



Final

***Virtual* Regulatory
Advisory Panel**

August 14, 2020

The Virginia Board of Funeral Directors and Embalmers convened virtually via WebEx for a Regulatory Advisory Panel meeting on Friday, August 14, 2020, with staff coordination on-site at the Department of Health Professions, Perimeter Center, 9960 Mayland Drive, Henrico, Virginia.

PANEL MEMBERS PRESENT:

Mia Mimms, FSL, JD, Board President, Panel Chair (On-Site)
R. Thomas Slusser, Jr., FSL, Board Vice-President (Virtual)
Kenneth Scott Hickey, M.D., Board Secretary Treasurer, Citizen Member (Virtual)
Joseph Frank Walton, FSL, Board Member/Educator (On-Site)
Paul Harris, Regulatory Support Services, Inc. (Virtual)
Barry Robinson, FSL, Virginia Mortician's Association (Virtual)
Laurence Spiaggi, FSL, Virginia Funeral Directors' Association* (Virtual)
John Paul Welch, FSL, Representative, Association of Independent Funeral Homes of Virginia (Virtual)

DHP STAFF PRESENT FOR ALL OR PART OF THE MEETING:

Erin Barrett, Assistant Attorney General, Board Counsel (Virtual)
David Brown, DC, DHP Director (Virtual)
Sarah Georgen, Licensing and Operations Manager (On-Site)
Kelley Palmatier, Deputy Executive Director (Virtual)
Corie Tillman Wolf, Executive Director (On-Site)
Heather Wright, Board Program Manager (On-Site)
Matt Treacy, Media Production Specialist (Virtual)

OTHER GUESTS PRESENT (VIRTUAL)

Suja Amir
Imam Ammar Amonette
Angela Bezik, Virginia Funeral Directors' Association
Chuck Duvall
Jerry Gentile
Muhammad Hanif, Citizen Member
Caressa Hughes
Scott Johnson
Jamie Karpa, FSL*
Bruce Keeney, Association of Independent Funeral Homes of Virginia
Malena Llanos
Hon. Jeremy McPike, Senate of Virginia
Blair Nelsen, FSL, Board Member*
Dalene Paull, The International Conference of Funeral Service Examining Boards
Dianne Rencsok, Funeral Consumers Alliance of the Virginia Blue Ridge

Samuel Rhue, Sr., FSL*

Amir Saeed

Lauren Thomas, The International Conference of Funeral Service Examining Boards

Ben Traynham

Lacy Whitaker, Virginia Funeral Directors' Association

Joseph Michael Williams, FSL, Board Member

Unknown Call-in User 6 (804-240-****)

Unknown Call-in User 7 (804-337-****)

Unknown Call-in User 8 (number unknown)

Unknown Call-in User 9 (804-928-****)

Unknown Call-in User 10 (757-749-****)

Unknown Call-in User 11 (571-437-****)

**participant indicates attendance to count toward continuing education requirements*

CALL TO ORDER

Ms. Mimms called the meeting to order at 9:30 a.m.

Due to the COVID-19 declared state of emergency and consistent with Amendment 28 to HB29 (Budget Bill for 2018-2020) and the applicable provisions of the Freedom of Information Act including Virginia Code § 2.2-3708.2, the Board convened a virtual meeting to consider such regulatory and business matters as was presented on the agenda necessary for the board to discharge its lawful purposes, duties, and responsibilities.

Ms. Mimms provided the Board members, staff, and the public with contact information should the electronic meeting be interrupted.

Ms. Mimms provided reminders to the Board and public regarding WebEx functions. She completed a roll call of the panel members and staff.

Ms. Mimms read the mission of the Board, which is also the mission of the Department of Health Professions.

ORDERING OF THE AGENDA

Ms. Mimms requested proposed changes to the ordering of the agenda. Hearing none, she proceeded with the meeting.

OPENING COMMENTS – Hon. Jeremy McPike, Senate of Virginia

Ms. Mimms welcomed the Honorable Jeremy McPike, Senate of Virginia, and patron of Senate Bill 1044 to offer opening comments for the meeting.

Senator McPike explained his legislative intent behind SB1044.

PUBLIC COMMENT

Ms. Mimms stated that written public comment had been received from the following individuals:

1. Bruce B. Keeney, Sr., Legislative Counsel, Independent Funeral Homes of Virginia
2. Dr. M. Farooq, President, Islamic Center/Northern Virginia Trust
3. Allison Carpenter, Chair, Interfaith Programs Committee, McLean Islamic Center
4. Josh Slocum, Executive Director, Funeral Consumers Alliance
5. Chavela Painter
6. Armeke Smith
7. Donita Greene
8. Unknown Commenter, Cooper and Humbles
9. Fisher Watkins
10. Sandra Hairston
11. Wendal Givens
12. Maya Ivory
13. Rhonda Pleasants
14. Mary Johnson Fields

Ms. Tillman Wolf stated that one additional written public comment from Suja Amir was received after the deadline and read the comment submitted.

Ms. Mimms stated that the written public comments received by the deadline had been distributed to the panel members prior to the meeting and would be included in the meeting minutes (Attachment A).

Ms. Mimms noted that there were no requests received to provide oral public comment.

ISLAMIC JURISPRUDENCE AND BURIAL REQUIREMENTS – Imam Ammar Amonette, Islamic Center of Virginia

Ms. Mimms welcomed Imam Ammar Amonette from the Islamic Center of Virginia to provide information to the panel members regarding Islamic jurisprudence and burial requirements.

Imam Amonette explained the religious bases for funeral practices in Islam in the context of the bifurcation of funeral licenses.

CHARGE OF THE RAP

Ms. Mimms stated that the Regulatory Advisory Panel (RAP) was convened pursuant to 18VAC65-11-70 of the Board's Regulations related to Public Participation. Ms. Mimms stated that this RAP was convened for the purposes set forth in regulation - to convene stakeholders and other individuals interested in this issue to provide input and technical assistance to the Board regarding the Board's adoption of regulations for the licensure of funeral directors and embalmers as separate license types.

Ms. Mimms stated that the intent of the meeting was to set the stage or build the foundation for the discussion and ultimate recommendations by looking at the available data on funeral directors and embalmers, current statutes and regulations related to licensure, both in Virginia as well as in neighboring states and states with

a separated licensure system, current internship requirements, and examples for education, examination and experience.

Ms. Mimms asked the panel members to consider the following questions during the meeting:

- What requirements for education for a funeral director or for an embalmer will ensure safety and competence to practice in these respective areas?
- What requirements for examination for a funeral director or for an embalmer will demonstrate entry-level safety and competence to practice in these respective areas?
- What should a required internship experience look like for a funeral director? For an embalmer?

Ms. Mimms stated that in addition to the examples for education, examination, and experience, there may be other regulatory areas that require discussion and recommendation, such as possible concerns about scope of practice within the context of unprofessional conduct for purposes of Board disciplinary action, and if there were any clarifying edits needed in the current regulations to address all three license types.

PRESENTATIONS OF INFORMATION

Current Laws and Regulations for Licensure and State Comparisons

Ms. Mimms welcomed Ms. Tillman Wolf, Executive Director of the Board. Ms. Tillman Wolf provided a presentation of the current laws and regulations for licensure and state comparisons. Ms. Tillman Wolf provided a brief background regarding the current scheme of licensure, as well as an overview of the statutes and regulations that currently address funeral directors and embalmers in addition to funeral service licensees. She introduced the three primary areas required for licensure – education, examination, and experience, and provided an overview of current requirements that exist for licensure in other states.

Education, Examination, and Experience Requirements

Ms. Tillman Wolf provided information regarding the education, examination, and experience requirements that exist in Virginia and across the country, including an overview of current accreditation requirements through the American Board of Funeral Service Education (ABFSE), examination requirements through the International Conference of Funeral Service Examining Boards, and current internship requirements.

Mr. Walton stated that the ABFSE currently does not accredit any funeral director only program. He stated that the ABFSE expressed an openness to accrediting a funeral-director only associates degree program in the future.

PANEL DISCUSSION AND NEXT STEPS

Ms. Mimms asked the panel to focus on the questions asked at the beginning of the meeting to start the overall discussion.

What requirements for education for a funeral director or for an embalmer will ensure safety and competence to practice in these respective areas?

The panel discussed possible recommendations for the education required for a funeral director and for an embalmer, including level of education, and whether funeral directors should be required to take certain science-based courses.

What requirements for examination for a funeral director or for an embalmer will demonstrate entry-level safety and competence to practice in these respective areas?

The panel discussed possible recommendations for examination requirements for a funeral director and for an embalmer, including national and state-level examinations.

What should a required internship experience look like for a funeral director? For an embalmer?

The panel discussed possible recommendations for the experience or internship requirements for a funeral director and for an embalmer, including the total number of hours, as well as the number of funerals and arrangements for a funeral director, and the number of embalmings for an embalmer.

BREAK

The Panel took a break at 10:51 a.m. The Panel reconvened at 11:02 a.m.

The meeting experienced a technical interruption at 11:14 a.m. and resumed the meeting at 11:18 a.m. (4 minutes, 13 seconds).

Ms. Tillman Wolf stated that she would draft recommendations discussed at the meeting for consideration at the next meeting (Attachment B).

NEXT STEPS

Ms. Mimms announced the next steps, including drafting initial recommendations for consideration by the Board and compiling information from the discussion and meeting.

Ms. Mimms said that the panel will review the specific regulatory requirements and possible draft language for recommendation to the Board at the next meeting.

Ms. Mimms asked that panel members continue to think about the same questions discussed in the meeting as they relate to the regulatory requirements for licensure.

NEXT MEETING

Ms. Mimms announced that the next Regulatory Advisory Panel would be convened on Tuesday, September 1, 2020 at 9:30 a.m.

CONTINUING EDUCATION CREDIT:

Ms. Mimms provided the steps necessary for participants to be awarded continuing education for attendance of the meeting pursuant to 18 VAC 65-20-151. She announced that continuing education would be awarded to those participants who provided their first name, last name, license number, and the meeting code by email to fanbd@dhp.virginia.gov by August 21, 2020.

ADJOURNMENT

With all business concluded, the meeting adjourned at 11:49 a.m.



Mia Mimms, FSL, JD, Panel Chair



Corie Tillman Wolf, J.D., Executive Director

10/6/2020

Date

10-07-2020

Date

4461 Cox Road, Suite 110
Glen Allen, VA 23060
Phone (804) 643-0312
Fax (804) 643-0311

IFHVOffice@gmail.com
www.ifhv.org



August 11, 2020

To: Virginia Board of Funeral Directors and Embalmers and Its Regulatory Advisory Panel:

Comments of the Association of Independent Funeral Homes of Virginia Related to the Promulgation of Regulations for Licensed Funeral Directors and Licensed Embalmers....

The Association of Independent Funeral Homes of Virginia (IFHV) appreciates the opportunity to provide comments in response to the Board promulgating regulations pursuant to SB 1044 of the 2020 (regular) session of the Virginia General Assembly. IFHV represents owners and managers of record of independently owned and operated funeral homes, many of which are family owned and operated and all actively serve and invest in the communities in which they are located.

In developing IFHV's recommendations, we relied on a highly publicized, well attended virtual meeting of IFHV firm owners and managers of record in which every participant provided comments. IFHV's recommendations represent the unanimous collective opinion of those participating in our virtual meeting (including owners and managers of record), and not just a Board of Directors, paid lobbyists, or a Task Force. Participation and input to IFHV included funeral establishments of every size, racial and gender and geographic diversity.

The opportunity to learn more about the Moslem faith's burial requirements, to be presented by Iman Ammar Amoretti, should be of interest to all. IFHV was previously advised the Moslem faith had concerns that current prerequisites for applicants as a funeral service licensee required demonstrating competency in embalming and that embalming is against the Moslem faith. **IFHV believes our recommendations address and resolve those concerns.** In the interim, IFHV recommends the Board of Funeral Directors, and perhaps their legal counsel, provide information as to what those of the Moslem faith may currently provide without a funeral service license. It is our understanding that if no fees or payment are received for transportation, storage and burial of remains, one is not required to be licensed. Additionally, some may not be aware that embalming is not required for burial. Such advice and counsel by the Board may provide options to the Iman which he may not be currently aware. They may also wish to communicate with the funeral homes in Northern Virginia which are currently licensed and operating in Northern Virginia, which we understand are owned by those of the Moslem faith.

It is important that the Regulatory Advisory Panel and the Virginia Board of Funeral Directors and Embalmers be reminded of **why funeral service providers are licensed as a health profession.** The mission of the Virginia Department of Health Professions is "to ensure safe and competent care" by licensed health professions. **Considering the health risks to the public concerning spread of contagious disease (including HIV and COVID19), handling of hazardous waste, etc., it is critical**

that those providing funeral services are fully and properly trained and educated to safely transport, handle, and prepare human remains for burial or cremation. Those functions are now and should remain under the “funeral service licensee” (and as appropriate, a licensed embalmer). However, those not handling human remains or embalming should be thoroughly knowledgeable about these processes so they may accurately present information to families making arrangements.

In Virginia, there are **3 different types of licensed funeral providers set forth in statute**, noting SB 1044 limits this regulatory process to just the last two listed. In general, they are:

- 1) **Funeral Service Licensee**: A graduate of an accredited mortuary school, completion of a supervised internship, passage of a National Board examination and a State Board exam. A funeral service licensee is then trained and competent to address the full range of all providing related products and services.
- 2) **Licensed Funeral Director** currently has no application process nor prerequisites for license in that this type of license is used to grandfather existing persons impacted from the last licensing structure change. In general, current Virginia law indicates a licensed Funeral Director can provide the same services as a “funeral service licensee,” except embalming and handling of dead human remains. Note this type of license specifically is tied to being paid for services and products. Thus, a “licensed funeral director,” under current Virginia law would most likely be prohibited from even touching the dead body.
- 3) **Licensed embalmer**, like the licensed funeral director, is tied to a grandfather provision. Note though Virginia law limits this type of license to embalming and restoration services, and does not include involvement with any other products or services.

The review of the current types of license set forth in the Virginia Code is important since regulations must comply with statutory definitions. Furthermore, regulations may clarify but not supersede statute.

IFHV’s recommendations, unanimously embraced by the IFHV “virtual meeting” of its members will:

- 1) Address the wishes of the Moslem faith so that they can be licensed to offer every funeral product and service (except handling human remains) without having to ever embalm a dead human body.
- 2) Address concerns about manpower shortages, especially in rural areas.
- 3) Set forth a shortened and more convenient process for licensing as a “Funeral Director.”
- 4) Maintain the delivery of funeral services by properly requiring varied levels of training which reflect the type of license and services rendered.
- 5) Maintain the protection, safety and health of the public, especially as related to infectious disease, HIV, COVID-14, hazardous waste, etc.

IFHV respectfully recommends (by regulatory change) the following:

- 1) Licensed “Funeral Director” be allowed to engage in and provide everything legally allowed by a “licensed service provider” EXCEPT EMBALMING and RESTORTATION SERVICES, and not handle dead human remains (this reflects current Virginia law.)

- a) The Funeral Director shall be under the direction of, supervised by and accountable (responsible) to a “Funeral Service Licensee” (both) affiliated with the same funeral establishment.
 - b) The Funeral Director shall not be required to perform or demonstrate competency in embalming (including not required to perform embalming as part of their training). However, the Funeral Director shall be educated and knowledgeable about the embalming and restoration process (to be able to competently explain the process to families making arrangements).
 - c) While the Funeral Director is not to engage in any embalming, restorative services of handling remains of dead human bodies, and while their education, training and examination will not be as comprehensive as a funeral service licensee, the applicant for Funeral Director license shall meet the following:
 - (i) Complete at an accredited school of mortuary the required didactic hours for a mortuary science associates degree, except for performing embalming. The applicant for this type of license shall be allowed to have accepted comparable course credit from other accredited colleges or universities, including online courses (i.e. Business Management, Anatomy, Chemistry, Infectious Disease). The Board, in consultation with the two mortuary schools accredited and located in Virginia, shall develop and maintain a list of such course requirements. No embalming lab is to be required.
 - (ii) Applicants for a Funeral Directors license shall pass a national board of which the questions, in determining passing rates, shall include knowledge and understanding but not the technical questions related to embalming. If the National Board includes questions applicable to demonstrating competency in performing embalming (and not knowledge of the embalming process), the Virginia Board consider not use of the national board for this type of exam and instead, develop and require an appropriate examination for Funeral Director.
 - (iii) Prior to applying for a license as a Funeral Director, the applicant shall complete an internship under the supervision of a funeral service licensee. Internship for Funeral Director shall not include actual embalming but may include observation of at least one embalming and one cremation.
 - (iv) Funeral Director shall pass the same Virginia Board exam required of a funeral service licensee (excluding embalming related questions other than those to demonstrate a general knowledge of the process.)
 - d) In that a “manager of record” has certain broad oversight and responsibilities and which require a full level of training and competency based examination, no Funeral Director shall be permitted to serve as a “Manager of Record” (this ensures that the Manager of Record be licensed to provide any and all services.)
- 2) Embalmer:
- a) The current statutory definition be retained as is.
 - b) The licensed embalmer applicant shall be required to complete Board approved courses related and necessary to provide embalming services safely and properly. In developing the required course and hands-on training, the Board shall work with the two accredited Mortuary Schools.

- c) The applicant's instruction shall include performing at least the same number of embalming procedures as required for licensure as a funeral service licensee.
- d) The applicant for an Embalmer's license shall complete embalm and restore at least 15 dead human remains which shall be under the supervision (an abbreviated internship) by either a Funeral Service Licensee or a Virginia licensed embalmer.
- e) The applicant for the Embalmer license shall successfully pass an examination in embalming either developed or accepted by the Board.
- f) If requested either by a Funeral Director or family making arrangements, the licensed Embalmer shall be reasonably available to explain their services to families seeking such information.
- g) The licensed Embalmer and their facilities in which they render services shall be subject to the same standards and inspections of "prep rooms" of a funeral establishment.

Thanks to the advance preparation of the Department's staff, the RAP and State Board now have a wealth of information as to the curriculum, national exams and even State exams already available and designed to address different types of license. IFHV believes there is sufficient and existing types of examinations for licenses as IFHV has recommended and in accordance with their suggested scope.

It may be that a delayed effective date may be necessary to allow the Board to finalize agreements with testing agencies (for national exams). Noteworthy are that IFHV's recommendations:

- should not need statutory changes,
- do fully address the intent of enabling legislation,
- do provide an opportunity to be licensed and serve families in providing specific funeral services for which one is trained and qualified,
- have the funeral service licensee as responsible for oversight of those who do not have their same, highest level of didactic and clinical training, and
- recognize those in the funeral profession as a health profession which protects the health and safety of the public, particularly as related to the transmission infectious disease and hazardous waste when handling human remains.

On behalf of the numerous members developing these recommendations, the Association of Independent Funeral Homes of Virginia encourages your endorsement of these recommendations and welcomes any questions you may have in reviewing our proposal.

Bruce B. Keeney, Sr.
Executive Director & Legislative Counsel
Association of Independent Funeral Homes of Virginia

BBK/lsm

4461 Cox Road, Suite 110
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 - d) In that a “manager of record” has certain broad oversight and responsibilities and which require a full level of training and competency based examination, no Funeral Director shall be permitted to serve as a “Manager of Record” (this ensures that the Manager of Record be licensed to provide any and all services.)
- 2) Embalmer:
- a) The current statutory definition be retained as is.
 - b) The licensed embalmer applicant shall be required to complete Board approved courses related and necessary to provide embalming services safely and properly. In developing the required course and hands-on training, the Board shall work with the two accredited Mortuary Schools.

- c) The applicant's instruction shall include performing at least the same number of embalming procedures as required for licensure as a funeral service licensee.
- d) The applicant for an Embalmer's license shall complete embalm and restore at least 15 dead human remains which shall be under the supervision (an abbreviated internship) by either a Funeral Service Licensee or a Virginia licensed embalmer.
- e) The applicant for the Embalmer license shall successfully pass an examination in embalming either developed or accepted by the Board.
- f) If requested either by a Funeral Director or family making arrangements, the licensed Embalmer shall be reasonably available to explain their services to families seeking such information.
- g) The licensed Embalmer and their facilities in which they render services shall be subject to the same standards and inspections of "prep rooms" of a funeral establishment.

Thanks to the advance preparation of the Department's staff, the RAP and State Board now have a wealth of information as to the curriculum, national exams and even State exams already available and designed to address different types of license. IFHV believes there is sufficient and existing types of examinations for licenses as IFHV has recommended and in accordance with their suggested scope.

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- do provide an opportunity to be licensed and serve families in providing specific funeral services for which one is trained and qualified,
- have the funeral service licensee as responsible for oversight of those who do not have their same, highest level of didactic and clinical training, and
- recognize those in the funeral profession as a health profession which protects the health and safety of the public, particularly as related to the transmission infectious disease and hazardous waste when handling human remains.

On behalf of the numerous members developing these recommendations, the Association of Independent Funeral Homes of Virginia encourages your endorsement of these recommendations and welcomes any questions you may have in reviewing our proposal.

Bruce B. Keeney, Sr.
Executive Director & Legislative Counsel
Association of Independent Funeral Homes of Virginia

BBK/lsm

AUG 11 2020

Dr. David E. Brown
Executive Director
Virginia Department of Health Professions
9960 Mayland Drive, Suite 300
Henrico, VA 23233-1463
bhp@dhp.virginia.gov

Corie E. Tillman Wolf
Executive Director
Virginia Board of Funeral Directors and Embalmers
9960 Mayland Drive, Suite 300
Henrico, VA 23233-1463
Corie.Wolf@dhp.virginia.gov

cc: Senator Jeremy McPike

Dear Dr. Brown and Ms. Tillman Wolf,

As you know, observers of many faiths, including the Islamic tradition, do not embalm the bodies of their deceased. In fact we believe it violates the body of the departed and that engaging in the practice is a sin for Muslims. Although some faiths allow embalming, others consider it sacrilege. Therefore, we disagree that this practice should be a requirement for all funeral directors in the Commonwealth. The title of this Board distinguishes between "Funeral Directors" and "Embalmers," and the licenses should as well. There should be a separate license for embalmers that still allows funeral directors to serve as managers of funeral establishments.

Religious diversity in Virginia is one thing that makes our state special. Imagine for a moment that anyone issuing a marriage license must be able to perform a wedding ceremony in accordance with the Islamic tradition. For those officiating weddings for couples who are not Muslims, it would be unnecessary for them to complete educational and examination requirements for a service they will never be providing.


Hundreds of thousands of Muslims live in the Commonwealth of Virginia. A leader of the Muslim community must be appointed to the Regulatory Advisory Panel to ensure that the intent of the legislation is fulfilled. Muslims make up a higher percentage of the population in Virginia than the nation as a whole and this should be reflected in its advisory panels.

We believe the following provisions will ensure all Virginians are able to practice in funeral service, regardless of their faith, and ask for them to be included:

- Funeral Directors must not be required to practice under a Funeral Service License;
- Funeral Directors must be able to serve as managers of funeral establishments;
- Educational and examination requirements should be those for a funeral director only, not an embalmer;
- A leader of the Muslim community must be appointed to the Regulatory Advisory Panel to ensure the intent of the legislation is fulfilled; and
- Opposition to restrictions on the funeral director license that amount to restraint of trade.

Muslims of Northern Virginia are tracking the progress the board will be making on this important matter, and we sincerely hope that there is separation of funeral director licenses from embalmer licenses.

Sincerely,


Dr. M. Farooq, President, ICNVT
Islamic Center/Northern Virginia Trust (ICNVT)
4420 Shirley Gate Road
Fairfax, VA 22030



Dr. David E. Brown
Executive Director
Virginia Department of Health Professions
9960 Mayland Drive, Suite 300
Henrico, VA 23233-1463

Corie E. Tillman Wolf
Executive Director
Virginia Board of Funeral Directors and Embalmers
9960 Mayland Drive, Suite 300
Henrico, VA 23233-1463

July 13, 2020

Dear Dr. Brown and Ms. Tillman Wolf,

As you know, observers of many faiths, including the Islamic tradition, do not embalm the bodies of their deceased. In fact we believe it violates the body of the departed and that engaging in the practice is a sin for Muslims. Although some faiths allow embalming, others consider it sacrilege. Therefore, we disagree that this practice should be a requirement for all funeral directors in the Commonwealth. The title of this Board distinguishes between "Funeral Directors" and "Embalmers," and the licenses should as well. There should be a separate license for embalmers that still allows funeral directors to serve as managers of funeral establishments.

Religious diversity in Virginia is one thing that makes our state special. Imagine for a moment that anyone issuing a marriage license must be able to perform a wedding ceremony in accordance with the Islamic tradition. For those officiating weddings for couples who are not Muslims, it would be unnecessary for them to complete educational and examination requirements for a service they will never be providing.

Hundreds of thousands of Muslims live in the Commonwealth of Virginia. A leader of the Muslim community must be appointed to the Regulatory Advisory Panel to ensure that the

intent of the legislation is fulfilled. Muslims make up a higher percentage of the population in Virginia than the nation as a whole and this should be reflected in its advisory panels.

We believe the following provisions will ensure all Virginians are able to practice in funeral service, regardless of their faith, and ask for them to be included:

- Funeral Directors must not be required to practice under a Funeral Service License;
- Funeral Directors must be able to serve as managers of funeral establishments;
- Educational and examination requirements should be those for a funeral director only, not an embalmer;
- A leader of the Muslim community must be appointed to the Regulatory Advisory Panel to ensure the intent of the legislation is fulfilled; and
- Opposition to restrictions on the funeral director license that amount to restraint of trade.

Muslims of Northern Virginia are tracking the progress the board will be making on this important matter, and we sincerely hope that there is separation of funeral director licenses from embalmer licenses.

Sincerely,

Allison Carpenter
Chair, Interfaith Programs Committee
Secretary, Board of Directors
McLean Islamic Center
8800 Jarrett Valley Drive
Vienna, Virginia 22182
secretary@mcleanmuslims.org

cc: Senator Jeremy McPike
P.O. Box 2819
Woodbridge, VA 22195

FUNERAL CONSUMERS ALLIANCE

A nonprofit protecting your right to choose a meaningful, dignified, and affordable funeral

33 Patchen Road, South Burlington, VT 05403 ~ 802-865-8300 ~ funerals.org

June 3, 2020

David E. Brown, D.C.
Director, Virginia Department of Health Professions
Perimeter Center
9960 Mayland Drive, Suite 300
Henrico, Virginia 23233-1463

sent by email: david.brown@dhp.virginia.gov

re: new licensing regulations for funeral directors pursuant to SB 1044

Dear Dr. Brown,

I write you as the executive director of Funeral Consumers Alliance. We are a nonprofit, 501(c)(3) educational charity. Our mission is to educate the public about funeral options with an eye to free choice and affordability. We also advocate for sensible regulations that protect grieving consumers.

Sometimes we are also obliged to object to regulations that purport to protect the public, but that are merely anti-competitive. We are concerned that such a regulatory effort may be underway in Virginia. As you know, SB 1044 was signed by the Governor this year. The bill authorizes the Board of Funeral Directors and Embalmers to issue separate licenses for funeral directors, embalmers, and practitioners of “funeral services.”

We understand the purpose of this bill is to allow funeral directors who are *not* also embalmers, and who have *not* earned a full mortuary college degree (which includes a heavy emphasis on embalming training) to offer funeral services for sale in Virginia, and to manage or direct a funeral service establishment.

Funeral Consumers Alliance supports these new categories of licensure. Current Virginia regulations require funeral licensees to be trained embalmers as well. This is unnecessary. It has closed down competition in the sector by filtering out candidates who have not paid for a full mortuary school education, and who do not wish to practice embalming.

Not only does this narrow employment opportunities without providing a corresponding consumer protection, it also sustains the higher prices preferred by some traditional practitioners.

We are aware that the Virginia Funeral Directors Association opposed SB 1044. This is not surprising; most trade agencies seek to preserve a favorable status quo. But we are concerned that trade groups will attempt to thwart the legislative intent behind SB 1044

by pushing for regulations that render it inoperative.

When competition is restricted, when states require that all funeral directors also hold degrees that include embalming, the effects on grieving families include:

- Higher prices—Embalming is not necessary unless the consumer chooses it. Virginia law allows for refrigeration in lieu of embalming when disposition does not occur within 48 hours. Requiring a fully trained embalmer to direct and manage a funeral service establishment provides no benefit to consumers. But it does raise the salary requirements, which raises the retail price.
- Fewer options for simple and affordable dispositions—Graduates from mortuary colleges, with their heavy emphasis on embalming, tend to perpetuate the values of that education in the kinds of businesses they open and operate. America's mortuary colleges are still, in 2021, teaching misinformation, such as the incorrect notion that embalming “protects public health”, and that it is necessary for appropriate grieving.

No state in the US needs to encourage more embalming-centric funeral businesses. The market, not state laws or regulations, should shape the field of offerings. Traditionally-focused full-service funeral homes have dominated the sector since the beginning of the funeral home industry in the late 19th century. As the cremation rate has passed 50 percent nationally, consumers are increasingly turning to lower-cost, simpler arrangements that do not necessarily include embalming. States should create regulatory structures that allow for such market-driven expansion, instead of regimes that hobble it.

The efficiencies and consumer cost-savings that can be realized by direct, simple disposition businesses are constrained by requirements to employ a mortuary school graduate and practicing embalmer for job duties that do not require these skills and the salaries they command. It is no more necessary for the managing director of a funeral home or direct cremation business to be an embalmer than it is necessary for the owner or manager of a car dealership to be a certified mechanic.

We ask the Department of Health Professions to ensure that industry trade groups do not thwart the goals of SB 1044. Specifically, we believe regulations must:

- Allow a funeral director-only licensee to perform all necessary duties with the exception of embalming. Funeral director-only licensees must be allowed to meet with families, plan arrangements at-need or pre-need, and to discuss prices and service options with families, including discussions of embalming.
- Allow a funeral director-only licensee to act as the managing director of a funeral establishment.

- Allow for an embalmer-only license category. Just as there are funeral directors who are not embalmers, there are embalmers who prefer to practice their technical skills, and who do not wish to be “front of the house” staff.

Virginia has an opportunity to modernize its funeral service license regime to allow the market to open up choices for grieving families while encouraging competition. The increasing number of families who choose simpler services without embalming is not going to reverse itself. Indeed, the current pandemic has accelerated it. But the trend was already there and clear to those who listen to the expressed needs—affordability especially—of American families dealing with a death.

Sincerely,



Joshua L. Slocum
Executive Director

cc: Corie E. Tillman Wolf, J.D., Executive Director, Virginia Board of Funeral Directors and Embalmers, Corie.Wolf@dhp.virginia.gov

----- Forwarded message -----
From: **Chavela Painter** <chavela***@aol.com>
Date: Thu, Aug 13, 2020 at 6:25 AM
Subject: Public Comment
To: <Corie.Wolf@dhp.virginia.gov>

Good morning,
Below you will find suggested qualifications for a Funeral Director's License. Thank you allowing comments.

Sincerely,
Chavela' D. Painter
Funeral Service Licensee
O. H. Smith & Son Funeral Home
Newport News, VA
(757) 380-8871

Qualifications for Funeral Director License

1. At least eighteen years of age;
2. One of good moral and character
3. Has not been convicted of any violent crimes or found guilty of a federal or crime of moral turpitude;
4. Has high school education or GED
5. Has successfully completed a degree program at an approved Mortuary School accredited by the American Board of Funeral Service Education and the state board
6. Has satisfactorily completed 2000 hours of supervised internship participating in 25 arrangements and 25 funerals
7. Passed the National Board Exam Art Section
8. Passed the state examination to include some Sciences in Funeral Service
9. Pay the required fees

Restrictions–

Not eligible to be Manager of Record (for those licensed after January 14, 2021) *Please note that current licensed Funeral Directors who are already serving as Manager of Record would be “grandfathered” so that new restriction would not affect them.

----- Forwarded message -----

From: **Armeke Smith** <arm***@aol.com>

Date: Thu, Aug 13, 2020 at 8:00 AM Subject:

Public Comment

To: <Corie.Wolf@dhp.virginia.gov>

Hello,

Below are suggested qualifications for the Funeral Director's License.

Thank you,

Armeke D. Smith

Funeral Service Licensee

O. H. Smith & Son Funeral Home

Newport News, VA

(757) 380-8871

Qualifications for Funeral Director License

1. At least eighteen years of age;
2. One of good moral and character
3. Has not been convicted of any violent crimes or found guilty of a federal or crime of moral turpitude;
4. Has high school education or GED
5. Has successfully completed a degree program at an approved Mortuary School accredited by the American Board of Funeral Service Education and the state board
6. Has satisfactorily completed 2000 hours of supervised internship participating in 25 arrangements and 25 funerals
7. Passed the National Board Exam Art Section
8. Passed the state examination to include some Sciences in Funeral Service
9. Pay the required fees

Restrictions –

Not eligible to be Manager of Record (for those licensed after approval of qualifications.

Sent from my iPhone

----- Forwarded message -----

From: **Donita Greene** <donita***@verizon.net>

Date: Thu, Aug 13, 2020 at 8:22 AM

Subject: FD License

To: <Corie.Wolf@dhp.virginia.gov>

Cc: Barry Robinson <MrBarryDe@aol.com>

I believe, at a minimum, these are the requirements needed for the FD license:

1. Minimum age of 18;
2. Had not been convicted of any violent crimes, federal crimes or any crimes of moral turpitude;
3. Is a person of good and moral character;
4. Has attained legally a high school diploma or his/her GED;
5. Has successfully completed, and attained a degree in a Mortuary Science Program accredited by the American Board of Funeral Service Education and the Virginia State Board;
6. Has satisfactorily completed, in Virginia, 2000 hours of supervised internship, completing a minimum of 25 funerals, and 25 arrangements
7. Successfully passes the Arts Section of the National Board Exam;
8. Successfully passes the VA State Board exam, including the few science related questions therein. (The candidate would have had the science classes, minus embalming, in their Mortuary Science curriculum.);
9. Pay all required fees; and
10. Be required to complete the State requirements for annual CEUs.

RESTRICTIONS:

1. The individual with this license cannot be the manager of record for the funeral home if licensed after January 14, 2021, and
2. This license is only valid for practice in the State of Virginia and cannot be transferred for use in any other State in the USA, including any other state that may also now, or in the future, create a Funeral Director license.

Thank you for your attention.

Sent from my iPhone - Donita Greene

----- Forwarded message -----

From: <cooperandhum****@verizon.net>

Date: Thu, Aug 13, 2020 at 8:42 AM

Subject: Public comment (Funeral Director's License)

To: <Corie.Wolf@dhp.virginia.gov>

Qualifications for Funeral Director License

1. At least eighteen years of age;
2. One of good moral and character
3. Has not been convicted of any violent crimes or found guilty of a federal or crime of moral turpitude;
4. Has high school education or GED
5. Has successfully completed a degree program at an approved Mortuary School accredited by the American Board of Funeral Service Education and the state board
6. Has satisfactorily completed 2000 hours of supervised internship participating in 25 arrangements and 25 funerals
7. Passed the National Board Exam Art Section
8. Passed the state examination to include some Sciences in Funeral Service
9. Pay the required fees

Restrictions –

Not eligible to be Manager of Record (for those licensed after January 14, 2021)

Sent from AOL Mobile Mail

Get the new AOL app: mail.mobile.aol.com

----- Forwarded message -----

From: **Fisher Watkins** <fisherwatkins*****@yahoo.com>

Date: Thu, Aug 13, 2020 at 10:14 AM

Subject: Qualifications for Funeral Director License

To: <corie.wolf@dhp.virginia.gov>, <sandrahairston***@yahoo.com>

Qualifications for Funeral Directors License

1. At least 18 years of age
2. One of good moral and character
3. Has not been convicted of any violent crimes/found guilty of a federal crime or moral turpitude
4. Has high school education or GED
5. Has successfully completed a degree program at an approved Mortuary School accredited by the American Board of Funeral Service Education and the State Board
6. Has satisfactorily completed 2000 hours of supervised internship/participating in 25 arrangements and 25 funerals
7. Passed the National Board Exam Art Section
8. Passed the State examination to include some Sciences in Funeral Service
9. Pay the required fees

RESTRICTIONS

Not eligible to be a Manager of Record (for those licensed after January 14, 2021)

----- Forwarded message -----

From: **sandrahairston***** <sandrahairston***@yahoo.com>

Date: Thu, Aug 13, 2020 at 10:18 AM

Subject:

To: <corie.wolf@dhp.virginia.gov>

Sent from my Samsung Galaxy , an AT&T LTE smartphone

Qualifications for Funeral Director License

1. At least eighteen years of age;
2. One of good moral and character
3. Has not been convicted of any violent crimes or found guilty of a federal or crime of moral turpitude;
4. Has high school education or GED
5. Has successfully completed a degree program at an approved Mortuary School accredited by the American Board of Funeral Service Education and the state board
6. Has satisfactorily completed 2000 hours of supervised internship participating in 25 arrangements and 25 funerals
7. Passed the National Board Exam Art Section
8. Passed the state examination to include some Sciences in Funeral Service
9. Pay the required fees

Restrictions –

Not eligible to be Manager of Record (for those licensed after January 14, 2021)

----- Forwarded message -----

From: **Wendal Givens** <givens***@gmail.com>

Date: Thu, Aug 13, 2020 at 9:56 AM

Subject: Comments for board

To: Corie.Wolf@dhp.virginia.gov <Corie.Wolf@dhp.virginia.gov>

Qualifications for Funeral Director License

1. At least eighteen years of age;
2. One of good moral and character
3. Has not been convicted of any violent crimes or found guilty of a federal or crime of moral turpitude;
4. Has high school education or GED
5. Has successfully completed a degree program at an approved Mortuary School accredited by the American Board of Funeral Service Education and the state board
6. Has satisfactorily completed 2000 hours of supervised internship participating in 25 arrangements and 25 funerals
7. Passed the National Board Exam Art Section
8. Passed the state examination to include some Sciences in Funeral Service
9. Pay the required fees

Restrictions –

Not eligible to be Manager of Record (for those licensed after January 14, 2021)

----- Forwarded message -----

From: ivorymaya**@yahoo.com <ivorymaya**@yahoo.com>

Date: Thu, Aug 13, 2020 at 11:00 AM

Subject: Fw: Public Comment for SB 1044 RAP of August 14, 2020

To: Corie.Wolf@dhp.virginia.gov <Corie.Wolf@dhp.virginia.gov>

Qualifications for Funeral Director License

1. At least eighteen years of age;
2. One of good moral and character
3. Has not been convicted of any violent crimes or found guilty of a federal or crime of moral turpitude;
4. Has high school education or GED
5. Has successfully completed a degree program at an approved Mortuary School accredited by the American Board of Funeral Service Education and the state board
6. Has satisfactorily completed 2000 hours of supervised internship participating in 25 arrangements and 25 funerals
7. Passed the National Board Exam Art Section
8. Passed the state examination to include some Sciences in Funeral Service
9. Pay the required fees

Restrictions –

Not eligible to be Manager of Record (for those licensed after January 14, 2021)

----- Forwarded message -----

From: **Rhonda Pleasants** <rkpleasant**@gmail.com>

Date: Thu, Aug 13, 2020 at 11:05 AM

Subject: Recommended Qualifications For Funeral Director Only License

To: <Corie.Wolf@dhp.virginia.gov>

Dear Ms. Wolf,

I support the split license with the following recommended qualifications:

Qualifications for Funeral Director License

1. At least eighteen years of age;
2. One of good moral and character
3. Has not been convicted of any violent crimes or found guilty of a federal or crime of moral turpitude;
4. Has high school education or GED
5. Has successfully completed a degree program at an approved Mortuary School accredited by the American Board of Funeral Service Education and the Virginia State Board of Funeral Directors and Embalmers
6. Has satisfactorily completed 2000 hours of supervised internship participating in 25 arrangements and 25 funerals
7. Passed the National Board Exam ARTS Section
8. Passed the state examination to include some Sciences in Funeral Service
9. Pay the required fees

Restrictions –

Not eligible to be Manager of Record (for those licensed after January 14, 2021)

Thank you for your kind consideration,

Rhonda Keyes Pleasants, CFSP, CCO

Manager, Henry W. Dabney Funeral Home, Inc.

Past President, Virginia Morticians Association, Inc.

Retired Department Chair, John Tyler Community College Funeral Services Program

----- Forwarded message -----

From: <msme***@msn.com> Date: Thu, Aug 13, 2020 at 12:17 PM

Subject: PUBLIC COMMENT-SB 1044

To: Corie.Wolf@dhp.virginia.gov <Corie.Wolf@dhp.virginia.gov>

As a Funeral Service Licensee for the Commonwealth of Virginia, I support the following qualifications for licensure of a Funeral Director under the regulations of SB 1044:

Qualifications for Funeral Director License

1. At least eighteen years of age;
2. One of good moral and character
3. Has not been convicted of any violent crimes or found guilty of a federal or crime of moral turpitude;
4. Has high school education or GED
5. Has successfully completed a degree program at an approved Mortuary School accredited by the American Board of Funeral Service Education and the state board
6. Has satisfactorily completed 2000 hours of supervised internship participating in 25 arrangements and 25 funerals
7. Passed the National Board Exam Art Section
8. Passed the state examination to include some Sciences in Funeral Service
9. Pay the required fees

Restrictions

- Not eligible to be Manager of Record (for those licensed after January 14, 2021)

Mary E. Johnson Fields

----- Forwarded message -----

From: **Suja S. Amir** <suja*****@gmail.com>

Date: Thu, Aug 13, 2020 at 4:54 PM

Subject: SB1044

To: <Corie.Wolf@dhp.virginia.gov>

I support the creation of a separate Funeral Director's license and am in favor of the adoption SB-1044.
Thank your or your time.

Suja S. Amir, MPA

" You learn a lot about someone when you share a meal together." Anthony Bourdain

✉ suja*****@gmail.com

**Virginia Board of Funeral Directors and Embalmers
Regulatory Advisory Panel – Licensure of Funeral Directors and Embalmers (SB 1044)**

First Meeting – Possible Recommendations for Further Discussion

License Type	Area	Possible Recommendations	Notes
Funeral Director	Education	<ol style="list-style-type: none"> 1. Associates degree from a program of mortuary science or funeral service accredited by the ABFSE, OR Board-approved program 2. Coursework in areas such as safe handling of remains, anatomy, physiology, pathology 3. Successful completion of coursework (grade of C or better) in lieu of examination related to sciences 	
	Examination	<ol style="list-style-type: none"> 1. Passage of National Board Exam - Arts (ABFSE accredited grad) or State Board Exam – Arts (non-ABFSE accredited grad) 2. Passage of state laws, rules, and regulations (LRR) examination 	In lieu of science-based exam at state-level, successful completion of coursework; Board review of state LRR to ensure global application of questions
	Experience	<ol style="list-style-type: none"> 1. 2,000 hours of internship completed in no less than 12 months 2. Assist with 25 funerals and 25 arrangement conferences 	
Embalmer	Education	Associates degree from a program of mortuary science or funeral service accredited by the ABFSE, <i>OR Board-approved program</i>	Additional information to be provided regarding possible Embalming-only curriculum
	Examination	<ol style="list-style-type: none"> 1. Passage of National Board Exam – Sciences (ABFSE accredited grad) or State Board Exam – Sciences (non-ABFSE accredited grad) 2. Passage of state laws, rules, and regulations (LRR) examination 	Board review of state LRR to ensure global application of questions
	Experience	<ol style="list-style-type: none"> 1. 2,000 hours of internship completed in no less than 12 months 2. Assist with 25 embalmings 	