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AQ28 - Proposed Rule - Government-Furnished Headstones, Markers, and Medallions; Unmarked Graves

Comment On: VA-2019-NCA-0007-0001

AQ28- Proposed Rule - Government-Furnished Headstones, Markers, and Medallions; Unmarked Graves

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Comment on AQ28- Proposed Rule -Hokenson, Phil

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General Comment

The part of this proposed rule change regarding the durability of headstones is long overdue. As it stands, veterans in rural Alaska who have graves marked by wooden crosses and who died before all veterans were granted markers in 1990, have often been denied a permanent marker for their graves. For families that encountered this issue, if the request for marker wasn't automatically rejected, NCA might ask for a photo to make a subjective determination of whether the marker appeared to be sufficiently "permanent". This rule change would create an objective standard for whether the marker is permanent and durable based on the material it is made of rather than on a VA employee's opinion.

Further, the VA's "History of Government Furnished Headstones and Markers"

(<https://www.cem.va.gov/cem/history/hmhist.asp>) discusses the unsuitability of wooden markers to permanently mark the graves of those who died in the Civil War. This rule change would clarify the idea of permanence that has been held since the 1870s.

This is particularly relevant for Alaska because WWII-era Alaska Territorial Guard Soldiers, who supported Lend-Lease operations and kept watch on the coastlines, were only granted recognition as veterans in 2000--over 50 years after the ATG program ended and long after many members had already passed away.

The Alaska Veterans Advisory Council requests that, should this change be adopted, box 4 of the VA Form 40-1330 be updated to indicate that currently marked graves must be marked with a permanent and durable marker (ex. stone or metal) to qualify as "currently marked."