Schwantes, Mary

From: Gary Brown <Brown.Gary@spcollege.edu>
Sent: Friday, September 25, 2026 11:27 AM
To: Schwantes, Mary
Cc: Mary Rutan; Kevin Davis; Beckham, Howard R.
Subject: Updates to Board Rules

Follow Up Flag: Follow up
Due By: Monday, September 28, 2026 5:00 PM
Flag Status: Flagged

You don't often get email from brown.gary@spcollege.edu. Learn why this is important

Dear Rules Committee,

I addressed this issue briefly during the Board's September 25, 2026, meeting and respectfully ask that the Board consider whether its rules could be amended to specifically address embalming performed by students who are actively enrolled in an ABFSE-accredited funeral service education program.

As the rules are currently written, there does not appear to be a specific provision permitting a student who is not a registered apprentice or intern to participate in embalming, even when the embalming is performed on campus as part of an accredited educational program. Historically, student embalming conducted as part of the educational process has been allowed in practice; however, the rules themselves do not appear to expressly recognize an exception for students enrolled in an ABFSE-accredited program.

This becomes particularly problematic when students seek to complete required embalming experiences away from campus. Many of our students attend the program part-time, are beginning second careers, and continue to work full-time in their old occupations while completing their education. Some intentionally wait until they are nearing completion of their academic requirements before beginning their formal internship so that the limited time available to them outside of full-time employment can be devoted to their coursework and academic preparation.

For a student to legally participate in embalming at a funeral establishment away from campus under the current rules, the student must be employed by a funeral establishment and registered with the State as an apprentice or intern. This creates a significant barrier for students who are attempting to complete embalming cases required as part of their educational program but who are not yet ready to begin their formal internship or an apprenticeship.

Other states have addressed this issue by providing a specific mechanism for students enrolled in accredited funeral service education programs to participate in embalming as part of their educational and clinical training. A similar provision in Florida would not only address off-campus educational experiences but would also provide clear regulatory authority for the student embalming that has historically occurred on campus as an essential component of funeral service education.

I therefore respectfully suggest that the Board consider adopting language that would permit a student who is actively enrolled and in good standing in an ABFSE-accredited funeral service education program

to participate in embalming for educational purposes, under the direct supervision of an appropriately licensed funeral director and embalmer, without requiring the student to first be registered as an embalming apprentice or intern.

Such a provision could be narrowly tailored to embalming performed as part of the requirements of an ABFSE-accredited educational program and could include appropriate requirements for supervision, documentation, institutional oversight, and approved locations. This would provide regulatory clarity for student embalming conducted both on campus and at approved funeral establishments while maintaining appropriate professional supervision and public protection.

Most importantly, this change would remove an unnecessary obstacle for students completing their required clinical education while providing clear regulatory authority for an educational practice that has historically been an integral part of funeral service education in Florida.

Thank you for considering this request and for the Board's continued support of funeral service education and the development of future funeral service professionals.

Gary J. Brown, LFD, MA
Program Director, Funeral Services
St. Petersburg College | HEC
727-341-3783 | brown.gary@spcollege.edu
Program Website