cemetery.

DEFICIENCY 2.1: The current management structure and manning levels of Arlington National Cemetery (ANC) are not robust enough to efficiently accomplish the organization's mission.

DISCUSSION: On the surface, ANC appears to be a very effective organization: the pristine rows of headstones, the sharp appearance of the Honor Guard members, and the somber professionalism provided during funeral services, wreath laying ceremonies, and distinguished visits, and the handling of hundreds of thousands of visitors each year, all point to an organization that accomplishes its given missions. However, the successful execution of these tasks obscures many problems that ANC faces – one of the major problems is an inefficient organizational structure with inadequate manning levels within the cemetery. The inspection team found that although cemetery employees complete the daily requirements, it is often done through "brute force" in that all employees rightfully view honoring the fallen and supporting Families as the priority mission and all employees will all do what it takes to ensure mission accomplishment/success. This "brute force" involves cemetery personnel working outside of the scope of their job descriptions, working extended hours, and making last-minute changes to fix unforeseen issues. Planning beyond the short- or medium-term is impossible because the employee focus is continually on the "25-meter target" of the next funeral or ceremony. One ANC supervisor stated, "We do four burials an hour – if people are missing, we don't have enough for 100% success rate. We scramble way too much behind the scenes. We can potentially do a disservice to the family."

In addition, because the cemetery lacks an effective organizational-level higher command, the leadership within ANC takes on the mission of long-term planning, adding yet another critical task to their already full plates. ANC is at a tipping point, with a very real potential to fall short on a future mission – one employee said, "We don't have the number of people we need . . . to do the radical number of burials we are doing in a first class manner." As the number of funerals at ANC continues to dramatically increase due to the passing of World War II, Korean Conflict, and Vietnam War Veterans, the Army can assist ANC by completing a top-to-bottom review of the mission requirements, developing a Table of Distribution and Allowances (TDA) that supports successful execution of those missions, and filling the billets.

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The inspection team reviewed the organizational structure of ANC and found three challenges: no codified, Army-approved organizational structure; a lack of key functional capability positions; and inadequate salary-grade levels for certain slots. Whereas Army units use a Table of Organization and Equipment (TOE) or TDA to codify manning authorizations, the leadership of ANC reported that they do not have one. Their means of tracking personnel billets is through a locally generated PowerPoint organizational chart. This would seem to indicate that there has never been a formal analysis by the Army of manning requirements for the cemetery. A comparison of ANC's homemade organizational chart with the structure of other National Cemetery agencies showed that ANC may lack expertise in certain key functional areas – particularly in functional specialties that would routinely be performed at the organizational-level of command. The inspection team found Chief Information Officers (CIOs), Chief Financial Officers (CFO), robust Public Affairs staffs (with interpretation and protocol personnel), and Civil Engineers dedicated to supporting the cemeteries of the Department of Veterans Affairs and the American Battle Monument Commission. Arlington either does not have this expertise at all (neither internally nor at a dedicated higher headquarters), or if it has a similar position in the functional area, it is assigned a grade/salary level that prohibits recruiting the best qualified candidates. Although ANC leadership recently addressed one aspect of this issue by adding a GS-15 CFO position to their staff, the Army needs to review all functional gaps in ANC operations and ensure that salaries are competitive.

In addition, interviews with cemetery employees and with commands that support the cemetery indicated that manning levels at ANC are not adequate. Discussions with key leaders of the Service honor guards who provide military support for funerals and ceremonies, revealed almost unanimous concern about the staffing of the ANC funeral scheduling section. The honor guard interviewees felt that the volume of work at ANC does not allow the staff to adequately inform outside agencies of future operations. This is generally an accurate assessment, in that the scheduling staff (and supporting honor guards) focus on the funeral requirements for the upcoming 48 hours. Because the funeral mission does not slow down, there is no method to look beyond the immediate needs. Two of the honor guards have identified a liaison to work with ANC schedulers, providing ANC with extra manning, while concurrently affording honor guard leaders longer-range visibility. Most (12 of 14) cemetery employees who were associated with the scheduling section also validated the perception of manning shortfalls. One senior leader stated, "We are up against a wall; tasked beyond capabilities. Absentees, injuries, and equipment failures create a great impact. [We are] not adequately

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manned." Another ANC leader expressed the same sentiments, but stated that current facility limitations may prohibit expanding the staff. Regardless of possible space limitations, the Army needs to conduct an assessment of overall manning requirements that will allow ANC to continue to succeed in the execution of its short-term mission while planning for the mid- and long-term.

The inspection team also found that manning shortfalls at the cemetery are not limited to the scheduling section: the one-deep public affairs office (PAO) is not sufficient. Prior to the hiring of the single PAO representative at ANC, the cemetery's public relations were conducted by the MDW PAO. The MDW PAO is a robust staff and prior to ANC assuming these duties internally; the MDW PAO maintained 2 personnel dedicated to the cemetery, with the capability to surge to 4 personnel for high profile situations. Currently the ANC PAO is one-deep, often requiring assistance from other personnel at the cemetery to complete day to day tasks as well as planning. The Arlington PAO maintains a good relationship with the Army's Office of the Chief of Public Affairs (OCPA) to assist with some of the workload. Some public affairs functions could be managed by an operational-level staff; however, because ANC lacks that operational-level oversight (OCPA provides strategic guidance and public affairs policy proponency), the ANC PAO alone is responsible for those requirements.

Because ANC lacks the administrative depth necessary to handle constant high tempo operations with periodic surge requirements, many supervisors at ANC work outside the scope of their positions. The inspection team found that ANC senior leadership served as the Budget Officer (a position that became vacant at the onset of the inspection) and performed duties expected of supervisors and foremen – coordinating high-visibility funerals and ceremonies, inspecting cemetery grounds, and directing traffic. ANC's personnel structure is so thin that when personnel are absent, their work is often done by supervisors, leaving those supervisors unable to accomplish their primary supervisory tasks. Based on interviews and observation, the inspection team found that many of the ANC staff work outside the scope of their position descriptions in an effort to achieve mission requirements. The historian performs protocol duties to assist the PAO, which impacts his ability to focus on documenting historical data. Clearly, the employees of ANC will do what is required to complete the mission, but this approach adversely impacts other aspects of cemetery operations. One supervisor felt that the "scrambling" that the staff must do to address the workload may have caused the mismarked grave situations identified by Salon.com. The supervisor felt that when the problem was discovered, the ANC employees and leaders may not have had the luxury of time to properly address the issue. Clearly, ANC needs adequate levels of manning

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and properly graded positions, both of which are clearly identified on a formal Army manning document.

RECOMMENDATIONS:

2.1.1. Assistant Secretary of the Army for Manpower and Reserve Affairs initiate a manpower survey to document structure, manpower and equipment requirements and authorizations for ANC.

2.1.2. Assistant Secretary of the Army for Manpower and Reserve Affairs, in conjunction with Assistant Secretary of the Army for Civil Works, review current position descriptions of all staff at ANC to ensure that positions adequately address and are of commensurate skill requirements to support structure requirements identified in manpower survey.

2.1.3. Assistant Secretary of the Army for Civil Works ensure that the 2010 Master Plan considers the Doctrine, Organization, Training, Material, Leader, Personnel, and Facilities (DOTMLPF) construct for assessing current and future capabilities and requirements to enable the Army to manage any required change.

DEFICIENCY 2.2: On-the-job training is the primary and, in most cases, the only means of training for ANC employees because of the lack of manning, training dollars and ANC leadership's insular attitude that ANC is too unique to benefit from outside training.

DISCUSSION: Arlington National Cemetery lacks several components of a viable professional development and training program for its employees. The success of a workforce depends increasingly on having opportunities for personal learning and practicing new skills. Leaders' success also depends on access to these kinds of opportunities. Professional development and training can result in a more engaged, satisfied, and versatile workforce that stays with the organization; organizational cross-functional learning; the building of an organization's knowledge assets; and an improved environment for innovation. Thus, learning is directed not only toward better service, but also toward being more responsive, adaptive, innovative, and efficient.

ANC lacks a learning and development system that addresses the organization's core competencies, strategic challenges, standardizes a program for the transfer of

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knowledge from departing or retiring workers, and reinforces new knowledge and skills on the job. In interviews of staff and management at ANC, all said that there was not a substantial training program at the cemetery. They referred only to general training sessions that occur annually because of requirements applicable to all government civilian employees (e.g., annual safety and Equal Employment Opportunity (EEO) training) and also pointed out a lack of professional development training opportunities. During interviews with the ANC leadership, a comment was made that "they [wage grade, clerical, and administrative workers] don't want any training." In the view of the inspection team, this comment reflected a clear indication that professional development and employee training programs are not priorities for some ANC leaders.

Compounding the issue is the level of staffing that has been discussed previously in the report. The staffing level for the current operational tempo (OPTEMPO) is inadequate and contributes to the sense that the organization cannot afford to send personnel to training at the expense of the core mission. From the perspective of the ANC leadership, the cemetery's "uniqueness" also serves as an enabling factor, allowing them to disregard training and professional development opportunities that may exist in other government cemetery operations, such as in the NCA, under the mistaken presumption that such training would be irrelevant or would yield little benefit given the "unique" environment of ANC. Interviewees at the management level within ANC continually referred to the cemetery's uniqueness of graveside burial in an active cemetery, as well as being a national shrine and a tourist attraction, as a core argument discounting the value of training opportunities that could be provided under the well established NCA training programs. As captured in ANC, FY2009 Performance Plan, ANC's only performance measurement for achieving its Strategic Goal #3 "Manage the facilities in a professional manner," is to conduct annual training on sexual harassment and diversity awareness. The inspection team acknowledges several differences in the operating conditions and procedures at various types of cemeteries, but is convinced that affording the opportunity for ANC employees to attend outside training would lead to a well-rounded workforce and will give new perspectives that could improve ANC's "unique" procedures.

ANC relies on the knowledge and experience that its employees have gained from on-the-job training over the years of working within the cemetery. On-the-job training, when incorporated as a standardized training method into an organizational training program, can be a viable means of providing employees a more focused knowledge of local operating procedures. However, the inspection team was unable to locate, and ANC management did not present, any comprehensive record of ANC SOPs or training

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