

## NCA NON-RECURRING MAINTENANCE PROGRAM

**1. REASON FOR ISSUE:** This directive updates policy and responsibilities for the Department of Veterans Affairs (VA) National Cemetery Administration (NCA) Non-Recurring Maintenance (NRM) program.

### 2. SUMMARY OF CHANGES:

a. Updates policy to align National Shrine (NS) projects under the NRM portion of the Operations and Maintenance (O&M) account; and

b. Revises definitions associated with NRM.

**3. RESPONSIBLE OFFICE:** NCA Budget Service (42B), 810 Vermont Avenue, NW, Washington, DC 20420, is responsible for the contents of this directive. For all inquiries, contact NCA Budget Service at: [VANCAWAS\\_42B2@va.gov](mailto:VANCAWAS_42B2@va.gov)

### 4. RELATED PUBLICATIONS:

a. NCA Directive 7545 Cultural Resource Management (January 4, 2019).

b. VA Directive 7545 Cultural Resource Management (February 22, 2024).

c. VA Handbook 7545 Cultural Resource Mgt. Procedures (December 5, 2011).

**5. RESCISSIONS:** NCA Directive 3022 Non-Recurring Maintenance Program (October 18, 2019).

**6. RECERTIFICATION:** This directive is scheduled for recertification not later than five (5) years from the date of issuance.

/s/

Matthew T. Quinn

Under Secretary for Memorial Affairs

Distribution: Electronic

## NCA NON-RECURRING MAINTENANCE PROGRAM

### 1. PURPOSE/AUTHORITY:

a. This directive establishes policy and responsibilities for the non-recurring maintenance (NRM) program. The NRM program includes projects based on documented and potential Facility Condition Assessment (NRM FCA) ratings and National Shrine (NRM NS) projects. NRM FCA projects are estimated to cost \$400,000 or less that do not qualify as recurring maintenance and repair (M&R) or minor construction projects. NRM NS projects, which currently have no set threshold for individual implementation, are repair and renovation projects to improve the overall appearance of national cemeteries.

b. The statutory authority for this directive is title 38 United States Code section 2404 (38 U.S.C. 2404).

### 2. POLICY:

a. All national and other Veterans' cemeteries under the control of NCA shall be considered national shrines as a tribute to our gallant dead.

b. The primary objective of the NRM program is to maintain the physical infrastructure (real property) of NCA facilities to help ensure safe, efficient, and economical operations. This includes improving the overall appearance of national cemeteries to honor Veterans with a final resting place in a national shrine.

c. Funding for the NRM program is included in the NCA annual Operations and Maintenance appropriation. NCA may apply Operations and Maintenance funds for NRM projects to repair, alter, or improve facilities under its jurisdiction, as well as maintain appearance standards.

d. Exceptions to NRM FCA project cost limit of \$400,000 must be approved by the Principal Deputy Under Secretary for Memorial Affairs or his/her/their designee. NRM NS does not require an exception and can exceed the \$400,000 threshold.

e. NRM projects that cost \$100,000 or more prior to October 1, 2013, and \$1,000,000 or more on or after October 1, 2013, must be capitalized in VA's financial system of record.

### 3. RESPONSIBILITIES:

a. **Principal Deputy Under Secretary for Memorial Affairs** is responsible for approving exceptions to NRM FCA project limit of \$400,000.

b. **Deputy Under Secretary for Finance and Planning** is responsible for:

(1) Providing guidance to District Executive Directors for preparing the NRM operating plan and maintaining program integrity;

(2) Incorporating the inventory of potential NRM projects into the annual budgeting process to obtain program funding;

(3) Consolidating NRM projects provided by District Executive Directors into a national NRM operating plan;

(4) Approving the NRM operating plan submission;

(5) Monitoring the commitment, obligation, and expenditure of NRM funds and reallocating funds as necessary;

(6) Providing monthly financial status information for the Monthly Management Review presentation to the Principal Deputy Under Secretary for Memorial Affairs;

(7) Reviewing and approving/disapproving changes to the NRM operating plan consistent with guidance contained the annual NRM operating plan call memorandum.

(8) Periodically reviewing unobligated balances in the NRM program and determining if unobligated funds should be reallocated;

(9) Ensuring NRM projects that cost \$100,000 or more prior to October 1, 2013, and \$1,000,000 or more on or after October 1, 2013, are capitalized in VA's financial system of record.

**c. Director, Budget Service** is responsible for:

(1) Issuing the annual call to the Executive Director, Cemetery Operations, and the District Executive Directors for NRM operating plans for the upcoming fiscal year. The call memorandum will provide an authorized funding level for each District Office based on needs identified by each district and funding limits for the fiscal year;

(2) Monitoring and tracking weekly project submissions and obligation updates to the NRM operating plan;

(3) Reviewing and providing recommendations to the Deputy Under Secretary for Finance and Planning for approving/disapproving revisions to the NRM operating plan, and any requests for additional funding;

(4) Providing NRM operating plan status to Deputy Under Secretary for Finance and Planning, Executive Director, Cemetery Operations, Director, Contracting Service, Director, Design & Construction Service, and District Executive Directors.

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

(1) Reviewing the annual NRM operating plans submitted by the District Offices to ensure submissions are consistent with the guidance outlined in the NRM call memorandum;

- (2) Reviewing any additions or changes to the plan;
- (3) Monitoring unobligated balances in the NRM program.

e. **Director, Design and Construction Service**, is responsible for reviewing and recommending changes to the inventory of potential NRM projects, the annual operating plan, and any additions to the plan to ensure coordination between the NRM operating plan and the minor construction program to maximize efficiencies and decrease facility disruption.

f. **Director, Contracting Service**, is responsible for:

- (1) Conducting procurement activities for NRM projects;
- (2) Establishing and processing NRM project obligations and providing status updates on award actions for submitted projects;
- (3) Reviewing changes to the NRM operating plan.

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

- (1) Developing internal procedures for planning NRM projects;
- (2) Approving/disapproving the initial NRM operating plan for submission consistent with the guidance provided in the NRM call memorandum;
- (3) Selecting and submitting approved NRM projects that address deficiencies reported in the annual FCA report rated as “D” or “F”;
- (4) Identifying and submitting NRM projects needed to maintain the national shrine standard of appearance as defined by the National Cemetery Administration, National Shrine Commitment, Operational Standards and Measures Guidebook;
- (5) Responding to the call memorandum by monitoring the NRM operating plan to achieve the obligation of authorized funds within the planned fiscal year;
- (6) Providing weekly NRM project status to the Deputy Under Secretary for Finance and Planning, and Director of Budget Service, including notice of project completion and operating plan changes;
- (7) Reporting the completion of a capitalized project at any of its facilities to the Deputy Under Secretary for Finance and Planning;
- (8) Reporting NRM expenditures for projects at any of its facilities is documented with clear, auditable records to financial administrators;
- (9) Monitoring compliance with the National Environmental Policy Act, the National Historic Preservation Act, and VA Directive/Handbook 7545, Cultural Resource Management Procedures;

(10) Submitting revisions to the approved NRM operating plan to the Director of Budget Service and the Executive Director, Cemetery Operations.

**4. DEFINITIONS:**

a. Non-Recurring Maintenance (NRM) program includes projects based on documented and potential Facility Condition Assessment ratings and to preserve national cemeteries as National Shrines.

(1) NRM Facility Condition Assessment (NRM FCA) is maintenance that is not routinely accomplished. NRM FCA program funds are authorized for non-recurring replacement, repair, alteration, or improvement of physical infrastructure (real property). NRM FCA projects have a project cost ceiling of \$400,000. NRM FCA includes projects that are not covered by maintenance and repair, or major or minor construction funding. Projects estimated to cost more than \$400,000 will be funded from the minor construction appropriation. NRM FCA may include:

i. One-for-one replacement of the major components of a building, such as roofing, tuck-pointing, flashings and copings, exterior finish materials (e.g., brick, masonry, stucco, vinyl), waterproofing, or windows and doors;

ii. One-for-one replacement of complete, or segments of, building components such as an entire roof, floor coverings, wall coverings, and ceilings, or heating, ventilating, and air conditioning system or water heater;

iii. Repaving large sections of cemetery roads;

iv. Replacing a flagpole;

v. Minimal improvements associated with a one-for-one replacement project.

(2) NRM National Shrine (NRM NS) are repair and renovation projects needed to improve the overall appearance of national cemeteries to maintain their status as national shrines honoring Veterans with a final resting place that provides an enduring memorial to their service. The NCA Operational Standards and Measures Guidebook, February 2021, provides the following national shrine definition:

“...a place of honor and memory that declares to the visitor or family member who views it that, within its majestic setting, each and every [V]eteran may find a sense of serenity, historic sacrifice and nobility of purpose. Each visitor should depart feeling that the grounds, the gravesites and the environs of the national cemetery are a beautiful and awe-inspiring tribute to those who gave much to preserve our Nation’s freedom and way of life.”

NRM NS does not require an exception and can exceed the \$400,000 threshold. NRM NS may include:

- i. Establishing a healthy stand of turf appropriate for the geographic area;
- ii. Renovating gravesites to ensure a level grade (i.e., there are no sunken graves);
- iii. Realigning and cleaning headstones and markers;

(3) NRM NS does not include:

- i. Purchasing land;
- ii. Constructing new structures or infrastructure that are not replacing existing structures or infrastructure;
- iii. Supplementing a major or minor construction project;
- iv. Remodeling, renovating, altering, amending, constructing, extending, improving, modifying, or changing a major or minor construction project within a year of final acceptance of the project;
- v. Improving surplus property;
- vi. Improving property projected to be leased;
- viii. Maintaining any property not owned by NCA (i.e., leased space).

b. Recurring maintenance includes grounds maintenance, maintenance of equipment and maintenance and repair (M&R). NCA's Operations and Maintenance appropriation has the overall authority to repair, alter or improve facilities under the jurisdiction of NCA.

(1) Grounds maintenance including certain construction activities that are necessary expenses of the account such as headstone setting and alignment, headstone resetting and irrigation work.

(2) Maintenance of equipment provides for maintaining and repairing lowering devices, mechanical grave excavators, tractors, backhoes, ditchers, mowers, generators, vehicles and office machines.

(3) M&R provides the normal annual maintenance to keep a building or structure operational including the recurring maintenance and repair of roads, drives, parking lots and walks; annual building equipment maintenance, such as HVAC filter replacement, system tune-ups, etc.; painting of buildings, fences and gates; repair of roofs, walls, flagpoles and irrigation; and electrical systems.

c. Minor/Major Construction is for projects including new construction, expansions, alterations, enhancements, or upgrades to existing cemeteries.

**5. GENERAL PROCESS FOR SUBMISSION OF NRM PROJECTS:**

a. Director, Budget Service, in consultation with the Executive Director, Cemetery Operations, will issue an annual call to the Executive Director, Cemetery Operations, and the District Executive Directors for NRM operating plans for the upcoming fiscal year. The call memorandum will include an authorized funding level for each District Office. Each District Office will submit an operating plan with project costs totaling its authorized funding level to Budget Service and Cemetery Operations.

b. District Executive Directors will submit revisions to the approved NRM operating plan to both the Director of Budget Service and Executive Director, Cemetery Operations.

c. Principal Deputy Under Secretary for Memorial Affairs; Executive Director, Cemetery Operations; Deputy Under Secretary for Finance and Planning; Director of Design & Construction Service; and Director of Contracting Service will review the status of the operating plan.

d. Deputy Under Secretary for Finance and Planning, and Director of Budget Service, will periodically review unobligated balances in the NRM program and determine if unobligated funds should be reallocated.

**6. REFERENCES:**

a. National Historic Preservation Act of 1966, Public Law 89-665, as amended (16 U.S.C. 470 *et seq*);

b. National Environmental Policy Act of 1969 (42 U.S.C. 4321 *et seq.*);

c. 38 U.S.C. § 2403;

d. 38 U.S.C. § 2404;

e. NCA Directive 7545, Cultural Resource Management at VA National Cemeteries, January 4, 2019;

f. National Cemetery Administration National Shrine Commitment Operational Standards and Measures Guidebook, February 2021.

g. VA Directive 7545, Cultural Resource Management, December 5, 2011;

h. VA Handbook 7545, Cultural Resource Management Procedures, December 5, 2011.