CEREMONIES AND SPECIAL EVENTS AT
DEPARTMENT OF VETERANS AFFAIRS NATIONAL CEMETERIES


2. SUMMARY MAJOR CHANGES: NCA made the following changes to the Directive:
   b. Redesignated previous Appendix D as Appendix E, Ceremony Monitoring Procedures.

3. RESPONSIBLE OFFICE: NCA, Office of Cemetery Operations Management (41A1), 810 Vermont Avenue, NW, Washington, DC 20420, is responsible for the contents of this Directive. Questions may be referred to the Executive Director, Cemetery Operations (41A).

4. RELATED PUBLICATIONS:


6. RECERTIFICATION: This publication is scheduled for recertification on or before the last day of September 2027.

/s/
Matthew T. Quinn
Under Secretary for Memorial Affairs

Distribution: Electronic
CEREMONIES AND SPECIAL EVENTS AT DEPARTMENT OF VETERANS AFFAIRS NATIONAL CEMETERIES

1. PURPOSE/AUTHORITY: This Directive establishes National Cemetery Administration (NCA) policy on the conducting of ceremonies and special events at Department of Veteran Affairs (VA) national cemeteries. The statutory authority for this Directive is title 38 United States Code (U.S.C.) sections 901 and 2404. The policies outlined in this Directive do not apply to committal or memorial services for individual Veterans, which are distinct from ceremonies and special events.

2. POLICY: It is NCA policy that all ceremonies and special events held at VA national cemeteries are compatible with NCA’s mission to maintain the final resting places of America’s Veterans and their dependents as national shrines, by honoring military service and those interred in the cemetery.

3. RESPONSIBILITIES:

a. Executive Director, Cemetery Operations is responsible for:

   (1) Notifying the Under Secretary for Memorial Affairs, through the Deputy Under Secretary for Field Programs and Cemetery Operations, of requests for ceremonies or special events from non-VA sponsors that are potentially controversial.

   (2) Leading decision making on how to address ceremony participants who violate policy or procedures in this Directive.

   (3) Approving or disapproving requests for ceremonies and special events from non-VA sponsors that are potentially controversial or that include requests for ceremonies recognizing the service of Confederate Servicemembers.

b. Director, Legislative and Regulatory Service is responsible for reporting requests for ceremonies made by Congressional members or staff, and U.S. Government, State, local, or foreign officials and dignitaries, and NCA’s approval or disapproval of such ceremonies, to the VA Office of Congressional and Legislative Affairs.

c. District Executive Directors are responsible for:

   (1) Making a recommendation on all requests for ceremonies or special events that are potentially controversial or that include requests for ceremonies recognizing the service of Confederate Servicemembers to the Executive Director of Cemetery Operations for a determination.

   (2) Consulting with the Executive Director of Cemetery Operations on actions to take when ceremony participants violate policy or procedures found within this Directive.

   (3) Approving and disapproving requests for ceremonies or special events that include the carrying or discharge of firearms or cannons with blanks.
d. Cemetery Directors are responsible for:

(1) Advising non-VA requestors about the request procedures in Appendix A.

(2) Reviewing requests from non-VA sponsors to hold ceremonies or special events and approving those requests that comply with the requirements in Appendix B.

(3) Responding in writing to requests from non-VA sponsors in accordance with the response procedures in Appendix C.

(4) Providing logistical support for approved ceremonies or special events, if requested and if the cemetery has support resources on-hand and available.

(5) Taking all necessary steps to promote the safety of staff and others present on cemetery grounds during ceremonies and special events.

(6) Monitoring ceremonies for violations of policies or regulations, in accordance with Appendix D.

(7) Submitting a First Notice of Event (FNOE) to report NCA approvals or disapprovals of ceremonies or events requested by Congressional members or staff, and U.S. Government, State, local, or foreign officials and dignitaries, and sending a copy of the FNOE to the Director, Legislative and Regulatory Service and to the NCA Public Affairs Officer.

(8) Planning and executing Memorial Day and other VA-sponsored ceremonies and events, as appropriate.

(9) Making a recommendation on all requests for ceremonies or special events that are potentially controversial or that include requests for ceremonies recognizing the service of Confederate Servicemembers to the applicable District Executive Director.

4. REFERENCES:


b. 38 CFR § 1.218.

5. DEFINITIONS:

a. Ceremonies/Special Events are pre-planned gatherings to commemorate or honor the military service of an individual or group who served or is serving in the Armed Forces of the U.S., or persons who are in interred at a national cemetery. Committal or memorial services for individual Veterans are not considered ceremonies.

b. National Cemetery means a property under the jurisdiction of the National Cemetery Administration, including all land acquired under the National Cemeteries Act of 1973 (Public Law 94-43), and all property later acquired by NCA, for the purpose of interment or memorialization of Veterans and their eligible dependents.
REQUEST PROCEDURES

1. GENERAL GUIDANCE FOR REQUESTS. Non-VA sponsors proposing to hold a ceremony or special event at a specific VA national cemetery must submit a written request to the Director of that cemetery. This written request should be submitted within a reasonable amount of time in advance of the desired date of the ceremony (typically 45 days in advance of the date of the ceremony) to allow NCA to consider the request and coordinate any resources or assistance as required and available for the ceremony.

   a. A Cemetery Director who receives a verbal request to hold a ceremony or special event will advise the requester to submit a written request.

   b. The written request must be dated and signed by an official of the sponsoring organization and must contain the following information:

      (1) Identity of organization requesting to hold a ceremony or event.

      (2) The start and end time (including the setup and breakdown) requested for the event.

      (3) The specific location within the cemetery where the organization would like to hold the event.

      (4) A brief summary of the purpose and nature of the event; for example, how the event would honor the memory of those interred in the cemetery.

      (5) A copy of the event’s agenda, including a list of proposed activities and names and affiliations of potential speakers.

      (6) A description of the estimated audience size and affiliations (if known).

      (7) Any potential logistical or support needs (NCA cemeteries may provide logistical support that includes use of equipment that NCA already has on hand – NCA cannot rent equipment to support ceremonies and special events with non-VA sponsors).

      (8) The name(s) and contact information for the official(s) who will be primarily responsible for organizing the event.

      (9) A statement that the sponsoring organization assumes liability for actions and events that are directly related to the ceremony or special event and must hold VA harmless for any damage to property or injuries that are directly related to the ceremony.

   NOTE: Cemetery Directors will contact the sponsoring organizations to request any missing or supplemental information that is needed to make a determination, preferably in writing (email is acceptable). Cemetery Directors will document all contact and contact attempts made to the sponsoring organization by detailing the date, time, name
or organization and representative in order to have a record of agreements, and in the case of non-contact, the effort made by the cemetery.

2. ADDITIONAL GUIDANCE FOR CERTAIN REQUESTS
   a. Requests Involving Firearms or Cannons:
      
      (1) Only blank rounds of ammunition may be carried or discharged on cemetery grounds as part of approved ceremonies or special events. If the requester indicates that the ceremony or special event will include the carrying or discharge of firearms or cannons with blanks, the requester must provide an additional certification that:

      (a) No live ammunition will be carried or discharged on cemetery grounds in the context of ceremonies or special events with the exception of the carrying of side arms and live ammunition by military personnel who are detailed to protect military service members and their equipment during ceremonial firings, or for other official purposes as consistent with 38 CFR 1.218(a)(13).

      (b) The carrying or discharge of firearms or cannons with blanks will be made only in the context of memorializing those buried within the national cemetery.

      (c) The sponsoring organization accepts liability for any harm to persons or property resulting from the carrying or discharge of firearms or cannons on cemetery grounds and must hold VA harmless for any damage to property or injuries resulting from such actions. NOTE: The acceptance of liability involving firearms or cannons is in addition to the acceptance of liability for actions and events directly related to a ceremony or special event as stipulated in paragraph 1.a.(9) of appendix A this Directive.

      (2) Cemetery Directors will forward all requests from non-VA sponsors that include the carrying or discharge of firearms with blanks, with the Cemetery Director’s recommendation for action, to the District Executive Director for determination and response.

   b. Confederate Ceremonies. Ceremonies recognizing the service of Confederate Servicemembers are permitted in those national cemeteries in which Confederates are interred. There are no limitations on the number of Confederate ceremonies that can be requested, but flags of the Confederacy can only be displayed two days per year (see NCA Directive 3220, Flags in VA National Cemeteries). The Executive Director for Cemetery Operations is the final approval authority for all Confederate ceremonies.

   c. Special U.S. Armed Forces Service Events. Individual Servicemembers and commands of the U.S. Armed Forces may request to hold an enlistment, re-enlistment, retirement, or a similar ceremony for individuals currently serving in the Nation’s Armed Forces, or those who have made a formal commitment to engage in such service. Such ceremonies or special events generally involve the Servicemember(s) along with family, friends, and fellow Servicemembers. Such ceremonies require only minimal logistical support, and Cemetery Directors will accommodate these requests under the policies and procedures for non-VA sponsored ceremonies as outlined in this Directive.
REVIEW CRITERIA AND PROCEDURES

1. BASIC CRITERIA. Cemetery Directors will review all requests to hold ceremonies or special events at VA national cemeteries under their jurisdiction and recommend approval only if:

   a. The request meets all the requirements contained in Appendix A.

   b. The ceremony or special event is compatible with NCA’s mission to maintain the final resting places of America’s Veterans and their dependents as National Shrines. In particular, the ceremony or special event must honor those who serve or have served in the U.S. Armed Forces or are interred or memorialized in that VA national cemetery.

   c. The ceremony or special event will be non-partisan and be conducted in compliance with the security and law enforcement regulations that govern public conduct at VA facilities.

   d. All requested information is provided in a timely manner, dated and signed by an officer or other official of the sponsoring organization. If the matter involves a controversial issue, or a Confederate ceremony, the request must be forwarded to the District Executive Director with a recommendation for action.

   e. The ceremony or special event does not conflict with or intrude upon interments or other cemetery operations and is for a date and time when the cemetery is open.

   f. The ceremony or special event will not place an undue burden on cemetery staff, or adversely affect cemetery resources. Cemeteries will provide minimal staff to assist, observe, and prevent the ceremony from conflicting with other cemetery operations.

   g. The ceremony or special event will not present a threat to health or safety of cemetery staff or visitors, or potentially damage the grounds of the cemetery.

   h. The ceremony or special event will be held in accordance with restrictions on activities occurring on VA property.

   i. There is not a conflict with an already approved ceremony or special event sponsored by another organization.

   j. The request was submitted within a reasonable time in advance of the desired date of the ceremony (typically 45 days in advance of the ceremony date) to allow the Cemetery Director to consider the request and coordinate resources and assistance as required and available for the ceremony.

2. ADDITIONAL CRITERIA. Certain ceremonies or special events must meet additional criteria:
a. Ceremonies or special events to recognize Confederate Servicemembers may be approved only if Confederate Servicemembers are physically interred in the national cemetery chosen for the ceremony.

b. Ceremonies or special events proposed to recognize those foreign individuals who served a government in conflict with the U.S. may be approved only if:

(1) The individuals died as prisoners of war or died on or near U.S. soil, and

(2) Their remains are interred in the national cemetery where the requested event is to take place.

3. VA WILL NOT REVIEW PROPOSED SPEECHES OR ORATIONS

a. The procedures stated below seek to ensure Cemetery Directors and their staff responsible for reviewing and approving ceremonies and special event requests do not engage in improper prior restraint of speech.

b. Cemetery Directors and cemetery staff will not request submission of proposed remarks, orations, prayers, and other forms of expression from ceremony organizers, speakers, clergy or other participants, nor review such documents if provided voluntarily.

c. If ceremony organizers, speakers, clergy, or other participants submit speeches or other items for review prior to a ceremony or special event, the Cemetery Director or cemetery staff will not review or comment on the items but must return the unsolicited material as soon as possible to the submitter, along with a copy of 38 CFR 1.218 and a cover letter that affirmatively notes that the documents were not reviewed for compliance with the regulation and reiterates the responsibility of presenters to abide by the regulation.

d. Cemetery Directors and their staff will monitor remarks as they are given during special events or ceremonies and take appropriate action on any non-compliance, in accordance with Appendix D.

4. OBSERVATION OF RELIGIOUS PRACTICES

a. VA is committed to protecting the dignity and solemnity of VA national cemeteries as national shrines and respecting the diverse beliefs and rights of all employees, Veterans, stakeholders, and visitors. Ceremonies or special events to honor military service, whether sponsored by VA or a non-VA entity, may include religious prayers, recitations, or orations.

b. When VA sponsors an event, VA will seek to foster religious tolerance and inclusion when selecting speakers and developing an agenda for the event.
c. Cemetery Directors may consult with VA chaplains on effective ways to promote tolerance and achieve the goals of diversity and inclusion.

d. When reviewing a non-VA sponsored ceremony or special event for approval, VA will do so without regard to the inclusion or exclusion of any particular faith tradition in the proposed ceremony.

e. Just as VA does not review proposed orations for partisan speech, Cemetery Directors will not review speeches or prayers for religious content in advance of any ceremony or special event, whether sponsored by VA or a non-VA entity.
RESPONSE PROCEDURES

1. APPROVED REQUESTS

a. The Cemetery Director has the authority to approve requests if they determine that a proposed ceremony or special event is appropriate to NCA’s mission to honor Veterans’ service, except for determinations on requests that are specifically reserved for the District Executive Directors or the Executive Director of Cemetery Operations as described in this Directive.

b. If the Cemetery Director determines that a request, which the Cemetery Director has authority to approve or disapprove, conforms to the requirements in this Directive, or if the Cemetery Director receives an approval from a District Executive Director or the Executive Director of Cemetery Operations, the Cemetery Director will approve the request in writing to the sponsoring organization. The approval letter must be on cemetery letterhead, dated and signed by the Cemetery Director or responsible designee, and include the following information:

   (1) The approved date and timeframe for the ceremony or special event.

   (2) Information on the type of assistance, if any, the cemetery staff will provide, such as seating, use of a public address system, traffic control, clean-up.

   (3) Information on types of assistance the cemetery will not provide, if applicable (NCA cannot rent equipment to support a request from a non-VA sponsor).

   (4) Requirements for the condition in which the cemetery grounds must be left after the event.

   (5) The name and telephone number of the cemetery staff member who will be the point of contact for the sponsoring organization.

   (6) The following, in its entirety, must be included in all approval letters that pertain to ceremonies involving persons interred in national cemeteries: “Pursuant to title 38, United States Code, section 2403(c), all national cemeteries shall be considered national shrines as a tribute to our gallant dead. National cemeteries are non-public forums, and ceremonies must be commemorative in nature and reflect upon the service of the individuals who rest in our cemeteries. Therefore, we expect that the remembrance of their sacrifice will be the focus of any non-partisan remarks made by various speakers during the (insert name of activity). NCA advises that all visitors to National Cemeteries conduct themselves in a manner appropriate for activities occurring at a national shrine and that the decorum of the cemetery and the dignity of those who are buried within its grounds is reflected at all times in the actions from all participants at a ceremony, in accordance with 38 CFR 1.218, Security and law enforcement at VA facilities.”
A statement that appropriate conduct is expected from all participants at the ceremony or special event, in accordance with 38 CFR 1.218, Security and Law Enforcement at VA facilities. Cemeteries will provide a copy of the current regulation to the requestor.

**NOTE:** Cemetery Directors may obtain a copy of the most recent version of the regulation by sending a request to the Legislative and Regulatory Service (42E) via the NCA 42E Action mail group or by downloading a copy from the Code of Federal Regulations website, which is linked above.

The Cemetery Director will retain a copy of the signed approval letter in the cemetery’s official records.

### 2. DISAPPROVED REQUESTS

a. If a Cemetery Director determines that the request for a ceremony or special event, which they have the authority to approve or disapprove, does not conform to the requirements set forth in this Directive, or if the Cemetery Director receives a disapproval from the District Executive Director or Executive Director of Cemetery Operations, the Cemetery Director must prepare a denial letter that includes the following information:

   (1) Reasons and bases for the disapproval.

   (2) Steps the sponsoring organization would need to take for this or future requests to be approved.

b. The Cemetery Director will submit a draft of the disapproval letter and any background information to the appropriate District Executive Director, or through the appropriate District Executive Director to the Executive Director of Cemetery Operations.

c. Cemetery Directors must send the final disapproval letter to the requester once a response is received from the District Executive Director (or from the Executive Director of Cemetery Operations through the District Executive Director) to issue the disapproval letter.

d. The final denial letter must be on cemetery letterhead, dated and signed by the Cemetery Director or responsible designee.

e. The cemetery must keep a copy of the signed approval or denial letter as the official record copy and is required to send copies to the appropriate District Executive Director.
1. Pursuant to NCA Directive 3425 (Floral Policy in Department of Veterans Affairs National Cemeteries), NCA’s floral policy permits the placement of wreaths on gravesites during December and January.

2. Cemetery Director Responsibilities. For any approved non-VA event to place wreaths at individual gravesites, regardless of the sponsoring organization, Cemetery Directors will:

   a. Coordinate and consult with sponsoring organizers (or their designated Local Coordinators) on their plan for executing wreath placement and pick up activities at the cemetery.

      Approve a date in coordination with the sponsoring organization for wreath pickup and removal activities and communicate this date and related expectations for the execution of these activities (see Appendix D/1);

   b. Establish and maintain an Objection List based on a family’s expressed wish to not have their loved one’s gravesite decorated with a wreath or other item (see Appendix D/2);

   c. Provide the cemetery’s Objection List to sponsoring organizers and cemetery staff and communicate to them that volunteers must not place wreaths on any of the headstones or markers identified on the list;

   d. Communicate to sponsoring organizers and cemetery staff and enforce that volunteers must not place wreaths on headstones or markers inscribed with a Star of David (03) Emblem of Belief (EOB) or a Crescent and Star (17) EOB. EOBs are numbered and displayed on NCA’s website for reference (see Emblems of Belief - National Cemetery Administration (va.gov)). Gravesites with either EOB may receive a wreath if the decedent’s family has requested specifically that a wreath be placed at their loved one’s gravesite or the family places a wreath at their loved one’s gravesite themselves;

   e. Provide a leadership presence while volunteers are on cemetery grounds to ensure the safety and security of the cemetery and assign other cemetery staff to assist in overseeing these activities as needed;

   f. Refrain from expending government funds in support of any wreath-laying programs beyond the overtime required to: oversee the arrival and departure of volunteers; oversee the conduct of an associated wreath laying ceremony; monitor wreath placement activities; review and confirm that wreaths were placed in accordance with NCA policy; and oversee wreath pickup/removal activities;

   g. After volunteers complete their wreath placement activities, execute the following review and corrective actions in coordination with sponsoring organizers to verify adherence to this guidance and to individual families’ wishes/requests:
(1) Physically check gravesites on the Objection List and those with a headstone or marker inscribed with a Star of David (03) EOB or a Crescent and Star (17) EOB.

(2) If the gravesite has a wreath on it, determine whether a placement request was received either by the sponsoring organization or the cemetery for the decedent’s gravesite:

   (a) If a request was received, leave the wreath/item in place; or

   (b) If there are no noted exceptions, remove the wreath and place it on an unadorned gravesite that is not on the Objection List and is not inscribed with a Star of David (03) EOB or a Crescent and Star (17) EOB.

(3) Confer with sponsoring organizers and consolidate with cemetery review information to verify all required gravesites were reviewed and corrective actions taken.

   h. Capture photos and/or video of wreath placement activities and email them as soon as possible after the event to NCANews@va.gov for posting on NCA social media, making sure to provide appropriate identifying/caption information to describe the image or video (Note: Cemeteries with their own Facebook accounts may also post this information directly to their page); and

   i. Submit any after action report (AAR) information to their District Office as required by the Office of Cemetery Operations and communicated in separate guidance.

3. Other Responsible Parties:

   a. Executive Director, Cemetery Operations will:

      (1) Issue any additional, specific guidance required annually to supplement the information provided in this Appendix.

      (2) Communicate all applicable guidance and enterprise-level information for logistics/planning (e.g., roster of all cemeteries’ mailing addresses for wreath shipment) to sponsoring organization representatives that operate at a national level.

   b. District Executive Directors will:

      (1) Communicate and reinforce all applicable guidance to their cemetery directors to ensure it is understood and followed, including compliance with Objection List instructions at Appendix D/2.

      (2) Refer any local sponsoring organizer issues or concerns to a national-level representative for the sponsoring organization, where applicable.

      (3) Submit any AAR information to the Office of Cemetery Operations as required and communicated in separate guidance.
NCA EXPECTATIONS FOR WREATH PLACEMENT SPONSORING ORGANIZERS
AT THE NATIONAL AND LOCAL LEVELS

1. **National-level Organizers/Coordinators**, where applicable, are responsible for:

   a. Communicating and reinforcing NCA guidance with Local Coordinators. (See “Local-level Organizers/Coordinators” responsibilities below.)

   b. Supporting Local Coordinators with web site and other communications requirements, to include ensuring information on the sponsoring organization’s web site for each event reflects NCA guidance and any local arrangements for wreath placement, pickup, removal, and disposal.

   c. Providing support to NCA’s district executive directors to resolve any issues or concerns as they arise.

2. **Local-level Organizers/Coordinators** are responsible for:

   a. Developing and executing a plan in consultation with the Cemetery Director for the placement of wreaths (managing, scheduling, organizing, and communicating with participating volunteers) at VA national cemeteries and for their pickup and removal/disposal.

   b. Producing and distributing communication materials, to include design, printing, and/or reproduction, and/or and supporting communication systems.

   c. Obtaining any scheduling tools as needed to manage volunteer sign to support effective wreath placement and pickup activities.

   d. Determining which gravesites will receive a wreath and which gravesite will not consistent with NCA policy and the Objection List provided by the Cemetery Director.

   e. Providing the Cemetery Director with a copy of any rosters or lists of gravesites where the family has purchased or secured a wreath for placement on their loved one’s gravesite or has otherwise requested that a wreath be placed on their behalf.

   f. Communicating and enforcing wreath placement instructions to volunteer participants consistent with NCA policy and guidance, to include leaving in place any items found on the gravesite.

   g. Monitoring wreath placement activities to ensure compliance with the cemetery’s Objection List.

   h. Properly disposing of shipping materials (boxes) and any other debris off/away from cemetery property.
i. Providing items needed to support the event(s) (e.g., tables, chairs, tents, speaker/sound system, transportation of wreaths, dumpster rental, and other supplies, etc.). **Note:** Limited items may be available for use at the cemetery; but if they are not, the cemetery **cannot** rent or buy these items for organizers to use.

j. Notifying the Cemetery Director immediately if rescheduling the wreath pickup and removal/disposal date due to inclement weather.
INSTRUCTIONS FOR ESTABLISHING, MAINTAINING AND ENFORCING AN OBJECTION LIST

1. On occasion, the Department of Veterans Affairs (VA) National Cemetery Administration (NCA) receives objections from families about wreaths and other items (“wreath/item”) being placed on their loved one’s gravesites at VA national cemeteries (“cemeteries”).

2. Cemeteries will maintain a list of such objections, referred to as the Objection List, based on a family’s expressed wishes to not have their loved one’s gravesite decorated with a wreath/item.

3. Cemetery Directors will provide the gravesite locations on their Objection List to wreath placement sponsoring organizers. Organizers will use that information to inform volunteers to not place wreaths/items on those gravesites where the family or personal representative has objected to their placement.

4. Cemetery Directors (or their designees) who receive a new objection either during preparation for or execution of wreath/item placement activities will:
   
   a. Determine whether the person making the complaint represents the family; and
   
   b. Add the gravesite to the cemetery’s existing Objection List; or, if no list exists, use the new objection received to create a list for on-going maintenance by the cemetery.

5. Following a wreath placement event, Cemetery Directors will conduct a review of each gravesite identified on the Objection List consistent with the guidance in paragraph 2.h. of Appendix D.
CEREMONY MONITORING PROCEDURES

1. Cemetery Directors or their designee must monitor approved ceremonies and document any actions that occur in violation of 38 CFR 1.218(a)(14), including but not limited to coarse utterances, violent or threatening words, abusive language, partisan commentary and other forms of restricted speech, including symbolic speech (e.g., unapproved placards, banners, or foreign flags).

2. Cemetery Directors and cemetery staff will allow an approved ceremony to continue despite non-compliance with 38 CFR 1.218(a)(14), unless the non-compliant conduct poses a threat to public health and safety (e.g., use of fighting words that incite or threaten an immediate breach of peace, injury, or confrontation). If necessary, Cemetery Directors may request assistance from law enforcement as described in 38 CFR 1.218(c).

3. Cemetery Directors will use notes taken during or immediately following the ceremony or special event to report non-compliance issues, following the FNOE process. Executive Director of Cemetery Operations will assist Cemetery Directors and District Executive Directors in determining the appropriate action(s) to be taken regarding any violation(s).