

## Rule on Alternative Preparatory Paths for Funeral Directors and Embalmers

### FUNERAL DIRECTORS

Pursuant to 26 V.S.A. §1252(a)(3), an applicant may qualify for a funeral director license without formal funeral-service schooling or Conference of Funeral Service Examining Boards (CFSEB) examination, by instead completing an Office of Professional Regulation (Office or OPR) approved preparatory program and examination. Participants shall apply for prior approval of a preparatory program, using forms supplied by the Office.

An approved program shall contain the following minimum elements:

(a) **Education.** In the ten years prior to applying for licensure, the applicant shall have earned at least 26 collegiate credits from a regionally accredited institution of higher learning, or College Board CLEP credit, including coursework with a clear and dominant focus on:

1. The psychology of death and dying
2. Human biology
3. Introductory ethics
4. Comparative religion
5. Financial accounting to include internal controls and external reporting to service providers, merchandizers, and corporations
6. Public speaking and effective communication
7. Conflict resolution or mediation; and
8. Business law

(b) **Course Content.** It is the burden of the applicant to demonstrate that courses offered in satisfaction of subpart (a) have a clear and dominant focus on the enumerated topics. The Director of OPR may require course syllabi and other supporting evidence where content is unclear.

(c) **Approved Course Sequences.** College credit claimed under this rule may be derived from any qualified educational institution. The Office maintains a list of approved course sequences from qualified educational institutions. The approved course list can be found on the Office's Funeral Service website.

(d) **Networking and Continuing Education.** During the preparatory program, the applicant shall participate in the same ten hours of continuing professional education undertaken each biennium by all licensed funeral directors, shall earn these hours at live events in the company of practicing Vermont funeral directors, and shall demonstrate active engagement in professional and civic activities related to the practice of funeral service.

**(e) Apprenticeship.** The applicant shall establish an Office-approved apprenticeship at a Vermont licensed funeral establishment, during which the applicant shall attain practical experience under the supervision of a Vermont-licensed funeral director.

1. The applicant must document working at least 50 dispositions, competently exercising, under supervision, the essential responsibilities of a funeral director, including removal of the deceased from the place of death; service arrangement meeting with the family; gathering information and writing the obituary; completing the Statement of Goods and Services; completing the demographic information on the VT EDRS website; if requested, coordinating clergy, musicians, cemetery, burial vault, flowers, and reception; conducting the funeral or memorial service; securing permits for burial/cremation; notifying the Social Security Administration; and completing a follow-up visit with the family after services.
2. The apprenticeship must specifically establish the applicant's proficiency in:
  - i. all aspects of the Vermont Mandatory Pre-need Contract, including rules for prepaid funeral funds pursuant to 26 VSA § 1272;
  - ii. VT Advanced Directive and COLST forms as well as using the Advanced Directive online database;
  - iii. the Federal Trade Commission (FTC) Funeral Services Rule;
  - iv. complete crematory operations from delivery of deceased through processing cremated remains, through documented onsite review;
  - v. the use and function of funeral merchandise, including but not limited to caskets, urns, and burial vaults;
  - vi. practical application of Vermont statutes, rules, and probate procedures controlling disposition of human remains, including 18 V.S.A. § 5227; and
  - vii. practical application of professional standards and bases for unprofessional conduct set out in Vermont law and regulation.
3. An apprenticeship supervisor must be a Vermont-licensed funeral director with at least three years of practice and must be in good standing. The supervisor shall be responsible for timely, accurate, and complete filing of evaluative forms supplied by the Office. The Director may limit the number of apprentices a supervisor may oversee simultaneously.

**(f) Examination.** An applicant shall pass a written examination, specified by the Director, addressing mortuary science, funeral practice, and laws and rules pertaining to the funeral industry.

## EMBALMERS

Pursuant to 26 V.S.A. §1252(b)(3), an applicant may qualify for an embalmer license without formal funeral-service schooling or CFSEB examination, by instead completing an Office approved preparatory program and examination. Participants shall apply for prior approval of a preparatory program, using forms supplied by the Office.

An approved program shall contain the following minimum elements:

(a) **Education.** In the ten years prior to applying for licensure, the applicant shall have earned at least 18 collegiate credits from a regionally accredited institution of higher learning, or College Board College-Level Examination Program (CLEP) credit, including coursework with a clear and dominant focus on:

1. Introduction to embalming (human biology, or anatomy and physiology, as a prerequisite)
2. Advanced embalming
3. Embalming clinical
4. Embalming chemistry
5. Sanitary science; and
6. Restorative art

(b) **Course Content.** It is the burden of the applicant to demonstrate that courses offered in satisfaction of subpart (a) have a clear and dominant focus on the enumerated topics. The Director may require course syllabi and other supporting evidence where content is unclear.

(c) **Approved Course Sequences.** College credit claimed under this rule may be derived from any qualified educational institution. The Office maintains a list of approved course sequences from qualified educational institutions. The approved course list can be found on the Office's Funeral Service Website.

(d) **Networking and Continuing Education.** During the preparatory program, the applicant shall participate in the same ten hours of continuing professional education undertaken each biennium by all licensed embalmers, shall earn these hours at live events in the company of practicing Vermont embalmers, and shall demonstrate active engagement in professional and civic activities related to the practice of funeral service.

(e) **Apprenticeship.** The applicant shall establish an Office-approved apprenticeship at a Vermont licensed funeral establishment, during which the applicant shall attain practical experience under the supervision of a Vermont-licensed embalmer.

1. The applicant must document competently exercising under supervision the essential responsibilities of an embalmer which include embalming or assisting in the embalming of at least 20 human bodies in addition to those completed during

the educational program described in subpart (a), herein. One embalmed body must be an autopsied individual, and one must be a bone and tissue donation. The applicant shall also view an autopsy performed at a medical center by the pathology department.

2. An apprenticeship supervisor must be a Vermont-licensed embalmer with at least three years of practice and in good standing. The supervisor shall be responsible for timely, accurate, and complete filing of evaluative forms supplied by the Office. The Director may limit the number of apprentices a supervisor may oversee simultaneously. In exceptional circumstances, the Director may authorize supervision by an embalmer licensed and practicing in a state or province bordering Vermont.

(f) **Examination.** Two types of examination are required:

1. Practical examination. An applicant shall pass a practical examination which will be administered by an institution of higher learning or a Vermont-licensed embalmer; both of which must be approved by the Office. The examiner shall not be the direct supervisor or employer of the apprentice taking the practical examination.
2. Written examination. An applicant shall pass a written examination, specified by the Director, addressing laws and rules pertaining to embalming and the funeral industry.