

## HISTORIC HEADSTONE/MARKER REPLACEMENT FOR ERROR-OF-FACT

- 1. PURPOSE:** This notice rescinds and replaces portions of National Cemetery Administration (NCA) Notice 2004-06 Headstone/Marker Replacement pertaining to NCA's policy for the replacement of "historic" Government-furnished headstones and markers to correct errors of fact. This notice applies to replacements in cemeteries administered by NCA and VA-funded State and Tribal Veterans cemeteries.
- 2. BACKGROUND:** NCA furnishes headstones and markers for eligible Veterans and dependents. NCA receives requests from the public to replace historic headstones or markers, predominantly from the Civil War era. These inquiries are often based on a desire to "correct" information inscribed during the 19<sup>th</sup> century, and/or to add new information found through modern research. The existing inscriptions were based on information available at the time the headstone or marker was furnished and the existing headstones and markers are collectively part of the historic cemetery landscape. However, NCA recognizes the need to permit correction of inscriptions on headstones and markers without disrupting the historic character of NCA's cultural landscapes.
- 3. POLICY STATEMENT:** In cases where the primary-source documentation indicates that it is "more likely than not" that an existing inscription on an historic headstone or marker is inaccurate, NCA will correct the inscription error and replace the marker "in kind," that is, with one that has the same type, style, and inscription elements that were used or available at the time of the decedent's death.
- 4. CHANGE TO PROCEDURES:** The revised policy requires the following changes to procedures for reviewing a request to replace a headstone or marker on which the decedent's date of death as shown on the headstone or marker (or, if more than one decedent, the earliest date of death shown) is 50 years or more prior to the date of the request for errors of fact:

  - a. Upon receiving a request to replace a historic headstone or marker to correct an error of fact, the cemetery director will forward to the NCA historians all primary source documentation submitted by the requestor. NCA historians will provide an analysis of the primary source documentation submitted by the requestor, and any additional information identified by NCA, and make a recommendation to the cemetery director whether to replace the headstone or marker based on whether it is more likely than not that the inscription information is inaccurate. Any recommendation that the headstone or marker should be replaced must include a further recommendation on the final disposition of the historic headstone or marker. If the cemetery director concurs with the recommendation, NCA will take action in accordance with the historians' recommendation. If the cemetery director does not concur with the historians' recommendation, the cemetery director will document his/her disagreement, provide justification for the disagreement, and forward all documentation (original submission,

NCA historians' analysis and recommendation, cemetery director's statement of disagreement and justification) through the district director to the Deputy Under Secretary for Field Programs for final decision on whether to replace.

b. NCA will make every attempt to replace the existing headstone or marker "in kind," defined as a headstone or marker of the same type, style, and inscription elements that were used or available at the time of the decedent's death, with a corrected inscription.

c. Prior to replacement, the cemetery director will photograph the existing headstone or marker and upload the image to the BOSS system along with the primary source documentation provided by the requestor, and any additional documentation used by the historians. Upon replacement, the cemetery director will upload a photograph of the new headstone or marker to BOSS, using the appropriate replacement code. The remarks section must be annotated with "Correction of historic inscription per primary records & Notice 2015-01 (Date of Entry)." The historic headstone or marker will be disposed of as recommended by the NCA historians.

**4. RESPONSIBLE OFFICE:**NCA, Office of Field Programs, 810 Vermont Avenue, NW, Washington, DC 20420, is responsible for the contents of this notice.

**5. RESCISSION:** This notice rescinds and replaces portions of NCA Notice 2004-06 dated December 21, 2004, that pertain to replacement of historic headstones and markers to correct an error of fact. All other provisions of NCA Notice 2004-06 remain in place and must be read in accordance with this notice.

**6. EXPIRATION:** This notice will expire on January 31, 2016; however, the information contained within will remain in effect until the NCA Directive and/or Handbook on the replacement of Government-furnished headstone and marker program is published.

/s/

Ronald E. Walters  
Interim Under Secretary for Memorial Affairs