



Oregon Funeral Directors Association

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CFSP

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Michelle Gaines, Executive Director
Oregon Mortuary and Cemetery Board
800 NE Oregon St Suite 445
Portland OR 97232

March 24, 2010

RE: Amendments and Adaptation of Chapter 830 OAR (Division 60)
As It Pertains To Death Care Consultants

Having been involved in this process from the very beginning from legislative concept to law and now to rulemaking, I come today on behalf of the Oregon Funeral Directors Association. I represent 75% of the funeral homes in Oregon.

The funeral business in Oregon is heavily regulated not only by the Oregon State Mortuary and Cemetery Board (OSMCB) but also by the Federal Trade Commission (FTC), the Occupational Health and Safety Administration (OHSA), the Environmental Protection Agency (EPA), the Department of Environmental Quality (DEQ); as well as by local, county, and state laws.

It is OFDA's position that anyone who wants to serve the public regarding preneed or at-need, be held accountable to the same high standards and requirements that now exist for funeral service practitioners and embalmers.

Those requirements include an educational component around public health and death care related curriculum. We would recommend practical experience equal to what FSP and Embalmer apprentices go through, the completion of continuing education when it becomes required, as well as a test administered by the OSMCB. Narrowing the scope of practice to truly reflect the legislative intent and fairly describe what a DCC does is vital.

In light of the fact that the OSMCB is on the verge of requiring continuing education for all current licensees; why would you want to have requirements that are less stringent for DCC's than those for FSP and Embalmers who all deal with the same public?

So in the spirit of consumer protection, we ask again that the definition and scope of practice be narrowed, and the requirement for licensure to include an education and practical components to truly reflect this emerging practice.

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In closing we hope that the Board will make rules that reflect the true meaning of the DCC, keeping consumer protection as the primary target; Using your mission statement as a guide, which states in part; 'Promoting professional behavior and standards in all facets of the Oregon death care industry.'

Thank you for your time.

Respectfully submitted,

Mark D. Stehn, CFSP
Executive Director
Oregon Funeral Directors Association