



**TESTIMONY
OF THE
NATIONAL FUNERAL DIRECTORS ASSOCIATION**

**BEFORE THE
HOUSE COMMITTEE ON VETERANS' AFFAIRS
SUBCOMMITTEE ON DISABILITY ASSISTANCE AND
MEMORIAL AFFAIRS**

NOVEMBER 13, 2024

Chairman Luttrell, Ranking Member Pappas, and Members of the Subcommittee, thank you for this opportunity to testify today on behalf of the National Funeral Directors Association (NFDA). I am Lesley Witter, Senior Vice President of Advocacy for NFDA, representing nearly 20,000 licensed funeral directors and embalmers across the nation. It is a profound privilege for funeral directors to serve veterans and their families by providing every deceased veteran the care, honor, and dignity they rightfully deserve. I wish to thank the NFDA members, and all those who provided valuable data and insights so that I can represent their interests here today.

As the leading funeral service organization in the United States and globally, NFDA advocates tirelessly for veterans and their families, collaborating closely with Congress, the Department of Veterans Affairs (VA), Veteran Service Organizations (VSOs), and others to honor our nations veterans and support their families. I hope that my testimony will provide valuable insights, and I look forward to continuing our collaborative efforts to honor those who have served our country.

While the VA and DoD are responsible for providing funeral and burial benefits, as well as ensuring proper military honors, it is funeral directors who assist families in organizing personalized services that both celebrate the life of their loved one and honor their service to our country.

Funeral directors coordinate with the VA to schedule funeral and burial services, assist families in filing benefit claims, ensure veterans receive the proper grave markers, and collaborate with the DoD and veterans' service organizations to provide the appropriate military honors.

I would like to begin by acknowledging the strong strategic partnership between the NFDA, the VA, and the DoD. Together, we are committed to supporting our fallen service members and their families. We appreciate the opportunity to speak with the members of this subcommittee today.

2024 NFDA VA CEMETERY STUDY:

In preparation for my testimony today, the NFDA conducted a survey of our members to gather their insights into how we can better serve veterans and their families. I'm pleased to share that NFDA members offered thoughtful and detailed responses on this crucial issue. I will now highlight some of the key findings from our survey.

Potential respondents had two days to complete the online survey. To increase the response rate, members were invited to participate in a drawing for a one-in-ten chance to win a \$50 American Express gift card. Of the potential respondents, 156 members anonymously completed the survey. The results of this study accurately reflect NFDA's total membership (with 95% confidence) within a range of $\pm 7.72\%$.

Our survey began by asking respondents what percentage of their 2023 caseload involved veteran funerals and burials. The results revealed that approximately 28% of respondents' caseloads in 2023 consisted of veteran funerals and burials.

I. DISTANCE TO NEAREST VA NATIONAL CEMETERY OR STATE OR TRIBAL VETERANS CEMETERY

To examine the VA’s progress towards ensuring veterans have reasonable access to a burial option within 75 miles of their homes, we asked respondents:

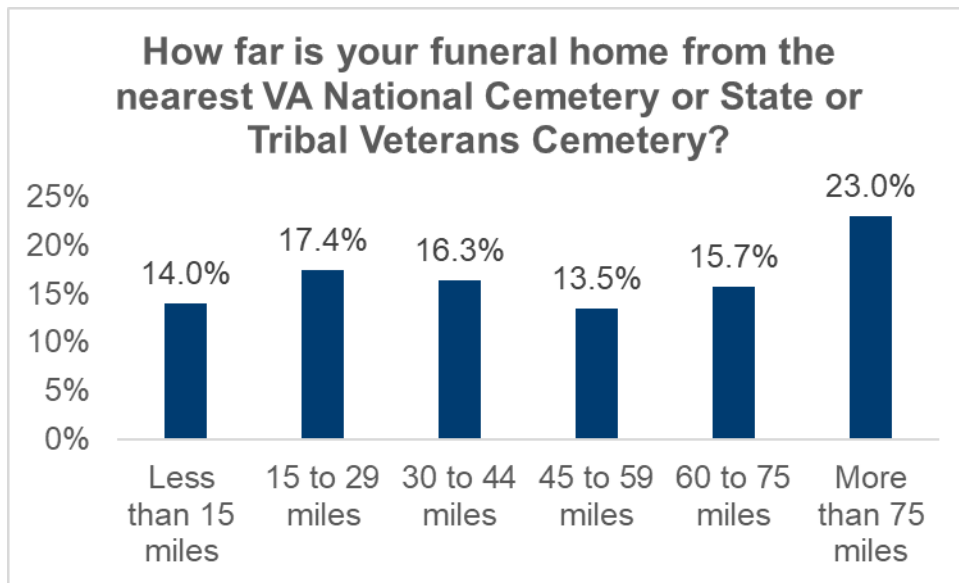
“How far is your funeral home from the nearest VA National Cemetery or State or Tribal Veterans Cemetery?”

Approximately three-quarters (77.0%) of NFDA survey respondents live within 75 miles of a VA National Cemetery, State or Tribal Veterans Cemetery. However, we did have one respondent who shared:

“Our closest Veteran's Cemetery is 95 miles from here in Danville, IL. Next best is 165 in Springfield, IL. Then on to the St. Louis, MO area which is more than 180 miles.”

Another noted:

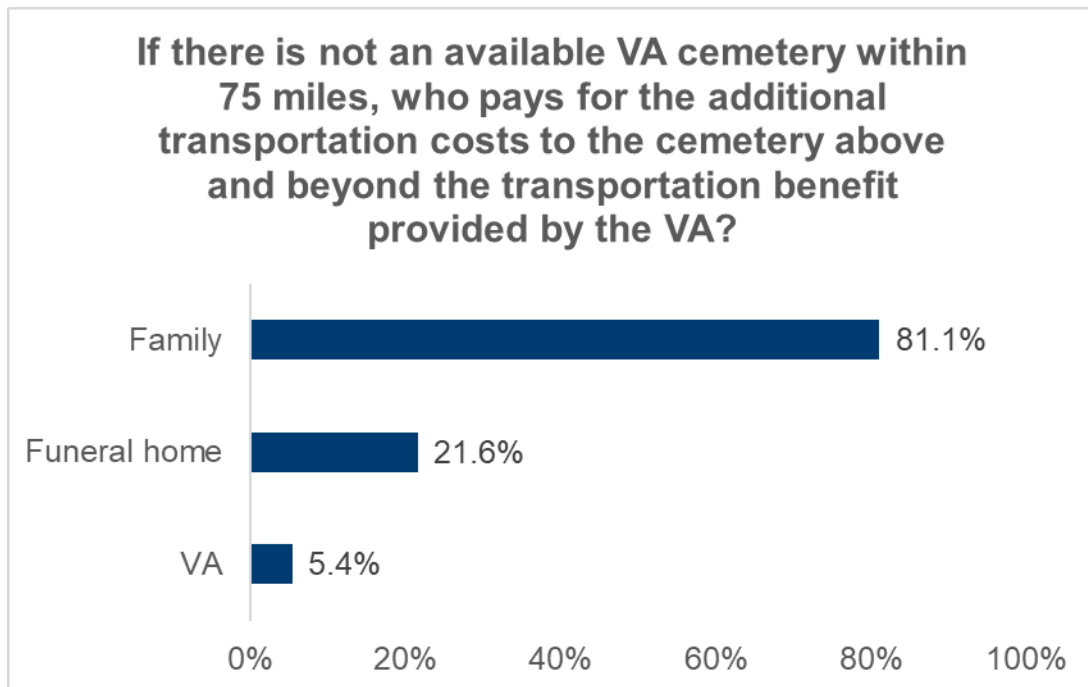
“There is not a national cemetery within 3 hours drive of our location. There is a state veterans cemetery 25 miles away, but many don't know about it, and don't know how to register for it.”



Interestingly, the results of the 2024 NFDA survey generally match the results of the 2024 National Cemetery Administration National Cemeteries Satisfaction Survey National Report, (August 2024) and the 2024 National Cemetery Administration State, Tribal or Territorial Veterans Cemeteries Satisfaction Survey National Report (August 2024).

NFDA Q 2: How far is your funeral home from the nearest VA National Cemetery or State or Tribal Veterans Cemetery?	NC FD Q 2: How far is your funeral home from the national cemetery with which you most frequently do business? (P 158) (N=1,740)	STVC FD Q 2: How far is your funeral home from the national cemetery with which you most frequently do business? (P 147) (N=612)
Less than 15 miles 14%	Less than 15 miles 12.53%	Less than 15 miles 12.42%
15 to 29 miles 17.4%	15 to 29 miles 17.93%	15 to 29 miles 23.37%
30 to 44 miles 16.3%	30 to 44 miles 18.10%	30 to 44 miles 18.79%
45 to 59 miles 13.5%	45 to 59 miles 18.33%	45 to 59 miles 15.69%
60 to 75 miles 15.7%	60 to 75 miles 16.67%	60 to 75 miles 14.05%
More than 75 miles 23%	More than 75 miles 16.44%	More than 75 miles 15.69%

Additionally, the NFDA survey sought to understand who would bear the additional transportation costs if a veteran were buried outside the 75-mile zone. The majority of respondents (81.1%) indicated that veteran families are responsible for covering these extra transportation expenses, beyond the transportation benefit provided by the VA.



However, it should be noted that almost half (46.3%) respondents said that distance has precluded a Veteran from being buried in a Veteran cemetery.

One respondent stated that:

“Families in our area are put off by the distance that they'd have to travel, not only for the actual funeral, but for visiting in the future. But when they do select a National Cemetery, they're very pleased with the cemetery, the process & the appearance.”

Another commented:

“For our location, the distance to one is off putting, being 2 hours or more each direction.”

Others stated:

“It is difficult for families that can’t afford burial, and the cemetery is at too far of a distance for reasonable visits. They choose cremation because of the financial burden...”

“Distance to VA cemeteries for families to travel after burial.”

RECOMMENDATION: NFDA urges the VA to continue working toward ensuring that veterans have reasonable access to a burial option within 75 miles of their homes. In cases where this is not feasible, we recommend exploring alternative solutions to address these situations.

II. ASSESS VA’S MODERNIZATION OF ITS MEMORIAL AFFAIRS TECHNOLOGY

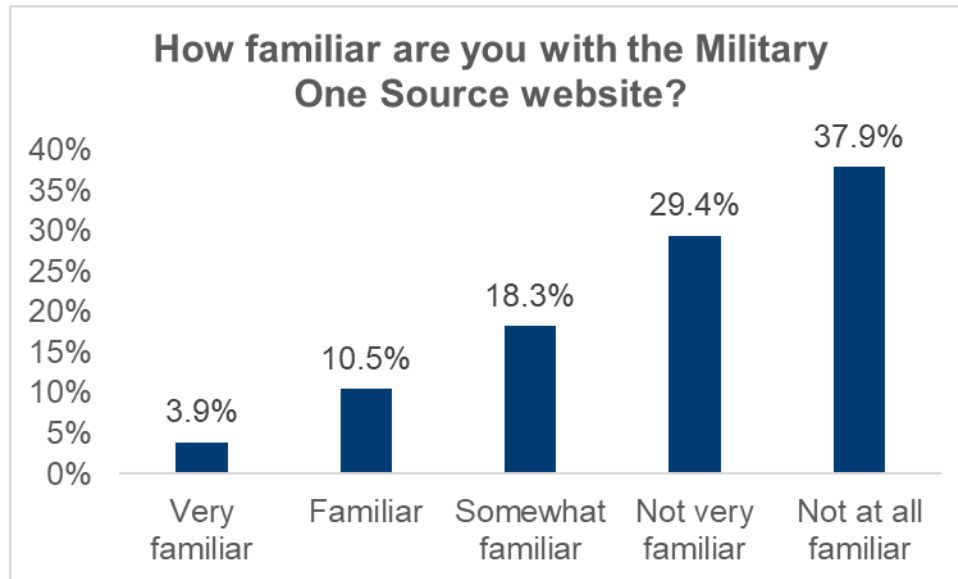
Although the NFDA and VA surveys differed slightly in their questions, the NFDA survey also sought to understand how easy it is for funeral directors to find information on VA benefits on the NCA website.

<p>Government Websites How easy is it to find information about VA benefits on National Cemetery Association website? Very easy 11.6% Easy 39.0% Somewhat easy 41.1% Somewhat difficult 7.5% Very difficult 0.7%</p> <p>Please provide any specific examples of issues you have had finding the information you need on the National Cemetery Association website.</p>	<p>GEN FD Q2: Are you aware there are resources available for Funeral Directors on the NCA Website? (P120) (N=2,257)</p> <p>Yes 81.44%</p> <p>No 18.56%</p> <p>Note: a GEN (General) question was asked of all funeral directors. Response data between the national cemetery survey and the state, tribal and territorial survey are the same.</p> <p>*Questions are not directly comparable (easy of use vs. awareness)</p>	<p>GEN FD Q2: Are you aware there are resources available for Funeral Directors on the NCA Website? (P113) (N=2,257)</p> <p>Yes 81.44%</p> <p>No 18.56%</p> <p>Note: a GEN (General) question was asked of all funeral directors. Response data between the national cemetery survey and the state, tribal and territorial survey are the same.</p> <p>*Questions are not directly comparable (easy of use vs. awareness)</p>
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From the information above, we can see a discrepancy between knowledge of government resources reported in VA studies (81.4%) and ease of use with only 11.6% of NFDA respondents finding it easy to find information on the VA NCA website.

However, it should be noted that the NFDA website links directly to Military One Source which includes information on Arlington National Cemetery, the VA, requesting funeral honors and other information Military Funeral Honors; Legal Matters, Forms and Directives; Military Funeral Honors FAQs; Resources, benefits and Military OneSource services for Funeral Directors and Planners, and other valuable information for veterans, families, and funeral

directors: <https://www.militaryonesource.mil/resources/millife-guides/military-funeral-honors-directors-and-planners/>.



Interesting, only 14.4% of NFDA respondents said they were either very familiar or familiar with the Military One Source website, and 37.9% said they were not at all familiar with it. In fact, some respondents said:

“I never knew it was a DoD source, came across like a third party site”

“I would like more information on this.”

“Not familiar with this program.”

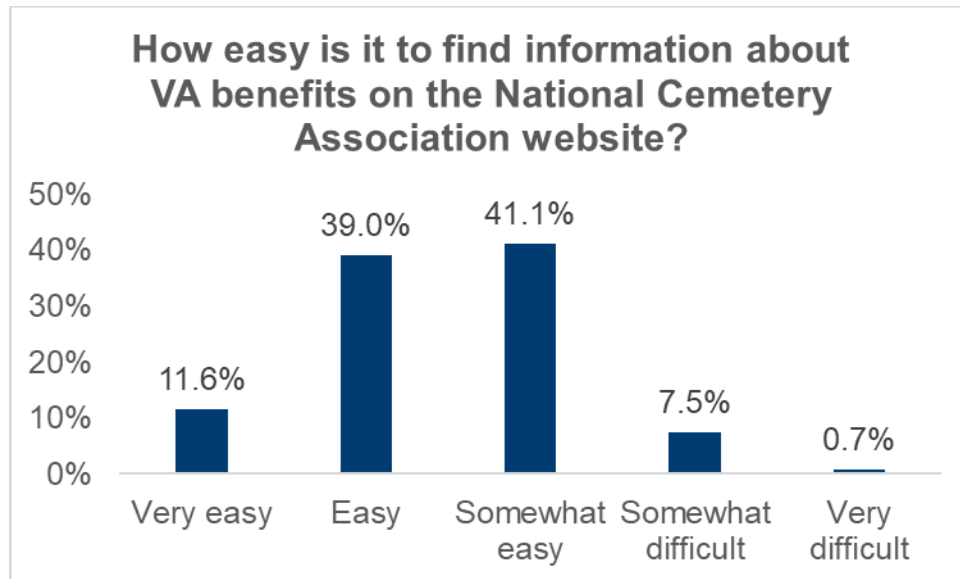
“Was unaware of the website.”

At this point, I would like to highlight some recent educational collaborations between NFDA, the VA and DoD regarding veteran funerals and burials including co-branded webinars designed to strengthen the partnership between the military and funeral service providers, ensuring the best possible support for veterans and their families. These webinars include: Military Funeral Honors; Grief Care for Families of Fallen Heroes or U.S. Servicemembers; Honoring Those Who Served: Requesting Military Funeral Honors and Fly Overs; Department of Defense Overseas Mortuary Operations; Dover Port Mortuary Convention Sneak Peak; The Dignified Arrival Process; Compassionate Care for Fallen Air Force Members; Guiding Compassion, Honoring Service: Maximizing Veterans Benefits & Supporting Families; A Look at Port Mortuary Embalming Procedures; and Military Funeral Honors Continued.

In addition, each year the Annual NFDA Convention features a military pavilion with representatives from DoD mortuary affairs, Dover AFMO, and the VA including the 3 VA

Administrations (NCA, VBA, VHA) who educate and speak with our approximately 6,000 attendees

The NFDA survey also sought to understand how easy it is for funeral directors to find information about VA benefits on the National Cemetery Association website.



When asked for specific examples of issues finding the information needed on the National Cemetery Association website NFDA survey respondents replied:

“From Friday noon till Monday, cannot schedule.”

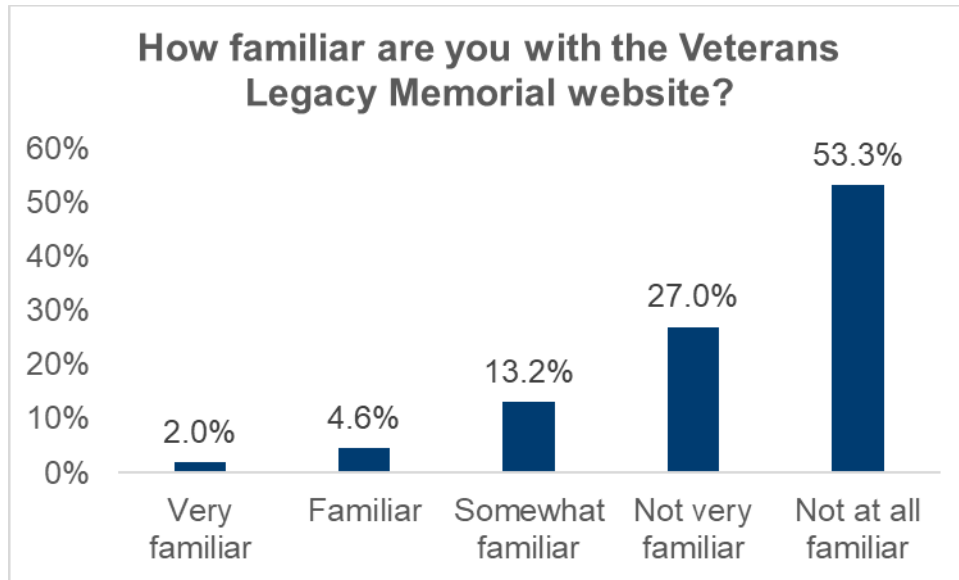
“Flag applications, list of cemeteries within the area.”

“The eligibility requirements are extremely confusing for many families.”

“The forms are constantly updated without notice. The examples of the different options are terrible.”

“It's just not very concise or specific in itself. I feel like it goes in circles sometimes.”

Similarly, only 6.6% said they were either very familiar or familiar with the Veterans Legacy Memorial website and 53.3% said they were not at all familiar with it.



“I learned about the site at the 2024 NFDA Convention.”

“Not familiar with this program”

“The first time I was asked if the family was okay with their loved one's information posted here was last month. Never knew it existed before.”

“Was unaware of the website.”

RECOMMENDATION: While the NFDA and VA collaborate closely to educate funeral service professionals about funeral and burial benefits, there appears to be a gap between our outreach efforts and the ease with which funeral directors, veterans, and their families can access and use this information. NFDA urges the VA to strengthen its educational outreach to veterans and their families well before they are in immediate need, ensuring that expectations are clearly communicated and understood from the outset.

III. CONFUSION AMONG FAMILIES REGARDED FUNERAL/BURIAL BENEFITS

When asked about challenges in serving veterans, many funeral directors cited confusion among families regarding which expenses are covered by the VA. Although funeral directors are knowledgeable about veteran funeral and burial benefits, they frequently encounter families with unmet expectations due to a lack of understanding about their entitlements. This places an additional burden on funeral directors, who must not only manage funeral and burial arrangements but also educate grieving families about the available benefits.

One respondent stated:

“A lot of veteran's families think all expenses for cremation or burial will be paid by the VA. There is a lot of miscommunication about what is paid for by family versus what is paid for by the VA.”

Another said:

“Many veterans have been told that their services are all taken care of by the VA. Many assume there will be no cost.”

Another commented:

“The misconception that all VA benefits are free to the veteran, and the family would not have any expense if buried in a public cemetery.”

One particularly concerning response is that:

“Navigating VA burial benefits and potential reimbursement is a nightmare. Trying to get an individual on the phone to ask questions is nearly impossible. Many of our veterans' family do not get all the benefits they are entitled to due to the obstacles in place.”

Another stated:

“Lack of education on what they are eligible for as it pertains to burial.”

RECOMMENDATION: Funeral directors who assist families in filing benefit claims are the ones who see firsthand the real-world impact of the VA's educational efforts. Our survey results highlight a clear need to reassess how veterans and their families are educated about the specific benefits to which they are entitled.

IV. CHALLENGES SURROUNDING DD214

The NFDA survey sought to identify challenges faced by funeral service professionals and veteran families in planning a veteran's funeral and burial. A recurring issue that emerged was the difficulty in obtaining complete and accurate records, such as missing or incomplete DD214 forms, as well as delays and obstacles in accessing essential documentation.

A DD214 form, or Certificate of Release or Discharge from Active Duty, is a document issued by the United States Department of Defense when a service member retires, separates, or is discharged from active duty. It serves as a complete record of a service member's military service, including details such as the character of service, duty assignments, and any awards received, and is often required to access veteran benefits.

Some comments from NFDA survey respondents include specific grievance caused by:

“Misplaced DD214. They are almost impossible to get before a service.”

“Lost DD214's are hard to replace, and this seems like it could be much easier.”

“Accessing DD 214 is sometimes difficult if family does not have.”

“Retrieving DD214 document in a timely manner for burial/military honors”.

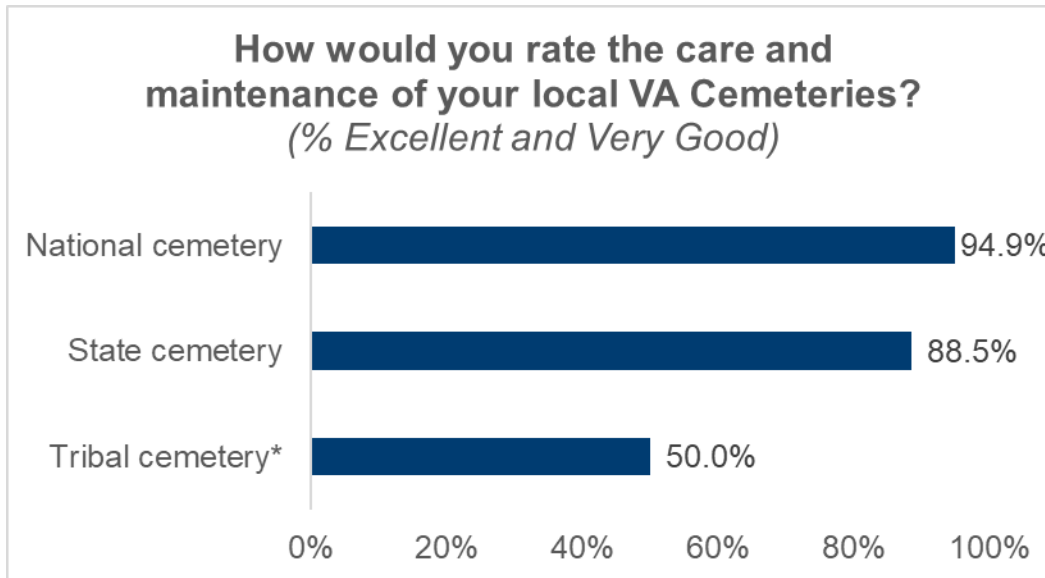
“When family can't find a DD214, it takes sometimes up to a month to receive a replay from St. Louis.”

“Veterans and or families that cannot locate their DD214. Also not often, but a dependent adult child being prequalified for burial with their parents.”

RECOMMENDATION: Response times from the National Archives National Personnel Records Center vary depending on the complexity of the request, the availability of the records, and workload. NPRC’s website states they “receive approximately 4,000 - 5,000 requests per day, and requests that people “do not send a follow-up request before 90 days have elapsed.” We know that the Department of Defense is working on creating a fully electronic version of the DD214 document, which would give veterans access to all of their information and cut down on the privacy concerns raised by the current form. We believe this will be a significant step forward in accelerating the processing of veterans' claims, streamlining funeral arrangements, and alleviating the burden on funeral service professionals who are often forced to chase down missing information.

V. CARE AND MAINTENANCE OF VA CEMETERIES

NFDA was also interested in learning how funeral directors evaluate the care and maintenance of VA cemeteries to determine whether they meet the standards expected by veteran families. We asked survey respondents “*how would you rate the care and maintenance of your local VA Cemeteries?*” Although the NFDA and VA surveys differed slightly in their questions, and while our results are similar but not directly comparable, we’ve outlined the key responses below.



NFDA Q 7 How would you rate the care and maintenance of your local VA Cemeteries?

	Excellent and Very good
State cemetery	94.9%
National cemetery	88.5%
Tribal cemetery	50.0% (N=20)

NC FD Q 34

The overall appearance of the national cemetery is excellent. (P13) (N=1,760)

Strongly Agree 84.72%
Agree 14.77%

(Overall positive response = 99.49%)

**Questions and results are similar but not directly comparable*

STVC FD Q 34

The overall appearance of the state, or territorial cemetery is excellent. (P 13) (N=595)

Strongly Agree 75.29%
Agree 21.85%

(Overall positive response = 97.14%)

**Questions and results are similar but not directly comparable*

Overall, respondents expressed positive feedback regarding the condition, upkeep, and care of VA cemeteries, as well as the professionalism of VA cemetery staff, including the following comments:

“All VA cemeteries I have been to have been in pristine condition.”

“Always clean and grass and grounds maintained”

“Always impeccable”

“Excellent grounds and very organized.”

“Great Lakes National Cemetery is a beautifully kept environment and a wonderful staff to work with.”

“Excellent grounds and very organized.”

“The cemetery is beautifully maintained and run very efficiently and on time.”

“I have never had any issues with the national cemetery. Always had a very positive experience.”

However, some respondents spoke about

“Irrigation issues, concrete collar crumbling, back log of setting VA markers, and things not being clean: bathrooms, chapel, and weeds.”

Additionally, one respondent raised the concern that

“Some tribal cemeteries have no personnel to take care of the grounds, no watering, mowing and many are just weed filled.”

RECOMMENDATION: While even seemingly minor issues can cause significant stress for a grieving family, NFDA commends the VA National Cemetery Administration for its dedication to honoring the military service of our nation's veterans. We believe the NCA provides dignified burials and lasting memorials for veterans and their eligible family members, ensuring that our veterans' cemeteries are preserved as national shrines.

VI. THE CARE OF UNCLAIMED VETERAN REMAINS

Funeral homes nationwide are currently holding the cremated remains of unclaimed individuals, including veterans without known relatives or next of kin. Funeral directors are dedicated to ensuring that every unclaimed individual, especially veterans, receives a dignified funeral and burial. We commend the ongoing efforts of the VA and VSOs in this important work and remain committed to continued collaboration in identifying unclaimed veterans' remains, ensuring they receive the full honors they deserve.

The NFDA survey found 42.4% of respondents have provided services for unclaimed Veteran remains within the past 5 years.

NFDA Survey Have you provided services for unclaimed Veteran remains within the past five years? Yes 42.4% No 57.6%	Does your State's Department of Veterans Affairs provide any guidance on providing unclaimed Veteran remains with a dignified and proper burial at VA National or State or Tribal Veterans Cemeteries? Yes 42.7% No 22.1% Don't know 35.3%	How familiar are you with your state's laws regarding unclaimed Veteran remains? Not at all familiar 17.7% Slightly familiar 10.3% Somewhat familiar 14.7% Moderately familiar 35.3% Extremely familiar 20.6% Not applicable/No state laws in place 1.5%
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Only 42.7% of respondents said their state's Department of Veterans Affairs offer guidance on providing unclaimed Veteran remains with dignified and proper burial at VA National and State or Tribal Veterans Cemeteries, and 35.3% did not know if guidance was provided. Additionally, when in possession of unclaimed Veteran remains, 49.1% said their first call is to a State Veterans Affairs Office, followed by the Coroner's office.

“I have had two unclaimed veterans that the VA never paid anything toward, because I was a funeral home. It was a nightmare.”

“Natrona County, Wyoming has no procedures or parameters for any unclaimed remains. At least there is a state law that unclaimed veterans must be interred at the nearest state veteran’s cemetery.”

“VA is too difficult to deal with for unclaimed vets....I quit trying to bury unclaimed vets.”

“We’ve assisted the local VA hospital with unclaimed Veterans. The process for reimbursement is unwieldy and takes too long.”

“Who is the next of kin? If we knew this answer, the Veteran wouldn’t be unclaimed.”

I would like to point out that many funeral directors willingly donate their time and services as a way to honor veterans. For example, one NFDA member stated that:

“Our time is basically donated, we work with the VA hospice for veterans without families or people to care for them, and their social worker is their next of kin.”

Another NFDA member stated:

“I support the veteran’s burial detail in our community by giving them an honorarium, a meal and special recognition. I also provide a matted and framed Presidential citation to each family that we serve at a public ceremony two times a year.”

Another funeral director honors our deceased veterans by donating a:

“Funeral coach, family transportation, and clergy transportation as well as the cost of a graveside service.”

Other comments included:

“We have had memorial services for these unclaimed veterans with military honors because our funeral home believes that every person deserves to have a ceremony whether they can pay for it or not. It’s a respect thing, not a money making thing.”

“Arranged for the interment of veterans’ cremated remains at Indiantown gap national cemetery.”

“In 2018, I took a homeless Veteran to local cemetery, had the honor guard from the Legion, Active Duty Army, and Patriot Guard Riders all in attendance, He was laid to rest, and a government marker issued for his grave. Many community members showed up to honor him. It’s what we should do for all Veterans, especially those of wartime service.”

“Burial in State Veteran Cemetery with Military honors and VA stone/plaque.”

“One veteran we cremated and transported to the veterans cemetery with no local or state funding. We donated our services in their entirety. It’s not something we can financially do often.

“We always try to bury in either a state or national cemetery. We place the veteran in a typical military style casket, arrange for military honors and invite the public to join us at the cemetery. This was just back in Jan. 10, 2024.”

“We worked in conjunction with the American Legion and the Patriot Guard to escort previously unclaimed remains to the National Cemetery for a ceremony and permanent placement. This took place in May of 2024, and we transported the remains of 9 veterans from Chapin, SC to Fort Jackson National Cemetery.”

“Yearly service coordinated by our state association and the State Dept. of Veteran Affairs.”

RECOMMENDATION: While even seemingly minor issues can cause significant stress for a grieving family, NFDA commends the VA National Cemetery Administration for its dedication to honoring the military service of our nation's veterans. We believe the NCA provides dignified burials and lasting memorials for veterans and their eligible family members, ensuring that our veterans' cemeteries are preserved as national shrines.

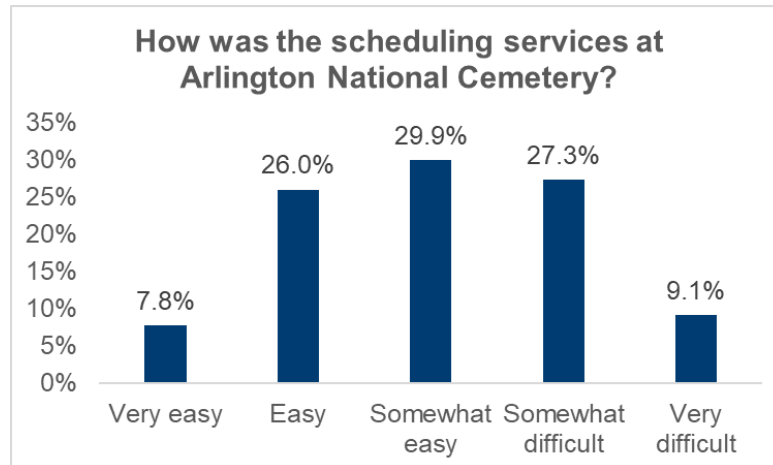
VII. HOW FAMILIES ARE IMPACTED BY WAIT TIMES AT ARLINGTON NATIONAL CEMETERY

Another area where funeral directors have experienced significant issues is when working with families impacted by delays when trying to schedule burials in Arlington National Cemetery.

Almost half (46.3%) of respondents have arranged a funeral at Arlington National Cemetery in the past five years.

Of those who planned services at Arlington National Cemetery, only one-third (33.8%) of respondents said it was either very easy or easy to schedule services at Arlington National Cemetery.

Of those who have planned a funeral at Arlington National Cemetery, over one-third of respondents said they have had families who have been negatively affected by the lack of caisson services.



“Scheduling services at Arlington National Cemetery is a NIGHTMARE! The call center, multiple reviews and delays are ridiculous and unnecessary. They are also unlike any other veterans cemetery in the country.”

“The wait time is cruel to the families. Funeral homes were not designed for long term storage of human remains. This is a problem. We are honored to serve our veterans and do it with the utmost dignity. To wait all that time and not get the entitled honors - the Caisson - is a huge let down to families and dishonors the veteran.”

“Arlington makes it difficult to schedule Fort Myer Old Post Chapel Services. They are putting it on the funeral home to call every day waiting for slots to be opened. They need to have the veterans placed in order upon 1st request.”

“From the time that the funeral home notifies Arlington to the time to hear back about possible burial dates available from Arlington can be quite a long period of time.”

“Ground burial services can take from several months to over a year. I have waited from several weeks to several months for a call back just to schedule ground burial services. This has improved since ANC began prioritizing scheduling casketed burials over cremated remains, but delays are still lengthy.”

“Wait times — mostly at Arlington National Cemetery. It’s always been long, but it’s been more drawn out recently — I’ve been waiting 8 months to schedule a casketed burial. I have also had challenges scheduling honors as the forms or emails change without notice or publication”

“It shouldn’t take months to arrange a service at Arlington. I have been doing this for close to 40 years, and it has gotten worse vs better.”

In addition, NFDA is concerned that the current wait time for a ground burial of a U.S. Veteran in Arlington National Cemetery and some other national cemeteries is up to and over nine (9) months. This is a major concern to funeral service because funeral directors want to be able to offer open casket funerals to veteran families and want to ensure bodies can be properly and

safely embalmed as they wait for ground burial. Formaldehyde is a critical tool for funeral directors to ensure grieving families expectations are met.

The EPA is currently undergoing a risk assessment of formaldehyde, and while formaldehyde “as used in embalming” was excluded from the EPA’s draft risk evaluation, we still have concerns about the downstream impact new EPA exposure numbers could have on the supply chain. NFDA is aware of no suitable alternative to formaldehyde that can adequately preserve veterans while awaiting burial. Funeral directors do not want to be in the position of explaining to a veteran's family that an open-casket funeral is not possible or that their loved one cannot be buried at Arlington National Cemetery due to the lack of a chemical that can preserve the body for the required time.

Some concerning survey responses included the following:

“Up to two years. It can take ANC 12-14 months to simply call back to schedule a service for cremated remains. The standard reply from the staff at ANC is that families choose Arlington, and they have other options. This is ridiculous and unacceptable.”

“The planning process is extensive with paperwork, the amount of staff involved in planning, the need to bring cremated remains to the cemetery before scheduled burial is difficult when family and funeral home are traveling in from out of state. The cost of travel to Arlington is a huge factor in determining whether to do burial there or not.”

“Storing remains in caskets and urns for services at Arlington during the delays in services is also very difficult. Most funeral homes are not designed or equipped for such lengthy storage periods. This hardship also leads to additional costs to families. I believe the worst of all the challenges at Arlington is that most families are beginning to learn how to cope and adjust to their new lives, without their loved one, by the time a service at Arlington occurs. These Arlington services don’t help families along their grief journey, they serve to rip the band-aid off of a healing wound!”

“There is no reason for the ridiculous delay in scheduling. Understaffed and ill-informed contract workers.”

“Waiting for a call back after determining eligibility is frustrating because the funeral home gets the call and then has to try to reach the family immediately or risk losing their place in the queue.”

RECOMMENDATION: NFDA encourages the DoD to review its processes for scheduling burials at Arlington National Cemetery and urges ANC to work closely with funeral directors as trusted partners. We stand ready to collaborate and provide valuable insights or data from the funeral service profession on the challenges faced by funeral directors and grieving families.

VIII. CHALLENGES ENCOUNTERED WITH REIMBURSEMENTS FROM THE VA

The 2024 NFDA survey asked respondents to detail the challenges encountered with reimbursements from the VA, and only 22.4% of respondents indicated having problems with reimbursements. Of those who had challenges, we see some recurring themes about lack of

education and understanding by veterans' families about what the funeral and burial benefits entails and covers. Additional challenges mentioned include lengthy reimbursement processing times, a complicated and confusing application process, and difficulty in determining eligibility for reimbursements.

“I have not had to work with the VA for reimbursement, but honestly, about 80% of veteran's families say, 'The VA is paying for everything.' when I call to set up arrangements once the person dies, I have to break it to so many families every single month, that no, the VA does not "pay for everything." The VA MAY reimburse the family for some costs, but the eligibility requirements significantly limit who is eligible. Recruiters, discharge officers, and the VA in general need to do better.”

“The family thinks that they will be reimbursed that day of the at-need appointment. we do not know what the family will be reimbursed for from the VA”

“Extremely slow...over 6 months at times.”

“It is just cumbersome and confusing for the family. It takes a long time for reimbursement, and you never are consistently sure of the amount that will get reimbursed.”

“It's hard to determine who is eligible for reimbursements.”

“Resending paperwork, delaying payment. Confirmed to have received and the asked to resend.”

RECOMMENDATION: While NFDA is encouraged that less than 25% of families have problems accessing benefits, funeral directors spend a great deal of time working with families to help them through a tiresome and burdensome process, and sometimes the families don't pay the funeral director after they receive the reimbursement. We would like to see the VA improve the speed and ease of receiving funeral and burial benefits. As always, we stand ready to collaborate and provide valuable insights or data from the funeral service profession on the challenges faced by funeral directors and grieving families.

IX. CURRENT BURIAL BENEFITS

Mr. Chairman, NFDA was honored to work with this Committee on the Johnny Isakson and David P. Roe, M.D. *Veterans Health Care and Benefits Improvement Act of 2020* ([Isakson-Roe package of 2020](#)). As part of that package, bipartisan legislation supported by NFDA, the *Burial Rights for America's Veterans' Efforts (BRAVE) Act* was enacted into law. This legislation updated the burial benefit to treat all non-service-connected deaths equally, regardless of where the veteran passes away. This legislative fix was essential to ensuring equitable treatment for all who earned that benefit. Under previous policy, survivors of certain veterans who die in a Department of Veterans Affairs (VA) facility were provided greater funds to cover the cost of a funeral than veterans who die in their home or another medical facility. Currently, for non-service-connected deaths the VA will pay up to \$978 toward burial and funeral expenses for deaths on or after October 1, 2024 and a \$978 plot-interment allowance (if not buried in a national cemetery).

NFDA supports further amending by supporting H.R.234 - Gerald's Law Act (<https://www.congress.gov/bill/118th-congress/house-bill/234>) introduced by General Bergman to amend as section 2202 of the Johnny Isakson and David P. Roe, M.D. *Veterans Health Care and Benefits Improvement Act of 2020* (Public Law 116-315; 134 Stat. 4984) to provide a burial allowance for certain veterans who die at home while in receipt of hospice care furnished by the Department of Veterans Affairs.

NFDA believes that future action to simplify the part of U.S. Code that deals with deaths from service-connected deaths is needed. Currently, the VA will pay up to \$2,000 toward burial expenses for service-connected deaths on or after September 11, 2001, or up to \$1,500 for deaths prior to September 11, 2001. If the Veteran is buried in a VA national cemetery, some or all of the cost of transporting the deceased may be reimbursed. However, this benefit is not indexed for inflation and has remained at \$2,000 since 2002. We strongly believe that this benefit should be indexed for inflation to ensure that non-service-connected deaths which are indexed for inflation do not surpass the service-connected reimbursement.

Mr. Chairman, I have previously testified that funeral directors nationwide firmly uphold the principle that decisions made by grieving families should not compromise a veteran's rightful entitlement to burial in a veteran's cemetery. While we commend the VA's efforts to offer burial options through commemorative plaques and urns for veterans whose cremated remains are not interred, NFDA would like to reiterate our concern about a provision in section 2207 of P.L. 116-315. This provision risks confusing the purchase of merchandise with a veteran's fundamental right to burial in a national cemetery. NFDA has underscored to this Committee and the VA our concern that a grieving spouse might unintentionally jeopardize the veteran's eligibility for ground burial by opting for an urn benefit from the VA. This contrasts starkly with privately purchasing an urn, which does not impact burial rights.

X. INDIAN AND TRIBAL BURIALS

Mr. Chairman and members of the Committee, I want to raise some issues that you may not yet be aware of but that I have recently discussed with knowledgeable individuals. I am not speaking for any tribe, but merely pointing out funeral and burial issues that may impact American Indian/Alaska Native veterans. You may know that American Indian/Alaska Native (AI/AN) have served in the military at approximately 6 times greater rate than other races per 100,000.

A unique issue for American Indian or Alaska Native individuals who die owning trust or restricted land is that their estate undergoes a probate process administered by the Bureau of Indian Affairs (BIA) within the Department of the Interior, rather than a traditional state probate court. Since the federal government holds the land in trust, its distribution is governed by federal law under the American Indian Probate Reform Act (AIPRA). The misclassification of race can significantly impact the speed of this process.

One of the first steps the VA can take is to correctly identify a deceased person's race to determine if the veteran is an American Indian/Alaska Native (AI/AN). Ensuring accuracy in recording the race of an AI/AN is the first step in assisting with probate issues as well as burial support, and survivor benefits. It should be noted that over 60% of AI/AN live off reservation therefore correctly exchanging accurate data and information to those who need to know or have

a right to know (such as Tribal Sovereign Nations) is essential. Adding to the complication, of course, is the large number of homeless veterans. Given that AI/AN serve at great numbers – we don't have accurate information on how many of those are/were homeless, but we can extrapolate a large percentage fall into this category. Adding yet another complication, there are Sovereign Tribes who have no land base- no reservation and therefore no Tribal cemeteries.

XI. THE OFFICE OF SURVIVORS ASSISTANCE

The Office of Survivors Assistance (OSA) was established by [Public Law 110-389, Title II, Section 222, in October 2008](#), to serve as a resource regarding all benefits and services furnished by the Department of Veteran Affairs to survivors and dependents of deceased Veterans and members of the Armed Forces. OSA also serves as a principal advisor to the Secretary of Veterans Affairs and promotes the use of VA benefits, programs and services to survivors.

In preparation for today's testimony, we have learned of a few areas where we believe the VA could improve service to families of the fallen:

- A. Setting up a national program dedicated to survivors is a good first step but it needs to be resources and prioritized – and should exist within every medical center so Directors can make warm handoffs for survivors who may qualify for additional benefits or connect with questions.
- B. The VA currently has no consistent way to direct survivors to VA representatives who can walk them through the complex next steps leaving Survivors to figure things out on their own.
- C. Funeral Directors report assisting with navigating these complicated next steps but with multiple agencies within VA (VHA, VBA and NCA) to connect a survivor with, an in-person representative should be available and accessible to Directors, Advocates, and Survivors to assist with next steps.
- D. Survivors who lose their Veteran should be provided with access to bereavement counseling and support.

RECOMMENDATION: NFDA supports the recommendation by the Federal Advisory Committee (FAC) that the VA should establish access to mental health services for family members who lose a loved one in the Department of Defense or VA care, in line with the 13-month standard of care for bereaved individuals established by CMS, Centers for Medicare and Medicaid Services.

Bereavement is complicated and can be long-lasting. Survivors, including parents, spouses, siblings, and children, should have access to the mental health care they need, especially in the vulnerable first year after a loss. While the CMS, Centers for Medicare & Medicaid Services, currently establishes a standard of care for bereaved individuals at 13 months, those who lose a family member in VHA care do not have access to bereavement counseling, creating an urgent need.

CONCLUDING REMARKS:

Mr. Chairman and members of the committee, on behalf of the National Funeral Directors Association, I want to reaffirm our unwavering commitment to honoring our nation's veterans and their families. Funeral directors across the country are dedicated to fulfilling this solemn duty with respect and compassion.

In closing, I would like to express my sincere gratitude for the opportunity to testify before you today on behalf of funeral service and NFDA.

I hope that my testimony has provided valuable insights, and I am happy to address any questions you may have.

Thank you.