

**DEPARTMENT OF VETERANS AFFAIRS NATIONAL CEMETERY
ESTABLISHMENT, EXPANSION, AND REPLACEMENT**

1. REASON FOR ISSUE: This National Cemetery Administration (NCA) directive establishes mandatory policy for the establishment, expansion, and replacement of Department of Veterans Affairs national cemeteries.

2. SUMMARY OF CONTENTS: This new NCA directive:

a. Establishes criteria by which NCA determines whether to establish new national cemeteries and expand or replace existing national cemeteries.

b. Establishes responsibilities and procedures for monitoring and assessing gravesite depletion in existing national cemeteries.

3. RESPONSIBLE OFFICE: NCA Office of Finance and Planning, Policy and Planning Service (42A), 810 Vermont Avenue, NW, Washington, DC 20420, is responsible for the contents of this directive. For all inquiries, contact NCA 42A at NCAPolicyPlanningService@va.gov.

4. RELATED PUBLICATIONS:

a. NCA Directive 3020, NCA Construction Programming and Budgeting Process (December 17, 2019);

b. NCA Directive 3140, Management and Decision Support System (October 18, 2019).

c. NCA Directive 3015, VA National Cemetery Reduction in Burial Services and/or Closure (March 6, 2010).

5. RESCISSIONS: IUSMA Decision Memorandum, National Cemetery Expansion or Replacement Criteria, dated April 20, 2017.

6. RECERTIFICATION: This document is scheduled for recertification on or before the last day of October, 2025.

/s/
Ronald E. Walters
Principal Deputy Under Secretary
for Memorial Affairs

Distribution: Electronic

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1. PURPOSE/AUTHORITY:

a. This directive establishes the policy for determining the need to establish new Department of Veterans Affairs (VA) national cemeteries, expand or replace existing national cemeteries, allow existing and depleting national cemeteries to close, or to reopen closed cemeteries.

b. NCA's authority to establish, expand, or replace national cemeteries, as well as allowing national cemeteries to close, is title 38, United States Code (U.S.C.), sections 2400, 2404, 2406, and 2412.

2. BACKGROUND:

a. VA's current system of national cemeteries was created with the enactment of Public Law 93-43, the "National Cemeteries Act of 1973." This law transferred to VA 82 national cemeteries and 32 soldiers' lots (in private cemeteries), Confederate cemeteries, monument sites and various government cemetery lots that were previously maintained by the Department of the Army. VA elevated the status of its own 21 cemeteries to that of national cemeteries, creating a nationwide system of 103 national cemeteries. In 1974, VA completed a study that resulted in its first expansion policy and began establishing 11 new national cemeteries under the "Regional Cemetery Concept". In 1986, Congress passed P.L. 99-576, the "Veterans' Benefits Improvement and Health-Care Authorization Act of 1986." This legislation required VA to submit to Congress "a list, in order of priority, of the 10 geographic areas in the United States in which the need for additional burial space for veterans is greatest." This legislation shifted the focus for establishing new national cemeteries from a "Regional Concept" to VA's current strategy of meeting Veterans' burial needs in areas of the country with the greatest need.

b. NCA's strategic goal is to provide reasonable access to a burial option, in a national cemetery or VA-grant funded State or Tribal Veterans' cemetery, to 95 percent of our Nation's Veterans. Part of NCA's plan to achieve this goal is to establish new VA national cemeteries and expand or replace existing cemeteries. As of August 2020, NCA maintains 146 VA national cemeteries with 129 offering a burial option (open or cremation only).

c. The second part of NCA's plan is to award grants through the Veterans Cemetery Grants Program (VCGP) to States, Tribes and Territories to establish cemeteries to bury Veterans living in concentrations that do not meet NCA's establishment criteria and to expand and improve those cemeteries, (as needed), once established. Through VCGP, NCA has awarded grants to States, Territories, and Tribes to establish and expand burial access for service areas that do not meet national cemetery establishment criteria. As of August 2020, the current number of State, Territorial and Tribal VA-funded Veteran cemeteries is 116.

3. POLICY:

a. It is NCA policy that cemetery establishment, expansion, and replacement determinations and decisions are made in accordance with this directive and using the decision-making process in this directive.

b. **Establishment of a New National Cemetery:** It is NCA policy to only establish new VA national cemeteries under one of the three types of new cemetery establishment categories below:

(1) Standard: NCA will establish a new national cemetery where 80,000 or more Veterans without reasonable access to a national cemetery or VA-grant funded state or territorial Veterans' cemetery reside within a 75-mile service area of a possible cemetery location.

(2) Rural Initiative: NCA will establish a new national cemetery in a State without an open or cremation-only national cemetery in a location with less than 25,000 Veterans that do not have access to a national cemetery or an in-state VCGP funded state cemetery within a 75-mile service radius of that location. Of these states, those where all Veterans are served by an existing VA-funded State Veterans cemetery within the state or national cemeteries in adjacent states are excluded.

(3) Urban Initiative: NCA will establish a new columbarium-only national cemetery to enhance service of existing national cemeteries in urban areas where distance and travel time from the center of the city (urban core) to the existing national cemetery present barriers to visitation and contribute to lower usage rates than typical at national cemeteries serving other large, urban areas. Locations for the Urban Initiative must serve cities that are one of the 50 most populous, according to the U.S. Census Bureau. The existing national cemetery must have a documented Veteran utilization rate of 20 percent or less for at least two of the last three years and recorded that next of kin cite travel time and/or distance as an access barrier at least five percent above the national average for at least two of the last three annual *Surveys of Satisfaction with National Cemeteries*.

c. **Consideration of Expansion or Replacement of an Existing National Cemetery:** It is NCA policy to consider expansion or replacement of a national cemetery when:

(1) NCA Budget Service and Office of Cemetery Operations' annual joint review of the 15 Year Projected Reduction and Closure List (15YPRC) indicates depletion of gravesites will result in cemetery closure or reduction in burial options within fifteen years.

(2) If NCA becomes aware that potential suitable land is available to expand or replace a cemetery in advance of the standard 15-year depletion window.

d. **Decision Criteria for Expanding or Replacing an Existing National Cemetery.** Expansion or replacement is necessary to support NCA's strategic goal to

maximize reasonable access to a burial option in a national or state cemetery for Veterans. A decision to not expand or replace would result in eventual closure or a reduction in burial services. When determining whether to expand or replace an existing national cemetery, it is NCA policy to consider the following five criteria in relation to one another. The presence or absence of the five criteria below either mitigate or support the need for cemetery expansion or replacement.

(1) Significant overlapping service: The presence of significant overlapping service with another national or VA-funded state Veterans cemetery mitigates the need to expand or replace a national cemetery, as other accessible burial options would be reasonably available. NCA determines the presence of significantly overlapping service by evaluating the proximity of neighboring national and state Veterans cemeteries (geographic threshold) and the impact of cemetery closure on providing reasonable access to Veterans currently living within the closing cemetery's service area (numeric threshold). See the definition of "significant overlapping service" in Paragraph 6.i.

(2) Cemetery utilization rate: A utilization rate consistently above the national average, or a consistently stable high rate of utilization is considered supportive of expansion or replacement. This generally indicates a national cemetery would continue to be utilized if expanded or replaced. See the definition of "cemetery utilization rate" Paragraph 6.e.

(3) First interment rate: A first interment rate averaging fifty or more interments for the past five years supports a decision to expand or replace the cemetery. Such a first interment rate suggests a national cemetery would continue to be utilized for first interments if expanded or replaced. A national cemetery's first interment rate also indicates how active it is in comparison to other national cemeteries, versus the more general utilization rate as described above. See the definition of "first interment rate" in Paragraph 6.f.

(4) Availability of land: The availability of new land or the possibility to redevelop existing cemetery land supports expansion or replacement of an existing national cemetery.

(5) Historic designation of existing cemetery: The following historical factors would support not expanding an existing national cemetery:

(i) When the cemetery and/or contiguous land utilized to expand an existing cemetery, is determined by appropriate Federal authorities to be more important as unaltered, to preserve archeological or historical values; or

(ii) If expansion would require the removal of features documented as "contributing" to an NCA cemetery's placement on the National Register of Historic Places and/or identified as "historic" in VA's Capital Asset Inventory

e. Allowing a National Cemetery to Close:

(1) A national cemetery will not be closed if it is the only one located in its state or territory and adjacent land is available and feasible for expansion. If adjacent land is not available, NCA will attempt a non-contiguous expansion by either constructing an annex cemetery on land within 3 miles of the existing cemetery (if available) or constructing a replacement cemetery on new land not in close proximity to the cemetery. NCA will close the cemetery if it determines that it is not feasible to expand or replace the cemetery due to lack of available land.

(2) Upon determination that a national cemetery will not be expanded (e.g., it will be replaced, closed, or reduce burial services), District Executive Directors will develop, maintain and execute a Reduction or Closure and Notification (R/C) Plan per Directive 3015.

f. **Reopening a Closed National Cemetery:** It is NCA policy that NCA will only consider reopening a closed national cemetery if the reopening supports one of the three establishment criteria (i.e. Standard, Rural Initiative, Urban Initiative) and is determined by NCA to be preferable to acquiring other land for that purpose.

4. RESPONSIBILITIES:

a. **Under Secretary for Memorial Affairs (USMA)** is responsible for deciding whether to establish, expand, or replace a national cemetery.

b. **Principal Deputy Under Secretary for Memorial Affairs** is responsible for making a final recommendation to the Under Secretary for Memorial Affairs on whether to establish, expand, or replace a national cemetery.

c. **Deputy Under Secretary for Finance and Planning** is responsible for recommending whether to establish, expand, or replace a national cemetery prior to submission to the Principal Deputy Under Secretary for Memorial Affairs.

d. **Deputy Under Secretary for Field Programs and Cemetery Operations** is responsible for coordinating with the Deputy Under Secretary for Finance and Planning to review and concur or non-concur with the recommendation on whether to establish, expand, or replace a national cemetery prior to submission to the Principal Deputy Under Secretary for Memorial Affairs.

e. **Executive Director, Cemetery Operations**, is responsible for:

(1) Reviewing the recommendation on whether to establish, expand, or replace a national cemetery and providing input to the Deputy Under Secretary for Field Programs and Cemetery Operations;

(2) Working with District Executive Directors during the second quarter of each fiscal year to review and validate the information on the 15YPRC;

(3) Approving District R/C plans and recertifying them annually;

f. **District Executive Directors** are responsible for:

(1) Validating the accuracy of current NCA Management and Decision Support System (MADSS) data on gravesite usage, available gravesites, developed and undeveloped acreage and reviewing interment rates to verify the projected date for reduction or closure;

(2) Considering the balance of burial options as each cemetery approaches depletion so that the final construction projects enable depletion of all burial options at roughly the same time.

(3) Developing the R/C Plan per Directive 3015 for each national cemetery in their district that has been identified on the 15YPRC as subject to potential reduction of services or closure.

g. Chief, Cemetery Development and Improvement Service is responsible for:

(1) Coordinating with the VA Office of Real Property to evaluate potential land actions or opportunities either identified by or offered to NCA. This includes evaluations conducted when NCA becomes aware of cemetery expansion opportunities in advance of the cemetery's placement on the 15YPRC (See paragraph 3.c (2)).

(2) Overseeing all NCA land acquisitions and/or real property issues managed by VA Office of Real Property.

(3) Coordinating with the Office of Finance and Planning when assessing the suitability of the potential land action within the framework of establishment, replacement or expansion criteria as provided in this directive.

h. Director, Budget Service, is responsible for:

(1) Producing annually by the end of the second quarter, the Strategic Planning and Analysis Internal Document (SPAID) and the 15YPRC of national cemeteries projected to reduce services or close to first interments within the next fifteen years based on gravesite, acreage, and interment data reported in MADSS and scheduling a briefing with the Deputy Under Secretary for Finance and Planning and the Deputy Under Secretary for Field Programs and Cemetery Operations to review the List.

(2) Monitoring Veteran population of prospective sites for future cemetery establishment and identifying new a cemetery expansion, replacement, closure, or reopening opportunities due to Veteran migration.

(3) Providing the necessary data and criteria analysis to support development of the decision document for each prospective cemetery expansion, replacement, closure, or reopening recommendation.

(4) Formulating NCA's budget proposals, which will include funding requests for needs identified in (R/C) Plans and shown in NCA's fifteen-year prioritized project plans for major and minor construction projects.

i. Director, Policy and Planning Service, is responsible for:

(1) Using the annual 15 Year Projected Reduction and Closure List, as necessary, in coordination with the Director, Budget Service; the Chief, Cemetery Development and Improvement Service; and the Director, Design and Construction Service to assemble the criteria analysis used to develop cemetery establishment, expansion, and replacement recommendations.

(2) Determining if cemetery expansion or replacement criteria specified in paragraph 3.d. of this directive are met. If it is determined that the criteria have not been met, the Director will consider any mitigating or other persuasive factors for expansion or replacement.

(3) Developing a decision document to inform the recommendation whether to establish, expand, or replace a national cemetery based on the criteria presented in this directive.

(4) Managing the routing to the Deputy Under Secretaries for Finance & Planning and Field Programs & Cemetery Operations and concurrence process for the decision document for any cemetery on the 15 Year Projected Reduction and Closure List where a decision document does not yet already exist or as requested by leadership on an ad-hoc basis.

j. Director, Design and Construction Service, is responsible for:

(1) Managing the major and minor construction programs that identify proposed construction projects for a running period of 15 years based on submissions by District Executive Directors which include needs identified in R/C Plan(s).

(2) Providing supporting criteria analysis of cemetery expansion, replacement or closure and reopening recommendations.

k. Executive Director, Office of Engagement and Memorial Innovation, is responsible for drafting all external communications, coordinating media queries with VA Office of Public Affairs Central Office and field offices, developing appropriate news releases for distribution to the news media, and planning and executing a new cemetery dedication ceremony in conjunction with cemetery directors.

l. Director, Congressional and Correspondence Service is responsible for:

(1) Working with VA Office of Congressional and Legislative Affairs to notify appropriate Congressional members when NCA establishes, expands, replaces, closes or reopens a national cemetery.

(2) Distributing USMA correspondence to appropriate officials and interested parties and coordinating public affairs/congressional relations activities/contacts with the VA Office of Public and Intergovernmental Affairs (OPIA) and the VA Office of Congressional and Legislative Affairs (OCLA) liaisons

5. REFERENCES:

- a. NCA Directive 3020, NCA Construction Programming and Budgeting Process (December 17, 2019);
- b. NCA Directive 3140, Management and Decision Support System (October 18, 2019).

6. DEFINITIONS:

a. **15-Year Projected Reduction and Closure List (15YPRC):** The annual list reviewed and issued by NCA Budget Service and Office of Cemetery Operations that provides the status of certain cemeteries when projections suggest depletion of first interment options within the next 15 years. It is used to monitor and inform decisions regarding expansion, replacement, or closure of certain cemeteries.

b. **Availability of land:** This directive addresses and considers the availability of contiguous land and non-contiguous land that may be acquired.

(1) Contiguous land is new land that is connected or in close proximity (for example, land that may be separated by a road or another geographical feature) to the existing cemetery that may be acquired for cemetery expansion. The presence of contiguous land weighs more favorably in the evaluation of whether to expand or replace a closing national cemetery.

(2) Non-contiguous land is new land that is not connected or in close proximity to the cemetery that may be acquired for cemetery expansion.

c. **Cemetery Annex:** A special category of non-contiguous cemetery expansion that, while not contiguous, is a logical extension of an existing cemetery that is not physically separated from the existing cemetery by a distance greater than 3 miles. It uses the same name and station number and is not counted separately in the official count of NCA national cemeteries. Examples of cemeteries that would fit this category are:

- (1) Barrancas historic and annex
- (2) Crown Hill historic and urban initiative annex
- (3) Culpepper historic and annex
- (4) Hampton, VA and Phoebus Addition (annex)
- (5) Los Angeles and urban initiative annex
- (6) Mountain Home and annex
- (7) Roseburg historic and annex
- (8) Salisbury historic and annex

d. **Cemetery Expansion**: An increase in the cemetery's developed or undeveloped acres.

e. **Cemetery utilization rate**: Cemetery utilization rates as referenced in this directive are based on national cemetery utilization rates, calculated based on Veteran interments divided by Veteran actuarial projections of deaths within a national cemetery's service area. Cemetery utilization rates are a measure of the degree to which Veterans who have reasonable access to a national cemetery choose to use that cemetery. The distance that Veterans must travel is often a major factor that influences utilization rates, but low Veteran populations or the presence of significantly overlapping service with other national or VA-funded state or tribal Veterans cemeteries may also contribute to low utilization rate. An average annual utilization rate at or above 5 percent for the previous three years would support the decision to expand or replace a closing national cemetery.

f. **First interment rate**: First interment rate as referenced in this directive means the number of first interments in a national cemetery per year. A first interment is defined as an interment of the Veteran or an eligible family member that consumes a plot or niche and into which other eligible family members may be later interred. An average of 50 or more first interments within a 5-year period would support expanding or replacing the national cemetery as this threshold is considered cost effective for expanding gravesites.

g. **Reasonable Access**: A Veteran is considered to have reasonable access if the Veteran lives within 75 miles of an open or cremation only VA national or VA-funded state or territorial Veterans cemetery.

h. **Replacement Cemetery**: An interim and internal-NCA term to refer to a cemetery that "replaces" an existing cemetery to provide burial access to (approximately) the same concentration of Veterans who would lose reasonable access or a burial option without the replacement. To the public (always) and internally (after the interim tag is no longer needed for administration purposes), NCA will refer to a replacement cemetery as a new cemetery. Cemeteries that fit this category are Louisiana National Cemetery, Miramar National Cemetery, and Morovis National Cemetery. Replacement cemeteries meet the following criteria:

(1) Physically separated from the existing cemetery by a distance greater than 3 miles;

(2) Different mailing/physical address;

(3) Separate name and station number; and

(4) Counted separately in the official count of NCA national cemeteries.

i. **Significant overlapping service**: Significant overlapping service occurs when the numeric threshold criteria and geographic threshold criteria for determining the population of living Veterans in a service area are met. This definition considers both

programmatic and public perspectives, and therefore has two assessment factors, both of which must be met to support a finding that there was not significant overlapping service.

(1) **Numeric threshold calculation** (programmatic perspective): Either of two numeric thresholds would be applied to the estimated number of living Veterans in the year in which a national cemetery is expected to close due to the depletion of available gravesites for first interments, based on VA's most recent VetPop Model provided by the VA Office of the Actuary (currently VetPop2016).

(i) Threshold 1: Loss of reasonable access to a first interment option for 5 percent or more of the estimated living Veteran population within the service area of a closing national cemetery

(ii) Threshold 2: The number of Veterans projected to lose reasonable access to a first interment burial option is greater than 0.05 percent of the total living Veteran population nationally.

(2) **Geographic threshold calculation** (public perspective): This threshold calculation would state that a national cemetery is considered to have significant overlapping service if there is at least one other national or VA-funded State or Territorial cemetery located within the cemetery's 75-mile service area, consistent with NCA's reasonable access measure.