

To: Rep. Sarah Copeland Hanzas, Chair

Good morning,

I would like to take a moment to summarize and clarify yesterday's conversation on 21-0761, the OPR amendment on limited services establishments.

I offer this illustration; Representative Hooper is a Vermont licensed funeral director in Rutland County. He recognizes an under fulfilled niche in providing a lower cost alternative for direct cremation, home funerals and green burials. Mr. Hooper finds a small building that provides a garage to store a vehicle, has space for a refrigeration unit to hold human remains awaiting final disposition, and office space. It meets zoning regulations, has water and septic. By today's definition of funeral establishment, Mr. Hooper has a facility that meets the standard requirements for licensing based on the level of services he wishes to provide. Funeral Establishments by definition are allowed to be licensed at the appropriate level of services being offered.

To my point yesterday, you do not need to amend the current unused limited services establishment license to provide for a less expense alternative level of services. It currently exists by definition. Please find attached the definition of Funeral Establishment.

In addition, if OPR's agenda is to ensure that VT licensed funeral directors are not freelancing as "consultants", the following solves this issue. Simply amend the definition of either funeral director or funeral establishment to require a funeral director, who is providing services to the public, be affiliated with an establishment. I would be glad to work with Mr. Gilman, as I have many times before, on crafting that definition. I would also welcome the opportunity to continue this conversation and answer questions in any upcoming hearings.

I have been a licensed funeral director, business owner for 41 years and have the privilege of serving as president of the Vermont Funeral Directors Association. I have a long history of working with the legislature and Secretary of State on a number of proposals promoting the ever-evolving needs of the public as it relates to funeral service.

Thank you for your time and service.

Best regards, Chris Palermo