



SECRETARY OF THE ARMY
WASHINGTON

16 SEP 2011

MEMORANDUM FOR RECORD

SUBJECT: Department of the Army Inspector General Inspection of the Army National Cemeteries Program and Arlington National Cemetery

This memorandum documents my review of, and action on, the recommendations made by Acting The Inspector General (ATIG) in the above referenced inspection report. The Director of the Army Staff will task designated Army officials to implement each recommendation, as approved. ATIG will monitor implementation and provide me with interim progress reports.

RELEASE AUTHORIZATION: I hereby authorize the above referenced report, to include its recommendations, to be posted to the Inspector General Intranet website.

A handwritten signature in black ink, which appears to read "John M. McHugh", is written over the typed name. The signature is stylized and cursive.

John M. McHugh

United States Army Inspector General Agency
Department of the Army Inspector General
Inspection of the Army National Cemeteries Program &
Arlington National Cemetery

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1 September 2011



Inspection Summary
Inspection of the
Army National Cemeteries Program and
Arlington National Cemetery

**What We Did:**

From 2 May to 5 August 2011, the Department of the Army Inspector General (DAIG) conducted a re-inspection of the Army National Cemeteries Program (ANCP) and Arlington National Cemetery (ANC). The re-inspection and this report served to assess and document compliance with, and the implementation and effect of, the approved recommendations of the DAIG's inspection report conducted on 9 June 2010. With a view to enabling the Secretary of the Army's report to Congress, as mandated by Public Law 111-339, dated 22 December 2010, the report also reflects findings and recommendations regarding the implementation of Army Directive (AD) 2010-04, dated 10 June 2010, and the review of ANC practices to provide information, outreach and support to families of individuals buried at ANC regarding procedures to detect and correct burial errors. The inspection team identified 31 observations, 2 other matters and made 53 recommendations.

What We Found:

- The ANCP and ANC staffs are implementing the recommendations from last year's inspection report. Significant progress has been made in all aspects of the Cemetery's performance, accountability and modernization.
- ANC and other Army agencies have executed their assigned tasks effectively, resulting in significant improvements at both Army National Cemeteries over the past 13 months and setting conditions for future success. Most critically, ANCP is on track to complete an accountability baseline for all gravesites and inurnment niches at ANC to support the Secretary's report to Congress on 22 December 2011.
- ANC's efforts to provide information, as well as, outreach and support to families regarding burial discrepancies were professional and supportive.
- Wait times are increasing for all types of ANC interment / inurnment services except for Service members killed-in-action. Requests for burial at ANC also are increasing and, at the current rate, ANC will be required to expand its capability to conduct in-ground burials before 2035.

What We Recommend:

The Secretary of the Army direct specified Headquarters, Department of the Army Staff elements and Army Field Operating Agencies to execute tasks intended to sustain and enhance the progress being made at ANC.



DEPARTMENT OF THE ARMY
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1700 ARMY PENTAGON
WASHINGTON DC 20310-1700

SAIG-ID

8 September 2011

MEMORANDUM FOR SECRETARY OF THE ARMY

SUBJECT: The Inspection of the Army National Cemeteries Program and Arlington National Cemetery

1. **Purpose.** The Department of the Army Inspector General (DAIG) inspected the Army National Cemeteries Program (ANCP) and Arlington National Cemetery (ANC) from 2 May to 5 August 2011 in order to determine if cemetery operations and management have improved since the 9 June 2010 DAIG inspection report on ANC was published. In order to enable your response to Congress set forth in Public Law 111-339, dated 22 December 2010, we also inspected the implementation of Army Directive (AD) 2010-04, dated 10 June 2010, and reviewed ANC practices to provide information, outreach and support to families of individuals buried at ANC regarding procedures to detect and correct burial errors.

2. **Background.** In July-August 2009, a series of news articles exposed evidence of mismanagement at ANC. On 17 August 2009, the Secretary of the Army (SecArmy) directed the DAIG to conduct an inspection of ANC and subsequently, on 12 November 2009, to investigate allegations of impropriety related to the management of the Cemetery. In response to the DAIG inspection and investigation reports, the SecArmy issued AD 2010-04 on 10 June 2010, establishing the ANCP, creating the position of Executive Director of the ANCP as well as directing agencies and organizations across the Army to accomplish numerous actions to improve Cemetery processes and procedures. DAIG completed an interim review of Arlington's progress in January 2011 and began this re-inspection in May 2011.

3. **Inspection Summary.**

a. The inspection team found that the ANCP Executive Director and Superintendent are systematically correcting the deficiencies found in the 9 June 2010 DAIG inspection report. ANCP and Army agencies and organizations have completed (or are in the process of completing) the tasks specifically assigned to them in AD 2010-04. Finally, the inspection team found that ANCP's efforts at providing outreach, information and support to Family members regarding burial discrepancies were professional and supportive. The mismanagement that was found at ANC in 2010 no longer exists. While management, performance and morale are all vastly improved, there is still some work to do. I am confident however that ANC is operating in a compliant and effective manner at this point.

b. The results of this inspection are discussed briefly below and in detail in the enclosed report. The inspection team made 31 observations and identified 2 other

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matters described in the report. We are making 53 recommendations which we believe will further enhance the tremendous improvements already made at ANC.

4. **Objectives.** A summary of this inspection by objective is described below.

a. **Objective #1 (Assess compliance, implementation and effect of the recommendations as approved by the 9 June 2010 DAIG inspection report).** The inspection team found that the ANC staff has effectively implemented, or is implementing, the recommendations from last year's inspection report. While there is still some work to be done, the team noted significant progress in all aspects of the Cemetery's performance, accountability, management and morale. We noted your directive designated and clarified authority and responsibility for the Cemetery when you established ANCP and the position of the Executive Director. The inspection team found that Arlington is currently provided adequate oversight from various Army agencies and that the Executive Director should continue to develop organization-wide self-assessment, OIP and customer feedback programs to enable continuous process improvement. While AD 2010-04 established the Executive Director as the de facto proponent for promulgating all policies and regulations of the ANCP, we noted that AR 290-5 must articulate both internal and external processes for long-term, continuous oversight. Next, the inspection team observed that ANC has established and is documenting standard operating procedures, its organizational structure has been revised and an authorization document has been approved which increases personnel and equipment density by more than 60 percent. Hiring actions required to meet the new end-strength are nearly complete. Programming and budgeting systems have been aligned with normal Army processes to facilitate management and oversight. Compliance in acquisition planning, requirements definition and contract management have improved so significantly since last year that only minor discrepancies were identified during this inspection. Perhaps most significantly, ANC now possesses a fully functional IT architecture, as well as effective knowledge management processes and procedures. Information Assurance at ANC is now among the best in the Army. Finally, the inspection team found vast improvements in the organizational climate at ANC, under the new leadership who took over in June 2010.

b. **Objective #2 (Assess the ANCP and other Army agencies' execution of and compliance with AD 2010-04).** The inspection team found that ANCP and other Army agencies and organizations are executing their assigned tasks appropriately as directed by AD 2010-04. This has resulted in significant improvements at Arlington National Cemetery over the past 13 months and is setting conditions for future success. ANCP is on track to complete an accountability baseline for all gravesites and inurnment niches at ANC to support the SecArmy's report to Congress in December 2011. The Assistant Secretary of the Army for Manpower and Reserve Affairs (ASA(M&RA)), with support from the Office of General Counsel (OGC) and the Office of the Chief of Public

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Affairs (OCPA), has initiated major policy revisions applicable to ANC, including submitting for initial publication in the Federal Register a revision to the applicable section of the Code of Federal Regulations. Finally, all members of the ANC Advisory Commission have been nominated to the Secretary of Defense (SecDef) for approval. Subject to the SecDef's appointment of the Commission members, we expect the first meeting of the Advisory Commission will be held in the near-term to begin to develop and oversee the future of the Army's National Cemeteries.

c. Objective #3 (Assess the adequacy of current practices at ANC to provide information, outreach and support to families of those individuals buried at ANC regarding procedures to detect and correct errors in burials there). The inspection team found that efforts to provide information, outreach and support to Families regarding burial discrepancies are conducted in a professional, compassionate and supportive manner. On 11 June 2010, the ANCP Executive Director established a hotline to receive all inquiries regarding burial discrepancies. Internal procedures have been developed to verify gravesite locations, correct the few discrepancies discovered and respond to family members. In a few cases, these efforts included significant actions to physically verify the remains of loved ones buried at Arlington, with Family member involvement if desired. In the small number of cases where errors were discovered, Arlington officials corrected the errors (again with Family member involvement, when desired). Finally, ANC's Gravesite Accounting Task Force, with support from Army Data Center-Fairfield and the Information Technology Agency, is establishing a full accounting baseline, which will allow ANCP to begin to identify other potential discrepancies.

5. Other Matters.

a. The inspection team found that, with the exception of Service members killed-in-action, wait times for all types of interment / inurnment (full honors, standard honors and no honors) were increasing and were different depending on the veteran's branch of Service. In June 2010, it took an average of 74 days (from the day eligibility was determined) before a deceased veteran was interred / inurned with full honors at ANC, compared to 87 days in June 2011, with a range of delay of almost 30 days between Services. This disparity in wait times is attributed to the increased responsiveness by the ANC call center, the lack of a multi-Service policy for interment / inurnment honors and the different procedures employed by the Services to manage ceremonial and band units.

b. ANC is currently projected to reach capacity for in-ground burials in 2035 and inurnments in columbarium niches by 2037. The inspection team found that the number of interments / inurnments at ANC is increasing, due in part to improved responsiveness by ANC and increasing deaths among aging retired veterans. In 1972, 2740 veterans were interred / inurned. This number increased to 5980 in 1998, 6970 in 2009 and to

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7154 in 2010. At this increasing rate, ANC will expend its usable space faster than projected.

6. Recommendations. Key recommendations are highlighted below:

a. Direct the Executive Director, ANCP to incorporate requirements for long-term, robust and continuous oversight processes and mechanisms in the next revision of AR 290-5 and ensure that all future versions of AR 290-5 acknowledge the role of the ASA(M&RA) in formulating and overseeing interment / inurnment eligibility policy. Clarify the authorities of the ANCP Executive Director as proponent for policies and regulations regarding Army National Cemeteries.

b. Direct the ASA(M&RA) to engage the Office of the SecDef and other Services in order to develop multi-Service policy, processes and procedures for interment / inurnment and ceremonial support at Army National Cemeteries.

c. Direct the DCS, G-3/5/7 (OGC assist) to analyze options for long-term ANCP command and control, organizational alignment and support relationships with other Army commands and organizations and present those options to SecArmy for decision.

d. Engage the Advisory Commission, when formed, to examine the causes and effects of increasing wait times for internments / inurnments and recommend changes to DoD, Army and ANCP policy, processes and procedures to reduce wait times appropriately. Likewise, engage the Commission to make recommendations to mitigate the effect that increasing demand for interment / inurnment will have on ANC's lifespan as an active burial ground.

e. Approve the additional recommendations in the enclosed report to enable ANCP to sustain its improvements.

7. Verification Actions. The inspection team provided a briefing to all agencies and DA-level staff elements affected by the recommendations developed in this inspection on 11 August 2011. The purpose of this briefing was to gain concurrence with findings and recommendations. Annex 1 of this memorandum is the verification matrix.

8. Follow-up. The findings and recommendations enclosed in this report will be entered into the DAIG Inspections Database upon your approval. Designated responsible entities will provide bi-monthly status updates.

7 Encls

1. Annex 1: Verification Matrix
2. Annex 2: Inspection Objective 1


WILLIAM H. MCCOY
Major General, U.S. Army
Acting The Inspector General

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3. Annex 3: Inspection Objective 2
4. Annex 4: Inspection Objective 3
5. Annex 5: Other Matters
6. Annex 6: Methodology
7. Annex 7: Glossary / Definitions

CF:

CHIEF OF STAFF, ARMY
UNDER SECRETARY OF THE ARMY
VICE CHIEF OF STAFF, ARMY
ED, ANCP
ASA(M&RA)
ASA(CW)
ASA(FM&C)
ASA(AL&T)
OGC
OAA
CIO / G-6
OCPA
OCLL
USACE
MDW
ACC
USAMAA
USAFMSA
CHRA
CMH

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SUBJECT: Annex 1 (Verification Matrix) to Memorandum, Subject: Inspection of the Army National Cemeteries Program and Arlington National Cemetery

1. Verification. The stakeholder organization(s) have been provided with a briefing of findings and recommendations for verification and comment. The intent of this process was to ensure factual correctness, confirm classification, and to capture stakeholder's comments in the final report. The enclosure to this memorandum lists all inspection findings and recommendations with the associated stakeholders, the date they were briefed, and their concurrence or non-concurrence.

<u>2. Organization</u>	<u>Stakeholder</u>	<u>Briefing Date</u>	<u>Comment</u>
ANCP	(b)(6)	20110809	Concur w/comments
ASA(M&RA)	(b)(6)	20110811	Concur
ASA(CW)	(b)(6)	20110811	Concur w/comments
ASA(FMC)	(b)(6)	20110811	Concur w/comments
ASA(ALT)	(b)(6)	20110811	Concur w/comments
ACC	(b)(6)	20110811	Concur
OGC	(b)(6)	Awaiting concur in conjunction w/ Form 5	
OCPA	(b)(6)	20110811	Concur
CMH	(b)(6)	20110811	Concur
USACE	(b)(6)	20110811	Concur
CIO/G-6	(b)(6)	20110811	Concur
USAMAA	(b)(6)	20110811	Concur
DCS G3/5/7	(b)(6)	20110907	Concur
MDW	(b)(6)	20110811	Concur
OAA	(b)(6)	20110811	Concur
CHRA(G-1)	(b)(6)	20110811	Concur

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Objective, Findings and Observations	Recommendation	Proponent & Brief Date	Comment
OBJECTIVE 1: Assess compliance, implementation, and effect of the recommendations as approved from the Department of the Army Inspector General's 9 June 2010 inspection report.			
1.1 OBSERVATION (reference #ID-1107.01): The immediate oversight mechanisms established in Army Directive 2010-04 have not yet been incorporated into AR 290-5, <i>Army National Cemeteries</i> .	1.1.1 (reference #ID-1107.01.01): 1.1.1 ED, ANCP incorporate requirements for long-term, robust and continuous oversight processes and mechanisms in the next revision of AR 290-5 and ensure that all future versions of AR 290-5 acknowledge the role of the ASA(M&RA) in formulating and overseeing interment / inurnment eligibility policy.	ED ANCP (20110809)	Concur
1.2 OBSERVATION (ID-1107.02): DA Pam 290-5 is outdated and does not provide adequate guidance for the operation, administration, and management of Army National Cemeteries or Army Post Cemeteries.	1.2.1 (Reference #ID-1107.02.02): ANCP update DA Pam 290-5 appropriately to promulgate standards that should apply to all Army post cemeteries and publish ANC-specific standards and procedures separately.	Executive Director Army National Cemeteries Program (ED ANCP) (20110809)	Concur
1.3 OBSERVATION (ID-1107.03): ANCP is standardizing and documenting its internal procedures.	1.3.1 (Reference #ID-1107.03.01): ANCP continue to develop and publish working SOPs for all divisions / branches within ANCP. Update ANC-specific standards as currently set forth in DA Pam 290-5 and incorporate those standards in SOPs.	ANCP (20110809)	Concur
1.4 OBSERVATION (ID-1107.04): ANCP and other appropriate Army commands, staff elements and agencies have established support relationships that have eliminated ANC's formerly insular approach toward operating the Cemetery.	1.4.1 (Reference #ID-1107.04.01): ANCP continue to engage the Army Secretariat, Army Staff, selected agencies and Army commands to leverage Army capabilities required to assist ANC in its performance.	ANCP (20110809)	Concur

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<p>1.5 OBSERVATION (ID-1107.05): The Executive Director Army National Cemeteries Program (ED ANCP) has established and implemented effective Commander's Critical Information Requirements (CCIR) for Arlington National Cemetery (ANC) and Soldiers' and Airmen's Home National Cemetery (SAHNC).</p>	<p>1.5.1 (Reference #ID-1107.05.01): ANCP periodically review CCIR and update as necessary.</p>	<p>ANCP (20110809)</p>	<p>Concur</p>
<p>1.6 OBSERVATION (ID-1107.06): In an effort to mitigate the effects of current interment / inurnment wait times, ANCP staff developed and published an informational guide and has distributed it to the public, funeral homes and the other Services.</p>	<p>1.6.1 (Reference #ID-1107.06.01): ANCP continue to manage expectations regarding interment / inurnment wait times through engagement with Family members, the public, funeral homes and the other Services, and their Casualty Assistance Offices.</p>	<p>ANCP ED (20110809)</p>	<p>Concur</p>
<p>1.7 OBSERVATION (ID-1107.07): ANC is leveraging internal and external training opportunities and is developing a comprehensive training program that links division core tasks, training requirements and employee proficiencies.</p>	<p>1.7.1 (Reference #ID-1107.07.01): ANC continue to develop a comprehensive training program to ensure all employees have the knowledge and skills necessary to be proficient in the core competencies necessary to accomplish ANC's mission.</p>	<p>Arlington National Cemetery (ANC) (20110809)</p>	<p>Concur</p>
<p>1.8 OBSERVATION (ID-1107.08): US Army Manpower Analysis Agency (USAMAA) and US Army Force Management Agency (USAFMSA) completed a full review of ANC's organizational structure and Arlington is hiring to fill to its new authorizations.</p>	<p>1.8.1 (Reference #ID-1107.08.01): ANC (Civilian Human Resources Agency (CHRA) assist) continue to expedite hiring to fill vacant ANC authorized positions in accordance with the current Table of Distribution and Allowances (TDA).</p>	<p>Civilian Human Resources Agency (CHRA (G-1) (20110811)</p>	<p>Concur</p>
<p>1.9 OBSERVATION (ID-1107.09): ANC's organizational climate has continued to improve since the June 2010 DAIG inspection Report.</p>	<p>1.9.1 (Reference #ID-1107.09.01): ED ANCP and ANC Superintendent leverage the results from Defense Equal Opportunity Management Institute (DEOMI) surveys to continue to improve organizational effectiveness and climate.</p>	<p>ED ANCP and ANC Superintendent (20110809)</p>	<p>Concur</p>

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<p>1.10 OBSERVATION (ID-1107.10): ANC has been provided adequate external assessments since the implementation of AD 2010-04. Plans are now in place to assure future oversight.</p>	<p>1.10.1 (Reference #ID-1107.10.01): The ED, as designated proponent, develop an external assessment and inspections program and incorporate this program into AR 290-5, <i>Army National Cemeteries</i>.</p>	<p>ED ANCP (20110811)</p>	<p>Concur</p>
<p>1.11 OBSERVATION (ID-1107.11): ANCP is making progress in its ability to self assess performance, but has not yet implemented an organization-wide formal self-assessment program.</p>	<p>1.11.1 (Reference #ID-1107.11.01): ANCP establish and conduct organization-wide self-assessments and Organizational Inspection Programs (OIPs) to improve operations, enhance management controls and reduce risk.</p>	<p>ED ANCP (20110809)</p>	<p>Concur</p>
<p>1.12 OBSERVATION (ID-1107.12): ANCP has developed and implemented customer feedback mechanisms that now should be formalized in order to provide ANC leaders the ability to analyze feedback and identify trends and patterns so as to promote continuous process improvement.</p>	<p>1.12.1 (Reference #ID-1107.12.01): ANCP target the type of customer feedback essential for measuring performance on core tasks and develop methods to obtain sufficient feedback to assist in improving performance.</p>	<p>ANCP (20110809)</p>	<p>Concur</p>
<p>1.13 OBSERVATION (ID-1107.13): ANC's compliance in acquisition planning, requirements definition and contract management has improved significantly since the June 2010 DAIG inspection and ANC is developing SOPs to document its acquisition processes and procedures.</p>	<p>1.13.1 (Reference #ID-1107.13.01): ANCP maintain close communications with, seek acquisition advice from, and involve contracting officers supporting their requirements to ensure the most complete requirements packages are submitted for each contracting action.</p> <p>1.13.2 (Reference #ID-1107.13.02): ANCP ensure that CORs perform their COR duties in a timely manner.</p>	<p>ANCP (20110809)</p>	<p>Concur</p>

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	<p>1.13.3 (Reference #ID-1107.13.03): ANCP leaders involved in the procurement process attend an acquisition overview class to ensure an understanding of contracting regulations, processes and required lead times.</p>		
	<p>1.13.4 (Reference #ID-1107.13.04): ANCP ensure that ANC G-6 includes the Contract Support Liaison and the appropriate contracting activity early in any discussions of acquisition strategy for the acquisition of IT for ANC.</p>		
	<p>1.13.5 (Reference #ID-1107.13.05): ANCP develop and document internal ANCP procedures and policies on the acquisition of IT to prevent future violations of acquisition regulations and OMB guidance.</p>		
	<p>1.13.6 (reference #ID-1107.13.06): ANCP ensure that management controls for the proper procurement of IT are enforced.</p>		
	<p>1.13.7 (reference #ID-1107.13.07): ANCP continue to develop and document appropriate SOPs, policies and guidance.</p>		
<p>1.14 OBSERVATION (reference #ID-1107.14): The oversight of ANCP contract and associated management controls have improved significantly and are now approaching the standard for best practices.</p>	<p>1.14.1 (reference #ID-1107.14.01): ACC and USACE continue to perform oversight of ANCP contract actions and assist ANCP in developing internal management controls for its acquisition processes.</p>	<p>ACC and USACE (20110811)</p>	<p>Concur</p>

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	1.14.2 (reference #ID-1107.14.02): ACC and USACE ensure contracting teams supporting ANC have an appreciation for the ANC mission and develop effective working relationships with the ANC staff.		
1.15 OBSERVATION (reference #ID-1107.15): Contracting commands supporting ANC are taking other positive steps to resolve internal acquisition issues identified by recent ANC reviews and audits and to assist ANC in improving its acquisition processes.	1.15.1 (reference #ID-1107.15.01): ANCP coordinate with ACC to ensure that the Contract Support Liaison position is continuously staffed to ensure that ANC receives adequate support and advice on acquisition-related matters.	ANCP (ACC assist) (20110811)	Concur
1.16 OBSERVATION (reference #ID-1107.16): Most of the ACC and USACE contractual documentation supporting ANC procurement actions since the June 2010 DAIG inspection was of a high quality and complied with acquisition regulations.	1.16.1 (reference #ID-1107.16.01): ACC and USACE include all ANCP contracting actions in the solicitation and contract review process at levels above the contracting officer until DASA(P) determines those contracts to be low-risk.	ACC and USACE (20110811)	Concur
	1.16.2 (reference #ID-1107.16.02): ACC and USACE continue to assess and target areas for improvement within their respective commands and provide appropriate corrective actions to strengthen the quality of the acquisitions supporting the ANCP.	ACC and USACE (20110811)	Concur
	1.16.3 (reference #ID-1107.16.03): ASA(ALT) include reviews of all ANCP GPC procurements in its PMRs until the ANCP GPC program is determined to be low-risk.	DASA(P) (20110811)	Concur

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	1.16.4 (reference #ID-1107.16.04): MICC ensure that local GPC reviews are detailed enough to enable management to target areas for improvement in the ANCP GPC program.	MICC (20110811)	Concur
1.17 OBSERVATION (reference #ID-1107.17): Planned improvements being implemented at ANC are also being incorporated at the Soldiers' and Airmen's Home National Cemetery (SAHNC).	1.17.1 (reference #ID-1107.17.01): ANCP continue to integrate the SAHNC into planned improvements	ANCP (20110809)	Concur
1.18 OBSERVATION (reference #ID-1107.30): ANC is in compliance and has met Army Information Assurance (IA) standards in 13 of 14 functional areas. One of the 14 IA functional areas (classified systems management) was not inspected because ANC does not manage classified information.	1.18.1 (reference #ID-1107.18.01): ANC and ITA address INFOCON measures in their respective incident handling plans.	ANC and ITA (20110717)	Concur
	1.18.2 (reference #ID-1107.18.02): ANC include the process to respond to WIDS alerts in its incident handling plan or reference the process and procedures identified in ITA's incident handling plan.	ANC (20110711)	Concur
	1.18.3 (reference #ID-1107.18.03): ANC identify an alternate IT site in its IT contingency plan.	ANC (20110711)	Concur

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	1.18.4 (reference #ID-1107.18.04): ANC complete the development of its COOP Plan and incorporate the IT contingency plan in the completed COOP Plan.	ANC (20110711)	Concur
	1.18.5 (reference #ID-1107.18.05): ITA install WIDS on the ANC network or obtain a waiver for this requirement.	ITA (20110717)	Concur
	1.18.6 (reference #ID-1107.18.06): ANC's PAO and OPSEC officers conduct the required online web risk training.	ANC (20110711)	Concur
	1.18.7 (reference #ID-1107.18.07): ANC add UDCI awareness to its internal checklist and reinforce user awareness during new user orientation training.	ANC (20110711)	Concur
	1.18.8 (reference #ID-1107.18.08): ITA provide oversight to ensure that all technicians assigned to ANC with privileged access have an ASCL token with an elevated privileged account and are using them to perform privileged level functions.	ITA (20110717)	Concur

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Objective, Findings and Observations	Recommendation	Proponent & Brief Date	Comment
OBJECTIVE 2: Assess the Army National Cemeteries Program and other Army agencies' execution of and compliance with Army Directive 2010-04.			
<p>2.1 OBSERVATION (reference#ID-1107.21): The Army National Cemetery Program (ANCP) is establishing a support relationship with the United States Army Corps of Engineers (USACE) Norfolk District to facilitate the formulation and implementation of a revised Arlington National Cemetery (ANC) Master Plan.</p>	<p>2.1.1 (reference#ID-1107.21.01): ANCP, in coordination with USACE, Norfolk District, collaborate to finalize a functional support relationship, to include USACE support to the revision of the ANC Master Plan.</p>	<p>ANCP, USACE (ASA(CW) assist) (20110811)</p>	<p>Concur</p>
<p>2.2 OBSERVATION (reference#ID-1107.22): Assistant Secretary of the Army for Civil Works (ASA(CW)) has authorized USACE to liaison directly with ANCP to produce construction plans and documents to support ANC's Master Plan.</p>	<p>2.2.1 (reference#ID-1107.22.01): SecArmy relieve ASA(CW) of responsibility for producing engineering and construction plans and documents in support of the ANC Master Plan and in support of proposals for the placement of new memorials and monuments at Army National Cemeteries.</p>	<p>SecArmy (20110817)</p>	<p>Concur</p>
<p>2.3 OBSERVATION (reference#ID-1107.23): ANCP is now included in the Army Program Objective Memorandum (POM) process and will submit annual budgets through the Office of the Administrative Assistant (OAA) to the SecArmy. ANCP's obligations and expenditures of funds will be tracked through the standard Army budget execution system.</p>	<p>2.3.1 (reference#ID-1107.23.01): OAA, (ASA(FM&C) assist) continue to provide process oversight of ANCP's formulation and execution of annual budgets for Army National Cemeteries and consider the amount of recouped Cemeterial Expenses, Army (CEA) funds when approving ANCP's FY13 budget.</p>	<p>Office of the Administrative Assistant to the Secretary of the Army (OAA), Assistant Secretary of the Army (Financial Management & Comptroller) (ASA(FM&C) assist) (20110811)</p>	<p>Concur</p>

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2.4 OBSERVATION (reference#ID-1107.24): In accordance with AD 2010-04, the United States Army Center of Military History (USACMH) is executing its pilot program to collect, catalog and store mementos left at graves in ANC's Section 60, while ANCP formulates a more comprehensive and sustainable memento policy.	2.4.1 (reference#ID-1107.24.01): USACMH, in coordination with ANCP, continue to execute the pilot program to collect, catalog and store mementos left at ANC's Section 60 gravesites, until a long-term and comprehensive flower and memento policy can be established and incorporated into AR 290-5, Army National Cemeteries.	USACMH (ANCPassist) (20110811)	Concur
2.5 OBSERVATION (reference#ID-1107.25): The Office of Chief Public Affairs (OCPA) drafted a media access policy and media ground rules for ANC and has received concurrence from ANCP.	2.5.1 (reference#ID-1107.25.01): OCPA (ASA(M&RA), ANCP assist) ensure that the ANC media access policy and media ground rules are included in the revisions of 32 CFR 553 and AR 290-5.	OCPA (ASA(M&RA), ANCP assist) (20110811)	Concur
2.6 OBSERVATION (reference#ID-1107.26): ASA(M&RA) completed a proposed revision to 32 CFR 553 that includes guidance for a revised interment / inurnment policy for Army National Cemeteries.	2.6.1 (reference#ID-1107.26.01): ASA(M&RA) continue to provide support to the proponent in publishing the update of 32 CFR 553..	ASA(M&RA), Deputy Assistant Secretary of the Army for Military Personnel Policy (DASA(MPP) (ANCP, Office of The Chief Legislative Liaison (OCLL) Office of General Counsel (OGC), assist) (20110811)	Concur
2.7 OBSERVATION (reference#ID-1107.27): Office of the General Counsel (OGC) complied with AD 2010-04 to update 32 CFR 553 to document jurisdictional realignment of the Army National Cemeteries Program.	2.7.1 (reference#ID-1107.27.01): Together with ASA(M&RA), OGC continue to provide support to the proponent in publishing the update of 32 CFR 553.	OGC	

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<p>2.8 OBSERVATION (reference#ID-1107.28): The current ANC TDA does not adequately reflect the recent reorganization of the ANCP's organizational structure or ANCP's unique function in the Army.</p>	<p>2.8.1 (reference#ID-1107.28.01): DCS, G3/5/7 (ASA(M&RA) assist) analyze options and recommend an appropriate short-term ANC command coding to SecArmy for decision.</p>	<p>DCS, G3/5/7 FM (20110907)</p>	<p>Concur</p>
	<p>2.8.2 (reference# ID-1107.28.02): DCS, G-3/5/7 (OGC assist) analyze options for long-term ANCP command and control, organizational alignment and support relationships with other Army commands and organizations and present those options to SecArmy for decision.</p>	<p>DCS, G3/5/7 FM (20110907)</p>	
<p>2.9 OBSERVATION (reference#ID-1107.29): In accordance with AD 2010-04, the Chief Information Officer (CIO) / G-6 provided and fully supported a proposal that will allow ANC to leverage modern information technologies.</p>	<p>2.9.1 (reference#ID-1107.29.01): ANCP (CIO / G-6, ITA, ADC-F assist) finalize requirements for, and field, an updated interment system that integrates with BOSS, Remedy and the future geospatially-enabled and digitized mapping system.</p>	<p>ANCP (Chief Information Officer (CIO)/G-6, Information Technology Agency (ITA), and Army Data Center Fairfield ((ADC-F) assist) (20110811)</p>	<p>Concur</p>
	<p>2.9.2 (reference#ID-1107.29.02): ANCP continue to enforce administrative controls to remain compliant with AR 25-1 <i>Army Knowledge Management and Information Technology</i>, AR 25-2 <i>Information Assurance</i>, DISA Best Business Practices and applicable ALARACT messages, DoDDs, and DoDIs.</p>	<p>ANCP (20110809)</p>	<p>Concur</p>

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<p>2.10 OBSERVATION (reference#ID-1107.31): The Assistant Secretary of the Army for Acquisition, Logistics, and Technology's (ASA(ALT))'s, Deputy Assistant Secretary of the Army for Procurement (DASA(P)) complied with AD 2010-04 by completing two detailed reviews of USACE and Army Contracting Command (ACC) contracts supporting ANCP.</p>	<p>2.10.1 (reference#ID-1107.31.01): ASA(ALT) continue routine PMRs of all ANCP contracts and the ANCP GPC program.</p>	<p>DASA(P) (20110811)</p>	<p>Concur</p>
<p>2.11 OBSERVATION (reference#ID-1107.32): SecArmy has forwarded all nominations for membership on the Army National Cemeteries Advisory Commission (ANCAC) to the SECDEF for approval and appointment.</p>	<p>2.11.1 (reference#ID-1107.32.01): ANCP should continue to monitor OSD's ongoing staffing of ANCAC nominations while the ANCAC DFO continues to sustain planning and preparation for the first meeting of the ANCAC, likely to be held in autumn 2011.</p>	<p>ANCP (20110809)</p>	<p>Concur</p>
<p>2.12 OBSERVATION (reference#ID-1107.33): The Gravesite Accountability Task Force is establishing an accountability baseline of all gravesites and inurnment niches and expects to be able to complete this effort in sufficient time to inform SecArmy's report to Congress by 22 December 2011, as required by Public Law 111-339.</p>	<p>2.12.1 (reference#ID-1107.33.01): ANCP continue to monitor and resource the Gravesite Accountability Task Force as required to ensure an accountability baseline is established in sufficient time to inform SecArmy's report to Congress on or before 22 December 2011.</p>	<p>ANCP (20110809)</p>	<p>Concur</p>
<p>Objective, Findings and Observations</p>	<p>Recommendation</p>	<p>Proponent & Brief Date</p>	<p>Comment</p>
<p><i>OBJECTIVE 3: Assess the adequacy of current practices at ANC to provide information, outreach, and support to families of those individuals buried at Arlington National Cemetery regarding procedures to detect and correct errors in burials at ANC.</i></p>			

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3.1 OBSERVATION (reference #ID-1107.35): Arlington National Cemetery's (ANC) efforts to provide information, outreach and support to Families regarding burial discrepancies was professional and supportive.	3.1.1 (reference #ID-1107.35.01): ANCP continue to leverage the IT capabilities resident within the Research Tool to ensure that all inquiry records are added and linked to the record by name and grave location, to each individual interred.	ANC in coordination with ITA CCSC (20110809)	Concur
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Objective, Findings and Observations	Recommendation	Proponent & Brief Date	Comment
<i>Other Matter</i>			
4.1 OTHER MATTER (reference #ID-1107.36): Wait times for interment / inurnment at ANC have increased and vary based on the deceased veteran's branch of Service.	4.1.1 (reference #ID-1107.36.01): ASA(M&RA) (ANCP assist) engage the Office of the Under Secretary of Defense for Personnel and Readiness and other Services to develop multi-Service policies, processes and procedures for interment / inurnment and ceremonial support at Army National Cemeteries.	ASA(M&RA) (ANCP Assist) (20110811)	Concur
	4.1.2 (reference #ID-1107.36.02): That SecArmy request that the Army National Cemeteries Advisory Commission (ANCAC), once convened, examine the potential causes and effects of increasing wait times and recommend changes to DoD, Army, other Service and ANCP policies, processes and procedures to reduce wait times appropriately.	N/A	
4.2 OTHER MATTER (reference #ID-1107.37): Increasing rates of interments / inurnments will expend the Cemetery's usable space prior to current projections.	4.2.1 (reference #ID-1107.37.01): That SecArmy request that ANCAC, once convened, analyze and advise on courses of action to mitigate the effect of increasing demand for interment / inurnment on ANC's projected availability.	N/A	

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INSPECTION OBJECTIVE 1: Assess compliance, implementation and effect of the recommendations as approved from the Department of the Army Inspector General's 9 June 2010 inspection report.

1.1 OBSERVATION (reference #ID-1107.01): The immediate oversight mechanisms established in Army Directive 2010-04 have not yet been incorporated into AR 290-5, *Army National Cemeteries*.

DISCUSSION:

The 9 June 2010 DAIG inspection report on Arlington National Cemetery (ANC) recommended (Recommendations 1.2 and 3.1) that the Secretary of the Army (SecArmy) designate an Army organization / activity to exercise authority and responsibility for ANC. SecArmy established the position of Executive Director (ED), Army National Cemeteries Program (ANCP), reporting directly to the SecArmy, and a supporting Provisional Oversight Group staff, to assist the ED in executing the inspection report recommendations, among other tasks. This action served to eliminate the deficient and ineffective bifurcated reporting chain under which the previous Cemetery administration operated. The 9 June 2010 DAIG inspection report also recommended (Recommendation 1.1) that a single proponent be established for developing, promulgating and overseeing the implementation of regulations and policies governing Army National Cemeteries. On 10 June 2010, in Army Directive (AD) 2010-04, the Secretary responded to this recommendation by tasking the ED with the responsibility for "formulating, promulgating, administering and overseeing plans, policies and regulations pertaining to the Army National Cemeteries Program..." Although the policies set forth in AR 25-30, *The Army Publishing Program*, provide that only the HQDA agency or an HQDA Principal Official may serve as the proponent of an Army Regulation, the Secretary's express and broad-based grant of authority to the ED, as set forth in AD 2010-04, served as an exception to policy to permit the ED (who is not an HQDA Principal Official) to exercise proponentcy for regulations pertaining to the ANCP. SecArmy also tasked the Assistant Secretary of the Army for Manpower and Reserve Affairs (ASA(M&RA)) in AD 2010-04 to "formulate and oversee interment and inurnment policy applicable to the Army National Cemeteries..." The ED ANCP executed the certifications and determinations required to initiate the process of publishing the draft rule in the Federal Register for public comment and her name, position title and contact information will be cited in the Federal Register as the "point of contact" for the draft rules. As interment and inurnment eligibility policy is one of the primary policy matters addressed in both the CFR and the corresponding Army Regulation, AR 290-5, *Army National Cemeteries*, ASA(M&RA) assumed administrative responsibility for updating the CFR and leading the staff effort in updating AR 290-5, in

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close coordination with ED ANCP. The SecArmy's grant of an exception to AR 25-30 to allow the ED to serve as the proponent of the regulations pertaining to the ANCP acknowledges the special significance of the ANCP to the Army as a whole and the unique role of the ED as the direct link between the Secretary of the Army and the ANCP.

AD 2010-04 also established for ANC several immediate oversight mechanisms related to the information technology / information assurance, budget, contracting, force structure and engineering support functions, among others. The remainder of this inspection report reflects that, over the course of the last year, the Army agencies charged with executing such oversight functions have diligently executed the tasks directed by the SecArmy in AD 2010-04. The inspection team believes that the immediate oversight mechanisms established by the AD must be regularized and maintained in force in the long term. The inspection team believes that one of the most effective ways to ensure the long term continuation of a robust and effective oversight program in regard to all aspects of the ANCP is to ensure that the regulations pertaining to ANCP document, with specificity, the nature of the oversight required and the standards to which such oversight should be executed. As the proponent of ANCP-related regulations, it is incumbent on the ED to ensure that the pending revisions of those regulations detail not only the policies applicable to the operations and management of the ANCP, but also the oversight programs and mechanisms that will play a crucial role in the governance of the ANCP in the long-term. In addition, it is imperative that the ED acknowledge in any regulation for which she serves as proponent, the sustained role of the ASA(M&RA) in formulating and overseeing interment / inurnment eligibility policy.

The ED must also ensure that, as the ASA(M&RA) revises or updates interment / inurnment eligibility policy, such revisions are timely captured and reflected in updated iterations of ANCP regulations. Only by incorporating robust oversight mechanisms into AR 290-5 and by ensuring that the regulation is timely updated to capture changes in interment / inurnment eligibility policy as they occur, will SecArmy ensure for the ANCP of the future, the appropriate oversight so lacking under the previous ANC leadership.

RECOMMENDATION:

1.1.1 (reference #ID-1107.01.01): ED, ANCP incorporate requirements for long-term, robust and continuous oversight processes and mechanisms in the next revision of AR 290-5 and ensure that all future versions of AR 290-5 acknowledge the role of the ASA(M&RA) in formulating and overseeing interment / inurnment eligibility policy.

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STANDARD(S): The 9 June 2010 DAIG Inspection report on ANC, Subject: Special Inspection of ANC; Army Directive 2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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1.2 OBSERVATION (reference #ID-1107.02): DA Pam 290-5 is outdated and does not provide adequate guidance for the operation, administration, and management of Army National Cemeteries or Army Post Cemeteries.

DISCUSSION:

The 9 June 2010 DAIG inspection report on ANC found that "All regulatory guidance for the Army Cemeteries Program is outdated" including Department of the Army Pamphlet (DA Pam) 290-5, *Administration, Operation, and Maintenance of Army Cemeteries*, dated 1 May 1991.

DA Pam 290-5, *Administration, Operation, and Maintenance of Army Cemeteries*, applies to both the ANCP and to the 28 Army post cemeteries. However, most of the sections in the Pamphlet address policies and procedures that are peculiar to ANC and do not apply to the other 28 post cemeteries. Examples of ANC-specific topics addressed by the Pamphlet include processes for approval of the Superintendent's leave, hours of duty, donations to ANC, ANC operating hours, etc. The Pamphlet has few references to Army post cemeteries. It specifically addresses other post cemeteries only in the summary and background paragraphs, and in a few other sections. The content of the Pamphlet specific to ANC could be captured in an ANC SOP rather than in a DA Pamphlet.

It is important to note that Army policy regarding the operation, maintenance and inspection of Army post cemeteries does reference and rely on DA Pam 290-5 in certain important areas. AR 210-190, *Post Cemeteries*, references DA Pam 290-5 with respect to certain standards such as marking of graves, erection of private monuments, maintenance standards, cemetery operations and disposition of records.

The inspection team notes that ANC is the Army's Cemetery center of excellence. The ED and Superintendent at ANC are currently raising the performance level at the Cemetery to meet industry standards that are currently applied in cemeteries under the jurisdiction of the Department of Veterans Affairs (VA) and elsewhere across the Nation. While DA Pam 290-5 is out of date, these new standards should be captured in the revised DA Pamphlet and promulgated to apply as well to Army post cemeteries.

Finally, DA Pam 290-5 specifically states that the proponent and exception authority is "Not Applicable" and that the agency responsible for suggested improvements is the "U.S. Total Army Personnel Command," now known as the US Army Human Resources Command (HRC). The lack of a designated proponent in the current Pamphlet leaves

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post cemeteries with nowhere to turn with questions or for exceptions regarding cemetery policies and procedures.

RECOMMENDATIONS:

1.2.1 (reference #ID-1107.02.02): ANCP update DA Pam 290-5 appropriately to promulgate standards that should apply to all Army post cemeteries and publish ANC-specific standards and procedures separately.

STANDARD(S): The 9 June 2010 DAIG inspection report on ANC, Subject: Special Inspection of ANC; Army Directive 2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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1.3 OBSERVATION (reference #ID-1107.03): ANCP is standardizing and documenting its internal procedures.

DISCUSSION:

The 9 June 2010 DAIG inspection report on ANC found that "ANC has not documented its procedures in Standard Operating Procedures (SOP)".

Following the release of the 9 June 2010 DAIG inspection report, ANCP developed and trained personnel on procedures critical to its day-to-day operations and is continuing to document these procedures in their SOPs. As of this inspection, some 23 of 95 processes and functions have been documented in SOPs. The majority of the documented SOPs are oriented on administrative procedures that assist the administrative division in some of its day-to-day tasks. Documenting their SOPs more comprehensively to cover core tasks will assist ANC employees in executing those tasks and will help leadership better measure employee performance.

RECOMMENDATION:

1.3.1 (reference #ID-1107.03.01): ANCP continue to develop and publish working SOPs for all divisions / branches within ANCP. Update ANC-specific standards as currently set forth in DA Pam 290-5 and incorporate those standards in SOPs.

STANDARD(S): The 9 June 2010 DAIG inspection report on ANC, Subject: Special Inspection of ANC; Army Directive 2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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1.4 OBSERVATION (reference #ID-1107.04): ANCP and other appropriate Army commands, staff elements and agencies have established support relationships that have eliminated ANC's formerly insular approach toward operating the Cemetery.

DISCUSSION:

Deficiency 1.2 in the 9 June 2010 DAIG inspection report on ANC found that command and control structures, as designated in Headquarters, Department of the Army (HQDA) General Orders (GO) No. 13, dated 29 October 2004, contributed to an insular environment at ANC in which the leadership and management team did not seek or accept assistance or advice from other Army organizations or other entities in the cemetery industry. As noted in the 2010 report, "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 stated 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 as so unique that it should not be under the supervision of MDW."

In addition to changing the command and control structures at ANC, AD 2010-04 assigned specific tasks to several Army agencies, organizations and staff directorates. Since June 2010, the ED ANCP has reached out to the HQDA staff and other Army agencies and organizations to assist in making improvements, taking actions and rendering assistance to ANCP. The AD and the ED's engagements across the Army have eliminated the previous insular environment at ANC.

This Inspection's Objective 2 (found in Annex 3) further identifies and discusses compliance with specific tasks mandated by the SecArmy in his 2010-04 Directive. The discussion below briefly highlights how those agencies and organizations across the Army helped to change the formerly insular environment at ANC.

The Army's CIO / G6 conducted a full review of ANC's information technology (IT) architecture and information assurance processes and made 14 recommendations in its 15 September 2010 report, "Information Technology Assessment of ANC." Since the issuance of that report, ANC is leveraging the report as its blueprint to help modernize its IT systems and is in the process of fully implementing the recommendations with the full engagement and support of expert Army organizations, to include the CIO / G-6; the Information Technology Agency (ITA) and its Consolidated Customer Service Center (CCSC) at Fort Detrick, Maryland; and the Army Data Center-Fairfield (ADC-F).

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The ED ANCP, with assistance from CIO / G6, The Old Guard, the Army Staff and ADC-F, established the Gravesite Accountability Task Force to aid in establishing a baseline accounting of all gravesites within ANC.

The ED and Superintendent have also engaged the Department of Veterans Affairs (VA) / National Cemetery Administration (NCA) regarding standards and training. ANC employees have attended cemetery representative courses, cemetery management courses and grave standards courses at the VA / NCA School at Jefferson Barracks National Cemetery in St. Louis, Missouri. Additionally, ANC has sent personnel from its Interments and Grounds Maintenance division to private industry heavy equipment operators' courses in Illinois and personnel from many cemetery divisions have attended standard DoD / Army Contracting Officer's Representative (COR) training.

The ED ANCP sought the assistance of the Administrative Assistant to the Secretary of the Army (AA) in budgetary planning, management, execution and oversight to better align ANC budget development and execution with more standard Army processes. OAA continues to provide assistance to ANCP for budget formulation as well as execution. Additionally, the ED leveraged assistance from the Deputy Assistant Secretary of the Army for Financial Operations in reconciling un-liquidated obligations (ULO) from as far back as 2004 and has recouped \$15 million of \$25 million ULO. ANCP's implementation of the General Fund Enterprise Business System (GFEB) played a critical role in achieving this recoupment.

Communication between the ANCP Interment Services Branch (ISB) and the honor guards of all Services also has improved but still requires refinement and is addressed further in Annex 5, Other Matters

RECOMMENDATION:

1.4.1 (reference #ID-1107.04.01): ANCP continue to engage the Army Secretariat, Army Staff, selected agencies and Army commands to leverage Army capabilities required to assist ANC in its performance.

STANDARD(S): The 9 June 2010 DAIG inspection report on ANC, Subject: Special Inspection of ANC; Army Directive 2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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1.5 OBSERVATION (reference #ID-1107.05): The ED ANCP has established and implemented effective Commander's Critical Information Requirements (CCIR) for Arlington National Cemetery (ANC) and Soldiers' and Airmen's Home National Cemetery (SAHNC).

DISCUSSION:

The 9 June 2010 DAIG inspection report on ANC found that ANC would greatly benefit from development of CCIR and a clearly understood reporting chain. The report recommended (recommendation 1.5) "Superintendent, ANC, codify CCIR, develop internal reporting procedures and comply with MDW CCIR reporting requirements."

Army Directive 2010-04 reassigned ANC and SAHNC under the jurisdiction of HQDA and established the ANCP to oversee ANC and the SAHNC. This action negated the 9 June 2010 DAIG report recommendation, specifically as it applied to compliance "with MDW CCIR reporting requirements" but did not nullify the need for development of ANC CCIR and a clearly understood reporting chain.

Immediately upon assuming the position, the ED leveraged staff meetings, town halls, and other venues to verbally clarify critical issues that needed to be brought to her attention. The ED subsequently began an effort to more formally develop CCIR with input from each of ANC's divisions and staff directors. The resulting product was promulgated on 29 April 2011, when the ED published a memorandum for all cemetery personnel entitled "Policy Memorandum: ED's Critical Information Requirements." The memorandum clearly defines 16 items of information deemed critical to the ED ANCP and Superintendent, ANC. Examples of reportable issues include injuries requiring medical attention, incidents that would attract the attention of outside agencies, burial or grave site discrepancies, any contact with high-ranking officials or media, incidents of violence or hostility and potentially hazardous situations. The memorandum clearly states that the critical item list was not an exhaustive list, but instead established minimum reporting requirements. It encourages employees to use their judgment in reporting other, non-specified information of potential importance to the ED and Superintendent. The memorandum directs ANCP personnel to immediately report critical information to the ANCP Chief of Staff and the ED, directs the appropriate method for reporting and establishes minimum information requirements for a report. The memorandum, as published, provides sufficient guidance to ANCP personnel. The inspection team found the ED meets frequently and regularly with the SecArmy to discuss progress and resolve ongoing issues at the Cemetery, including changes in policy or precedent. These regular meetings and the direct oversight of ANCP by the Secretary ensure the ED briefs the SecArmy in advance of making decisions or taking

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actions that may be of significant external interest. The ED's established CCIR provides a useful tool to help trigger such relevant discussions with the Secretary and ensures ANCP operates in accordance with his intent.

RECOMMENDATION:

1.5.1 (reference #ID-1107.05.01): ANCP periodically review CCIR and update as necessary.

STANDARD(S): The 9 June 2010 DAIG inspection report on ANC, Subject: Special Inspection of ANC; Army Directive 2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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1.6 OBSERVATION (reference #ID-1107.06): In an effort to mitigate the effects of current interment / inurnment wait times, ANCP staff developed and published an informational guide and has distributed it to the public, funeral homes and the other Services.

DISCUSSION:

The 9 June 2010 DAIG inspection report on ANC found "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."

ANC developed and published an informational guide titled "Administrative Guide to Information and Burial at Arlington National Cemetery" and has distributed it to the public, funeral homes and the other Services. This informational guide includes in the "Frequently Asked Questions" section clear notice that burials at ANC could "take from several weeks to several months depending upon volume of services, Family desires and specific military funeral honors to be rendered." The guide goes on to say that the most routine causes of delay in scheduling burials include the availability of a chapel and / or military chaplain and the request for military funeral honors (to include the use of the caisson). The inspection found that most (12 of 14) Service Casualty Assistance Offices (CAO), of all Services, are aware that there will be a waiting period for burial at ANC.

Although ANC appropriately responded to the recommendation from the 9 June 2010 inspection report to help manage expectations about the timing of burials, the inspection team also noted that the average wait time for all burials at ANC has increased from 44 days in 2004 to 73 days in 2011. In fact, the 4-6 week wait time highlighted in the previous IG report appears to be anecdotal. Data obtained from the Cemetery reflects the actual average wait time for burial increased from 62 days (9 weeks) in 2010 to almost 73 days today. This year's increase is attributable to improved tracking and response processes at ANCP / ANC. The ITA call center is now able to better track incoming calls and requests. The team noted the a general perception among ANCP / ANC senior leaders that Family members and funeral homes were not able to get through to ANC on the phone prior to the establishment of the call center and simply gave up trying to bury their loved ones at ANC. With the recently established call center, calls are getting through, and tracking and ticket numbers are being established and provided to the funeral homes and the Families. This accountability measure instills greater confidence in callers that their loved ones can be buried at ANC. This

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improved tracking of the demand, and the associated greater confidence in Cemetery procedures, have contributed to both an increased number of requests and consequently increased wait times. The implications of this increased demand and wait times are discussed further in the Other Matters section of this report.

RECOMMENDATION:

1.6.1 (reference #ID-1107.06.01): ANCP continue to manage expectations regarding interment / inurnment wait times through engagement with Family members, the public, funeral homes and the other Services, and their Casualty Assistance Offices.

STANDARD(S): The 9 June 2010 DAIG inspection report on ANC, Subject: Special Inspection of ANC; Army Directive 2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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1.7 OBSERVATION (reference #ID-1107.07): ANC is leveraging internal and external training opportunities and is developing a comprehensive training program that links division core tasks, training requirements and employee proficiencies.

DISCUSSION:

The 9 June 2010 DAIG inspection report on ANC found that "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."

The three areas cited in the inspection report as limiting training opportunities have all been addressed. Specifically, personnel authorizations have increased and ANC is hiring to fill these positions. Funding for external training is also no longer an issue. Finally, the new ANCP / ANC leadership has eliminated the formerly insular attitude that persisted and is committed to improving training.

Since June 2010, ANC has trained 4 of 18 cemetery representatives at the VA / NCA Cemetery Representative training course in St. Louis, Missouri (in both the November 2010 and March 2011 classes). ANC also sent 4 of 16 heavy equipment operators to training with industries in Illinois in June 2011. ANC also trained 17 employees as CORs to administer the Cemetery's 14 service support contracts. In addition, ANC employees have completed externally provided training on the SSN-LIN Automated Management & Integrating System (SLAMIS), cemetery supervisor training, Government Purchase Card (GPC) training and training in the use of the HQDA Tracking System.

The 9 June 2010 DAIG inspection report recommended that ANC "link core tasks to available training opportunities." The Cemetery is still in the early stages of defining these core tasks for each of the divisions and for which each employee must be trained. Efforts to link these core tasks to individual development plans and an overarching training program that validates that each employee has met established standards and possesses requisite proficiencies are ongoing.

The ED ANCP published Annual Training Guidance (ATG) for ANC on 25 May 2011 to address the third and fourth quarters of Fiscal Year (FY) 2011 and for all of FY12. This ATG mentions an assessment of its training and the ED's training priorities, which include: taking advantage of training opportunities offered by the VA / NCA; Army automated systems training; utilizing industry to train and improve proficiency on heavy equipment and horticultural tools; risk management and safety focus by all personnel;

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and other Army mandatory training. Safety and mandatory training are also addressed. The ATG does not address how and when to conduct future training with the VA / NCA, automated systems training or training with industries. The inspection team noted that the training guidance still does not define core tasks. Specifically, two divisions, the Interment Services Branch (ISB) and the Field Operations Division (FOD), which execute the core mission of scheduling and executing the private and public interments and inurnments at ANC, would greatly benefit from an effort to define and document their core tasks. Defining the core tasks, conditions and standards on which employees in these divisions should be trained and proficient would greatly help the Cemetery in determining training requirements, to include external training, and serve as useful tools in evaluating performance.

During the inspection, it was clear that ANC had conducted training for FOD employees to ensure that burials are conducted accurately and properly, and to minimize burial errors. Although the ANC mission is such that most of the training must be conducted "on-the-job," such training still should be documented according to tasks, conditions and standards and still should be included in the ATG as part of the overall ANC training program.

The 9 June 2010 DAIG inspection report had recommended that ANC develop Individual Development Plans (IDPs) for employees and that these IDPs be linked with ANCP's core tasks. ANC has begun the development of IDPs for its employees; however, only 25 of 127 IDPs have been developed as of this inspection.

RECOMMENDATION:

1.7.1 (reference #ID-1107.07.01): ANC continue to develop a comprehensive training program to ensure all employees have the knowledge and skills necessary to be proficient in the core competencies necessary to accomplish ANC's mission.

STANDARD(S): The 9 June 2010 DAIG inspection report on ANC, Subject: Special Inspection of ANC; Army Directive 2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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1.8 OBSERVATION (reference #ID-1107.08): US Army Manpower Analysis Agency (USAMAA) and US Army Force Management Agency (USAFMSA) completed a full review of ANC's organizational structure and Arlington is hiring to fill to its new authorizations.

DISCUSSION:

The 9 June 2010 DAIG inspection report found that the management structure and staffing levels at ANC were "not robust enough to efficiently accomplish the organization's mission." The report recommended a manpower survey to document structure and manpower requirements and authorizations and a review of position descriptions for ANC employees. In his 10 June 2010 Directive, the SecArmy directed that the US Army Manpower Analysis Agency (USAMAA) and the US Army Force Management Agency (USAFMSA) complete an all-inclusive study of the organizational structure of ANC.

The Deputy Assistant Secretary of the Army for Force Management, Manpower and Resources submitted the completed USAMAA and USAFMSA report to the ED on 23 July 2010. The report recommended an increase of 63 personnel authorizations, from 102 personnel to 159 personnel, at ANC. In addition to the requirement for 159 personnel authorizations the report also documented the need for a 44-member chaplain section (detailed from the Services rather than assigned) and the need for a 6-manyear equivalent workload for the duties executed by the Arlington Ladies, a multi-Service volunteer organization that play a well-established role in the interment / inurnment ceremonies that occur at ANC.

A new TDA, effective 1 October 2011, increased the TDA to 165 personnel and added the chaplain section and the Arlington Ladies, for a total 215 authorizations. As part of implementing this increased structure, ANCP reorganized. Key to this reorganization was the formation of an ANCP staff and increases in the number of personnel assigned to the divisions that support essential Cemetery operations.

During the last year, the Civilian Human Resources Agency (CHRA) and ANC reported that the Cemetery experienced losses of 21 personnel due to retirements or resignations. Therefore, ANC has had to contend with replacing these personnel in addition to hiring the new personnel authorized. In total, 84 positions have required either replacement or new hire. Efforts by both the CHRA and ANC to expedite the hiring of personnel have resulted in the staffing of 136 of the 165 current authorizations (215 total authorizations minus 50 authorizations allocated to the chaplain section and the Arlington Ladies) as of 3 August 2011. CHRA's prioritization of ANC's hires also

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resulted in an average decreased fill time for ANC's open positions, from 113 days in January 2011 to 93 days by July 2011. As of 3 August 2011, ANC and CHRA report having 27 hiring actions in progress as they continue efforts to fill the remaining vacant positions.

RECOMMENDATION:

1.8.1 (reference #ID-1107.08.01): ANC (CHRA assist) continue to expedite hiring to fill vacant ANC authorized positions in accordance with the current TDA.

STANDARD(S): The 9 June 2010 DAIG inspection report on ANC, Subject: Special Inspection of ANC; Army Directive 2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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1.9 OBSERVATION (reference #ID-1107.09): ANC's organizational climate has continued to improve since the June 2010 DAIG inspection Report.

DISCUSSION:

The 9 June 2010 DAIG inspection report on ANC (Deficiency 2.4) found that "Most ANC employees reported a work environment where mid-level managers are micromanaged and are not consulted on key decisions. Some employees also reported an unhealthy organizational climate."

Since the 9 June 2010 DAIG inspection, the DAIG, in coordination with the ED, administered two Defense Equal Opportunity Management Institute (DEOMI) organizational climate surveys, one in January 2011 and a second in June 2011, to monitor the changes in climate as measured by employees' perceptions. The DEOMI surveys measured perceptions of the organization's members in seven climate factors associated with equal opportunity and six factors of organizational effectiveness. Equal opportunity factors included sexual harassment and sex discrimination, differential command behavior toward minorities, positive equal opportunity behaviors, racist behaviors, religious discrimination, age discrimination and disability discrimination. With respect to organizational effectiveness, the surveys specifically measured perceptions of organizational commitment, trust in the organization, work group effectiveness, work group cohesion, leadership cohesion and job satisfaction. Additionally, DEOMI allowed the ED the opportunity to include in the surveys 10 locally developed questions, which remained the same for both the January and June surveys. Finally, the inspection team drew on leader and staff interviews and sensing sessions with employees to confirm survey results. During this follow-up inspection, the inspection team met with 28 employees in sensing sessions and conducted 100 individual and group interviews, which were used to assess DEOMI survey results. By way of comparison, the January 2011 DEOMI survey received responses from 72 of 118 employees at ANC, as compared to the June 2011 survey to which 82 of 127 employees responded. A DEOMI survey was not executed during the 2009-2010 DAIG inspection. Therefore, statistical results for that time period do not exist. The locally developed questions for the January and June surveys assisted the inspection team in determining changes in organizational effectiveness from the previous inspection to the present.

Equal Opportunity Areas. In the seven Equal Opportunity areas assessed, six are now rated as organizational strengths. The most significant improvement was observed in the area of command behavior toward minorities which shifted from a slight organizational concern in January 2011 to an area of strength by June 2011. This result would appear to be supported in day-to-day practice at ANC; the number of employees

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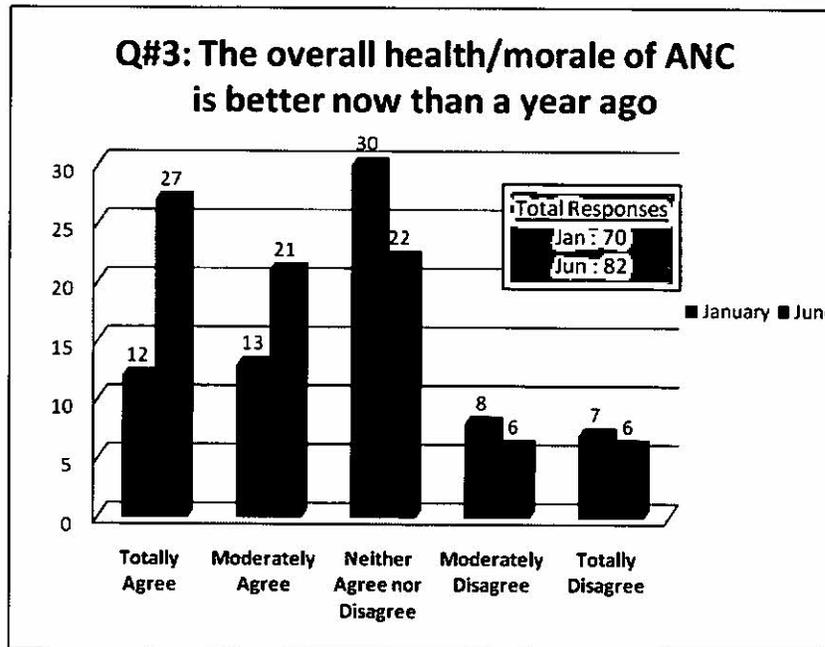
reporting discrimination of any kind in the 12 months preceding the survey, which included an increase in "senior civilians" surveyed from 26 to 43 between the January and June surveys, dropped from 19 in the January 2011 survey to 13 in the June 2011 survey. The only area still perceived as a slight concern was in the area of age discrimination, which was rated as a "slight concern" in both the January and June surveys.

Organizational Effectiveness. In the six organizational effectiveness areas evaluated all but "leadership cohesion," are now rated by employees as organizational strengths. The area of "trust in the organization" data reflected large improvements from January to June 2011. Previously this area was identified as a moderate concern, but it is now perceived as an "organizational strength." The data pertaining to the area of "leadership cohesion" indicated a slight downward trend, attributed to the disparity between perceptions of military members as compared to civilian employees. The military members, who were included in the June survey, were not surveyed in the prior January survey. Although "leadership cohesion" received high overall scores in all subgroups, the survey noted disparities in perceptions reported between majorities and minorities and between military and civilians.

Locally Developed Questions. The responses to all 10 locally developed questions, which were administered in both January and June 2011, indicated improvements in all areas. The inspection team noted the percentage of employees who agreed, either moderately or totally, that the health and morale at ANC is better now than a year ago, had increased from 35 percent in January to 58 percent in June, as shown on the chart on page 2-19.

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RECOMMENDATION:

1.9.1 (reference #ID-1107.09.01): ED ANCP and ANC Superintendent leverage the results from Defense Equal Opportunity Management Institute (DEOMI) surveys to continue to improve organizational effectiveness and climate.

STANDARD(S): The 9 June 2010 DAIG inspection report on ANC, Subject: Special Inspection of ANC; Army Directive 2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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1.10 OBSERVATION (reference #ID-1107.10): ANC has been provided adequate external assessments since the implementation of AD 2010-04. Plans are now in place to assure future oversight.

DISCUSSION:

The 9 June 2010 DAIG inspection report on ANC found that ANC lacked formal programs for external assessments and that there had been no formal inspection of ANC since 1997 (Deficiency 3.3). The report recommended "the Assistant Secretary of the Army for Civil Works (ASA(CW)), seek to negotiate and enter into a Memorandum of Agreement (MOA) with the Department of Veterans Affairs to include ANC in their National Cemeteries Administration's Operational Assessment and Inspection program" to periodically inspect ANC for adherence to industry standards. Although the recommendation identified ASA(CW) as the lead agency to execute this recommendation due to the oversight responsibilities assigned to it by then existing HQDA GO No. 13, AD 2010-04 superseded GO No. 13, effectively severed the oversight relationship between ASA(CW) and ANC and instead created the position of ED, reporting directly to the SecArmy.

The inspection team noted that, while direct coordination for inspections with the VA had not occurred, multiple reviews and inspections of ANC, to include by the Government Accountability Office (GAO) and DAIG, had occurred since June 2010. In addition, Assistant Secretary of the Army for Acquisition, Logistics and Technology (ASA(ALT)) and the Army Audit Agency (AAA) have conducted numerous audits. These reviews, inspections and audits meet the intent of the 9 June 2010 DAIG inspection report recommendation. Finally, Public Law 111-339 mandates that SecArmy provide follow-up reports on ANC to Congress in 2012 and 2013. It is presently envisioned that DAIG will be the lead Agency for the inspections that will inform SecArmy's reports to Congress, as required by the Public Law.

Sufficient assessments have been conducted to ensure that proper management systems are operating at ANC and plans are in place to implement enduring oversight.

RECOMMENDATION:

1.10.1 (reference #ID-1107.10.01): The ED, as designated proponent, develop an external assessment and inspections program and incorporate this program into AR 290-5, *Army National Cemeteries*.

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STANDARD(S): The 9 June 2010 DAIG inspection report on ANC, Subject: Special Inspection of ANC; Army Directive 2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program

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1.11 OBSERVATION (reference #ID-1107.11): ANCP is making progress in its ability to self assess performance, but has not yet implemented an organization-wide formal self-assessment program.

DISCUSSION:

In the 9 June 2010 DAIG inspection report on ANC, the inspection team found that ANC lacked formal programs for self-assessments (Deficiency 3.3). The report provided the VA Organizational Assessment and Inspection (OAI) as an example of an effective self-assessment program for large public cemeteries. The VA's OAI combines cemetery self-assessments with external assessments. Since its establishment, ANCP has achieved success in improving ANC's effectiveness and efficiency by conducting focused self-assessments of selected Cemeterial tasks. For example, in August 2010, ANCP conducted an internal review of its Interment Services ranch (ISB) and determined that a large number of telephone callers were not getting through to the ISB to request and schedule the interment / inurnment of a deceased loved one and that there was no voice mail system in place to track call volume. ANC immediately established a voice mail system and from August to December 2010, 2351 voicemails were left and subsequently responded to by the Cemetery staff. This large volume of voicemails gave the ED and staff an indication of the scale of caller volume and led to ANC seeking to establish a call center to centralize calls, differentiate tourist calls from interment / inurnment scheduling-related calls, free the ISB for the core function of scheduling services, and continue to respond to burial discrepancy inquiries. The resulting solution was to establish a centralized call center, in coordination with the Information Technology Agency's Consolidated Customer Service Center (CCSC) in December 2010.

Call Center Self-Assessments. The CCSC provides an excellent example of an organization that has a systemic, organization-wide self-assessment program. CCSC's call center representatives answer telephone calls made to ANC from the general public and provide general information (e.g., ANC hours of operation, directions to the cemetery, burial eligibility policies, etc.). These types of general informational inquiries are referred to as Tier I calls that usually can be handled by the CCSC representative. Tier II calls are more complex and usually involve inquiries about burial discrepancies or requests for interment / inurnment. The CCSC representatives are able to provide initial information for these Tier II calls and establish a case file using their CCSC's Remedy call management system, which records each call received and creates a discrete digital record (called a "ticket") of the actions taken by a call center representative in answering that specific call. Once the file is established and initial questions are answered the caller is transferred to ISB Cemetery Representatives

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(CRs) for further support and assistance. CCSC has established an ongoing self-assessment program that measures both quality and production where every month, supervisors review their call center operators' production data by listening in on three random Remedy calls for each call center operator. Each call center employee is then evaluated against CCSC's "ANC Quality Assurance Score Card" and the score is included in each call center operator's personnel record. As of July 2011, all of the call center operators were scoring in the high 90 percent of their established criteria which is allowing the call center Director to manage to standards and continue to improve performance.

The CCSC Remedy tracking system also enables ANC's leadership with the same capabilities; however, currently ISB CRs are only being monitored for the number of interments / inurnments scheduled, wait times and number of calls referred from the CCSC to the ISB each day. In August 2011, after the first six months of operation, CCSC leadership provided ANC with a report detailing metrics and trend analysis for call center performance. This report indicated continuing improvement in CCSC and ISB performance. More importantly, this report proved instrumental in identifying new CCSC staffing requirements and assisted ANC in improving ISB processes and workflows.

Self-Assessments Required for All ANC Operations. Other than call center operations, the inspection team could not identify any other aspect of ANC operations in which ANCP leadership currently applies defined metrics to measure performance. Defining the metrics against core tasks for all ANCP Divisions would significantly improve ANCP's ability to see itself as an organization and make systemic improvements. ANCP would benefit from a comprehensive program of internal management controls to measure performance in respective divisions' core areas and serve as a foundation for a self-assessment program. Such a program would allow the ANCP leadership to determine if the Cemetery is operating as it should, conduct evaluations to meet changing conditions and provide reasonable assurance that its objectives are being achieved.

RECOMMENDATION:

1.11.1 (reference #ID-1107.11.01): ANCP establish and conduct organization-wide self-assessments and an Organizational Inspection Program (OIP) to improve operations, enhance management controls and reduce risk.

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STANDARD(S): The 9 June 2010 DAIG inspection report on ANC, Subject: Special Inspection of ANC; Army Directive 2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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1.12 OBSERVATION (reference #ID-1107.12): ANCP has developed and implemented customer feedback mechanisms that now should be formalized in order to provide ANC leaders the ability to analyze feedback and identify trends and patterns so as to promote continuous process improvement.

DISCUSSION:

The inspection team noted in the 9 June 2010 DAIG inspection report on ANC (Deficiency 3.3) that ANC would benefit from a more formalized customer feedback system and analysis of customer perceptions. Customers at ANC can be divided into two general categories: (1) Tourists visiting the Cemetery or its social media sites; and (2) Next of kin (NOK) who are in need of support to inter their loved ones at ANC. The needs of these customers are different and efforts to make their experience and interactions with ANC positive require different feedback approaches. As noted in the 9 June 2010 DAIG report, ANC collected feedback comments from Families in an informal face-to-face method following interment and inurnment ceremonies; this practice continues today. Additionally, when a service is scheduled, Family members are provided a packet that includes methods by which the NOK can provide feedback. However, a method does not exist yet to ensure the Cemetery obtains a quantifiable number of responses from either tourists or NOK to ensure a statistically relevant sampling by which to accurately gauge mission performance with regard to both customer groups.

Since the 9 June 2010 inspection, ANCP has leveraged multiple public and social media opportunities to provide feedback. Customers are able to place phone calls to the ITA CCSC to register compliments or complaints. ANCP's public affairs staff monitors the social media sites that have been established. These sites include an ANC Facebook© page, Twitter © and the Army's Interactive Customer Evaluation tool on the ANC website. Reflecting the level of interest in these sites, as of 23 June 2011 ANC had over 42,000 Facebook© fans; of these, 23,000 are active followers. Feedback comments from customers and Family members of loved ones buried at ANC continues to be provided across all of these social media sites.

Although these feedback efforts are proving useful, the inspection team noted that ANCP has not yet developed the targeted feedback processes and mechanisms it is seeking in order to measure performance and make improvements. Targeted feedback could enable ANCP to improve the packet being provided to NOK and could enable the development of other means of ensuring the ANCP receives the kind of adequate, meaningful feedback it requires to identify trends and patterns in all facets of Cemetery operations.

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RECOMMENDATION:

1.12.1 (reference #ID-1107.12.01): ANCP target the type of customer feedback essential for measuring performance on core tasks and develop methods to obtain sufficient feedback to assist in improving performance.

STANDARD(S): The 9 June 2010 DAIG inspection report on ANC, Subject: Special Inspection of ANC; Army Directive 2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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1.13 OBSERVATION (reference #ID-1107.13): ANC's compliance in acquisition planning, requirements definition and contract management has improved significantly since the June 2010 DAIG inspection and ANC is developing SOPs to document its acquisition processes and procedures.

DISCUSSION:

Background. At the time of the 9 June 2010 DAIG inspection report, ANC received its acquisition support from several contracting offices. This resulted in ANC not always being correctly aligned with the core competencies of the contracting office supporting ANC on a given contracting action. ANC's acquisition support is now more appropriately aligned with contracting activities that possess the requisite expertise to provide the various types of contracting support required by ANC. Additionally, in March 2011, the USACE North Atlantic Division directed its USACE Baltimore District (NAB) to transfer support of ANC's construction projects to USACE Norfolk District (NAO). This transfer of the program management function is near completion and the transfer of the supporting contracts is scheduled to take place before the end of first quarter FY12. ANC is currently receiving its automation support services from ITA, the Army agency that provides IT services to the DoD community located within the National Capital Region. In September 2010, ACC assigned the Mission and Installation Contracting Command (MICC) as the contracting activity responsible for ANC's installation-type service contracting support.

The 9 June 2010 DAIG inspection report also found major compliance issues with ANC's Information Assurance (IA) program. The report also indicated that ANC's Total Cemetery Management System (TCMS), ANC's primary IT modernization effort and major IT investment, did not have an acquisition strategy to ensure that it was properly procured, integrated and compliant with Army IA requirements. Accordingly, ANC was in violation of reporting requirements established by Office of Management and Budget Circular A-11 (OMB A-11) associated with the acquisition of IT and other acquisition regulations regarding the procurement of IT. The report also indicated that contract requirements for IT had been generated by ANC employees who were unqualified in IT and that contracted expert advice on IT efforts had been ignored by ANC.

Inspection Focus. The inspection team focused on acquisition processes and contract actions in support of ANC since the 9 June 2010 DAIG inspection report. ANC's major acquisition focus since June 2010 was awarding a new suite of service contracts, which were completed by MICC. A sample of other ANC acquisition efforts, including minor construction and architect-engineering support by Baltimore District, also were reviewed. In the last year, there were no IT equipment procurements (except through

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ITA) and no IT systems were procured. Two task orders for geospatial mapping at ANC were awarded by the USACE Army Geospatial Center in late June 2011. Accordingly, the procurement of IT was not the major acquisition focus area for this inspection.

Improved ANC pre-award compliance. ANC partnered with MICC to re-compete the new suite of service contracts supporting many of ANC's operations. As a result of this extensive partnering effort, and the corresponding training provided to ANC during the pre-award process, ANC has improved its ability to perform the required pre-award activities and comply with applicable Federal, Defense and Army regulations. The inspection team reviewed the documentation for several of the recent ANC service requirements and found a high level of ANC compliance in several areas. Despite the tight acquisition schedule for these procurements, contract management and file documentation (particularly for the larger acquisitions) was strong in the following pre-award acquisition activities:

- Conducting extensive market analysis.
- Planning and documenting an acquisition strategy for the action that supported the Army's competition and small business goals.
- Analyzing the consolidation of existing ANC contracts.
- Adequately identifying and defining requirements.
- Preparing a complete acquisition requirements package.
- Developing suitable performance work statements.
- Developing quality assurance surveillance plans.

The inspection team reviewed four new USACE contracts for ANC: one service contract, two small construction contracts and one architect-engineer contract. Market research was conducted for all service and construction efforts. The inspection team noted that despite the low dollar value of the service contract action, a considerable amount of market research was documented. Trained CORs were nominated and appointed for three of the contracts.

Teaming. AR 70-13, *Management and Oversight of Service Acquisitions*, requires that the parties involved in service contracting use a team approach. Since June 2010, robust acquisition planning exchanges and good teaming have not always occurred for all ANC requirements. Initially, teaming appeared to be a problem area in the relationship between ANC and USACE. However, since USACE Norfolk District took over ANC's construction projects, the acquisition and program management teaming process has improved greatly. Acquisition planning has generally been a strength of the relationship between ANC and MICC. There was one instance when ANC did not involve the MICC contracting activity early enough in the acquisition process. The

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contract files for contract W91QV1-11-P-0085 indicate that although ANC knew about a potential requirement for the installation of a camera at least 11 calendar days prior to the date the service was required, ANC did not contact the contracting activity about the requirement until 4 calendar days prior to the required service date. This left the contracting agency minimal time to respond appropriately to the requirement and, as a result, the contract file was incomplete. However, the contract action was completed in time to support the funeral.

Acquisition requirements packages. AR 70-13 specifies that it is the responsibility of the requiring activity to provide the contracting activity with documentation required for the acquisition of the service. Both MICC and USACE indicated that some acquisition requirements packages received from ANC were either missing key documents or the documents received were inadequate. One example of a deficient document was the requirements statement ANC provided to USACE for the packing and movement of two Cemetery urns (W912DR-11-P-0073). As written, the statement was insufficient to describe the requirement and was not performance based.

ANC did not provide an appropriate amount of procurement package documentation required by AR 70-13 to the contracting office for contract W91QV1-11-P-0085. The COR nomination and training information, Approval for Civilian Hiring and Initiation / Continuation of Contracts for Service Personnel and the Quality Assurance Surveillance Plan (QASP) were not provided. The performance work statement was insufficient to describe the requirement adequately. Additionally, the purchase request was received very late in the process.

ANC contract management compliance. The service contracts awarded by MICC were still relatively new contracts when the inspection team conducted the contract review. The inspection team observed a greater emphasis on contract management efforts. All of the larger dollar service contracts (over \$100,000) had QASPs. Files of the larger dollar service contracts indicated that trained CORs were being nominated and appointed prior to award of the contract. The inspection team observed that ANC CORs were receiving a significant amount of formal and hands-on contract management training.

COR nominations. AR 70-13 requires the nomination of a qualified COR to be submitted with the requirements package and the contracting officer to appoint a qualified COR for the management of contract performance. Despite overall improvements in contract management, three of the seven service contract files reviewed (W91QV1-11-P-0083, W91QV1-11-P-0085 and W91QV1-11-D-0008) did not have the appropriate COR documentation required by AR 70-13. The contract file for

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W91QV1-11-D-0008 indicated numerous attempts by the contracting office, over a 2-month period, to obtain COR training documents that should have been provided by ANC prior to contract award.

Training. The inspection team observed an increased emphasis on acquisition training at ANC in the areas of contract formation and in contract management. The Defense Acquisition University conducted a Service Acquisition Workshop for ANC in October 2010 to provide tailored pre-award instruction on developing the requirements packages for the new group of service contracts. MICC personnel provided additional tailored instruction on preparing performance work statements, QASPs and other required documentation pertinent to the contract formation effort.

Training to strengthen contract management skills also has increased. All currently assigned CORs completed the required COR training and all nominated CORs were scheduled for COR training. Additional COR training included the use of the Wide Area Workflow (WAWF) system to accept and process vendor invoices, the use of the COR Management System (CORMS) to enter contractor performance information and training on surveillance methods appropriate to the contracted effort.

Post-award orientation and meetings. AR 70-13 recommends that some type of post-award orientation be provided to enable a strong business relationship between the government and the contractor at the onset of the contract and avoid problems during performance. Both ANC and the contracting offices supporting ANC reported limited post-award interaction and coordination. AR 70-13 also directs that periodic status meetings are to be held to resolve contractual issues. Again, both ANC and the supporting contracting offices reported that these meetings are generally not taking place.

One purpose of having a post-award orientation meeting is to ensure that the contractor understands the roles of government personnel involved in the acquisition process and knows to contact the contracting officer if they experience contractual problems that are not being resolved. Periodic status meetings also offer a forum to resolve contractual issues. It is clear that one small-business contractor (contract W91QV1-11-C-0011) could have benefitted from such meetings. The contractor experienced delays in payments due to a COR not receiving services in a timely manner in the WAWF system. The same contractor experienced delays of more than a month in responses to his repeated requests to resolve an outstanding contractual issue (i.e., adding a contingency to the contract for additional safety aides to support special ANC events). Repeated problems with payments and the ability of a contractor to contractually comply with ANC's requests should have been elevated to the contracting officer.

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IT Status. ANC now has a partially staffed G-6 Division with the expertise to define and approve IT-related requirements for ANC. The ANC G-6 is bringing ANC into full compliance with the laws, regulations and policies governing IT procurements and with all IA regulations. Given that G-6 only recently initiated strategic planning efforts for ANC's major IT system improvements, there have been no major IT investments by ANC since the initial June 2010 inspection. The ANC G-6 staff has indicated that it is aware of OMB A-11 reporting requirements and that it will comply with those requirements prior to the acquisition of IT systems supporting ANC operations.

IT Support. In the last year ANC's transitioned all of their IT support to the ITA. ITA is providing ANC with reliable, secure, cost-effective IT services and assistance in both IT planning and IA compliance.

ITA and ANC formalized their relationship in a Service Level Agreement (SLA), executed in June 2011. Under this agreement, ITA provides ANC with automation support services that comply with approved automation standards and initiatives for the National Capital Region. This detailed document specifically defines ITA's support for ANC's automation requirements on a reimbursable basis. The SLA provides for ANC's business applications, cable television, commercial wireless voice and data, CSSC support, desktop support, managed application hosting, managed storage, network connectivity, voice over internet protocol and video teleconferencing requirements. It also provides for the procurement of IT equipment that supports services within the scope of the SLA.

Planning for future IT needs. ANC has implemented a strategic planning process for its IT architecture and supporting acquisitions. ANC is now largely compliant with IT acquisition regulations as it is developing a suitable acquisition strategy prior to the procurement of IT systems and supporting IT infrastructure. ITA provided ANC with recommendations to implement effective strategic planning and has offered ANC's G-6 assistance in the planning process.

ITA's approach for assisting ANCP in its strategic planning efforts for IT includes analyzing ANC's current business processes and architecture, defining the required information systems architecture, developing the associated requirements and acquiring ANC's technology requirements. ITA has in place an existing contract for strategic planning services and can assist ANC with the development of the requirements package for the required strategic planning services support contract. ITA is willing to provide some level of interim support until the strategic planning services contract is in place to support fully the ANC planning effort.

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Management controls. There are management control mechanisms in place to ensure ANC's acquisition of IT is conducted in accordance with OMB guidance and applicable acquisition regulations. The correct use of the support SLA with ITA and the MOAs with USACE and ACC will ensure that IT requirements are referred to the appropriate acquisition office (i.e., one with proficiency in IT procurements). Currently the ANC Contract Support Liaison reviews all procurement requests over \$3,000. This practice reinforces the use of the appropriate activity to procure required IT equipment or services. USACE and MICC contracting activities also screen incoming requirements from ANC to ensure that the requirements are appropriate for their respective contracting activities to procure and that the designated contracting activity has the requisite expertise to do so.

Acquisition Process and Procedures. One of the initial recommendations from the 9 June 2010 DAIG inspection report was that ANC, in coordination with the contracting activities supporting ANC, develop and implement processes and procedures and document those processes by developing SOPs. The recommendation suggested several topics for SOPs, to include requirements generation, the contents of requirements packages, acquisition approval thresholds, minimum training requirements and the use of assigned contracting offices.

To date, ANCP has three draft acquisition-related documents: Procurement Information Memo 11-01, Understanding the Procurement Process; Procurement Information Memo 11-02, Contracting Officer's Representative Training Requirements; and the Government Purchase Card (GPC) Policy. Other documents on the use of the Wide Area Workflow system, the General Fund Enterprise Business System and the prevention of unauthorized commitments are in development.

RECOMMEDATIONS:

1.13.1 (reference #ID-1107.13.01): ANCP maintain close communications with, seek acquisition advice from, and involve contracting officers supporting their requirements to ensure the most complete requirements packages are submitted for each contracting action.

1.13.2 (reference #ID-1107.13.02): ANCP ensure that CORs perform their COR duties in a timely manner.

1.13.3 (reference #ID-1107.13.03): ANCP leaders involved in the procurement process attend an acquisition overview class to ensure an understanding of contracting regulations, processes and required lead times.

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1.13.4 (reference #ID-1107.13.04): ANCP ensure that the ANC G-6 includes the Contract Support Liaison and the appropriate contracting activity early in any discussions of acquisition strategy for the acquisition of IT for ANC.

1.13.5 (reference #ID-1107.13.05): ANCP develop and document internal ANCP procedures and policies on the acquisition of IT to prevent future violations of acquisition regulations and OMB guidance.

1.13.6 (reference #ID-1107.13.06): ANCP ensure that management controls for the proper procurement of IT are enforced.

1.13.7 (reference #ID-1107.13.07): ANCP continue to develop and document appropriate SOPs, policies and guidance.

STANDARD(S): The 9 June 2010 DAIG inspection report on ANC, Subject: Special Inspection of ANC; Army Directive 2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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1.14 OBSERVATION (reference #ID-1107.14): The oversight of ANCP contract and associated management controls have improved significantly and are now approaching the standard for best practices.

DISCUSSION:

Since the initial 9 June 2010 DAIG inspection report, ANCP and contracting activities supporting ANC have received a considerable amount of oversight. At the direction of the SecArmy, ASA(ALT) completed two Procurement Management Reviews (PMRs) of all ANC contract actions since the issuance of AD 2010-04. ASA(ALT)'s reviews included all types of contracts and procurement activities, to include service, supply, construction, architect-engineer and IT contracts and GPC actions, at all contracting activities supporting ANC. Additional reviews, inspections and audits of contracts and contracting activities have been conducted by GAO, AAA and the DAIG. Also, ANCP, USACE, ACC and MICC all have implemented their own oversight and management control initiatives to improve contracting operations supporting ANC.

ACC and USACE leadership have demonstrated personal involvement and a commitment to resolving problems identified by recent reviews, inspections and audits. Both commands changed the offices supporting ANC in an effort to provide better acquisition support. ACC and USACE leadership are assigning dedicated personnel to provide improved levels of support for ANC actions. Both commands have improved oversight activities at the HQs level in an effort to improve their acquisition processes and supporting documentation.

Support agreements. During 2010, ANC entered into Memoranda of Agreement (MOAs) with ACC and USACE for contracting support; the ANCP ED also issued a policy directing the use of these contracting activities. Both the MOAs indicate that each organization will make the appropriate assignment of a contracting support office. This control mechanism should curtail the use of contracting offices in performing work outside of their areas of core competency, a matter of concern with regard to past ANC contracts. Both MOAs indicate that joint contract reviews will be held periodically with ANC to discuss ongoing and upcoming contract requirements.

The ACC MOA is limited to contracting support and sets forth some of the basic responsibilities of each party. It directs that the ACC-assigned contracting office will execute subordinate MOAs with ANC to further detail the scope of support provided. To date, several MICC activities have provided contracting support to ANC under the MOA. The HQ MICC staff indicated that the current MOA was working well due to senior

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leadership's clear articulation of its expectation that providing support to ANC was of critical importance to ACC.

The USACE MOA is a generalized support agreement, detailing no further responsibilities of each signatory. Within USACE, the program management and contracting support is in the process of transferring from the USACE Baltimore District (NAB) to the USACE Norfolk District (NAO). USACE Norfolk District and ANC are further defining their specific roles and responsibilities in the acquisition process in a Program Management Plan (PMP). HQ USACE indicated that the current MOA, as supplemented by the PMP, was working well.

In addition to the MOAs with contracting agencies, a SLA between ITA and ANC was executed in June 2011. As previously discussed, this SLA provides for ANC's automation support services. ITA's services are compliant with approved automation standards and initiatives for the National Capital Region.

ANCP initiatives. ANCP established several acquisition related management controls. The Contract Support Liaison screens and tracks every ANC requirement over \$3,000 (the threshold at which many formal acquisition rules begin to apply) and reviews the associated procurement packages provided to the supporting contracting activity to ensure they contain adequate documentation to support the procurement. ANCP implemented internal controls to limit use of the GPC until ANC fully establishes its GPC program. These controls include the review and approval of all GPC purchases by the ED or Chief of Staff.

USACE initiatives. USACE has several ongoing oversight initiatives. A Business Operations Branch will be established at each USACE division office to perform oversight and management control functions within each district. ANC requirements were screened for appropriateness by the Baltimore District contracting activity to ensure that only work within that District's core competency areas was being accepted. The Baltimore District promulgated and is implementing an internal Acquisitions Process Improvement Plan (APIP). The APIP addresses all issues identified by the recent reviews, inspections and audits of USACE support to ANC and defines numerous tasks to be undertaken to resolve issues in five areas: business process and policy; documentation and compliance; engagement, leadership and culture; organization, staffing and resources; and training. As contracts transition to the Norfolk District, USACE will conduct a review of operations at the Norfolk District to ensure the contracting office is complying with acquisition regulations prior to the transfer of ANC contracts from Baltimore District. USACE is also involved in the implementation of several corrective actions identified during PMRs conducted by the Deputy Assistant

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Secretary of the Army for Procurement (DASA(P)), as necessary. USACE is also monitoring the progress of corrective actions applicable to USACE contracting activities.

Army Contracting Command / Mission and Installation Contracting Command (ACC / MICC) initiatives. ACC HQ has several oversight and compliance initiatives underway to improve the quality of ACC's acquisition support to ANC. HQ ACC personnel monitor the progress of corrective action plans for ACC contracting activities involved in ANC procurements. ACC employs review processes appropriate to the value and complexity of ANC contracting actions. ACC's Management Assessment Division conducts periodic and special interest reviews of contracting activities and ACC can direct HQs-level staff assistance visits as needed. ACC assigned one of its employees to provide functional contracting oversight, with duty on-site at ANC. Additionally, there is regular top-level communication between ANCP, HQ MICC and HQ ACC personnel to resolve any acquisition issues that may arise on any front.

To improve the quality and compliance of contracting actions, MICC HQ issued command guidance on review and approval requirements for MICC contracting actions that lowers, for MICC contracting offices, the review thresholds established by regulation. The effect is increased oversight of MICC contracts, at all dollar levels, by MICC contracting offices. MICC HQs monitors the progress of corrective action plans from reviews, inspections and audits. MICC leadership placed an increased emphasis on post-award contract management (to include COR training and appointments, QASPs and monitoring performance) in MICC contracting offices. MICC HQ instituted an expedited review process for the recent re-competition of a group of ANC service contracts; a team of subject matter experts met and concurrently reviewed the solicitations and contracts to reduce the procurement acquisition lead time.

At the MICC-Fort Belvoir contracting office, the Director reviews all incoming requirements on a daily basis to ensure work coming into the office is appropriate for that office. MICC-Fort Belvoir has conducted training on the MICC guidance for contract review and approval requirements. The office is transitioning its official contract file system (to include ANC contracts) from paper to the Paperless Contract File system to enable improved contract management and oversight. The MICC-Fort Belvoir contracts reviewed by the inspection team included documentation of internal compliance reviews at the appropriate level. The MICC-Fort Belvoir office has also been conducting reviews of the ANC GPC program.

Communication and coordination meetings. The Contract Support Liaison, MICC HQ senior staff members and MICC-Fort Belvoir contracting office staff members

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currently hold a weekly battle rhythm meeting to discuss any ANC contracting support issues. Other coordination meetings with ANC are held on an as-needed basis. USACE is developing a detailed PMP for its support of ANC's construction projects. In June 2011, the senior leadership of ANCP and USACE held an initial Senior Executive Review Group (SERG) in an effort to gain consensus on USACE's support to current ANC construction projects, ANC's Master Plan and supporting acquisitions. The SERG plans to meet quarterly. Additionally, the ANC staff will meet with the Norfolk District Program Manager monthly for a line item-style review of current and future ANC projects.

RECOMMENDATION:

1.14.1 (reference #ID-1107.14.01): ACC and USACE continue to perform oversight of ANCP contract actions and assist ANCP in developing internal management controls for its acquisition processes.

1.14.2 (reference #ID-1107.14.02): ACC and USACE ensure contracting teams supporting ANC have an appreciation for the ANC mission and develop effective working relationships with the ANC staff.

STANDARD(S): The 9 June 2010 DAIG inspection report on ANC, Subject: Special Inspection of ANC; Army Directive 2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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1.15 OBSERVATION (reference #ID-1107.15): Contracting commands supporting ANC are taking other positive steps to resolve internal acquisition issues identified by recent ANC reviews and audits and to assist ANC in improving its acquisition processes.

DISCUSSION:

ACC and USACE leadership have demonstrated personal involvement and a commitment to resolving problems identified by recent reviews, inspections and audits. Both commands changed the offices supporting ANC in an effort to provide better acquisition support. ACC and USACE leadership are assigning dedicated personnel to provide improved levels of support for ANC actions. Both commands have improved oversight activities at the HQs level in an effort to improve their acquisition processes and supporting documentation.

Dedicated ANC support. The USACE Norfolk District has established Project Delivery Teams that hold regular planning meetings regarding support to ANC and has assigned a program manager for all support to ANC and individual project managers for each ANC construction project. A detailed PMP is in development. Additionally, the USACE Norfolk District Commander intends to establish a resident office at ANC to support ANC construction projects. This resident office will include a dedicated program manager, a quality assurance specialist, a COR and possibly, an administrative contracting officer.

HQ MICC provided ANCP with an on-site senior contract specialist to serve as a Contract Support Liaison. This liaison works with ANC staff to define requirements, develop requirements packages, track procurement actions and provide acquisition advice. After the award of a series of short-fused service contracts required to maintain operations at ANC, the job focus of this position has grown to include documenting ANC procurement processes and providing additional acquisition training. This position is currently filled by an MICC employee on a temporary basis. Contracting activities supporting ANC have indicated that the quality of requirements packages has improved at ANC since the arrival of the Contract Support Liaison. Continuous staffing for this position is critical to keep ANC's acquisition processes moving in the right direction and to provide acquisition mentoring to the ANC staff.

MICC-Fort Belvoir has established a seven member contracting team dedicated to ANC contracting support. The support team consists of a division chief, a contracting officer, four contract specialists and a quality assurance specialist. The team will be located at the MICC-Fort Belvoir contracting office and make frequent visits to ANC. Despite two

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selectees declining the contracting officer position thus far, the MICC-Fort Belvoir continues to diligently work this hiring action and has augmented the four ANC-funded team positions with additional team members from its existing workforce to ensure a high level of support for ANC.

Training efforts. Targeted training at ANC has increased since the last inspection. MICC has conducted a significant amount of acquisition training at ANC over the past year. To assist the ANC staff in preparing properly its most recent group of service contracts, MICC HQ staff members ensured ANC staff members were trained in the proper development of procurement packages and in contract management activities. This effort included MICC HQ staff members:

- Coordinating with Defense Acquisition University to conduct a Service Acquisition Workshop for ANC personnel.
- Conducting a Program Risk Assessment training session.
- Conducting several on-site sessions of the ACC COR Comprehension Training class.
- Conducting tailored training with CORs to develop QASPs and surveillance schedules for their contracts.
- Conducting "hand-on" training for CORs in using the appropriate surveillance methods for their contracts.
- Conducting training for CORs on the use of the Wide Area Workflow system to accept contractual services

In addition to the above efforts, training for the acquisition workforce since the last inspection at MICC commands has included:

- Training on the Standard Procurement System.
- Training on the use of the Army Computer Hardware, Enterprise Software and Solutions (CHESS) program for the procurement of information technology.
- Source Selection training.
- Price Analysis training.
- Training on the use of the Army's General Fund Enterprise Business System (GFEBs).

USACE, a cost-reimbursable organization, is hampered in its training efforts because it is required to use overhead funding for all labor costs, including time spent in acquisition training. Despite this challenge, training for the acquisition workforce since the last inspection at USACE commands has included:

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- Market Research training.
- Source Selection training.
- Price Analysis training.
- Peer Review training.
- COR training.
- Justification and Approval training for non-competitive actions.
- Performance Work Statements.
- QASPs.
- Performance Based Service Acquisition training.

USACE did not provide IT acquisition training (such as the Army CHES program) because it will not be accepting future IT requirements from ANC. .

Government Purchase Card (GPC) program. MICC assumed responsibility for the ANC GPC program, to include designating a MICC Billing Official and training GPC cardholders at ANC. This will allow ANC to concentrate on other more important acquisition issues until the time that ANC is fully prepared to resume GPC program management responsibilities. MICC will assist with the transition of the program to ANC in the future.

Corrective Action Plans. Both ACC and USACE have extensive corrective action plans in place to correct deficiencies noted in recent PMRs. There is HQs-level oversight in place at both commands to track corrective actions by their subordinate commands. Additionally, USACE Baltimore District analyzed acquisition issues and developed an Acquisitions Process Improvement Plan (APIP) to improve its internal processes. Additionally, the Baltimore District has begun implementation of a number of wide-ranging improvements in its program management and acquisition processes as outlined in the APIP.

RECOMMENDATION:

1.15.1 (reference #ID-1107.15.01): ANCP coordinate with ACC to ensure that the Contract Support Liaison position is continuously staffed to ensure that ANC receives adequate support and advice on acquisition-related matters.

STANDARD(S): The 9 June 2010 DAIG inspection report on ANC, Subject: Special Inspection of ANC; Army Directive 2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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1.16 OBSERVATION (reference #ID-1107.16): Most of the ACC and USACE contractual documentation supporting ANC procurement actions since the June 2010 DAIG inspection was of a high quality and complied with acquisition regulations.

DISCUSSION:

The initial 9 June 2010 DAIG inspection report of ANC cited documentation problems and poor source selection procedures in contract actions supporting ANC. To make a determination if compliance with applicable acquisition regulations had improved since the last inspection, the inspection team reviewed a sample of contract actions supporting ANC operations over the last 12 months. The inspection included a review of the official contract file documentation for actions from the MICC-Fort Belvoir, MICC-Fort Myer and the USACE Baltimore District contracting offices.

MICC support. In September 2010, ACC transferred the contracting authority for ANC service contracts to MICC. MICC supported the re-competition of 14 ANC replacement contracts for operational services using MICC personnel, including several senior staff members for MICC HQ and several MICC contracting offices. MICC provided ANC with acquisition planning support, temporary on-site ANC staff support (i.e., the Contract Support Liaison), contract execution support and contract review and oversight support for ANC requirements.

Despite the abbreviated time that remained to put replacement ANC contracts in place by March 2011 to avoid a lapse in service, the re-competition effort was conducted well. The acquisition strategy for the new ANC service contracts involved an extensive market research effort, including coordination with the VA, working with the MICC Small Business Office and holding an Industry Day to seek input from vendors on how to craft the new requirements in ways that were performance based. The acquisition strategy included the use of competitive procurements using small businesses whenever possible. MICC used an expedited review process to support the solicitation and contract review processes, which reduced the acquisition timeline.

Most discrepancies in the MICC files reviewed by the inspection team were discovered in the files of smaller value contract actions (i.e., under \$100,000). Those files indicated fewer internal compliance reviews (i.e., review only at the contracting officer level). The findings and related observations for MICC contracting offices, together with supporting regulatory references, are detailed in Figure 1, page 2-44.

MICC-Fort Belvoir. Contracts reviewed at MICC-Fort Belvoir were generally well organized, used contract checklists, and contained very high quality documentation

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suitable to the contract action, especially considering the very tight milestone schedules for these actions. Market research documentation, acquisition planning documentation, documentation supporting the consolidation of requirements, performance work statements and QASPs were particularly well written and included the required information. It is the inspection team's observation that MICC-Fort Belvoir properly applied acquisition regulations to new ANC contract actions, with some exceptions, detailed in Figure 1, page 2-44.

The inspection team reviewed an internal MICC-Fort Belvoir 15 February 2011 review of ANC's GPC accounts. The internal review report indicated that ANC's GPC records did not fully support ANC GPC card charges, but the review report did not provide detailed findings. Detailed information on findings would facilitate making improvements in the ANC GPC card program.

MICC-Fort Myer. The contracting office at MICC-Fort Myer reported having provided only minimal support to ANC operations. The MICC-Fort Myer office issued three modifications to existing contracts for base operations on Joint Base Myer-Henderson Hall. The modifications all added new in-scope work for ANC, but the official contract file documentation for the two modifications reviewed by the inspection team revealed that required documents were missing and that the existing documentation was insufficient to support the actions being taken. These findings and related observations are detailed in Figure 1, page 2-44.

USACE Baltimore District. The USACE Baltimore District is in the process of transferring its program management and contracting functions in support of ANC operations to the USACE Norfolk District. This effort should be completed sometime during first quarter FY12. At the time of the inspection, the USACE Baltimore District contracting office was supporting ANC. The inspection team visited the USACE Baltimore District offices to review a sampling of different contract types (i.e., construction, architect-engineer and service).

The inspection team found that the contracts reviewed at USACE Baltimore District were generally well organized and used a checklist suitable to the contract action. The construction and architect-engineer contracts reviewed generally had stronger documentation than did the service contracts. Most of the USACE Baltimore District service and architect-engineer contracts contained required QASPs, COR appointments and supporting COR documentation. Much of the post-award contract administration documentation was missing from the official contract files reviewed. A more detailed analysis of findings and observations pertaining to contracts reviewed at the USACE Baltimore District is located in Figure 2 on page 2-48.

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Contracting Agency Oversight. The majority of the official ACC and USACE contract files pertaining to actions in support of ANC and reviewed by the inspection team reflected some errors and omissions. Additionally, for the ANC contracts reviewed at the MICC-Fort Belvoir contracting office, a trend was noted: the contract files for smaller dollar ANC actions (i.e., under \$100,000) generally contained more errors and omissions than did the files of the larger dollar contract actions. The MICC contract review guidance generally does not mandate reviews for these smaller dollar actions, but it does mandate the review of special interest items regardless of dollar value. This is a strong indicator that appropriate oversight should occur on all ANC contract actions, regardless of dollar value.

Another potential problem in the area of oversight is that the locally produced report on the review of GPC operations supporting ANC was not very detailed as to specific problems identified as to GPC purchases. The inspection team could not determine what corrective actions (other than a need for additional file documentation) were required for the ANC GPC program. Unless the review report is detailed, the review is of little assistance to management in identifying problems and trends, thus making it difficult to effectively implement corrective actions required as to the GPC program.

RECOMMENDATIONS:

1.16.1 (reference #ID-1107.16.01): ACC and USACE include all ANCP contracting actions in the solicitation and contract review process at levels above the contracting officer until DASA(P) determines those contracts to be low-risk.

1.16.2 (reference #ID-1107.16.02): ACC and USACE continue to assess and target areas for improvement within their respective commands and provide appropriate corrective actions to strengthen the quality of the acquisitions supporting the ANCP.

1.16.3 (reference #ID-1107.16.03): ASA(ALT) include reviews of all ANCP GPC procurements in its PMRs until the ANCP GPC program is determined to be low-risk.

1.16.4 (reference #ID-1107.16.04): MICC ensure that local GPC reviews are detailed enough to enable management to target areas for improvement in the ANCP GPC program.

STANDARD(S): The 9 June 2010 DAIG inspection report on ANC, Subject: Special Inspection of ANC; Army Directive 2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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(Figure 1) The following chart details inspection team findings pertaining to contract files at MICC contracting commands:

	Missing required documentation	No file for review	Excessive misfiled documentation	Document missing information	Solicitation method unclear	Document missing signatures	Modification used incorrect authority	Inadequate price analysis
MICC-Fort Belvoir								
Smaller actions								
W91QV1-11-C-0015	X			X				
W91QV1-11-D-0008-0001								
W91QV1-11-F-0040	M				X		X	
W91QV1-11-F-0040-P00001	M						X	
W91QV1-11-P-0083	M						X	
W91QV1-11-P-0083-P00001	X							
W91QV1-11-P-0085 (Camera)	M							
W91QUZ-10-D-0010-2M48 (CHESS)								
Larger actions								
W91QV1-11-C-0008	X					X		
W91QV1-11-C-0008-P00001								
W91QV1-11-C-0011			X			X		
W91QV1-11-C-0011-P00001						X		
W91QV1-11-C-0022	X				X	X		
W91QV1-11-C-0022-P00001	X							
W91QV1-11-D-0008	X							
MICC-Fort Myer								
Smaller actions								
W91QF7-09-C-0040-P00011	X					X		X
W91QF7-10-C-0008-P00018	X							X

Key: M=multiple findings, X=single

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MICC-Fort Belvoir:

The following specific findings and observations were noted in the MICC-Fort Belvoir contract actions supporting ANCP acquisitions:

A. Not all of the files contained all required documentation appropriate to the action type. Some examples of missing file documentation included:

- Contract W91QV1-11-C-0015 did not contain a Request for Quotation (RFQ) in the appropriate contract file tab, but it was evident that one was sent to the vendor because the file contained a vendor's quotation (FAR13.101).
- Contracts W91QV1-11-C-0022 and W91QV1-11-P-0083 were missing a certified purchase request to evidence the availability of funds in the backup information for funding modifications. A funding line was cited in the funding modification so it seems clear that a purchase request was done, but it was not filed (FAR 32.702).
- Contract W91QV1-11-P-0083 was missing the requirement for contractors to complete the Army's Contractor Manpower Reporting (AR 70-13).
- Contract W91QV1-11-P-0083 was missing the ANC ED's approval for Civilian Hiring and Initiation/Continuation of Contracts for Service Personnel for the service being acquired (AR 70-13). There was no indication in the file if this document was received from ANC or not.
- Contract W91QV1-11-P-0083 was missing a QASP or contracting officer's QASP exemption (AR 70-13). There was no indication in file if this document was received from ANC or not.
- Contract W91QV1-11-P-0083 was missing COR nomination, appointment and training documentation (AR 70-13). There was no indication in the file if this document was received from ANC or not.
- Contract W91QV1-11-F-0040 was missing Contract Action Reports (DFARS 204.6).
- Contracts W91QV1-11-F-0040 and W91QV1-11-D-0008 were missing evidence of distribution of the contract action (DFARS 204.2).

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- Contracts W91QV1-11-C-0008 and W91QV1-11-C-0011 were missing documentation on contract reviews (AFARS 5137.590).
- Contract W91QV1-11-C-0011 was missing a contracting officer's determination of price reasonableness (FAR 15.406-3). The Source Selection Decision Document discussed price reasonableness but it was not signed by a contracting officer.
- Contract W91QV1-11-C-0011 was missing documentation of the synopsis of the request for proposals (RFP). The contract award synopsis was filed with the RFP (FAR 5.201).
- Contract W91QV1-11-C-0011 was missing a contracting officer's commerciality determination (FAR 12.207 & 2.101).

B. One contract file (W91QV1-11-C-0011) contained numerous pieces of misfiled documentation, including portions of the RFP, the pre-award past performance questionnaires, source selection evaluation board documents, evidence of contract distribution and contractor requests for debrief (FAR 4.802).

C. One document was not completely in the format specified by AFARS 5153.9005. The Justification for Other Than Full and Open Competition for contract W91QV1-11-C-0015 was very well written and contained all the required information, except that there was no reference to the use of certified cost and pricing data.

D. Two contract files were not entirely clear on the type of solicitation being used:

Contract W91QV1-11-C-0022 used both the combined synopsis/solicitation (FAR 12.603) and negotiated contracting methods (FAR 15.204).

Contract W91QV1-11-F-0040 used a combination of procedures for ordering from General Services Administration (GSA) schedules (FAR 8.405) and simplified acquisition procedures (FAR 13.3).

E. Some files contained documents that require signatures, but that were not signed (FAR 1.704). For example:

- The price reasonableness determination for contract W91QV1-11-C-0022 was not signed by the contracting officer.

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- The commerciality determination for contract W91QV1-11-C-0008 was not signed by the contracting officer.
- The Source Selection Decision Document for contract W91QV1-11-C0011 was not signed by the Source Selection Authority.

F. Two contract modifications for contracts W91QV1-11-P-0083 and W91QV1-11-F-0040 were issued using an incorrect authority for the type of modification being done (FAR 43.102).

MICC-Fort Myer:

The following specific findings and observations were noted in the MICC-Fort Myer actions:

- A. There was no contracting officer's in-scope determination contained in the supporting documentation for contracts W91QF7-09-C-0040-P00011 and W91QF7-10-C-0008-P00018 (FAR 43.2).
- B. Both modifications W91QF7-09-C-0040-P00011 and W91QF7-10-C-0008-P00018 added new work non-competitively, but neither modification document file contained the determinations or justification and approval documents to support other than full and open competition (FAR 13.106(b), FAR 6.303).
- C. The requests for proposal and technical analysis of the proposals were missing from the files of both modifications (W91QF7-09-C-0040-P00011 and W91QF7-10-C-0008-P00018).
- D. The price analysis for both modifications (W91QF7-09-C-0040-P00011 and W91QF7-10-C-0008-P00018) was insufficient to support the addition of the new work (FAR 43.204, FAR 15.404).
- E. For W91QF7-09-C-0040-P00011, the contractor did not sign the file copy of the bilateral modification (FAR 43.103).

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(Figure 2) The following chart details findings in contract files at the USACE Baltimore District:

USACE Baltimore District	Missing required documentation	No file for review	Document missing required information	Inadequate price analysis
W912DR-09-C-0003-P00004	X		X	
W912DR-09-D-0050-0022	M			X
W912DR-09-D-0050-002201		X		
W912DR-09-D-0050-002202				
W912DR-10-D-0014-0002	M			
W912DR-10-D-0014-000201				
W912DR-11-C-0003	M			
W912DR-11-P-0073	M			X

Key:

M=multiple findings, X=single finding

The following specific findings and observations were noted in the USACE Baltimore District actions:

- A. One of the contract files could not be located for review - Contract W912DR-09-D-0050, Task Order 0022, Modification 01.
- B. Not all of the files contained all required documentation appropriate to the action type. Examples of missing documentation included:
 - The file for Contract W912DR-09-C-0003 Modification P00004 did not contain a contracting officer's determination of price reasonableness (FAR 15.406-3).

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- The file for Contract W912DR-11-P-0073 was missing a determination of price reasonableness (FAR 13.106-3).
- The file for Contract W912DR-11-P-0073 was missing a QASP or written contracting officer's QASP exemption (FAR 46.401, FAR 46.404, DFARS 246.401, SAAL-PP memorandum).
- The file for Contract W912DR-11-P-0073 was missing an Independent Government Estimate (IGE) or other pricing information sufficient to support contract award (FAR 15.402, DFARS 215.403).
- The file for Contract W912DR-11-C-0003 was missing a determination of price reasonableness (FAR 15.406-3). There was no documentation indicating a site visit or pre-construction conference had taken place (FAR 36.210 and 36.212). There was no indication of required Davis-Bacon payroll information or reviews (FAR 22.406).
- The file for Contract W912DR-09-D-0050 Task Order 0022 was missing documentation on market research and the DD 2579 Small Business Coordination Form (FAR 10.001 and DFARS 219.201).
- The file for Contract W912DR-10-D-0014 Task Order 0002 was missing documentation on performance bonds (which was marked on the file checklist), a site visit, a pre-construction conference and the DD 2579 Small Business Coordination Form (FAR 28.102, FAR 36.210, FAR 36.212, and DFARS 219.201 respectively.) There was no indication of required Davis-Bacon payroll information or reviews (FAR 22.406).

C. One of the files contained incomplete documentation in that the Contracting Officer's Determination to Exercise an option for Contract W912DR-09-C-0003 Modification P00004 was missing required information (FAR 17.207).

D. Contract W912DR-09-D-0050 Task Order 0022 is for Architect-Engineer Services. The contracting officer awarded this task order with a 10 percent profit, which exceeds the statutory limitation of 6 percent profit or fee for architect-engineer services for public works or utilities imposed by 10 U.S.C. 2306(d) and 41 U.S.C. 254(b) (FAR 15.404-4).

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1.17 OBSERVATION (reference #ID-1107.17): Planned improvements being implemented at ANC are also being incorporated at the Soldiers' and Airmen's Home National Cemetery (SAHNC).

The 9 June 2010 DAIG inspection report on ANC found that many of the same challenges and issues found at Arlington were present at the SAHNC and that improvements made at ANC in the areas of automation, training, inspections and contracting should also be considered for implementation at the SAHNC. The 9 June 2010 inspection also noted that the scale of operations at the SAHNC is significantly smaller than at ANC in all facets. The SAHNC Superintendent, a General Schedule-9 (GS-9) employee reports to the ANC Deputy Superintendent, a GS-15. All other support is provided via contract or from ANC employees on an as needed basis. In terms of tourism, there is no comparison in the scope of mission. Whereas ANC receives over 4 million visitors a year, the SAHNC only receives a handful on most days. Cemetery visitors consist predominantly of Family members of loved ones interred at SAHNC or other residents of the Soldiers' and Airmen's Home. Eligibility for interment at the SAHNC differs from that at ANC in that it is limited to residents of the Home. Consequently, the SAHNC conducts an average of only 7-8 funerals per year. Because of these key differences, the SAHNC only requires a fraction of the resources and involvement by Service stakeholders that are required by ANC on a daily basis.

Despite the much smaller scale of operation at the SAHNC, the inspection team noted that efforts like those recently initiated at ANC to correct automation and standardization have not yet been initiated at the SAHNC. Specifically, although corrective actions are part of the longer-term ANCP plan, efforts to automate the SAHNC's records and to digitize its maps has not begun. SAHNC is nominally connected to the ANC Interment Scheduling System (ISS) but the resourcing of funerals still must be conducted by the SAHNC Superintendent. Mirroring the findings of the 9 June 2010 DAIG inspection report, this inspection found that this process is not currently impacting operations because of the extremely low volume. However, the future vision for automating and integrating IT systems at ANC and enabling the future digitization of records to be interactive with the public could be equally effective at the SAHNC and could readily be additive to ANC's future system. Interviews with senior leaders at ANC and with the SAHNC Superintendent all reflect acknowledgement of the ongoing need to automate and enable SAHNC systems and records, but there is general agreement that this should not be undertaken until the ANC effort is complete. Given the visibility of the discrepancies that were reported regarding burials at ANC and the lack of such reported issues at the SAHNC, the ED ANCP has appropriately prioritized the ANC effort. Both the contracting and budgeting processes for the SAHNC have been absorbed by ANCP in the last year in conjunction with major overhauls of these processes at ANC

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and by the HQDA staff. Operations have been absorbed into ANC contracts (e.g., grounds, equipment, facilities and IT). Consequently, the inspection team noted that these areas have been addressed since last year's inspection.

RECOMMENDATION:

1.17.1 (reference #ID-1107.17.01): ANCP continue to integrate the SAHNC into planned improvements.

STANDARD(S): The 9 June 2010 DAIG inspection report on ANC, Subject: Special Inspection of ANC; Army Directive 2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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1.18 OBSERVATION (reference#ID-1107.18): ANC is in compliance and has met Army Information Assurance (IA) standards in 13 of 14 functional areas. One of the 14 IA functional areas (classified systems management) was not inspected because ANC does not manage classified information.

DISCUSSION: During the DAIG's IA compliance inspection of ANC in 2010, ANC did not meet the Army standard in any of the 12 of 14 IA functional areas inspected (two functional areas did not apply at that time).

A follow-on Army IA Compliance Inspection of ANC was conducted from 20-27 June 2011. Compared to last year's inspection, where none of the applicable functional areas met the standard, during the most recent inspection ANC met Army IA standards in all applicable functional areas. ANC's improved IA readiness is attributed to a strong tenant-service provider relationship, leadership focus on IA, and ANC's proactive IA staff. The areas that follow in this Observation still require some additional attention.

Incident Handling Plan. Review of ANC's incident response plan revealed it did not include a response to Information Operation Conditions (INFOCON). INFOCON is a threat level based primarily on the status of information systems and is a method used by the military to defend against a computer network attack. There were no references or information concerning INFOCON in either the ANC or the ITA incident handling plans. ANC believed that they adequately addressed the INFOCON in the incident handling plan. The inspection team showed ANC the actions they needed to take to become compliant. Further, ANC's incident response plan did not require installation network security personnel to respond to all Intrusion Detection System (IDS) / Wireless Intrusion Detection System (WIDS) alerts and ANC did not maintain IDS / WIDS log data on the actions taken in response to an alert. WIDS is a system to provide security against wireless attacks. Finally, the requirement to report and respond to classified information spillage events was not understood by ANC. Users must be aware of the requirement to report and respond to an unauthorized disclosure of classified information (UDCI) (receiving a message with classified information on the unclassified network). ANC incorrectly believed that they did not need to report or respond to UDCI because they do not process classified information.

Continuity of Operations (COOP) Plan. ANC did not identify an alternate site as part of its IT contingency plan. An alternate site enables continuity of IT operations. ANC also did not have a Commander's COOP Plan. This oversight resulted from a lack of familiarity with the policy. ANC is now in the process of developing a COOP Plan and must incorporate the IT contingency plan in the COOP Plan upon completion.

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Wireless Security. ANC installation of WIDS to detect unauthorized wireless devices was not completed. ANC believed that WIDS installation was only required if a wireless local area network infrastructure existed. WIDS is required for all networks, whether wired or wireless in accordance with Army Wireless Security Standards. Based on that improper assumption and their understanding of the policy, ANC had previously cancelled a request to have WIDS on their network.

Web Content Management. ANC's Public Affairs Officer (PAO) and Operations Security (OPSEC) Officer did not complete the online OPSEC web content vulnerability and web risk assessment training. This training is required for all personnel responsible for web content review and posting. ANC recently appointed these individuals to their positions and as a result have not had the time or opportunity to schedule the training.

Alternate Smart Card Logon (ASCL). ITA System Administrators did not use an ASCL card to access their higher privileged account or to perform their higher privileged account functions (i.e., install and configure printers, create user accounts, install software, etc.). Although they have ASCL cards issued and elevated privileged accounts established but are not using them to perform privileged account functions as required, the technicians are using their Common Access Cards (CAC) and general user accounts to perform privileged account functions. ITA did not provide the oversight necessary to ensure that the technicians assigned to ANC were using the required ASCL cards. Further, ITA did not establish privileged accounts to perform privileged tasks. The technician's general user accounts were not configured to exclude elevated privileges.

Defense Information Systems Agency (DISA) Security Technical Implementation Guide (STIG). ITA application servers, network infrastructure devices and other information systems not supported by the Army Golden Master program were not configured with the appropriate DISA STIGs. The most recent scan of the ISS revealed seven Category (CAT) I vulnerabilities. CAT I findings are any vulnerabilities that provide an attacker immediate access into a machine, super user access, or access that bypasses a firewall. ITA improperly assumed CAT I findings on the ISS were appropriately mitigated and / or addressed. For corrective action, ITA has submitted seven Plans of Action and Milestones (POA&Ms) to CIO / G-6 for Information Assurance Certification or Accreditation. A POA&M is a tool that identifies tasks to be accomplished to correct an IA deficiency.

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RECOMMENDATION:

1.18.1 (reference #ID-1107.18.01): ANC and ITA address INFOCON measures in their respective incident handling plans.

1.18.2 (reference #ID-1107.18.02): ANC include the process to respond to WIDS alerts in its incident handling plan or reference the process and procedures identified in ITA's incident handling plan.

1.18.3 (reference #ID-1107.18.03): ANC identify an alternate IT site in its IT contingency plan.

1.18.4 (reference #ID-1107.18.04): ANC complete the development of its COOP Plan and incorporate the IT contingency plan in the completed COOP Plan.

1.18.5 (reference #ID-1107.18.05): ITA install WIDS on the ANC network or obtain a waiver for this requirement.

1.18.6 (reference #ID-1107.18.06): ANC's PAO and OPSEC officers conduct the required online web risk training.

1.18.7 (reference #ID-1107.18.07): ANC add UDCI awareness to its internal checklist and reinforce user awareness during new user orientation training.

1.18.8 (reference #ID-1107.18.08): ITA provide oversight to ensure that all technicians assigned to ANC with privileged access have an ASCL token with an elevated privileged account and are using them to perform privileged level functions.

STANDARD(S): AR 25-2; DoDI 8500.2 IA; CJCSM 6510.01A; STRATCOM Directive 527-1; Army Wireless Security Standards BBP; Department of the Army PAM 25-1-2, Information Technology Contingency Planning, 16 November 2006; DoDD 8100.2; AR 530-1; BBP 03-VI-O-0001(Classified Information Spillage); NIST 800-53; DoD 8570.1-M; Army CIO / G-6 Memorandum, Subject: Alternative Smart Card Logon (ASCL) Token for Two-Factor Authentication

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INSPECTION OBJECTIVE 2: Assess the Army National Cemeteries Program and other Army agencies' execution of and compliance with Army Directive 2010-04.

2.1 OBSERVATION (reference#ID-1107.21): The Army National Cemeteries Program (ANCP) is establishing a support relationship with the United States Army Corps of Engineers (USACE) Norfolk District to facilitate the formulation and implementation of a revised Arlington National Cemetery (ANC) Master Plan.

DISCUSSION:

The Secretary of the Army (SecArmy) Directs ANCP to “formulate and implement” the ANC Master Plan. In 1998, the former leadership of ANC published a Master Plan, endorsed by then-SecArmy Togo West, which included a series of projected major civil works projects designed to ensure the Cemetery’s future growth, capacity and viability. In Army Directive (AD) 2010-04, SecArmy assigned the ANCP’s Executive Director (ED) responsibility for “formulating and implementing the ANC Master Plan.” Soon after the ANCP Provisional Oversight Group (POG) was established, the ED recognized that revision of the Master Plan would require the assistance of personnel with engineering expertise. Accordingly, the ED requested the addition of an Army engineer colonel to ANCP’s staff. The leadership of both USACE and ANCP established a formal relationship by signing a Memorandum of Agreement (MOA) in December 2010. Furthermore, in an effort to ensure that the ANCP received effective engineer support, in March 2011 USACE’s North Atlantic Division and ANCP agreed to transfer responsibility for support to the ANC civil works program to the Norfolk District. While ANCP’s future civil works projects will be supported by Norfolk District, projects originally undertaken by Baltimore District will be transferred to Norfolk District once corrective action plans have been completed (See Observation 1.18).

USACE Norfolk District Supporting Master Plan Revision. Since initiating its support relationship with ANC in March 2011, Norfolk District has appointed a program manager to supervise all support to ANC, assigned individual project managers for each of the 17 USACE construction projects underway at ANC and has begun development of a comprehensive Program Management Plan (PMP). This PMP includes a project to revise ANC’s current Master Plan. On 16 June 2011, the senior leadership of the ANCP, USACE and other interested parties participated in an initial Senior Executive Review Group (SERG) to gain consensus on USACE’s support to current ANC construction projects, ANC’s Master Plan and supporting acquisitions. Finally, the Norfolk District Commander intends to establish a program manager’s office at ANC consisting of a Quality Assurance Specialist, a Contracting Officer’s Representative (COR) and an Administrative Contracting Officer.

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RECOMMENDATION:

2.1.1 (reference#ID-1107.21.01): ANCP, in coordination with USACE Norfolk District, collaborate to finalize a functional support relationship, to include USACE support to the revision of the ANC Master Plan.

STANDARD(S): AD2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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2.2 OBSERVATION (reference#ID-1107.22): ASA(CW) has authorized USACE to liaison directly with ANCP to produce construction plans and documents to support ANC's Master Plan.

DISCUSSION:

Assistant Secretary of the Army for Civil Works (ASA(CW)) Directed to Produce ANC Engineering Plans. In AD 2010-04, SecArmy directed ASA(CW) to, "produce appropriate engineering and construction plans and documents in support of (i) the Arlington National Cemetery Master Plan and (ii) proposals for the placement of memorial and monuments on the lands of the Army National Cemeteries." Despite this direction, ASA(CW) has not produced engineering and construction plans for the ANCP Master Plan or for any memorials or monuments. The inspection team determined producing such plans is beyond the capability of the ASA(CW).

Oversight of Civil Works Programs / Projects. ASA(CW) provides policy direction and supervision of Department of the Army (DA) functions relating to all aspects of USACE's civil works program, including civil works programs and projects at ANC. Under ASA(CW)'s policy oversight and supervision, USACE's subordinate units produce construction and engineering plans to support the civil works projects that comprise these programs. Soon after ANCP was established, the newly-formed Provisional Oversight Group (POG) reviewed the established support relationship with USACE Baltimore District. At ANCP's request, ASA(CW) authorized USACE to liaison directly with ANCP. In December 2010, USACE and ANCP signed a Memorandum of Understanding (MOU) and in March 2011, USACE North Atlantic Division authorized the transfer of responsibility for ANC support from the Baltimore District to the Norfolk District. As stated in Observation 2.1, Norfolk District has assigned an ANC program manager and individual project managers to support ANC and has begun development of a comprehensive PMP.

Proposals for Memorials / Monuments at ANC. Prior to the release of AD 2010-04, ASA(CW) was responsible for staffing proposals for the construction of new memorials / monuments received from other governmental agencies, public organizations, or private citizens. After the establishment of ANCP, ASA(CW) no longer participated in the staffing of proposals for new memorials / monuments (or the production of any supporting engineering and construction plans and documents). Currently, this function is performed by the ED ANCP and staff with engineer support from USACE.

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RECOMMENDATION:

2.2.1 (reference#ID-1107.22.01): SecArmy relieve ASA(CW) of responsibility for producing engineering and construction plans and documents in support of the ANC Master Plan and in support of proposals for the placement of new memorials and monuments at Army National Cemeteries.

STANDARD(S): AD2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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2.3 OBSERVATION (reference#ID-1107.23): ANCP is now included in the Army Program Objective Memorandum (POM) process and will submit annual budgets through the Office of the Administrative Assistant (OAA) to the SecArmy. ANCP's obligations and expenditures of funds will be tracked through the standard Army budget execution system.

DISCUSSION:

Previous Oversight of ANC's Budget. The Army's National Cemeteries are funded through the Cemeterial Expenses, Army (CEA) Appropriation line item contained in the annual Military Construction / Veterans Affairs / Related Agencies (MILCON / VA / RA) appropriation. Although, prior to June 2010 and SecArmy's issuance of AD 2010-04, ASA(CW) assisted the ANC staff in formulating annual budgets and presented justifications for budget increases to the Director of the Office of Management and Budget (OMB) (See Figure 1, page 3-6), no Army command, agency or staff element provided oversight of ANC's execution of budgeted CEA funds (\$39.9 million in 2010). ANC's former leadership attempted to account for its expenditure of CEA funds by providing certification authority over ANC's obligations to analysts assigned to the Defense Finance and Accounting System Headquarters in Indianapolis, Indiana. After the 9 June 2010 DAIG inspection report and AD 2010-04 were released, the ED ANCP and POG focused ANCP's Resource Management (RM) Division on integrating ANC's programming and execution of the CEA into the Army's fiscal management system, in an effort to establish transparency, control and discipline in ANC's internal budgeting process.

Current Oversight of ANC's Budget. Since the release of 9 June 2010 DAIG inspection report and AD 2010-04, the ANCP staff has coordinated with the staff of the Assistant Secretary of the Army for Financial Management and Comptroller (ASA(FM&C)) to establish better budget oversight by including ANC in the "family" of DA agencies and staff elements that submit annual budget requests and justifications to OAA. ANCP submitted a budget request for Fiscal Year (FY) 2013 to OAA in June 2011 and will also submit ANC's budget input to the FY14-18 Army POM to OAA. ANC's annual budget expenditures will be supervised by the OAA (See Figure 2, page 3-6). In the last year, the ED ANCP oversaw the Cemetery's conversion of all of its accounting processes to the General Fund Enterprise Business System (GFEBS). This system will better allow the ED and the ANCP RM Division to account for the Cemetery's expenditures. OAA will conduct tri-annual reviews of ANC's GFEBS account beginning in August 2011. Should discrepancies be found or questionable expenditures noted during these reviews, the ANCP and OAA staffs will execute the reconciliation process.

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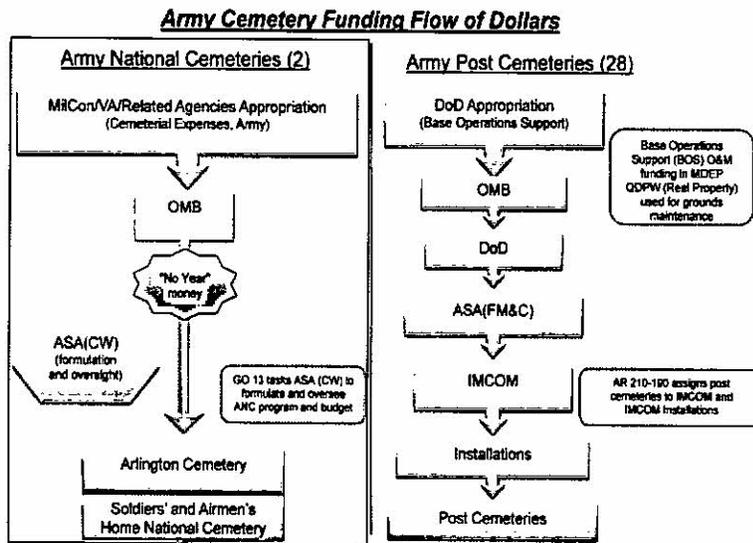


Figure 1: ANC Budget Process Prior to AD 2010-04

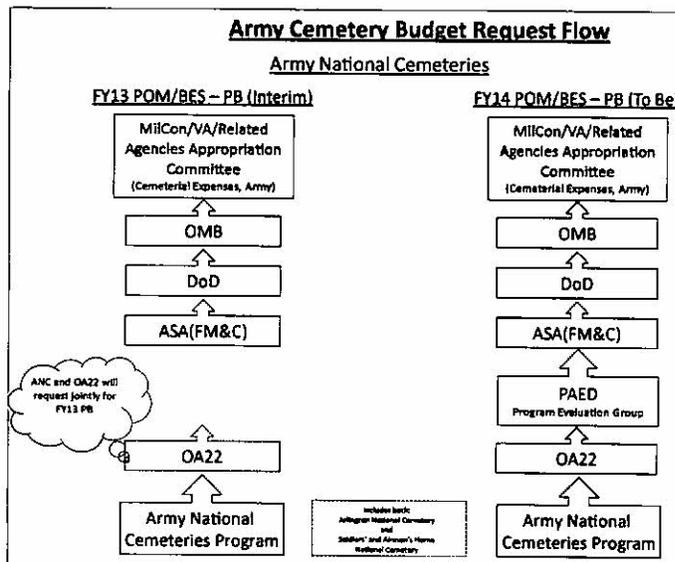


Figure 2: Current and Future ANCP Budget Processes (July 2011)

ANC Unliquidated Obligations (ULOs). In accordance with AD 2010-04, the Army Office of General Counsel (OGC) developed legislative proposal concepts that, if enacted into law, could enable transfers of funds from appropriations within the MILCON / VA / RA Appropriations Act to the CEA appropriation and / or transfers of funds from the Operations and Maintenance, Army account to the CEA appropriation. If these concepts were enacted in law, the ED ANCP would have the authority to initiate

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such transfers, subject to approval by the congressional committees, upon a determination that ANCP required funding greater than a future MILCON / VA / RA Appropriation Act would provide. In the course of migrating ANC's funding execution oversight to GFEBS, ANCP discovered that approximately \$25 million worth of ULOs existed against CEA funds provided to ANC prior to FY10. These ULOs included 420 contracts, military purchase requests and other funding documents dating back to 2004. ANCP's RM Division began recovering these ULOs in May 2011. To date, ANCP has recovered approximately \$15 million and intends to continue this effort until all existing ULOs are reconciled. In an effort to determine if ANCP's current CEA authorization is appropriately-sized, the ED ANCP has decided not to request any increase in funding until the amount of funds recovered from ULOs is finally tallied and ANCP completes one full budgetary cycle (FY13).

RECOMMENDATION:

2.3.1 (reference#ID-1107.23.01): OAA (ASA(FM&C) assist) continue to provide process oversight of ANCP's formulation and execution of annual budgets for Army National Cemeteries and consider the amount of recouped CEA funds when approving ANCP's FY13 budget.

STANDARD(S): AD2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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2.4 OBSERVATION (reference#ID-1107.24): In accordance with AD 2010-04, the United States Army Center of Military History (USACMH) is executing its pilot program to collect, catalog and store mementos left at graves in ANC's Section 60, while ANCP formulates a more comprehensive and sustainable memento policy.

DISCUSSION:

USACMH Pilot Memento Program. USACMH collects, documents and catalogs mementos left on gravesites in ANC's Section 60. Each week, CMH curatorial teams collect mementos left on and around Section 60 gravesites. Each item is photographed and accounted for in a digital database, which links each memento with the gravesite from where it was removed. Once accounted for, USACMH personnel evaluate each memento for its potential historical value. Mementos determined to be of historical significance are retained, appropriately packaged and stored in a Directorate of Logistics warehouse at Fort Belvoir, Virginia. Mementos determined to have no historical value are discarded. CMH leadership stated that 90 percent of mementos collected from Section 60 are of no historical significance. Additionally, CMH is also collaborating with ANCP's Strategic Communications staff to provide selected mementos and subject matter expertise for planned interpretive historical displays in the ANC Visitors' Center. CMH will continue executing this pilot program while ANCP develops its proposal for a long-term memento policy for Army National Cemeteries, as required by AD 2010-04.

Advisory Commission to Consider Long-Term Policy. AD 2010-04 directed the ED ANCP to review CMH's ongoing pilot memento program and propose a long-term flowers and memento policy for Army National Cemeteries. ANCP intends to recommend to SecArmy that he request the Army National Cemeteries Advisory Commission (ANCAC), once convened, to provide appropriate advice on the development of this new policy. Nominations for the nine ANCAC members have been forwarded for approval and appointment by the Secretary of Defense.

RECOMMENDATION:

2.4.1 (reference#ID-1107.24.01): USACMH, in coordination with ANCP, continue to execute the pilot program to collect, catalog and store mementos left at ANC's Section 60 gravesites, until a long-term and comprehensive flower and memento policy can be established and incorporated into AR 290-5, *Army National Cemeteries*.

STANDARD(S): AD2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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2.5 OBSERVATION (reference#ID-1107.25): The Office of the Chief of Public Affairs (OCA) drafted a media access policy and media ground rules for ANC and has received concurrence from ANCP.

DISCUSSION:

SecArmy Directs Formulation of Public Affairs Policy. In AD 2010-04, SecArmy directed OCA to formulate and oversee the implementation of public affairs policy for Army National Cemeteries. Specifically, SecArmy required OCA to document a policy governing media access to Army National Cemeteries. OCA's draft public affairs policy for Army National Cemeteries describes how media representatives gain access to Army National Cemeteries for news-gathering purposes. The draft policy includes requirements for media credentials, parameters for "special" media access (media activities that would otherwise contravene the standard rules applicable to visitors) and standard restrictions involving coverage of private funeral or memorial services. This draft policy also describes how media representatives may gain authorization for Next of Kin (NOK) interviews and guidelines for media attendance at disinterments. The policy provides OCA points of contact and establishes requirements for members of the entertainment industry, documentary filmmakers or book authors seeking to conduct activities in Army National Cemeteries. While media representatives will be subject to the same visitor rules that apply to the general public, OCA's draft media access policy provides specific permissions to, and imposes specific restrictions on media representative conduct that has the potential to disturb mourners or interfere with cemetery operations.

Staffing of PA Policy and Media Ground Rules. OCA provided a draft of its revised public affairs policy to the ED ANCP and staff on 17 May 2011. On 20 June 2011, the ED ANCP approved these documents and OGC reviewed the policies and deemed them legally sufficient in August 2011. After final staffing and approval by the ED ANCP, these policies will be announced to the public and the public media.

ANCP Strategic Communications Working Group. Initially, OCA chaired a weekly ANC strategic communications working group, the frequency of the meeting reflecting the SecArmy's seriousness of purpose in addressing the issues that had been raised at ANC. Today, as operations at ANC have become more regularized, the OCA meetings are held only twice each month. The working group's main effort is to ensure collaborative synchronization of strategic communications between the ANCP staff, the Army Secretariat and Army Staff elements charged with optimizing ANCP's interaction with the American public, media organizations and the Congress. The working group meetings are normally attended by representatives of OCA; the ANCP staff; the Strategic Communications Directorate, Office of the Chief, Legislative Liaison (OCLL); OGC; USACMH; and the ASA(M&RA)'s Deputy Assistant Secretary of the Army for Military Personnel Policy (DASA(MPP)).

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RECOMMENDATION:

2.5.1 (reference#ID-1107.25.01): OCPA (ASA(M&RA), ANCP assist) ensure that the ANC media access policy and media ground rules are included in the revisions of 32 CFR 553 and AR 290-5.

STANDARD(S): AD2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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2.6 OBSERVATION (reference#ID-1107.26): ASA(M&RA) completed a proposed revision to 32 CFR 553 that includes guidance for a revised interment / inurnment policy for Army National Cemeteries.

DISCUSSION:

SecArmy Directs Revision of 32 CFR 553. The Army's policy for interments / inurnments at Army National Cemeteries is among the policies set forth in 32 CFR 553. The ASA(M&RA) has long been responsible for formulating interment / inurnment policy because such policy is a component of the Army's human resources policy, writ large, which falls under the purview of the ASA(M&RA). The ASA(M&RA)'s, DASA(MPP) has been pursuing a revision of the interment / inurnment policy components of 32 CFR 553 since 2006. In AD 2010-04, SecArmy assigned OGC and ASA(M&RA) complementary tasks to update "appropriate section(s) of Title 32 of the Code of Federal Regulations" and to "formulate and oversee interment and inurnment policy applicable to the Army National Cemeteries, including administration of the Interment, Inurnment and Memorialization Review Board" (ASA(M&RA)). This update to 32 CFR 553 will also include policies and procedures that govern the ANC Advisory Group established by SecArmy in an 8 April 2011 memorandum. The Advisory Group reviews all requests for exception to current policy governing eligibility for interment / inurnment at ANC and forwards recommendations for the SecArmy's decision. It is important to note that the ANC Advisory Group is different and distinct from the Arlington National Cemetery Advisory Commission established by SecArmy (with SecDef approval) in AD 2010-04. The ANC Advisory Group is internal to the Army Secretariat and is focused solely on making recommendations to SecArmy regarding requests for exceptions to interment / inurnment policy. The ANC Advisory Commission is a Federal Advisory Commission; established to inquire into development, operations, management, and administration of Army National Cemeteries.

Revision to 32 CFR 553 Ready for Public Comment. In August 2011, OGC and ANCP leadership completed a draft proposed revision of 32 CFR 553. The staff of ASA(M&RA)'s DASA-MPP provided administrative support the process. Once OGC and ANCP concurred on the revised content, the ED ANCP signed the draft rule and the DASA-MPP authorized its release to the Army's Records Management and Declassification Agency (RMDA). RMDA will provide this draft revision to DoD's Regulatory Policy Officer (RFO) the Department of Defense Office of General Counsel (DoD OGC) for review. Once cleared by the DoD RPO and DoD OGC, the draft revision of the CFR will be published in the Federal Register for a period of 60 days to allow time for the public to review and comment on the rules and policies it proposes. At the conclusion of the public comment period, the Army must analyze all comments and suggestions received and decide whether or not to change the draft revision of the CFR based on those comments and suggestions. In any event, the Army must formally explain and document why each comment and suggestion was or was not incorporated

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in the final rule. Upon completion of this effort, the revision to the CFR, as modified by any public comments or suggestions the Army may decide to incorporate, will be submitted for publication in the CFR as the final agency rule applicable to Army National Cemeteries.

RECOMMENDATION:

2.6.1 (reference#ID-1107.26.01): ASA(M&RA) continue to provide support to the proponent in publishing the update of 32 CFR 553.

STANDARD(S): AD2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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2.7 OBSERVATION (reference#ID-1107.27): Office of the General Counsel (OGC) complied with AD 2010-04 to update 32 CFR 553 to document jurisdictional realignment of the Army National Cemeteries Program.

DISCUSSION:

Documenting Jurisdictional Realignment. In AD 2010-04, the SecArmy directed OGC to, "... effect an immediate modification to the appropriate sections(s) of Title 32 of the Code of Federal Regulations to document the jurisdictional realignment of the Army National Cemeteries and, as appropriate, other updated information pertaining to the Army National Cemeteries Program and its operations." 32 CFR 553 is the legal codification of certain of the Army's policies that govern the operation of Army National Cemeteries. OGC completed this task, in coordination with ASA(M&RA) and the ED ANCP. The revised draft of 32 CFR 553 has been submitted to DoD for clearance; once cleared the draft rule will be published in the Federal Register for public comment (see Observation 2.6).

RECOMMENDATION:

2.7.1 (reference#ID-1107.27.01): Together with ASA(M&RA), OGC continue to provide support to the proponent in publishing the update of 32 CFR 553.

STANDARD(S): AD2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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2.8 OBSERVATION (reference#ID-1107.28): The current ANC TDA does not adequately reflect the recent reorganization of the ANCP's organizational structure or ANCP's unique function in the Army.

DISCUSSION:

ANCP POG Supports ED ANCP. With the release of AD 2010-04, SecArmy established the ANCP POG to assist the ED ANCP in the performance of duties and responsibilities. In accordance with SecArmy's directive, the ANCP POG focused on developing, coordinating and implementing plans, policies and processes to correct deficiencies identified in the June 2010 DAIG inspection report and reports generated by other officials and organizations regarding the development, operations, management and administration of ANC. According to the findings of DAIG's Interim Review released on 11 March 2011, ANC has "... significantly increased effectiveness and efficiency in all its missions and functions . . . ," with improvement in 66 of 78 deficiencies / observations noted in the 9 June 2010 DAIG inspection report. Improvements at ANC are attributable, in large part, to the support the POG has provided the ED ANCP and ANC staff.

POG Absorbed in to ANCP Staff Positions. AD 2010-04 directed the U.S. Army Manpower Analysis Agency (USAMAA) and U.S. Army Force Management Support Agency (USAFMSA) to complete "an all-inclusive study of (ANC's) organizational structure." Upon completion of this study in July 2010, ANCP, USAMAA and USAFMSA collaborated to produce a series of updated Tables of Distribution and Allowances (TDAs) which currently reflect a total of 165 military and civilian personnel authorizations at ANC, an increase of 63 (as well as providing for an enhanced chaplain capability and for the Arlington Ladies). ANCP's leadership has filled most of the positions newly established as the result of this TDA enlargement. The ED ANCP and ANCP staff, with the assistance of the Civilian Human Resources Agency (CHRA), continue to pursue hiring actions (see Observation 1.8). While the most recent iteration of the ANC TDA (effective 1 October 2011) includes paragraph and line numbers for the members of the POG, the required and authorized strengths for the POG positions reflect "zero" values; effectively, the workload executed by members of the POG has been transitioned to the permanent ANCP staff, with a concomitant increase in the number of personnel authorizations documented on the ANC TDA.

Changes to ANCP and ANC Staff Organizations. Since the latest version of the ANC TDA was published, the ED ANCP reorganized the ANCP and ANC staffs to best support organizational and functional requirements. This reorganization plan nests strategic and organizational capabilities under the ED ANCP, while maintaining staff support for "day-to-day" Cemeterial management under the ANC Superintendent. Currently, the ANCP staff includes the ED's Office and the Strategic Management and Communications, Information Management and Communications, RM, Law

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Enforcement and Facility Engineering Divisions. The ANC Superintendent's Staff includes a singular Cemetery and Memorial Field Operations Division (FOD), comprised of the Interment Operations, Utilities Services, Equipment Services and Interment Services Branches (ISB). Although the TDA has been updated to reflect the increase in ANC's personnel authorizations, the major restructuring of the ANCP organization has not yet been incorporated in the current TDA.

ANCP Command Assignment Coding. In revising the ANCP TDA in accordance with AD 2010-04, USAFMSA assigned ANCP a command assignment code of "SB." This command assignment code identifies ANCP as a Field Operating Agency (FOA) of the Army Secretariat. In general, FOAs assigned an SB code serve as extensions of specified Army Secretariat or Army Staff elements and execute that staff element's policies. As described in AD 2010-04, ANCP receives oversight directly from the Office of the Secretary of the Army (OSA), however the inspection team found that there was no intent to designate ANCP as a FOA. Accordingly, ANC's TDA coding as a FOA is inaccurate and should be corrected.

Army Direct Reporting Units (DRUs). The United States Military Academy's (USMA's) assignment coding and designation as an Army DRU provides a possible example for ANCP. An Army DRU is defined in AR 10-87, *Army Commands, Army Service Component Commands and Direct Reporting Units*, as, "...an Army organization...with institutional or operational support functions, designated by the SecArmy...to provide broad general support to the Army in a single, unique discipline not otherwise available elsewhere in the Army." To account for USMA's unique institutional role in educating, training and inspiring cadets for a career of professional excellence as Army officers, USMA was designated as an Army DRU in 2006 and assigned a unique assignment code of "MA." AR 210-26, *The United States Military Academy*, assigns SecArmy, the Chief of Staff of the Army, ASA(M&RA), Deputy Chief of Staff, G-1 and the USMA Superintendent responsibilities for USMA's general governance and operation. AD 2010-04 describes ANC as the Nation's "most hallowed burial ground" and a "national shrine." Similar to the governance and relationship established for USMA, ANCP performs a unique Army institutional function in exercising authority, control and operations over Army National Cemeteries. These responsibilities, combined with the unique relationship ED ANCP has with SecArmy and continuous support and oversight from a myriad of Army commands and elements of the HQDA Staff and other Army agencies and organizations, necessitates a review and assignment of the appropriate command coding.

Other Command Code Options. In August 2011, the Deputy Chief of Staff (DCS), G-3/5/7 (through USAFMSA) provided the ED ANCP, four options for revising its command coding. The four options include: assigning ANCP to the Office of the SecArmy; establishing ANCP as a FOA of the SecArmy; including ANCP among seven other SecArmy Joint and Support Agencies; and designating ANCP as an Army DRU.

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The ANCP and USAFMSA staffs are collaborating to determine the most appropriate command code for ANCP.

RECOMMENDATION

2.8.1 (reference#ID-1107.28.01): DCS, G3/5/7 (ASA(M&RA) assist) analyze options and recommend an appropriate short-term ANC command coding to SecArmy for decision.

2.8.2 (reference# ID-1107.28.02): DCS, G-3/5/7 (OGC assist) analyze options for long-term ANCP command and control, organizational alignment and support relationships with other Army commands and organizations and present those options to SecArmy for decision.

STANDARD(S): AD 2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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2.9 OBSERVATION (reference#ID-1107.29): In accordance with AD 2010-04, the Chief Information Officer (CIO) / G-6 provided and fully supported a proposal that will allow ANC to leverage modern information technologies.

DISCUSSION:

CIO / G-6 ANC Information Technology (IT) / Information Assurance (IA) Proposal. AD 2010-04 directed CIO / G-6 to provide a review and evaluation of the IT systems and applications and IA processes currently in use at ANC. Based on this assessment, CIO / G-6 was directed to provide the ED ANCP a comprehensive proposal to mitigate deficiencies and overhaul IT systems, applications and processes required to automate Cemetery administration and operations. The CIO / G-6 report, issued on 28 July 2010, included 14 recommendations to improve IA architecture, enhance information processes and ensure IA compliance at ANC. ANCP staff has implemented 12 of the 14 CIO / G-6 recommendations and is currently in the process of implementing the last two recommendations.

ITA Consolidated Customer Service Center (CCSC). In December 2010, ITA's CCSC assumed responsibility, though its call center at Fort Detrick, Maryland, for all initial telephonic customer contacts with ANC. With this transfer of customer service responsibility, ITA and ANCP implemented the use of the CSCC's Remedy system to facilitate case management. The ANC Interment Scheduling System (ISS) and the Remedy system have some limited interface, which: allows the CCSC and the ANC ISB to collaborate in recording, scheduling and coordinating interment / inurnment services; provides a capability to assess CSCC performance and customer service; and providing a database for historical records.

ANCP IT Transition Plan. In September 2010, the ANCP G-6 staff met with the ITA Customer Relationship Management Team to formulate a three-phase IT transition plan; implementation of the plan began in October 2010 and will be completed in January 2012. The execution of tasks set forth in the plan is currently 73 percent complete and the plan's implementation is scheduled to be completed on or ahead of schedule. ANC and ITA also have three planned future projects: the Audio Visual Server Platform, installation of Fiber Optic redundancy for ANC's campus and the acquisition and installation of IT systems and automation equipment for new office space in the ANC Visitors' Center basement.

Update and Integration of ISS. Cemetery Representatives (CRs) assigned to ANC's ISB use the ISS to record, schedule and coordinate interment / inurnment services. ISS is a standalone information system, supported by an Access database; ISS contains ANC interment / inurnment information and scanned images of burial records. CRs also access the Burial Operations Support System (BOSS) to order headstones through the Department of Veterans Affairs (VA). BOSS was developed by the VA to manage

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operations at its cemeteries worldwide. As a stand-alone system, ISS does not provide CRs an efficient means to resolve public inquiries regarding burial discrepancies. Furthermore, there is no interface between BOSS and ISS, requiring CRs to transfer information manually, creating the opportunity for human error and increasing the possibility of mistakes on headstones or in burial records. ANCP has identified the need to integrate the three systems (ISS, BOSS, Remedy) it uses to schedule and manage interment / inurnment ceremonies into a single, user-friendly application. The ANCP staff has engaged ITA and the VA to develop a long-term solution to integrate ISS, BOSS and Remedy with a geospatial information system being developed by Assistant Chief of Staff for Installation Management (ACSIM) and described further below. In June 2011, ANCP and ITA leadership agreed to begin development of a project charter in September 2011. ANCP and the VA will partner to complete the interface between BOSS and ISS in FY12. Once complete, this interface should dramatically reduce the potential for error on headstone engravings and in grave records. The inspection team agrees with ANCP senior leaders' estimates; the integration of these three systems will save approximately two man-years worth of labor currently expended in the ISB division and should dramatically improve customer service and record-keeping at ANC.

Army Data Center-Fairfield (ADC-F) Support to ISS Upgrades. A critical task in implementing CIO / G-6's proposal was the creation of a MOU between ITA, ANCP and ADC-F. This MOU defined roles and responsibilities for supporting the development of applications and optimizing ANC network operations and maintenance. Further, the MOU also defined ADC-F's plan to assist ANCP in updating and upgrading ISS. ANCP's ISB uses ISS to schedule and coordinate interments / inurnments. ADC-F will also develop a research tool to provide, screen and correct data for ISS inputs; perform public Website tasks; and provide mobile phone interfaces to ISS. Additionally, ADC-F plans to support ANCP collaboration with the VA to integrate BOSS and ISS. As of 30 August 2010, the draft MOU has been approved and provided to each agency for signature.

Mapping Capability at ANCP. In August 2010, the ED ANCP requested that the ACSIM support the ANCP's use of Army Mapper software. With the support of ACSIM's Geospatial Information and Services Division, ANCP plans to use this software to convert ANC's obsolete paper maps to geospatial, digitized map products. These map products then will be integrated with ISS and the digital record and pictorial databases that have been created by ANCP's Gravesite Accountability Task Force. Additionally, this integrated system will allow cemetery visitors to use mobile phone technology to locate gravesites and niches throughout ANC. ANCP plans complete this project by February 2012.

Service Level Agreement (SLA). CIO / G-6's proposal included recommendations for an extensive hardware, software and engineering reconfiguration of ANC's

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infrastructure and the creation of a recovery plan to protect ANC's network architecture against catastrophic failure. On 16 June 2011, having worked successfully with ITA since July 2010 to provide call center services to members of the public, ANCP initiated a broad-based Service Level Agreement (SLA) with Army ITA to implement, monitor and complete execution of the CIO / G-6 recommendations. ITA is a full-service IT provider and can provide ANCP the experience and expertise necessary to complete IT modernization and fulfill CIO / G-6 recommendations efficiently and effectively.

Planned ANCP Operations Center. In its proposal, the CIO / G-6 recommended that ANC establish an operations center. The ED ANCP is in the process of establishing this operations center, with a view to achieving initial operations capability no later than January 2012. The operations center will ensure situational awareness and facilitate the sharing of information across ANCP's organic divisions and externally with the Service component headquarters that support private and public ceremonies at ANC. In July 2011, ANCP filled its operations officer position; the operations officer will be responsible for the stand up of the operations center and will supervise and manage the center once it is established.

RECOMMENDATIONS:

2.9.1 (reference#ID-1107.29.01): ANCP (CIO / G-6, ITA, ADC-F assist) finalize requirements for, and field, an updated interment scheduling system that integrates with BOSS, Remedy and the future geospatially-enabled and digitized mapping system.

2.9.2 (reference#ID-1107.29.02): ANCP continue to enforce administrative controls to remain compliant with AR 25-1 *Army Knowledge Management and Information Technology*, AR 25-2 *Information Assurance*, DISA Best Business Practices and applicable ALARACT messages, DoDDs and DoDIs.

STANDARD(S): AD 2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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2.10 OBSERVATION (reference#ID-1107.30): The Assistant Secretary of the Army for Acquisition, Logistics and Technology's (ASA(ALT))'s, Deputy Assistant Secretary of the Army for Procurement (DASA(P)) complied with AD 2010-04 by completing two detailed reviews of USACE and Army Contracting Command (ACC) contracts supporting ANCP.

DISCUSSION:

Procurement Management Reviews (PMRs). PMRs are a method of reviewing and analyzing procurement actions for compliance with acquisition regulations, policies and best practices. The process involves the use of matrixes of acquisition topics, tailored for different contract types, to review official procurement documentation. Through the PMR process, reviewers develop findings, provide recommendations and, where appropriate, determine contract execution risk.

Determination of Contracting "Risk." In the PMR process, an activity's contracting operation may be assessed as "low-risk," "medium-risk," or "high-risk," based on the number and severity of deficiencies identified during the review. These three risk assessments are defined as follows:

- A low risk assessment indicates that the organization is operating normally and is at risk of receiving only minor criticism or experiencing only minimal adverse impact to contracting operations or customer mission support.
- An assessment of medium risk indicates that the organization is at risk of receiving moderate negative criticism or experiencing moderate adverse impact to contracting operations or customer mission requirements. An assessment of medium risk requires the organization to address PMR recommendations and mitigate risks within six months.
- A high risk assessment indicates the organization is at risk of receiving severe criticism or may suffer serious adverse impact to contracting operations or customer mission requirements. An assessment of high risk requires the organization to immediately address PMR recommendations and mitigate risks.

DASA(P)'s Initial PMR. As directed by SecArmy in AD 2010-04, ASA(ALT)'s DASA(P) completed two PMRs of ANC contracts awarded or administered by USACE and ACC (previously the Contracting Center of Excellence). ASA(ALT) DASA(P)'s initial review was conducted from 22 June through 27 July 2010 (with the associated report issued on 27 July 2010) and included a review of acquisition activities at ANC, the Army Contracting Command-National Capital Region (ACC-NCR), USACE Baltimore District and of ANC information technology contracts. To facilitate this review, DASA(P) issued an Army-wide data call and ensured all ANC support contracts were available for review.

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Results of Initial PMR. The initial PMR results for the review of ANC, ACC-NCR and USACE Baltimore District supported findings included in the 9 June 2010 DAIG inspection report. Both found ANC experienced a general breakdown in sound contracting policy, processes and procedures and a disregard for statutory and regulatory requirements from requirements definition through contract closeout. Both ACC-NCR and USACE Baltimore District contracting activities were assessed as high risk for their contract execution of ANC procurements. The initial PMR report indicated that the reviewed organizations had already put corrective action plans in place to address DAIG's inspection findings and were working those plans to correct the deficiencies identified. The report stated that the DASA(P) PMR team would perform a follow-up review in 6 months and report the progress of the corrective actions to the ED ANCP and the Army's Senior Procurement Executive (the ASA(ALT)).

Follow-up PMR. A follow-up PMR was conducted in January 2011 (with the associated report issued on 28 April 2011). The focus for this PMR was the status of corrective actions implemented since DASA(P)'s initial PMR and the review of any new contract actions awarded in support of ANC from 1 June through 31 December 2010. This review also assessed Mission and Installation Contracting Command (MICC)-Fort Belvoir's ability to support the acquisition of all new ANC service contracts, given that ACC transferred contracting support for ANC's service contracts from the ACC-NCR to the MICC after the completion of DASA(P)'s initial PMR.

Results of Follow-up PMR. The follow-up PMR results indicated that the reviewed organizations were actively working their corrective actions plans: ACC-NCR corrective actions were complete or near completion and ANC contracts were being closed, as they would expire on 31 March 2011; USACE had issued guidance to support the PMR findings and was establishing surveillance and training schedules across the organization; and ANC had completed a number of corrective actions to mitigate future risk. The PMR review team did not assign risk ratings to either ACC-NCR or USACE for this review, but indicated that all reviewed organizations were improving and were dedicated to continuing their efforts to correct identified weaknesses to mitigate future risk. Further, the follow-up PMR review indicated that the MICC-Fort Belvoir office was effective in managing the continuation of service contracts for ANC and had awarded all replacement service contracts for ANC. Finally, the report indicated that ANC's Government Purchase Card (GPC) program, managed by MICC on ANCP's behalf, was now operating at a low risk level.

Leadership Involvement. Both reviews assessed the effectiveness of the Heads of Contracting Activities (HCAs) and Principal Assistants Responsible for Contracting (PARCs) in executing and overseeing ANC contract actions. The initial report indicated no direct involvement of the USACE PARC or ACC HCA in ANC's contract support. The follow-up report, however, indicated that senior leadership at USACE, ACC and

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MICC had increased their involvement in their organization's support to ANC for contracting actions. Examples of leadership involvement with ANC actions included:

- USACE and ACC signed a support MOA with ANC.
- USACE and ACC were tracking corrective action plans for contracting activities supporting ANC.
- USACE was analyzing and refining its acquisition processes.
- USACE transferred contracting support from the Baltimore District to the Norfolk District.
- ACC and MICC are expediting ANC's new service contracts, training the ANC staff and detailing on-site contracting support to ANC.
- ACC transferred contracting support from ACC-NCR to MICC to ensure increased and appropriate contracting support for ANC's installation-type requirements.

During the course of both procurement reviews, DASA(P) updated the ANC ED in weekly meetings. DASA(P) has maintained an ongoing dialogue with the ANC ED and staff concerning procurement findings, recommendations and corrective actions.

Plans for Future Contract Oversight. In addition to PMRs of MICC and USACE completed during FY10 and FY11, DASA(P) will continue to provide future oversight of ANC acquisitions. DASA(P) plans to review ANCP contracts in the FY12 PMR cycle and will continue to review ANCP actions regularly until the contracting activities are no longer indicated as high-risk.

RECOMMENDATION

2.10.1 (reference#ID-1107.30.01): ASA(ALT) continue routine PMRs of all ANCP contracts and the ANCP GPC program.

STANDARD(S): AD 2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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2.11 OBSERVATION (reference#ID-1107.31): SecArmy has forwarded all nominations for membership on the Army National Cemeteries Advisory Commission (ANCAC) to the SECDEF for approval and appointment.

DISCUSSION:

SecArmy Directs Efforts to Establish an Advisory Commission. SecArmy directed the ED ANCP to undertake efforts to implement an ANCAC "to visit the cemeteries at established intervals and to consult with the Secretary of the Army and the Executive Director." SecArmy envisioned that the ANCAC would inquire into long-term strategic issues related to the Army National Cemeteries, as well as matters affecting their day-to-day operations. The Federal Advisory Committee Act of 1972 (5 U.S.C., Appendix 2) (commonly known as "FACA") provides the basis for establishing and managing federal advisory committees, such as the ANCAC, within the Executive Branch.

Approval of the ANCAC Charter and Appointment of the Designated Federal Official (DFO). Soon after AD 2010-04 was issued, the ED ANCP designated a member of the POG to serve as the administrative point of contact for actions necessary to establish the ANCAC as a new federal advisory committee. Because only the SECDEF or his designee may establish a new federal advisory committee within DoD, the POG submitted a formal request to establish the ANCAC, together with a draft Charter proposed to govern ANCAC operations, through the SecArmy to the SECDEF. The ANCAC Charter was approved on 11 October 2010 and describes the objectives and scope of the Commission's mission generally as "provid[ing] to the Secretary of Defense, through the Secretary of the Army, independent advice and recommendations on the ANCP." Subsequently, the member of the POG who had served as the administrative POC for ANCAC-related actions, was appointed as the DFO for the ANCAC; the DFO is the federal government's representative to the ANCAC and is responsible for ensuring that the Commission complies with all laws, regulations and policies governing FACA committees. SecArmy then initiated development of a list of candidates for membership on the Advisory Commission in accordance with the membership structure set forth in the approved ANCAC Charter. The Charter provides for nine members: seven nominated by SecArmy (the SecArmy has the authority to nominate the ninth and final member), one nominated by the Secretary of the American Battle Monuments Commission and one nominated by the Secretary of Veterans Affairs. The ANCAC DFO is also actively preparing for the first meeting of the Commission, which will occur as soon as possible after SECDEF's appointment of the members, likely in the autumn of 2011.

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RECOMMENDATION:

2.11.1 (reference#ID-1107.31.01): ANCP should continue to monitor OSD's ongoing staffing of ANCAC nominations while the ANCAC DFO continues to sustain planning and preparation for the first meeting of the ANCAC, likely to be held in autumn 2011.

STANDARD(S): AD 2010-04, dated 10 June 2010, Subject: Enhancing the Operations and Oversight of the Army National Cemeteries Program.

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2.12 OBSERVATION (reference#ID-1107.32): The Gravesite Accountability Task Force is establishing an accountability baseline of all gravesites and inurnment niches and expects to be able to complete this effort in sufficient time to inform SecArmy's report to Congress by 22 December 2011, as required by Public Law 111-339.

DISCUSSION:

Establishment of the Accountability Task Force. The ANCP Gravesite Accountability Task Force was formed in May 2011 by the ED ANCP, with manning support from The Old Guard, the CIO / G-6, and from across the Army Staff. The Task Force's mission is to establish an accountability baseline for all gravesites and inurnment niches within ANC and the SAHNC. To establish this baseline, the Task Force is executing three primary tasks: verifying and digitizing all paper burial records (prior to 2007) for inclusion in ANC's ISS and the VA's BOSS databases; photographing all headstones to capture all pertinent markings; and updating the ANC map. The Task Force is currently comprised of 37 personnel, including Active and Reserve Component Soldiers, DA civilian employees, contractors and summer interns. A company of Soldiers from The Old Guard is directly supporting the Task Force by photographing gravestones. All data collected is transmitted electronically to servers hosted by ADC-F. The Task Force compares scanned burial records, headstone photographs and mapping data using a research tool developed by ADC-F to confirm consistency of each gravesite with Cemetery records. The ED ANCP projects the Task Force will be complete with its accountability baseline in sufficient time to inform SecArmy's 22 December 2011 report to Congress, as mandated by Public Law.

Task Force Methodology. As the Task Force builds its three data sets (digitized records, headstone photos and map locations), it compares them to identify "discrepancies of fact" (errors or inconsistencies in the information recorded about the grave location or occupant). The Task Force considers the discovery of a "discrepancy of fact" to meet one of the ED ANCP Critical Information Requirements. As the Task Force continues its operations and adds new scanned burial records, digital photographs of headstones and map updates to ISS and BOSS, CRs assigned to ANC's ISB are capturing the same three data points for each new interment or inurnment. Once the Task Force completes its mission and is disestablished, the ISB will assume custody of all ANCP accountability data.

RECOMMENDATION:

2.12.1 (reference#ID-1107.32.01): ANCP continue to monitor and resource the Gravesite Accountability Task Force as required to ensure an accountability baseline is established in sufficient time to inform SecArmy's report to Congress on or before 22 December 2011.

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INSPECTION OBJECTIVE 3: Assess the adequacy of current practices at ANC to provide information, outreach and support to Families of those individuals buried at Arlington National Cemetery regarding procedures to detect and correct errors in burials at ANC.

3.1 OBSERVATION (reference #ID-1107.35): Arlington National Cemetery's (ANC) efforts to provide information, outreach and support to Families regarding burial discrepancies was professional and supportive.

DISCUSSION:

Background. In July–August 2009, a series of news articles exposed allegations of mismanagement at ANC to the American public. In response, on 17 August 2009, the Secretary of the Army (SecArmy) directed the Department of the Army Inspector General (DAIG) to conduct an inspection of ANC and subsequently, on 12 November 2009, to investigate allegations of impropriety related to management of the Cemetery. The results of both the DAIG inspection and investigation revealed numerous systemic problems, to include burial discrepancies at ANC and that the Cemetery lacked adequate policies, procedures and administrative depth to manage daily operations.

Current Status, June 2010–June 2011. On 11 June 2010, immediately following SecArmy's issuance of Army Directive (AD) 2010-04, the newly appointed Executive Director, Arlington National Cemeteries Program (ED ANCP), established a hotline to respond to the influx of telephonic burial discrepancy inquiries that arose in the wake of public release of the June 2010 DAIG report. In the first few months of its operation, the hotline received more than 1,100 calls from concerned Family members whose loved ones were buried at ANC. Primarily, the incoming hotline calls were from Family members seeking to ascertain whether any discrepancy existed with regard to their loved one's burial location or whether any other anomaly was associated with their loved one's interment or inurnment. In the meantime, the Interment Services Branch (ISB) continued to receive phone calls from Next of Kin (NOK) seeking to schedule the interment / inurnment at ANC of their deceased loved one. As reported earlier in this report, in December 2010, ANC partnered with the Information Technology Agency (ITA), to centralize all Cemetery call-intake functions in the ITA's Consolidated Customer Service Center (CCSC). This freed the ISB to focus on its core function of scheduling services. At the same time, with the daily hotline call volume substantially reduced, the hotline calls were also migrated to the CCSC. This migration was transparent to customers and although the CCSC call center began receiving all incoming calls, the senior ANCP staff continued to personally handle the resolution of calls dealing with burial discrepancy inquiries. Inquiries from concerned next of kin about possible burial discrepancies have now dropped to less than 10 per month.

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Established Procedures. Once the hotline was established the ED, the DA Office of General Counsel and ANCP POG developed, and on 21 June 2010 the ED signed, a memorandum entitled, *Protocols for Follow-up Actions in Response to ANC Hot Line Calls*. This memorandum established a tiered system for responding to Family member inquiries and to inform and support their requests. The first step in the protocol describes the process for confirmation of documents related to a particular deceased and his or her burial, and authorizes the Chief of Staff, ANC to approve a response to these types of inquiries. Step Two provides for a gravesite validation in the event of a document discrepancy or at the insistence of the Next-of-Kin(NOK). Step three provides for personal identification when gravesite validation is inconclusive and step four provides for scientific testing when step three is inconclusive. The memorandum also prescribes procedures to document all communications and correspondence for future review. This protocols employed an ANCP-generated form (the "Family Concern Form") on which a member of the ANCP staff would record: the date and time the inquiry was received; the caller's name and relationship to the deceased; the rank and branch of Service of the deceased; the deceased's gravesite and burial section, if known to the family member calling; contact information for the caller; and the specific nature of the caller's concern.

From these forms, the ANCP staff would enter the above data into an Excel spreadsheet database from which the information could be retrieved and leveraged for query purposes. As the staff looked into each case, they would also annotate and add any data not provided by the Family member during the intake call to the spreadsheet--most frequently the gravesite location. Additionally, the protocol established a checklist of actions that the staff was required to execute with regard to each Family member inquiry. Staff members were required to initial beside each action, once completed, to verify personally that each of the requisite steps had been taken pertaining to the caller's concerns. The requisite actions included pulling and copying the record of the deceased's interment/burial card and the gravesite card and collating it with the Family Concern Form in a single inquiry file. The staff member was then required to visit the gravesite that was the subject of the inquiry and take digital pictures of the front and back of each headstone placed at the site. These pictures were added to the inquiry file

All of the above documents and data were cross-checked for accuracy and consistency. Next, the accuracy and completeness of the checklist pertaining to the inquiry was independently verified by a second staff member. Once all of the actions on the checklist were completed and the information independently verified as accurate and presuming that no discrepancies or inconsistencies were identified in the records or the information they contained, the Chief of Staff signed the checklist, releasing the staff member handling the case to contact the Family member. Calls to respond to Family members who had initiated an inquiry were handled by ANCP staff members using a

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"Next of Kin (NOK) Phone Call Return Script." also developed by ANCP. Once the phone call to the Family member was complete and any requisite follow-on actions had been taken, the staff annotated the "NOK Phone Call Return Script" to document that the response to the Family was complete. The staff further annotated the script to indicate whether the Family member had requested a hard copy of the records pertaining to his or her loved one, enumerate any additional information requested by the Family member and to document any further action to be taken by the Cemetery. The ANCP Chief of Staff, Superintendent, and Executive Director provided oversight of follow-up actions and intervened as required by the protocol.

Additional Follow On Actions. As of 31 August 2011, 24 cases have required steps beyond step one (document confirmation). The 24 cases include the eight cases related to eight cremated urns, each of which contained remains, found in one grave in October 2010. In the 16 other cases, ANC determined that a gravesite validation or personal identification was required to respond appropriately to Family member concerns. In an effort to be as supportive as possible, ANC invited Family members to participate in the verification process at whatever level, and to whatever extent each Family member was comfortable in so doing. Of these 16 discrepancy inquiries, Family members in nine cases elected to participate (two Families at government expense) to allow them to verify personally that their deceased loved ones were buried in the correct gravesite. In the remaining cases, six were verified by ANC staff at the request of and on behalf of the inquiring Family member and the last case was verified by ANC without Family member involvement due to no known contact information for the NOK.

As to the 16 gravesite validations and personal identification cases, conducted, ANC verified that the deceased were in the correct gravesites in 11 cases. The five remaining verification efforts revealed substantiated burial discrepancies. Of the five cases involving substantiated discrepancies, the first and second cases were related and stemmed from one inquiry from a Family member. Likewise, the third and fourth cases were related and stemmed from one inquiry.

The first case began with an inquiry from a Family member who was concerned that her deceased Soldier husband was not actually interred in the grave that bore his headstone. Physical verification by ANC revealed that the Family member's concerns were well founded; the widow's deceased husband had been interred in the gravesite adjacent to, and as viewed from the headstone looking toward the far end of the grave, to the left of his marked grave, below the urn of an unrelated spouse (who was in her correct gravesite). A different female spouse, whose burial records indicated that she had been interred in gravesite adjacent to, and to the right of the inquiring Family member's spouse's marked gravesite, was found to have been interred in the gravesite bearing the headstone of the concerned Family member's deceased Soldier spouse. In

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the first case, at the request of the inquiring widow, the deceased Soldier's remains were disinterred from the incorrect gravesite and reinterred in a new gravesite; a new headstone was emplaced and the grave records were updated accordingly. The urn that was above the Soldier, and in the proper grave, was temporarily removed to allow the disinterment of the Soldier's casket and placed back in the correct gravesite. In the second case, at the request of the surviving husband of the female spouse who had been interred in the grave of the deceased Soldier, the female spouse's remains were not moved; the headstone on the grave was changed to reflect her burial information and Cemetery records were update properly.

In the third case, following a Family member inquiry, an urn with cremated remains of a veteran's spouse was found to have been interred in the incorrect gravesite. The urn was disinterred by hand excavation and reinterred with her deceased husband in the correct gravesite; headstones and records were updated accordingly.

The fourth case was triggered by the third case. As the document confirmation process occurred in the third case, the cross checking of adjacent gravesites resulted in Cemetery personnel finding both a deceased veteran's and his spouse's remains in an incorrect, adjacent gravesite. The Cemetery, lacking any NOK contact information, left the couple in the gravesite in which they were found, emplaced a new headstone and updated records accordingly.

In October 2010, a fifth case was generated by cemetery officials who noted that the ground was consistent with the presence of a grave where no headstone existed. A records check indicated that no burials were documented as having occurred at the identified gravesite. The Cemetery probed and found evidence of remains. Further probing of the gravesite adjacent to that location, and which records indicated should have been occupied, revealed no indication of remains. After further investigation, the Cemetery determined the remains of a veteran had been incorrectly placed in the gravesite, adjacent to the grave she was recorded as occupying. After reaching out to, and consulting with the NOK, a new headstone was placed on the correct grave in which the veteran was buried, Cemetery records were updated accordingly.

The inspection team noted that the ED and ANCP staff were professional and supportive to Families throughout the inquiry process.

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Eight Urns. The remaining eight cases were generated on 20 October 2010, when ANC received information from a Cemetery employee that Section 69, gravesite 5253¹ contained more than one set of cremated remains. The gravesite was excavated by hand and eight urns, each of which contained cremated remains, were discovered. Immediately upon discovering the eight urns, ANC alerted the Army's Criminal Investigation Division (CID) and requested a criminal investigation of the matter. Four of the inurned remains were positively identified. ANC contacted the surviving Family members associated with each identified urn and offered support and assistance. The four identified urns and have been reinterred as directed by their Families, with Family member involvement in two of the cases (one at Army expense). Family members in the other two cases requested ANCP officials reinter their loved ones. Four urns cannot be identified and have been designated and reinterred as "unknown" by ANCP officials with the full dignity and respect accorded any interment. For each reinterment, the ED and Superintendent were present in lieu of the NOK at the interment of the final three unknown urns.

In all of the above cases, the ED extended to Family members an offer of the support and presence of chaplains, if desired. Additionally, the ED and Superintendent were present for each gravesite validation and personal identification providing personal support to the NOK who elected to participate and overseeing the process on behalf of the Army when NOK elected to not participate. The presence of these ANCP senior leaders ensured that all gravesite validations, personal identifications and disinterments and reinterments were treated with dignity and respect.

Random Sample. As of 30 June 2011, ANC had received 1,282 queries regarding more than 1,300 veterans or Family members interred or inurned at ANC. Of the 1,282 cases, only 18 remain open; all others are resolved. ANC continues to work with affected Family members to resolve the 18 remaining cases. In the majority of the 18 open cases, ANC is awaiting a decision from the Family as to final disposition of the matter or is awaiting receipt of updated contact information from Family members. The DAIG's methodology for evaluating ANC's efforts to address the 1,282 total inquiries was to review the action taken by ANC in a random sample² (approximately 23 percent or 297 inquiries) of all inquiries. An assessment of the 297 randomly sampled cases revealed that 293 inquiries were resolved to the satisfaction of the affected Family members. Of the remaining four randomly sampled cases, one proved to be the result

¹ Note: An ANCP staff member inadvertently transposed 5253 to 5352 on some ANCP documentation pertaining to this incident. A senior member of the ANCP staff confirmed that Section 69, gravesite 5253 is correct.

² The sample size was derived from accredited methods from Universal Accreditation Board, Random Sample Size (table), Accreditation Study Course 2003.

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of human error. In the absence of any information or evidence to the contrary, the DAIG inspection team determined it likely that in the process of transferring other information in the database, the ANCP Chief of Staff inadvertently "opened" a new inquiry in the Excel spreadsheet database in which all incoming inquiries were recorded. The database automatically assigned a case number to the newly opened inquiry, but as no such inquiry actually existed, no other information ever was entered into the database and all database cells, except the automatically assigned case number remained blank. The Cemetery had no other supporting documentation on this case number. The final three cases of the 297 sampled were among the 18 open cases cited above and remain in the resolution process.

The ANCP staff developed its process for in-taking, tracking and responding to burial inquiries on extremely short notice and a significant number of inquiries were filed in a very short period of time. Initially, the ANCP staff scanned and digitized all of the inquiry records and stored them on their systems and maintained paper copies as a back-up method. However after the creation and fielding of the ANCP Research Tool by the POG, and the fielding of the Remedy case tracking database, the ANCP staff transitioned to using the Research Tool for research purposes and Remedy as the database for burial inquiry records. As to the paper records created in the course of ANC's response to the 1,282 burial inquiries, most have been scanned onto ANCP's shared drive, and are being incorporated into the Research Tool. The inspection team noted that the ANCP staff and the Task Force now both employ the Research Tool, which provides the user access to all supporting Cemetery records (records of interment, gravesite cards, pictures of the headstone – front and back) at their computers at the click of a mouse. Leveraging the IT capabilities resident within the Research Tool allows all inquiry records to be added to the Research Tool database and linked, by name and grave location, to each individual interred. The integration of these records into the database facilitates the accurate and appropriate resolution of the document confirmation cases and allows the more complex cases to continue to be elevated to the senior leadership of the ANCP.

The Gravesite Accountability Task Force is establishing a baseline for all gravesites and inurnment niches with a view to accounting for every deceased interred or inurned at ANC through the digitization of burial records, photographing and recording of their headstones and documenting and mapping the grid coordinates of each gravesite. To resolve future discrepancies, the Task Force will employ protocols established and well-honed in the context of responding to the previous 1,282 queries. In addition, in each case that arises, affected Family members will receive the same personal attention and care that ANCP leadership and staff devoted to prior cases.

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ANCP has initiated several other methods of outreach to inform the public about what the Cemetery has done and will continue to do to address burial inquiries. In addition to regular press releases (including a contact number to reach ANC), ANC has established an informative Web-site where it publishes information about how to contact the Cemetery with any question about burial discrepancies. In February 2011, the ANC Web site added a new feedback method, leveraging the Army's Interactive Customer Evaluation (ICE) link. Additionally, ANC has created Facebook© and Twitter© sites to enable it to reach out to, communicate with, and obtain feedback from, the public. Finally, ANCP has created a new *Guide to Burial and Next of Kin Information Guide* to assist family members with the burial of the loved ones at an ANCP cemetery.

The inspection team found the current ANCP and ANC leadership and staff to be extremely diligent in their efforts to correct the errors of the past Cemetery administration; to communicate timely, accurately and honestly with Families concerned about burial errors that may affect their loved ones; and to put in place appropriate measures and standard operating procedures to prevent future burial errors and to detect and correct, as quickly as possible, any potential error that yet may be identified.

RECOMMENDATION:

3.1.1 (reference #ID-1107.35.01): ANCP continue to leverage the IT capabilities resident within the Research Tool to ensure that all inquiry records are added and linked to the record by name and grave location, to each individual interred.

STANDARD(S): Public Law 111-339, dated 22 December 2010

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4.1 OTHER MATTER (reference #ID-1107.36): Wait times for interment / inurnment at ANC have increased and vary based on the deceased veteran's branch of Service.

DISCUSSION:

Wait Times for Interment / Inurnment Increasing. The inspection team found that wait times for burial at Arlington National Cemetery (ANC) for almost all deceased (active duty, veterans and dependents and for full honors, standard honors and no honors) are increasing. Further, wait times differ depending on the veteran's branch of service; only wait times for internments / inurnments of soldiers killed while deployed in support of Operation Enduring Freedom and Operation New Dawn have not increased. In 2004, Next of Kin (NOK) requesting full honors interment of the loved one (in ground burial) waited an average of 53 days between the date the deceased's eligibility was determined and the interment was performed. By 2011, this wait time had increased to 87 days, with the greatest increase (12 days) experienced between 2010 and 2011. Additionally, interment / inurnment wait times at ANC are dependent on the Service providing honors. In 2011, NOK for deceased Air Force and Navy veterans were required to wait an average of 98 and 100 days, respectively, a significantly longer delay when compared to an average of 82 days for Army veterans and 78 days for Marine Corps' veterans.

Causes of Increasing Wait Times.

Enhancements to the Prior Administration's Ineffective Call Accounting and Management at ANC have Improved Call Tracking and Accountability. Before August 2010, telephones in ANC's Interment Services Branch (ISB) did not have a voicemail system. The inspection team determined that before the ISB's voicemail system was enabled, many NOK calling ANC to request interment / inurnment for a deceased veteran were unable to reach a Cemetery Representative (CR) and could not leave a voicemail message. This lack of responsiveness may have caused many NOK to give up and make arrangements for interment / inurnment at another cemetery. To improve internal processes, the ANCP Provisional Operations Group (POG) established a voice mail system on all telephones in the ISB on 13 August 2010. Between 13 August and 13 December 2010, the ISB received and responded to 2,351 voice mail messages left on the new system. ANCP leadership compared these 2,351 voice mails to the number of telephone calls received by ISB personnel before the voicemail was enabled. This analysis revealed that before the voicemail system was activated, the ISB had been missing a significant number of incoming calls. Leaders at ANC reported that this past inefficiency resulted in artificially low demand for interment / inurnment at ANC and obscured the actual wait times that NOK would have experienced had the ISB been more responsive.

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Establishment of ANC's Customer Service Call Center. Requests for interment / inurnment and wait times have continued to increase since the Army's Information Technology Agency (ITA) established ANC's Customer Service Call Center (CSCC) at Fort Detrick, Maryland on 13 December 2010. The CCSC estimated its staffing requirement to meet an average demand of 170 calls per day. As CCSC tracked call volume, it became clear the ANCP and CCSC leadership had underestimated call volume as ANC consistently received between 200 and 300 calls each day. After the CSCC became operational, even more NOK for eligible deceased veterans were able to successfully contact ANC CRs at the ISB and schedule interments/inurnments. Additionally, military Casualty Assistance Officers and local funeral home directors reported that this increase in ANCP's efficiency and effectiveness has helped to improve public perception of ANC. These increasingly positive "word-of-mouth" endorsements within veterans' communities contribute to increased demand for interment / inurnment (as evidenced by increased call volume) and a corresponding increase in wait times.

No Multi-Service Standards for Honors at ANC. Currently, each of the Services determines what honors will be rendered during interments / inurnments at ANC. While DoD Instruction (DoDI) 1300.15, *Military Funeral Support*, assigns responsibilities and establishes policies for military funeral honors support, this DoDI is not applicable to honors rendered at ANC, where each Service follows its own policies for honors. Honors for interment / inurnment at ANC vary by the rank and Service of the deceased veteran and can include a Service-specific chaplain, escort platoon, colors team, band and / or a caisson section. AR 600-25, *Salutes, Honors and Visits of Courtesy*, governs Army policy for honors. DA Pam 290-5 defers to each of the Services to provide military honors for funerals as each sees fit and allows for local arrangements to be made between Services for furnishing honors. Despite the latitude that exists, due to the high visibility of ANC, parity of support is closely scrutinized. For example, in January 2009, then-Secretary of the Army Pete Geren signed a memorandum authorizing full military honors (including, "an escort platoon, colors team, band and a caisson section") for all Soldiers killed in action. In an effort to ensure parity, the Navy, Marine Corps, Air Force and Coast Guard changed their standards for full honors eligibility at ANC to match what the Army provided. While this changed standard increased requirements for Navy, Marine Corps, Air Force and Coast Guard ceremonial units, these units were not provided a corresponding increase in resources. The increased demand for funeral honors resulted in scheduling conflicts with the other critical functions performed by these ceremonial units. To resolve these conflicts, Services adopted different scheduling procedures. A multi-Service review and standardization of assets required for honors funerals would reduce the resourcing strain and the corresponding wait times for resources to become available to perform the honors ceremonies to which the deceased is entitled.

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Effects of Service Block Times on Wait Times. To avoid resource conflicts, some Services established "block times" each month when ANC CRs were prevented from scheduling full honors interments / inurnments involving those Services' ceremonial units. These block times limited the number of days ceremonial units were available to support interments / inurnments and increased wait times for those units. Additionally, for some period of time, the Naval District of Washington (NDW) only accepted requests to support ANC interments / inurnments scheduled to occur within 90 days beyond the current month. This allowed NDW to avoid conflicts with other non-cemeterial events and functions. Because the Army, Marine Corps' and Air Force ceremonial units accept ANC requests beyond 90 days, NOK for Navy veterans have experienced longer wait times. In July, 2011, NDW rescinded its 90 day policy. Finally, all of the Services have access to the Interment Scheduling System (ISS) but leverage its capabilities differently in their scheduling of resources.

Other Factors Impacting Wait Times. Increases in wait times could be mitigated by establishing multi-Service policies and processes and / or adjusting DoD, Army, other Service and ANCP-specific policies and procedures.

The Three Cs. The 9 June 2010 DAIG inspection report noted three factors (the "Three Cs") that also impacted wait times: the availability of chaplains, chapels and caissons to support the demand for funerals. This inspection team noted that the "Three Cs" continue to impact wait times, together with the factors discussed above. Optimizing the use of the "Three Cs," increasing the number of each and/or reviewing the eligibility for chaplains, chapels and caissons at funerals could all assist in reducing wait times.

Eligibility Standards. Currently, deceased active duty Service members; retired members of the Armed Forces; and honorably discharged former members of the Armed Forces who were prisoners of war or were awarded the Medal of Honor, Distinguished Service Cross / Medal, Silver Star or Purple Heart (and their Family members), are eligible for in-ground burial or inurnment in a columbarium niche at ANC. Reducing the number of eligible veterans and their dependents by changing the current interment / inurnment burial eligibility policy would reduce demand. This would reduce wait times and increase ANC's future capacity accordingly (See Other Matter 4.2).

NOK Preferences. Currently, CRs at ANCP select dates for interment / inurnment based on the preference expressed by the deceased's NOK. While allowing NOK preferences to drive scheduling contributes to customer satisfaction, this practice increases wait times. Alternatively, ANCP could require NOK requesting an interment / inurnment date to accept the earliest time available. This would increase predictability and reduce wait times.

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RECOMMENDATIONS:

4.1.1 (reference #ID-1107.36.01): ASA(M&RA) (ANCP assist) engage the Office of the Under Secretary of Defense for Personnel and Readiness and other Services to develop multi-Service policies, processes and procedures for interment / inurnment and ceremonial support at Army National Cemeteries.

4.1.2 (reference #ID-1107.36.02): That SecArmy request that the Army National Cemeteries Advisory Commission (ANCAC), once convened, examine the potential causes and effects of increasing wait times and recommend changes to DoD, Army, other Service and ANCP policies, processes and procedures to reduce wait times appropriately.

STANDARD(S): Not Applicable.

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4.2 OTHER MATTER (reference #ID-1107.37): Increasing rates of interments / inurnments will expend the Cemetery's usable space prior to current projections.

DISCUSSION:

Requests for Interment / Inurnment Increasing. ANC's capacity to provide new in-ground gravesites and inurnment niches is finite. According to a May 2011 survey conducted by the Center for Army Analysis, ANC's current rate of interment / inurnment will expend all usable space for interments in 2035 and inurnments in 2037. These projections include additional space gained through the acquisition and development of the Navy Annex and execution of the Millennium Project. In the 9 June 2010 DAIG inspection report, inspectors determined the number of interments / inurnments at ANC was steadily increasing over time. As noted, 2740 interments / inurnments were conducted at ANC in 1972. Interments / inurnments had increased to 5980 by 1998 and to 6970 by 2009. This increase can be attributed to veterans of World War II, Korea and Vietnam War aging and dying at increasing rates. Additionally, 11 percent of Service members killed in action while serving in Iraq and Afghanistan were being interred / inurned at ANC, also contributing to this increase.

Improvements at ANC Reveal Additional Demand. Since the issuance of Army Directive 2010-04 in June 2010, ANCP has markedly improved the effectiveness and efficiency of Cemeterial operations at ANC. As discussed in Other Matter 4.1, these improvements have revealed a demand for interment / inurnments greater than previously recognized. If ANC continues to service this demand, current projections of ANC's long-term availability for interments / inurnments must be reduced accordingly.

Mitigating the Effect of Increasing Demand. Reducing the population of veterans eligible for interment / inurnment by changing the Army's current interment / inurnment policy could compensate for increasing demand and sustain ANC's future capacity. Additionally, increasing the amount of space available for in-ground burials and / or inurnment niches by acquiring new property could sustain or increase ANC's capacity.

RECOMMENDATION:

4.2.1 (reference #ID-1107.37.01): That SecArmy request that ANCAC, once convened, analyze and advise on courses of action to mitigate the effect of increasing demand for interment / inurnment on ANC's projected availability.

STANDARD(S): Not Applicable.

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SUBJECT: Annex 6 (Methodology) to Memorandum, Subject: The Inspection of the Army National Cemeteries Program and Arlington National Cemetery

INSPECTION METHODOLOGY

1. Objectives (Reference, Annex 6-Inspection Directive).

a. Assess compliance, implementation and effect of the recommendations as approved from the Department of the Army Inspector General's 9 June 2010 inspection report.

b. Assess the Army National Cemeteries Program and other Army agencies' execution of and compliance with Army Directive 2010-04.

c. Assess the adequacy of current practices at ANC to provide information, outreach and support to Families of those individuals buried at Arlington National Cemetery regarding procedures to detect and correct errors in burials at ANC.

2. Inspection Team. The inspection team consisted of 11 members; 9 assigned within the U.S. Army Inspector General Agency (USAIGA) Inspections Division and 2 IG Augmentees / subject matter experts (SMEs) from the Chief Information Officer (CIO) / G-6 and US Army Contracting Command (ACC):

Team Chief	USAIGA
Deputy Team Chief / Inspector	USAIGA
Operations Officer	USAIGA
Inspector	USAIGA
U.S. Army Contracting Command (ACC)	ACC
CIO / G-6	CIO / G-6

3. Scope. The inspection assessed:

a. Compliance with and the implementation and effect of the approved recommendations of the Department of the Army Inspector General's 9 June 2010 inspection report.

b. The Army National Cemeteries Program and other Army agencies' execution of and compliance with Army Directive 2010-04.

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c. The adequacy of current practices at ANC to provide information, outreach and support to Families of those individuals buried at Arlington National Cemetery regarding procedures to detect and correct errors in burials at ANC.

4. Methodology.

a. The DAIG team organized into 2 person interview teams to conduct simultaneous inspections of multiple agencies and formed larger teams when appropriate. All interviews were conducted within the National Capital Region.

b. Document Review. The inspection team reviewed U.S. Code; DoD and Army regulations, directives and instructions and inspected agency policies, guidance and standing operating procedures. The team also reviewed contracts from MICCs-Belvoir and Myers, together with contracts from ANC.

c. Events / Processes Observed: The inspection team interviewed personnel from: the Arlington National Cemetery Provisional Oversight Group; Arlington National Cemetery; the Soldiers' and Airmen's Home National Cemetery; Consolidated Customer Service Center (CCSC); the Office of the Chief of Public Affairs, Assistant Secretary of the Army (Manpower and Reserve Affairs), Assistant Secretary of the Army (Civil Works), Assistant Secretary of the Army (Financial Management and Comptroller), Assistant Secretary of the Army (Acquisition, Logistics and Technology), U.S. Army Corps of Engineers, Chief Information Officer / G-6, General Counsel, U.S. Army Center of Military History, U.S. Army Manpower Analysis Agency, U.S. Army Force Management Support Agency, U.S. Army Contracting Command, U.S. Army Mission and Installation Contracting Command and the Administrative Assistant to the Secretary of the Army; U.S. Government Accountability Office; the Commanding General, Military District of Washington; Army, Navy, Air Force, Coast Guard and Marine Ceremony Coordinators; the Fort Myer Casualty Assistance Office; and the Records Management Declassification Agency. The inspection team also observed personnel from the CCSC coordinating funeral arrangements with surviving Family members and addressing burial inquiry cases.

d. In-Progress Review: To examine inspection trends and progress and to receive updated guidance from senior leadership, the team conducted an in-progress review with Acting The Inspector General.

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5. Locations and Agencies: All interviews were conducted within the National Capital Region

Agency
ANCP & ANC
ASA(CW)
ASA(M&RA)
ASA(FM&C)
ASA(ALT) / DASA(P)
OCPA
OAA
CASUALTY ASST OFFICE - FORT MYERS, VA
CG MILITARY DISTRICT OF WASHINGTON
CIO / G-6
US ARMY CORPS OF ENGINEERS
GAO
OGC
USAFMSA
USAMAA
US ARMY CENTER OF MILITARY HISTORY
US ARMY INFO TECH AGENCY - FORT DETRICK, MD
COAST GUARD CEREMONY COORDINATOR
MARINE CEREMONY OPS COORDINATOR
MDW OLD GUARD CEREMONY OPS COORDINATOR
NAVY CEREMONY OPS COORDINATOR
MICC (ACC)
RECORDS MGMT DECLASSIFICATION AGENCY
CHRA (G-1)

6. Findings and Observations Format.

The inspection team addressed its findings in this report using the following format:

1. Deficiency / Observation Statement.
2. Root Cause(s).
3. Discussion.
4. Recommendation(s).
5. Standard(s).

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7. In the report quantitative terms, such as "few, some, majority and most" are used to describe percentile ranges of personnel interviewed and surveyed. The team used the following thresholds throughout the report:

None	0 percent
Few	1-25 percent
Some	26-49 percent
Half	50 percent
Majority	51-75 percent
Most	76-99 percent
All	100 percent

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SUBJECT: Appendix A: Inspection Directive, (Annex 6 (Methodology)) to
Memorandum, Subject: The Inspection of the Army National Cemeteries Program
(ANCP) and Arlington National Cemetery (ANC)

Appendix A

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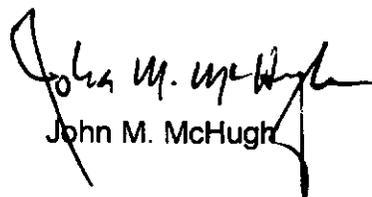
SECRETARY OF THE ARMY
WASHINGTON

02 MAY 2011

MEMORANDUM FOR ACTING THE INSPECTOR GENERAL

SUBJECT: Inspection of the Army National Cemeteries Program and Arlington National Cemetery

1. You are directed to conduct a comprehensive inspection of the Army National Cemeteries Program and Arlington National Cemetery (ANC).
2. The inspection will focus on the following objectives:
 - a. Assess compliance, implementation, and effect of the recommendations as approved from the Department of the Army Inspector General's 9 Jun 10 inspection report.
 - b. Assess the Army National Cemeteries Program and other Army agencies' execution of and compliance with Army Directive 2010-04.
 - c. Assess the adequacy of current practices at ANC to provide information, outreach, and support to families of those individuals buried at Arlington National Cemetery regarding procedures to detect and correct errors in burials at ANC.
3. You are authorized unlimited access to Army activities, personnel, locations, organizations and documents to ensure the successful accomplishment of this inspection. Additionally, you are authorized to coordinate with other services and Joint Staff for assistance, documentation and information that may assist in completing this inspection.
4. You are authorized to task the Army Staff and subordinate headquarters as an approved exception to the HQDA Short Notice Tasking Policy dated 031253Z Jan 01.
5. You will publish a report of your findings and observations, including recommendations for my review and approval upon the conclusion of the inspection, in such time in order to comply with the suspenses contained in Public Law 111-339.


John M. McHugh

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SUBJECT: Annex 7 (Glossary / Definitions) to Memorandum, Subject: The Inspection of the Army National Cemeteries Program and Arlington National Cemetery

<u>Acronym</u>	<u>Full title</u>
AAA	U.S. Army Audit Agency
ACC-NCR	U.S. Army Contracting Command-National Capital Region
AD	Army Directive
ADC-F	Army Data Center-Fairfield
AFARS	Army Federal Acquisition Regulation Supplement
AGM	Army Golden Master
ALARACT	All Army Activities
ANC	Arlington National Cemetery
ANCAC	Army National Cemeteries Advisory Commission
ANCP	Army National Cemeteries Program
APIP	Acquisitions Process Improvement Plan
AR	Army Regulation
ASA(ALT)	Assistant Secretary of the Army (Acquisition, Logistics and Technology)
ASA(CW)	Assistant Secretary of the Army (Civil Works)
ASA(FM&C)	Assistant Secretary of the Army (Financial Management & Comptroller)
ASA(M&RA)	Assistant Secretary of the Army (Manpower and Reserve Affairs)
ATG	Annual Training Guidance
BOSS	Burial Operations Support System
BRAC	Base Realignment and Closure
CCE	US Army Contracting Command Center of Excellence
CCIR	Commander's Critical Information Requirements
CCSC	Consolidated Customer Service Center
CEA	Cemeterial Expenses, Army
CFR	Code of Federal Regulation
CHES	Computer Hardware, Enterprise Software and Solutions
CHRA	Civilian Human Resources Agency
CIO / G-6	Chief Information Officer / G-6
COOP	Continuity of Operations
COR	Contracting Officer's Representative
CORMS	Contracting Officer's Representative Management System
CPOL	Civilian Personnel Online
CR	Cemetery Representative
CRM	Customer Relationship Management

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SUBJECT: Annex 7 (Glossary / Definitions) to Memorandum, Subject: The Inspection of the Army National Cemeteries Program and Arlington National Cemetery

DA PAM	Department of the Army Pamphlet
DAIG	Department of the Army Inspector General
DASA(MPP)	Deputy Assistant Secretary of the Army for Military Personnel Policy
DASA(P)	Deputy Assistant Secretary of the Army for Procurement
DCS	Deputy Chief of Staff
DEOMI	Defense Equal Opportunity Management Institute
DFARS	Defense Federal Acquisition Regulation Supplement
DFO	Designated Federal Official
DISA	Defense Information Systems Agency
DoD	Department of Defense
DoDD	Department of Defense Directive
DoDI	Department of Defense Instruction
DRU	Direct Reporting Unit
DVA	Department of Veterans Affairs
ED	Executive Director
ED ANCP	Executive Director Army National Cemeteries Program
EO	Executive Order
FAR	Federal Acquisition Regulation
FOA	Field Operating Agency
FY	Fiscal Year
GAO	US Government Accountability Office
GFEBS	General Fund Enterprise Business System
GPC	Government Purchase Card
GSA	US General Services Administration
HCA	Head of Contracting Activities
HQ	Headquarters
HQDA	Headquarters Department of the Army
HRC	Human Resources Command
IA	Information Assurance
IACORA	Information Assurance Certification or Accreditation
IAW	In Accordance With
ICE	Interactive Customer Evaluation
ICW	In Coordination With
IDP	Individual Development Plan
IDS	Intrusion Detection System
IGE	Independent Government Estimate

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INFOCON	Information Operations Condition
ISB	Interment Services Branch
ISS	Interment Scheduling System
IT	Information Technology
ITA	US Army Information Technology Agency
JBMHH	Joint Base Myer-Henderson Hall
MDW	Military District of Washington
MICC	US Army Mission and Installation Contracting Command
MOA	Memorandum of Agreement
MOU	Memorandum of Understanding
NCA	National Cemetery Administration
NCRCC	National Capital Region Contracting Center
NOK	Next of Kin
OAA	Office of the Administrative Assistant to the Secretary of the Army
OAI	Organizational Assessment and Inspection
OCLL	Office of the Chief of Legislative Liaison
OCPA	Office of Chief Public Affairs
OGC	Office of General Counsel
OMB	Office of Management and Budget
OMB A-11	Office of Management and Budget Circular A-11
OPSEC	Operations Security
OSD	Office of Secretary of Defense
OUSD(P&R)	Office of Under Secretary of Defense for Personnel and Readiness
PAO	Public Affairs Officer
PARC	Principal Assistant Responsible for Contracting
PCF	Paperless Contract File
PMP	Program Management Plan
PMR	Procurement Management Review
POA&Ms	Plan of Action and Milestones
POG	Provisional Oversight Group
POM	Program Objective Memorandum
QASP	Quality Assurance Surveillance Plan
RFQ	Request for Quotation
RM	Resource Management
RMDA	Records Management Declassification Agency
RPO	Regulatory Policy Officer

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SA	Secretary of the Army
SAHNC	Soldiers' and Airmen's Home National Cemetery
SAIG	Secretary of the Army Inspector General
SecArmy	Secretary of the Army
SECDEF	Secretary of Defense
SERG	Senior Executive Review Group
SLA	Service Level Agreement
SOP	Standard Operating Procedure
TCMS	Total Cemetery Management System
TDA	Table of Distribution and Allowances
TOG	The Old Guard
ULO	Unliquidated Obligation
USACC	US Army Contracting Command
USACE	US Army Corps of Engineers
USACE-NAB	US Army Corps of Engineer - Baltimore District
USACE-NAO	US Army Corps of Engineers - Norfolk District
USACMH	United States Army Center of Military History
USAFMSA	United States Army Force Management Support Agency
USAIGA	US Army Inspector General Agency
USAIGA IA	US Army Inspector General Agency Information Assurance Division
USAMAA	US Army Manpower Analysis Agency
USMA	US Military Academy
WAWF	Wide Area Workflow
WIDS	Wireless Intrusion Detection System

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Definitions

Army National Cemeteries: The Army National Cemeteries, consist of the Arlington National Cemetery, Arlington, Virginia, and Soldiers' and Airmen's Home National Cemetery, Washington, DC, both of which are under the jurisdiction of the Secretary of the Army (Sec Army).

Deficiency: A serious deviation from the standard / problem identified by an Inspector General during an inspection that warrants the attention of Senior Army Leaders if left unresolved.

Discussion: Explains how the inspection team arrived at their finding.

Failing Deficiency: A serious deviation from the standard identified during an inspection that requires immediate attention / resolution and results in an overall failure of the inspection as defined by the proponent / SecArmy.

Finding: An issue identified by an Inspector General during the course of an Inspection and noted in this final Inspection Report. Inspection Findings consisted of four sub-categories: Failing Deficiencies, Deficiencies, Observations, and Other Matters.

Observation: A problem identified during a inspection has only minor impact / consequences and doesn't require special attention from higher command echelons / the Senior Leaders of the Army.

Other Matter: Problems identified by an Inspection team that are outside the scope of a particular inspection.

Proponent: The individuals or staff agencies the inspection team identified in the recommendation(s) paragraphs to correct problems specified in the inspection report.

Recommendation: Actions necessary to address an issue / problem identified during an inspection.

Root Cause: The underlying reason why something happens or does not happen.

Standard: The way something should be as outlined in Army policies, regulations, doctrine, published orders, or standing operating procedures.

Urgent Recommendation: Urgent (or time sensitive) actions necessary to address an urgent issue / problem identified during an inspection.