

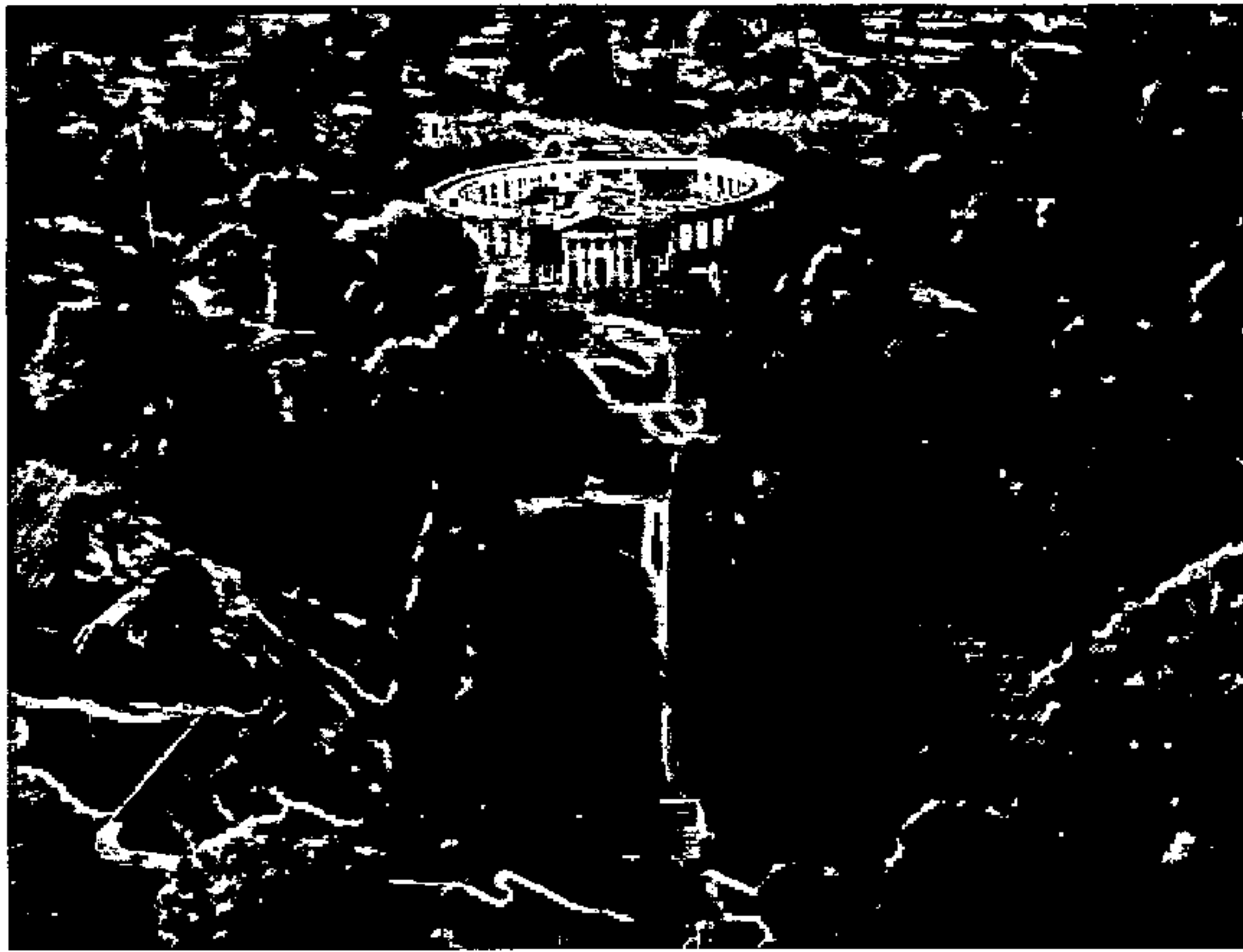


U.S. Army Inspector General Agency
Special Inspection of Arlington National Cemetery
Final Report

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

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

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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SUBJECT: Department of the Army Inspector General Agency, Inspections Division,
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. *AW 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)
- G Other Matters (Inspection of Soldiers' and Airmen's Home National Cemetery)
- H Other Matters (Army Post Cemeteries & Contracting Oversight)

CF:

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

APPROVED *Jim 8 Jul 10*
DISAPPROVED _____
SEE ME _____

As modified by Strikeouts

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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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