



Response to EIAC inquiry, May 13, 2014

1. Cost saving if regulation of funeral services, cremations, and cemeteries were handled by DPHHS
  - a. *If the regulations and licensure of facilities was moved to DPHHS the impact to DLI would be a reduction in revenue with limited reduction in expenses (see the attached cost breakdown – FS EAIC Response 6-30-14).*
  - b. *DPHHS is providing an estimate of the cost to assume these responsibilities.*
2. Potential alternative licensure options if the board of Funeral Services was eliminated and a program used for licensure. Could monitoring of professional services be handled by the Attorney General's office or by national or local associations
  - a. *National Funeral Directors Association – The role of this association is to promote the businesses and the profession to the general public/customers*
  - b. *The International Conference of Funeral Service Examining Boards - Is a not-for-profit voluntary association providing examination services, information, and regulatory support to funeral service licensing boards and educators, governmental bodies and other regulatory agencies.*
  - c. *Mortician – Intern program exists, must go to an approved school, complete hours for internship, and test. Then they qualify for licensure*
  - d. *Crematory Operator – requires a High School education and training under a licensed operator.*
3. Can DPHHS provide structural regulation of PAARP.
  - a. *DPHHS and the PAARP board are set to meet to discuss this opportunity. In initial meetings with DPHHS the general consensus was that regulation within DPHHS could be structured in a way that would not be overly burdensome and would also provide greater oversight and options to take action against facilities that do not meet outline operating requirements.*
4. Recommend whether the definition of PAARP facilities could be expanded to include religious oriented facilities
  - a. *The Department feels that this is a policy decision, and thus outside or administrative role, so we will not provide a recommendation.*
5. Determine if HAD and Speech Pathologists can be combined, would it be financially viable and what would the financial impacts be.
  - a. *This is outlined in an attached document provided by DLI.*
6. Provide an analysis on what the impacts dissolution of the HAD board would have on the industry, particularly if the statutes were to remain in place regarding licensing requirements and complaints were handled by DOJ.

- a. The Division is unable to provide what the impact the dissolution of the board would have on the industry. However we can comment that in our research we determined that states without a HAD board did not have HAD within the state.*
  - b. Trainee – Nationally developed written and practical exam and 1000 hours under either a licensed Hearing Aid dispenser. (37-16-405)*
  - c. National Certification – Certification requirements are: minimum of 2 years of full time dispensing in last 5 years, current dispensing license or registration, or have graduated from 1 of 7 specific colleges*
7. What would the costs of licensure be within a program.
  - a. These numbers are provided in the attached document.*
8. Financial estimate of the cost to the general fund, or the private sector, to run the Athletics Program.
  - a. These numbers are provided in the attached document.*
9. Analysis of a way of maintaining the structure of the Athletics program if oversight is given to another entity.
  - a. For a fight to be sanctioned by the American Boxing Commission the commission putting on the fight has to be recognized by the ABC as a legal representative of that commission. To our knowledge the ABC requires the commission to be attached to State Government. It is possible for a sanctioning body from another state to sanction a fight in Montana, however this has proven to be challenging to accomplish in the past. The ABC has also, upon petition, sanctioned bouts within states that do not have a commission.*

