

APPROVED
VIRGINIA BOARD OF FUNERAL DIRECTORS AND EMBALMERS
BOARD MEETING MINUTES

The Virginia Board of Funeral Directors and Embalmers convened for a board meeting on Wednesday, August 20, 2014 at the Department of Health Professions, Perimeter Center, 9960 Mayland Drive, 2nd Floor, Board Room 2, Henrico, Virginia.

BOARD MEMBERS PRESENT

Christopher P. Vincent, FSL, Vice-President, Chair
Eric V. Wray, II, FSL, Secretary-Treasurer
Walter Ball, Citizen Member
Robert Oman, FSL
J. Paul Welch, FSL
Connie B. Steele, FSL
Louis R. Jones, FSL
R. Thomas Slusser, Jr., FSL

BOARD MEMBERS ABSENT

Junius H. Williams, Jr., Citizen Member, President

DHP STAFF PRESENT FOR ALL OR PART OF THE MEETING

Lisa R. Hahn, Executive Director
Lynne Helmick, Deputy Executive Director
David Brown, D.C., Agency Director
Elaine Yeatts, Senior Policy Analyst
Missy Currier, Deputy Executive Director

BOARD COUNSEL

Erin Barrett, Assistant Attorney General

QUORUM

With 8 members present a quorum was established.

GUESTS PRESENT

Paul Harris, Regulatory Support Services, Inc.
Karen McPherson, Virginia Morticians Association (VMA)
Lacy Whittaker, VFDA
W. Scott Johnson, First Choice Consulting LLC

CALL TO ORDER

Chris Vincent, Vice-President, called the meeting of the Virginia Board of Funeral Directors and Embalmers to order at 11:01 a.m. Mr. Vincent gave welcome to Dr. David Brown the Agency Director Tommy Slusser as the newest member nominated to the board. Mr. Vincent also asked the board members, staff and members of the audience to introduce themselves.

ORDERING OF AGENDA

Upon a motion by Eric Wray and properly seconded by Louis Jones, the board accepted the agenda as written. The motion passed unanimously.

ACCEPTANCE OF MINUTES

Upon a motion by Bob Oman and properly seconded by Louis Jones, the Board voted to accept the following Meeting Minutes:

- (2) Formal Hearings – May 8, 2014
- Legislative/Regulatory Meeting May 9, 2014
- Board Meeting – May 9, 2014
- Public Hearing – June 17, 2014

The motion carried by a majority vote. Tommy Slusser abstained from the vote since he was not present during the meetings.

PUBLIC COMMENT PERIOD

Mr. Vincent read the following public statement from Barry D. Robinson, Past President and Chairman of the Board, VMA that was sent to Lisa R Hahn, Executive Director of the Board:

Due to a state board inspection this morning at the funeral home, I will not be attending today's board meeting. However, for public comments I would like to thank you, your staff and the entire board for supporting the Virginia Morticians Association over the past 2 years during my presidency. Thank you for the presentations, invitations to meetings, and answers to our questions. We look forward to a long time relationship with you, your staff, and the appointment members of the board.

AGENCY DIRECTORS REPORT – Dr. David Brown, D.C.

Dr. Brown welcomed Tommy Slusser to the board and thanked all the members for their hard work and dedication.

EXECUTIVE DIRECTOR'S REPORT – Lisa R. Hahn

Ms. Hahn also welcomed Tommy Slusser to the board and shared that she met with him the week prior to brief him on board procedures.

Expenditure and Revenue Summary

Ms. Hahn began by stating that further discussions would take place regarding the budget later in the meeting.

FY14

FY14 beginning with the cash balance as of June 30, 2013 of \$(172,121); revenue received YTD FY 14 was \$537,625; less the direct and In-Direct expenditures of \$608,337; leaving the cash balance as of June 30, 2014 of \$ (242,833).

Discipline Statistics

Ms. Hahn provided statistics as of August 6, 2014; 33 open cases; 24 in the Enforcement Division at the Investigative stage; 5 cases in the Probable Cause stage, 2 cases at the APD level; 2 cases in the informal stage; and 0 cases were at the formal stage. Ms. Hahn added that 23 funeral board Orders are being monitored for compliance.

Licensee Statistics

Ms. Hahn reported that as of August 6th there were; 1,507 Funeral Service Licensees, 175 Funeral Interns, 440 Funeral Establishments, 4 Embalmers, 51 Funeral Directors, 410 Funeral Service Supervisors, 65 Branch Establishments, 104 Crematories, 20 Continuing Education Providers, 72 Courtesy Card Holders and 47 Surface Transportation and Removal Services.

Virginia Performs

4th Quarter 2014:

- Licensing Standard less than 30 days – 100%
- Clearance Rate-64% (rec'd 11 – closed 7)
- Pending Caseload older than 250 days- 0%
- % of cases closed within 250 days- 86%
- Customer Satisfaction (Goal is 95%) –88.9% for Q42014 & 100%FY13

Ms. Hahn commended Lynne Helmick and Kathy Petersen as well as the board members for resolving cases in a timely manner while protecting the public first and foremost.

Ms. Hahn also mentioned that some of the survey comments were mostly related to confusion on the exam. Ms. Hahn stated that she would be contacting Professional Examination Service (PES), to try to identify where the confusion might be coming from.

Presentations

- Lisa Hahn - VFDA Central District Meeting; May 13th
- Lynne Helmick –VMA Convention – Williamsburg; June 19th
- Lisa Hahn – VFDA Annual Convention – VA Beach; June 29th

Board Business

Ms. Hahn shared the following with the board;

- She had attended the International Conference of Funeral Service Examining Boards (ICFSEB) Annual meeting in Orlando, FL in February and presented on the Model Practice Act.
- She was scheduled to attend another meeting the following week in Newport Beach, California to continue working with the committee on the Model Practice Act.
- Missy Currier would email the members the presentation on Alkaline Hydrolysis to keep everyone up to date with the information.
- Board Portal (SharePoint) Update –
 - Bob Oman and Chris Vincent continue to review cases on SharePoint. They have had an number of issues logging in to SharePoint. This software will be used primarily by members on the IFC Committees.
- CE Audit Results: 16% of the licensees audited were found to be non-compliant. They were issued Consent Orders and CCA's depending on the extent of the missing continuing education hours.

FY 14 Meeting Statistics

- **July 1, 2013 – June 30, 2014**
 - Board Meetings – 3
 - Formal Hearings – 6
 - IFC's – 7
 - Adhoc Committee's – 3
 - Regulatory/Legislative – 1
 - Public Hearings – 1

- **Total meetings - 21**

Calendar

- **2014**
 - October 7th

- **2015 (Tentative)**
 - January 13th
 - April 14th
 - July 14th
 - October 2nd

Ms. Hahn concluded her report with information she had just received and that may have an effect on the funeral profession:

- Gay marriages in Virginia –same-sex marriages may become legal as early as the next day which may result in questions from licensees regarding next of kin designations.
- The Medical Examiner’s office will be holding a meeting later today regarding the electronic filing of death certificates.

NEW BUSINESS

Status of Regulatory Actions:

Ms. Yeatts reported on the status of the following Regulatory Actions (as of 8/7/14):

Chapter	Action / Stage Information		
Regulations of the Board of Funeral Directors and Embalmers [18 VAC 65 - 20]	<table border="1"> <tr> <td>Fee increase [Action 3236]</td> </tr> <tr> <td>Proposed – Register Date: 6/2/14 Comment Closed 8/1/14</td> </tr> </table>	Fee increase [Action 3236]	Proposed – Register Date: 6/2/14 Comment Closed 8/1/14
Fee increase [Action 3236]			
Proposed – Register Date: 6/2/14 Comment Closed 8/1/14			
Regulations of the Board of Funeral Directors and Embalmers [18 VAC 65 - 20]	<table border="1"> <tr> <td>Identification of human remains [Action 3340]</td> </tr> <tr> <td>Proposed - At Governor's Office for 53 days. Emergency Regulations expired on 9/30/13.</td> </tr> </table>	Identification of human remains [Action 3340]	Proposed - At Governor's Office for 53 days. Emergency Regulations expired on 9/30/13.
Identification of human remains [Action 3340]			
Proposed - At Governor's Office for 53 days. Emergency Regulations expired on 9/30/13.			
Regulations of the Board of Funeral Directors and Embalmers [18 VAC 65 - 20]	Authorization for cremation [Action 4181] Final – Register Date: 6/30/14 Effective: 7/30/14		

2015 Legislation:

Ms. Yeatts stated that DHP was working very hard on meeting the deadlines for the 2015 General Assembly Session. She indicated that a bill is expected to be introduced allowing for Nurse Practitioners and Physician Assistants to be appointed as local medical examiners to determine the cause of death for ME cases.

DHP Draft 2015 Legislation (Attachment #1)

Ms. Yeatts reviewed the draft legislation to be introduced by DHP during the 2015 General Assembly session. Upon a motion by Bob Oman and properly seconded by Eric Wray, the board votes to accept the draft legislation as written. The motion carried unanimously.

Fee Increase (Attachment #2):

Ms. Yeatts thoroughly reviewed the financial position and provided background to assist the board with the information they needed to make a decision on proposed fee increases. Ms. Yeatts also reported that the board received no public comment on the proposed regulation.

Ms. Yeatts explained the methodology for the fee increases by offering different options. She explained the difference in the options was a matter of timing and anticipation of the need for another fee increase.

Upon a motion by Bob Oman and properly seconded by Eric Wray, the board voted to adopt the final amendments for a fee increase with a two-time shortfall assessment. The motion passed unanimously.

Dr. Brown concluded the discussions by stating that getting fees in order have been his top priority since he started with the agency in March. He emphasized that the majority of the board's expenditures are outside of the board's control. The expenditures that are within the boards control have been reduced due to the efforts of Ms. Hahn and her staff who adopted several innovative ways to do their jobs more effectively while cutting costs. Other boards in the department have adopted some of these cost cutting measures.

BREAK

The board recessed at 12:05 and reconvened at 12:20 pm.

ELECTIONS

A motion was made by Eric Wray to nominate Bob Oman for the position of Secretary-Treasurer. Mr. Oman thanked Mr. Wray for the nomination but requested that the offer be rescinded as he had already served in the officer positions during his previous tenures on the board.

Following Mr. Oman's rescission, a second motion was made by Connie Steele to nominate Paul Welch as the Secretary-Treasurer. The motion was properly seconded by Bob Oman and the motion carried unanimously.

Upon a motion by Paul Welch and properly seconded by Walter Ball, the board voted to nominate Connie Steele as Vice-President. The motion carried unanimously.

Upon a motion by Louis Jones and properly seconded by Walter Ball, the board voted to re-elect Junius Williams for a second term as Board President. Voting in favor were; Louis Jones, Walter Ball and Connie Steele.

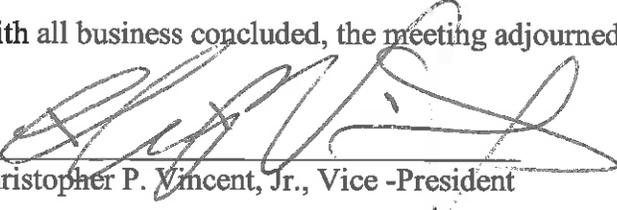
Upon a motion by Bob Oman and properly seconded by Eric Wray, the board voted to elect Chris Vincent as Board President; voting in favor were; Bob Oman, Eric Wray, Paul Welch, and

Tommy Slusser. By a majority of the vote, Christopher Vincent was elected as the new Board President.

Ms. Hahn congratulated the new slate of officers but added that she was thankful for the amazing work that Junius Williams contributed to the board during his tenure. Ms Hahn added that Chris Vincent wished to remain active on the Special Conference Committee and would therefore recommend that Junius Williams continue to Chair the formal hearings.

ADJOURNMENT:

With all business concluded, the meeting adjourned at 12:25 p.m.



Christopher P. Vincent, Jr., Vice -President



Lisa R. Hahn, Executive Director

1/13/15
Date

1/14/15
Date

Attachment #1

Department of Health Professions 2015 Session of the General Assembly

A bill to amend and reenact §§ 54.1-2800, 54.1-2802, 54.1-2806, 54.1-2815 and 54.1-2819 of the Code of Virginia, relating to the Board of Funeral Directors and Embalmers.

Be it enacted by the General Assembly of Virginia:

1. That §§ 54.1-2800, 54.1-2802, 54.1-2806, 54.1-2810, 54.1-2815 and 54.1-2819 of the Code of Virginia are amended and reenacted as follows:

§ 54.1-2800. Definitions.

As used in this chapter, unless the context requires a different meaning:

"Advertisement" means any information disseminated or placed before the public.

"At-need" means at the time of death or while death is imminent.

"Board" means the Board of Funeral Directors and Embalmers.

"Cremate" means to reduce a dead human body to ashes and bone fragments by the action of fire.

"Cremator" means a person or establishment that owns or operates a crematory or crematorium or cremates dead human bodies.

"Crematory" or "crematorium" means a facility containing a furnace for cremation of dead human bodies.

"Embalmer" means any person engaged in the practice of embalming.

"Embalming" means the ~~preservation and disinfection of the human dead by external or internal application of chemicals~~ process of chemically treating the dead human body by arterial injection and cavity treatment or, when necessary, hypodermic tissue injection to reduce the presence and growth of microorganisms to temporarily retard organic decomposition.

"Funeral directing" means the for-profit profession of directing or supervising funerals, preparing human dead for burial by means other than embalming, or making arrangements for funeral services or the financing of funeral services.

"Funeral director" means any person engaged in the practice of funeral directing.

"Funeral service establishment" means any main establishment, branch or chapel which is permanently affixed to the real estate and for which a certificate of occupancy has been issued by

the local building official where any part of the profession of funeral directing, the practice of funeral services, or the act of embalming is performed.

"Funeral service intern" means a person who is preparing to be licensed for the practice of funeral services under the direct supervision of a practitioner licensed by the Board.

"Funeral service licensee" means a person who is licensed in the practice of funeral services.

"In-person communication" means face-to-face communication and telephonic communication.

"Next of kin" means any of the following persons, regardless of the relationship to the decedent: any person designated to make arrangements for the disposition of the decedent's remains upon his death pursuant to § 54.1-2825, the legal spouse, child over 18 years of age, custodial parent, noncustodial parent, siblings over 18 years of age, guardian of minor child, guardian of minor siblings, maternal grandparents, paternal grandparents, maternal siblings over 18 years of age and paternal siblings over 18 years of age, or any other relative in the descending order of blood relationship.

"Practice of funeral services" means engaging in the care and disposition of the human dead, the preparation of the human dead for the funeral service, burial or cremation, the making of arrangements for the funeral service or for the financing of the funeral service and the selling or making of financial arrangements for the sale of funeral supplies to the public.

"Preneed" means at any time other than at-need.

"Preneed funeral contract" means any agreement where payment is made by the consumer prior to the receipt of services or supplies contracted for, which evidences arrangements prior to death for: (i) the providing of funeral services or (ii) the sale of funeral supplies.

"Preneed funeral planning" means the making of arrangements prior to death for: (i) the providing of funeral services or (ii) the sale of funeral supplies.

"Solicitation" means initiating contact with consumers with the intent of influencing their selection of a funeral plan or funeral service provider.

§ 54.1-2802. Board; appointment; terms; vacancies; meetings; quorum.

The Board of Funeral Directors and Embalmers shall consist of nine members as follows: seven funeral service licensees of the Board with at least five consecutive years of funeral service practice in this Commonwealth immediately prior to appointment and two citizen members. The terms of office shall be for four years from July 1. Appointments shall be made annually on or before June 30 as the terms of the members respectively expire. Appointments to the Board should generally represent the geographical areas of the Commonwealth. The Board shall annually elect a president, a vice-president and a secretary-treasurer.

The Board shall hold at least two meetings each year. In addition, the Board may meet as often as its duties require. Five members shall constitute a quorum. ~~No less than quarterly, the Board shall offer examinations for licensure. Such examinations for licensure are not required to be held in conjunction with meetings of the Board.~~

§ 54.1-2806. Refusal, suspension or revocation of license.

The Board may refuse to admit a candidate to any examination, refuse to issue a license to any applicant and may suspend a license for a stated period or indefinitely, or revoke any license or censure or reprimand any licensee or place him on probation for such time as it may designate for any of the following causes:

1. Conviction of any felony or any crime involving moral turpitude;
2. Unprofessional conduct which is likely to defraud or to deceive the public or clients;
3. Misrepresentation or fraud in the conduct of the funeral service profession, or in obtaining or renewing a license;
4. False or misleading advertising or solicitation;
5. Solicitation at-need or any preneed solicitation using in-person communication by the licensee, his agents, assistants or employees; however, general advertising and preneed solicitation, other than in-person communication, shall be allowed;
6. Employment by the licensee of persons known as "cappers" or "steerers," or "solicitors," or other such persons to obtain the services of a holder of a license for the practice of funeral service;
7. Employment directly or indirectly of any agent, employee or other person, on part or full time, or on a commission, for the purpose of calling upon individuals or institutions by whose influence dead human bodies may be turned over to a particular funeral establishment;
8. Direct or indirect payment or offer of payment of a commission to others by the licensee, his agents, or employees for the purpose of securing business;
9. Use of alcohol or drugs to the extent that such use renders him unsafe to practice his licensed activity;
10. Aiding or abetting an unlicensed person to practice within the funeral service profession;
11. Using profane, indecent or obscene language within the immediate hearing of the family or relatives of a deceased, whose body has not yet been interred or otherwise disposed of;

12. Solicitation or acceptance by a licensee of any commission or bonus or rebate in consideration of recommending or causing a dead human body to be disposed of in any crematory, mausoleum or cemetery;
13. Violation of any statute, ordinance or regulation affecting the handling, custody, care or transportation of dead human bodies;
14. Refusing to surrender promptly the custody of a dead human body upon the express order of the person lawfully entitled to custody;
15. Knowingly making any false statement on a certificate of death;
16. Violation of any provisions of Chapter 7 (§ 32.1-249 et seq.) of Title 32.1;
17. Failure to comply with § 54.1-2812, and to keep on file an itemized statement of funeral expenses in accordance with Board regulations;
18. Knowingly disposing of parts of human remains, including viscera, that are received with the body by the funeral establishment, in a manner different from that used for final disposition of the body, unless the persons authorizing the method of final disposition give written permission that the body parts may be disposed of in a manner different from that used to dispose of the body;
19. Violating or failing to comply with Federal Trade Commission rules regulating funeral industry practices;
20. Violating or cooperating with others to violate any provision of Chapters 1 (§ 54.1-100 et seq.) and 24 (§ 54.1-2400 et seq.), this chapter or the regulations of the Board of Funeral Directors and Embalmers or the Board of Health;
21. Failure to comply with the reporting requirements as set forth in § 54.1-2817 for registered funeral service interns;
22. Failure to provide proper and adequate supervision and training instruction to registered funeral service interns as required by regulations of the Board;
23. Violating any statute or regulation of the Board regarding the confidentiality of information pertaining to the deceased or the family of the deceased or permitting access to the body in a manner that is contrary to the lawful instructions of the next-of-kin of the deceased;
24. Failure to include, as part of the general price list for funeral services, a disclosure statement notifying the next of kin that certain funeral services may be provided off-premises by other funeral service providers;
25. Disciplinary action against a license, certificate or registration issued by another state, the District of Columbia or territory or possession of the United States; ~~and~~

26. Failure to ensure that a dead human body is maintained in refrigeration at no more than approximately 40 degrees Fahrenheit or embalmed if it is to be stored for more than 48 hours prior to disposition. A dead human body shall be maintained in refrigeration and shall not be embalmed in the absence of express permission by a next of kin of the deceased or a court order; and

27. Mental or physical incapacity to practice his profession with safety to the public.

§ 54.1-2815. Application for license; how license signed; duration.

All applications for examination for a license for the practice of funeral service shall be upon forms furnished by the Board.

~~All licenses shall be signed by the president and secretary of the Board and stamped with the seal of the Board.~~

All licenses shall be issued or renewed for a period prescribed by the Board, not exceeding two years.

§ 54.1-2819. Registration of surface transportation and removal services.

Any person or private business, except a common carrier engaged in interstate commerce, the Commonwealth and its agencies, or an emergency medical services agency holding a permit issued by the Commissioner of Health pursuant to § 32.1-111.6, shall apply for and receive a registration as a transportation and removal service in order to be authorized to engage in the business of surface transportation or removal of dead human bodies in this Commonwealth.

Surface transportation and removal services shall not arrange or conduct funerals, provide for the care or preparation, including embalming, of dead human bodies, or sell or provide funeral-related goods and services without the issuance of a funeral service establishment license.

The Board of Funeral Directors and Embalmers shall promulgate regulations for such registration including proper procedures in the handling of all dead human bodies being transported, application process for registration, and establishment of registration fees. These regulations shall not require the use of a casket for transportation. No licensed funeral service establishment shall be required to receive such registration in addition to its funeral service establishment license. However, such establishment shall be subject to the regulations pertaining to transportation and removal services.

All registrations as a surface transportation and removal service shall be renewed annually and no person, or private business or funeral service establishment shall engage in the business as a surface transportation and removal service without holding a valid registration.

Any surface transportation or removal service which is not registered or persons who knowingly engage in transportation or removal services without registration shall be subject to the disciplinary actions provided in this chapter.

This section shall not be construed to prohibit private individuals from transporting or removing the remains of deceased family members and relatives either by preference or in observation of religious beliefs and customs.

ATTACHMENT #2

Board of Funeral Directors and Embalmers

Fee Proposal

18VAC65-20-70. Required fees.

A. The following fees shall apply for initial licensure or registration:

1. License to practice funeral service or as a funeral director or an embalmer	\$275 <u>325</u>
2. Funeral service establishment license	\$500 <u>600</u>
3. Surface transportation and removal service registration	\$300 <u>325</u>
4. Courtesy card	\$275 <u>325</u>
5. Crematory	\$200 <u>250</u>
6. Waiver of full-time manager requirement	\$150

B. The following fees shall apply for renewal of licensure or registration:

1. License to practice funeral service or as a funeral director or an embalmer	\$475 <u>225</u>
2. Funeral service establishment license	\$300 <u>400</u>
3. Surface transportation and removal service registration	\$250 <u>300</u>
4. Courtesy card	\$275 <u>300</u>
5. Crematory	\$150 <u>200</u>
6. Waiver of full-time manager requirement	\$100

C. The following fees shall apply for late renewal of licensure or registration up to one year following expiration:

1. License to practice funeral service or as a funeral director or an embalmer	\$60 <u>75</u>
--	---------------------------

2. Funeral service establishment license	\$ 100 <u>135</u>
3. Surface transportation and removal service registration	\$ 85 <u>100</u>
4. Courtesy card	\$ 90 <u>100</u>
5. Crematory	\$ 50 <u>75</u>
6. Waiver of full-time manager requirement	\$35

D. The following fees shall apply for reinstatement of licensure or registration:

1. License to practice funeral service or as a funeral director or an embalmer	\$ 275 <u>400</u>
2. Establishment license	\$ 500 <u>635</u>
3. Surface transportation and removal service registration	\$ 350 <u>425</u>
4. Courtesy card	\$ 275 <u>425</u>
5. Crematory	\$ 225 <u>275</u>
6. Reinstatement following suspension	\$ 500 <u>1,000</u>
7. Reinstatement following revocation	\$ 1,000 <u>2,000</u>

E. Other fees.

1. Change of manager or establishment name	\$ 75 <u>100</u>
2. Verification of license or registration to another state	\$50
3. Duplicate license, registration, or courtesy card	\$ 15 <u>25</u>
4. Duplicate wall certificates	\$60
5. Change of ownership	\$100
6. Nonroutine reinspection (i.e., structural change to preparation room, change of location or ownership)	\$ 300 <u>400</u>

F. Fees for approval of continuing education providers.

1. Application or renewal for continuing education provider	\$ 300 <u>400</u>
2. Late renewal of continuing education provider approval	\$100
3. Review of additional courses not included on initial or renewal application	\$300

18VAC65-20-154. Inactive license.

A. A funeral service licensee, funeral director or embalmer who holds a current, unrestricted license in Virginia shall, upon a request for inactive status on the renewal application and

submission of the required renewal fee of ~~\$90~~115, be issued an inactive license. The fee for late renewal up to one year following expiration of an inactive license shall be ~~\$30~~40.

1. An inactive licensee shall not be entitled to perform any act requiring a license to practice funeral service in Virginia.

2. The holder of an inactive license shall not be required to meet continuing education requirements, except as may be required for reactivation in subsection B of this section.

B. A funeral service licensee, funeral director or embalmer who holds an inactive license may reactivate his license by:

1. Paying the difference between the renewal fee for an inactive license and that of an active license for the year in which the license is being reactivated; and

2. Providing proof of completion of the number of continuing competency hours required for the period in which the license has been inactive, not to exceed three years.

18VAC65-40-40. Fees.

A. The following fees shall be paid as applicable for registration:

1. Funeral service intern registration, reinstatement or renewal	\$100 <u>150</u>
<u>2. Funeral service intern renewal</u>	<u>\$125</u>
2.3. Late fee for renewal up to one year after expiration	\$35 <u>45</u>
3.4. Duplicate copy of intern registration	\$25
4.5. Returned check	\$35
5.6. Registration of supervisor	\$25 <u>35</u>
6.7. Change of supervisor	\$25 <u>35</u>
7.8. Reinstatement fee	\$170 <u>195</u>

B. Fees shall be made payable to the Treasurer of Virginia and shall not be refundable once submitted.