

COMPLIANCE REVIEW PROGRAM (CRP)

1. REASON FOR ISSUE: To establish policy and responsibilities for the administration of the CRP, a program to review cemeteries that have received grant funds through the Veterans Cemetery Grants Program (VCGP). The purpose of the CRP is to assess grant-funded cemeteries' compliance with applicable National Cemetery Administration (NCA) operational standards and measures, and to monitor the status of corrective actions and provide reports on compliance levels and the status of corrective actions to the NCA senior leaders.

2. SUMMARY OF CONTENTS: This new directive establishes:

- a. NCA policy and responsibilities for the CRP.
- b. The three types of CRP inspections, which include the Standard Inspection, Verification Inspection and Remedial Assessment.
- c. The basis for conducting the three types of CRP inspections.

3. RESPONSIBLE OFFICE: NCA, Improvement and Compliance Service (ICS or 42D), 810 Vermont Avenue, NW, Washington, D.C. 20420, is responsible for the material contained in this directive. Questions may be referred to the Director, ICS.

4. RELATED PUBLICATION: NCA Operational Standards and Measures (Feb. 2021)

5. RESCISSIONS: None.

6. RECERTIFICATION: This directive is scheduled for recertification not later than the last day of October 2027.

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

Distribution: Electronic

COMPLIANCE REVIEW PROGRAM (CRP)

1. PURPOSE/AUTHORITY:

a. This directive establishes policy and responsibilities for the CRP. The purpose of the CRP is to assess Department of Veterans Affairs (VA) grant-funded cemeteries' compliance with applicable NCA operational standards and measures and monitor the status of corrective actions and provide reports on the status of corrective actions to NCA senior leaders.

b. 38 U.S.C. § 2408 authorizes VA to provide aid to states, counties and tribal organizations for establishment, expansion and improvement of Veterans' cemeteries. Section 2408(d)(1) requires that any grant made to assist in establishing a Veterans' cemetery shall be made on the condition that such cemetery shall conform to such standards and guidelines as VA may prescribe by regulation.

c. VA regulations at 38 C.F.R. § 39.1 set forth the mechanism to obtain a grant to establish, expand or improve a Veterans cemetery that meets VA's national shrine standards of appearance. Additionally, section 39.31(b)(13) requires grant-funded cemeteries seeking a grant to submit VA Form 40-0895-15 (Certification of Cemetery Maintained in Accordance with National Cemetery Administration Standards) to ensure that any cemetery established, expanded or improved through a grant will be operated and maintained in accordance with NCA's operational standards. Section 39.122 requires grant-funded cemeteries to allow VA inspectors and auditors to conduct inspections as necessary to ensure compliance with the provisions of such standards and guidelines.

2. BACKGROUND:

a. The CRP is the program employed by NCA to assess grant-funded cemeteries' compliance with applicable NCA operational standards and measures, monitor the status of corrective actions and provide reports on the status of corrective actions to NCA senior leaders.

b. CRP procedures and specific information are contained in related CRP Standard Operating Procedures (SOP).

3. POLICY:

a. It is NCA policy to maintain an effective compliance review program to assess VA grant-funded cemeteries' compliance with applicable NCA operational standards and measures, monitor the status of corrective actions, and provide reports on the status of corrective actions to NCA senior leaders.

b. NCA will conduct periodic Standard Inspections at each grant-funded cemetery every three to four years to assess its compliance with applicable NCA operational standards and measures.

c. At the discretion of NCA senior leadership, NCA will conduct a Verification Inspection, within 5 to 18 months after a Standard Inspection, based on aggregated weighted scores resulting from deficiencies identified in the previous compliance review.

d. At the discretion of NCA leadership, NCA will conduct a Remedial Assessment when there are compelling reasons to do so. Examples of such reasons include: the cemetery is the subject of a report or referral by the Office of Inspector General (OIG) or Government Accountability Office (GAO); special requests from state, territorial or tribal officials or Members of Congress; or a previous standard or verification inspection requires a more targeted assessment to assist the grantee to remediate specific deficiencies.

4. RESPONSIBILITIES:

a. **Under Secretary for Memorial Affairs (USMA)** is responsible for approving and signing CRP performance recognition awards to VA grant-funded cemeteries.

b. **Principal Deputy Under Secretary for Memorial Affairs (PDUSMA)** is responsible for:

- (1) Authorizing a Remedial Assessment for a grant-funded cemetery.
- (2) Reviewing recommendations for performance recognition awards to grant-funded cemeteries and approving such awards for USMA review; and
- (3) Making decisions on which and whether additional accountability measures should be imposed on cemeteries that have failed to provide Corrective Action Plans (CAPs) within the required 90-day period following an inspection.

c. **Deputy Under Secretary for Field Programs and Cemetery Operations (41)** is responsible for:

- (1) Approving (co-sign with 42) the annual Standard Inspection schedule proposed by Improvement and Compliance Service; and
- (2) Approving (co-sign with 42) Verification Inspection site visits proposed by ICS.
- (3) Providing Expertise (which could include providing Subject Matter Experts to visit VCGP sites), to assist Improvement and Compliance Service during Remedial Assessments).
- (4) Collaborating with 42 DUS to provide recommendations to PDUSMA on enforcement actions NCA should take when required CAPs are 90 days or more overdue.

d. Deputy Under Secretary for Finance and Planning (42) is responsible for:

(1) Providing oversight of the CRP, to include Improvement and Compliance Service (ICS) program administration and the ICS-led team of independent reviewers that conduct inspections.

(2) Approving (co-sign with 41) the annual Standard Inspection schedule proposed by ICS.

(3) Approving (co-sign with 41) Verification Inspection site visits proposed by ICS.

(4) Notifying PDUSMA of cemeteries that have overdue CAPs of 90 days or more and providing the PDUSMA recommendations (after collaboration with 41 DUS) on enforcement actions NCA should take when that occurs.

e. Improvement and Compliance Service (ICS) Director and Deputy Director are responsible for:

(1) Managing and administering the CRP.

(2) Reviewing CRP reports and providing results to the cemetery's leadership and NCA senior leaders.

(3) Reviewing and approving cemetery Corrective Action Plans (CAPs).

(4) Monitoring the status of corrective actions and reporting it to NCA senior leaders.

(5) Reviewing appeals made by grant-funded cemeteries' leadership to change preliminary CRP report deficiencies.

(6) Developing schedules for Standard and Verification inspections and submitting them to 41 and 42 for approval.

(7) Providing oversight of CRP on-site review teams.

(8) Reviewing monthly aggregated CRP CAPs Tracker issued by ICS and working with cemeteries that have overdue CAPs of 60 days or more to submit or update CAPs as needed.

(9) Notifying 41 and 42 DUSs of cemeteries that have overdue CAPs of 90 days or more and informing them that these cemeteries have met the threshold for DUS consideration of enhanced accountability measures.

(10) Communicating standards to VCGP cemeteries at least once annually and more frequently when changes to the standards are enacted. When doing this, collaborate with the Veterans Cemetery Grant Program on the best communication methods to ensure VCGP cemeteries have the standards.

f. ICS Analysts are responsible for:

(1) Conducting Standard Inspections, Verification Inspections and Remedial Assessments, including the preparatory and post-review actions listed in the CRP SOP.

(2) Issuing the final site visit report and Corrective Action Plan (CAP) template to the cemetery's leadership with a copy to the cemetery, 41, and ICS.

(3) Ensuring that grant-funded cemeteries requiring a submit a CAP to NCA within the timeframe listed in the CRP SOP.

(4) Reviewing the monthly aggregated CAPs Tracker and working with cemeteries that have overdue CAPs of less than 60 days to submit or update CAPs as needed.

(5) Corresponding with grant-funded cemeteries to monitor CAPs to facilitate completion of corrective measures to resolve critical and high priority failures that resulted in the CAP.

(6) Developing recognition award packages for senior leaders' approval.

(7) Annually updating CRP review forms and providing updated forms to stakeholders.

(8) Annually updating the CRP SOP.

g. Veterans Cemetery Grants Program (41C) is responsible for facilitating communication between NCA and grant-funded cemeteries as needed.

h. VA Grant-funded Cemeteries are responsible for collaborating with NCA officials to schedule and conduct CRP site visits, review and provide feedback on CRP reports, and develop, submit, and provide status updates on CAPs.

5. REFERENCES:

a. National Cemetery Administration, National Shrine Commitment, Operational Standards and Measures (February 2021) [NCA Operational Standards and Measures](#).

b. Compliance Review Program Standard Operating Procedures (SOP).