Equity Action Plan

(1) Executive summary

- Agency Name and Mission

American Battle Monuments Commission

The American Battle Monuments Commission (ABMC) is a small agency: 500 employees and an annual appropriation of $84.1M, nearly half of which goes to compensation and benefits. Of our 500 employees, only 90 are Federal service; the other 410 are foreign service nationals in the 10 countries within which we operate. ABMC’s purpose is to commemorate the U.S. armed forces by maintaining the national legacy of their service in the world’s consciousness, commemorating the service, achievements, and sacrifice of American armed forces in the U.S. and where they have served overseas since April 6, 1917, the date of U.S. entry into World War I. We do this through the erection of memorial shrines; maintaining American military burial grounds in foreign countries; controlling the design and construction of U.S. military monuments in foreign countries by other U.S. citizens and organizations; and encouraging the maintenance of such monuments by their sponsors. The Commission administers 26 overseas American military burial grounds; and 32 separate memorials, monuments, and markers, only four of which are in the United States. ABMC is principally an overseas agency; 27 of our 28 staffed sites are overseas, with only our Arlington, Va., headquarters located in the U.S.

- Summary of Action Plan

For the past few years we have intentionally worked to recognize the diversity of the American people represented by the war dead buried and memorialized at ABMC sites worldwide, through social media platforms, commemorative publications, and visitor center exhibits, and we will continue to do so. However, ABMC is a small agency providing limited public services and contracting opportunities, the majority of which are executed in the overseas environment through our Paris operations office. As such, our expectations for significantly improving people’s lives or increasing economic benefits to underserved people groups are tempered by the realities of our scope of operations and the nature of our mission. Nonetheless, our action plan envisions three areas with opportunity for improvement:
I. Expanding our commemorative, public outreach, and visitor services programs to be more inclusive of underserved people groups.

II. Reducing the burden online visitors may encounter when accessing Agency data and resources or requesting Agency services.

III. Expanding the percentage of U.S.-based contracted goods and services awarded to minority-owned, women-owned, and service disabled veteran-owned enterprises.

(2) **Summary of early accomplishments**

I. Expanding our commemorative, public outreach, and visitor services programs to be more inclusive of underserved people groups.

   - Awarded a contract for PR services, to include acquiring a thorough audience analysis of agency stakeholders, with a specific focus on underserved people groups.

   - Consolidated current tribal contacts into a tribal contact database for further consultation and outreach. Letters were sent from the ABMC Acting Secretary to the tribal contacts, introducing ABMC and requesting interest in collaborating on future commemorative projects.

   - Developed a Native American soldier database compiling all available information on Native American servicemembers buried or commemorated at ABMC sites and collected existing Native American soldier stories used in interpretive tours and exhibits.

   - Included Native Hawaiian stakeholder organizations and individuals in the public comment and consultation phases of the Agency’s Honolulu Memorial visitor center project.

II. Reducing the burden online visitors may encounter when accessing Agency data and resources or requesting Agency services.

   - This is a new initiative not defined in our 200-day assessment. During our 200-day assessment, we included “Recruitment and Hiring of a Diverse Workforce” as a focus area. This inward focused initiative to recruit and hire a more diverse workforce will instead be reported in DEIA assessments and plans, not here. Concurrently, we recognize that ABMC provides commemorative data and
resources, and limited public services, through our outward facing website at www.abmc.gov. As a new focus area there are no early accomplishments to report.

III. Expanding the percentage of U.S.-based contracted goods and services awarded to minority-owned, women-owned, and service disabled veteran-owned enterprises.

- The Agency contracting officer has recruited a term contract specialist to be located in our Arlington, Va., headquarters. The specialist will be tasked to maximize contract award opportunities for U.S.-based underserved enterprises.

(3) **Equity action plan**

I. Expanding our commemorative, public outreach, and visitor services programs to be more inclusive of underserved people groups.

This is the Agency’s top Equity priority, with the greatest potential for positive impact. During the equity assessment process, we saw an opportunity to identify scenarios for engagement with underserved community groups where ABMC operates, domestically and internationally.

A. **Barrier to Equitable Outcome(s)**

At present, our circle of influence and interest mirrors the military culture of our mission; an audit of our social media channels determined that on most platforms our audience is largely American/Western European, white, male, and in the 55+ age range. Yet, those honored within our cemeteries reflect the full diversity of the nation; three communities of particular interest that would be impacted by targeted outreach and visitor service programs are African Americans, Asian Americans and Pacific Islanders, and Native Americans. We want to bridge that diversity we honor to the people groups within the U.S. who are the descendants of the war dead and share their ethnic and cultural heritage.

B. **Action and Intended Impact on Barrier**

Domestically and internationally, we will identify patterns or disparities in the demographics of our onsite and online visitor populations to address the root causes of documented disparity through targeted outreach and educational and interpretive products and programs. Specifically, we will—

- Use audience analysis data to develop communication plans and strategies to reach and engage the diverse segments of the American public that are represented at Agency
commemorative sites, in particular African Americans, Asian Americans and Pacific Islanders, and Native Americans.

- Develop partnership opportunities with tribal schools and educators to share educational material and curricula and explore the potential of developing Tribal Nation student internship programs at the Lafayette Escadrille Memorial Cemetery.

- Develop collaborative education programs with schools in underserved and minority communities to increase awareness of the ABMC mission and its continued relevance to diverse audiences worldwide.

- Develop interpretive and educational programs highlighting Native Hawaiians and Native American Code Talkers in ABMC’s planned visitor center in Honolulu.

- Consult with underrepresented groups on new memorial projects that may be relevant to their national heritage and military service experiences.

- Combine quantitative analysis (visitor counting systems) and qualitative analysis (visitor surveys and data collection) to better understand the demographic profile of our overseas on-site visitors, their motivations for visiting, and their visit experiences. The visitor survey is currently in the public comment period of the OIRA approval process.

C. Tracking Progress

Baseline surveys in development for field use in FY 2022 will quantify our current reach into underserved people groups. Annual follow-up surveys will provide trend data to validate the effectiveness of our outreach in expanding audience engagement beyond the current “American/Western European, white, male, 55+ age” demographic. Additionally, the number of education partnerships we are able to create and sustain will provide quantitative and qualitative validation of progress.

Long-term success is sustained engagement with Agency programs and resources by currently underrepresented stakeholders, such that the diversity of those we honor is reflected in the diversity of those we serve. This initiative will have no economic benefits but will increase the awareness and appreciation of the contributions of our nation’s diverse population in preserving our freedom and the freedom of others.
D. Accountability

Accountability will be tracked through the Agency’s quarterly Strategic Plans and Programs reviews, Annual Reports posted to the Agency external website, and individual employee performance reviews.

II. Reducing the burden online visitors may encounter when accessing Agency data and resources or requesting Agency services.

This Equity initiative dovetails with our top priority initiative to expand our commemorative, public outreach, and visitor services programs to be more inclusive of underserved people groups. As our stakeholder audience grows beyond the current demographic of American/Western European, white, male, and 55+ age range, we must ensure that the services defined below are fully accessible and burden free to all.

A. Barrier to Equitable Outcome(s)

Services and information we provide to the public include—

- ABMC Database of the war dead interred or memorialized at ABMC cemeteries and memorials, including the ability to print a certificate of the individual’s record.
- Education Program resources across disciplines for teachers to use in classrooms to illuminate the service, experiences and sacrifice of those honored at ABMC sites.
- Equal Employment Opportunity policies and procedures
- Family Assistance provided to families of the war dead upon arrival at the cemetery, including escort to gravesites, photographs, and guided personal tours of the site.
- Floral Decorations that can be placed within ABMC cemeteries at gravesites through arrangements with local florists.
- Floral Decoration Photos provided upon request to direct next-of-kin who had flowers placed at a relative’s gravesite.
- Korean War Honor Roll Certificates, which are commemorative certificates individuals can print from the Agency website after searching the Korean War Veterans Memorial Honor Roll.
- Letters Authorizing Fee-free Passports for families traveling to an overseas grave or memorialization site.
- Photographs of headstones or tablets of the missing requested by direct next-of-kin of their family’s war dead.
- **Travel Information**, including best in-country routes and modes of travel, and accommodations near ABMC sites.

- **WWII Registry database associated with the WWII Memorial on the National Mall.**

We have received anecdotal data from visitors to our website that it is difficult to find information on the services we offer to the public. When the information is found, there is often confusion on how to receive the benefits, particularly in the placement of floral decorations at gravesites in our overseas cemeteries. Additionally, customer feedback has described the cumbersome nature of enrolling family members in the WWII Registry, a database with more than two million honorees submitted by the public. We will analyze all of the processes and procedures listed above to ensure that we apply adequate resources to administer the processes and that we identify opportunities to reduce any burden experienced by our online visitors.

**B. Action and Intended Impact on Barrier**

Improvements to address this barrier include funded initiatives to—

- Redesign the Agency website at [www.ABMC.gov](http://www.ABMC.gov). Navigation will be improved to facilitate online visitor access to our services by making those pages easier to find and the forms associated with those services easier to complete, all of which should reduce the burden now faced by our online customers.

- Redesign another website owned by ABMC at [www.WWIIMemorial.com](http://www.WWIIMemorial.com). This heritage site, associated with establishment of the World War II Memorial on the National Mall, hosts the WWII Registry database. The website has been hosted and operated by a contracted vendor since its creation in the mid-90’s. We are bringing this site in-house to create a more secure and user-friendly online experience for visitors to the site.

In combination with our priority Equity initiative to improve our reach and engagement with underserved communities, these website initiatives will provide a dynamic and simplified engagement platform for our new audiences as well as current customers, allowing the Agency to remain relevant with a more diverse audience base well into the future.

**C. Tracking Progress**

As the website redesign and functionality are improved, quantitative and qualitative data will be measured to track progress toward reducing the burden of accessing our public services. We will continue to work with OMB to measure the customer experience through analytics and short hosted online surveys, such as those provided by ForeSee software, as well as focused
survey instruments associated with the outreach programs planned to increase our engagement with underserved community groups.

As a result of the website redesign enhancements and improvements described in Section B, we should see marked improvement in our customer reach and satisfaction beginning in FY 2023. Long-term success is defined by sustained engagement by a customer base that better reflects the diversity of the war dead we honor and the evolving demographics of the American public.

D. Accountability

Accountability will be tracked through the Agency’s quarterly Strategic Plans and Programs reviews, Annual Reports posted to the Agency external website, and individual employee performance reviews.

III. Expanding the percentage of U.S.-based contracted goods and services awarded to minority-owned, women-owned, and service disabled veteran-owned enterprises.

The Agency awarded only $41.0M in contracts in FY 2021, an insignificant amount of the Federal budget. Of that amount, only $9.0M was awarded in the U.S. The impact of this Equity initiative will be limited; nonetheless, any success achieved will help to advance the President’s Equity agenda.

A. Barrier to Equitable Outcome(s)

This is a function of the location of our staffed facilities, 96 percent of which are outside of the U.S. Of the $9.0M in FY 2021 U.S. contract awards, $7.8M were awarded to small business, and $4.3M of the small business awards were to 8a companies, by definition small, disadvantaged businesses historically underrepresented and/or subjected to ethnic, cultural, or racial bias, such as African-Americans and Native Americans. Thus, 48 percent of the U.S. contracts were awarded to 8a companies, yet this was only 11 percent of the Agency’s worldwide contract awards. Of the remaining $4.7M in U.S. contracts, nearly $1.5M were awarded to Women Owned ($760K), Service Disabled Veteran Owned ($400K), or Veteran Owned ($305K).

There are no mechanisms available to determine participation by underserved groups (or what are considered underserved groups) in our overseas contracting environment. Yet, most of our cemeteries are in remote areas and we rely on small local businesses for many of our services and supplies. It is our policy to procure services near and around the cemeteries when available, thus improving the economic status of what are often poor, rural European communities. We will continue this practice into the future.
B. **Action and Intended Impact on Barrier**

Despite the small amounts of monies involved, the nature of our predominantly overseas contracting program, and our current record of awards to small, disadvantaged business in the U.S., we will seek opportunities to increase the participation of underserved businesses in our contracting activity by—

- Researching and maximizing contract award opportunities for U.S.-based underserved enterprises.

- Seeking opportunities for underserved enterprises to compete more equitably for Agency contracts awarded overseas, which totaled $32.0M or 78 percent of our FY 2021 awards, more than three times the U.S. award total of $9.0M. The Agency contracting officer anticipates that Agency contract awards will grow by 2 percent or more in FY 2022.

C. **Tracking Progress**

We will continue to track contract awards statistically by category of award, which will allow us to determine annually the growth in contract award percentages among underserved enterprises. Of the $9.0M in U.S. FY 2021 contracts awards, $5.8M or 64 percent were awarded to 8a, Women Owned, Service Disabled Veteran Owned, or Veteran Owned enterprises.

Near- or mid-term success would see that percentage rise above 67 percent and long-term success would see that percentage sustained at 70 percent or more.

D. **Accountability**

Accountability will be tracked through the Agency’s quarterly Strategic Plans and Programs reviews, Annual Reports posted to the Agency external website, and individual employee performance reviews, using quantifiable contract award data.