

VIRGINIA BOARD OF FUNERAL DIRECTORS AND EMBALMERS**Guidance on Student Embalming Assistance Performed by Persons Enrolled in Online Funeral Service or Mortuary Education Programs****Question:**

Is a student who is located in Virginia, but enrolled in an online funeral service program located physically outside of the state, considered to be “enrolled in a mortuary education program in the Commonwealth” for purposes of assisting with embalming and completing embalming clinicals under supervision of a funeral service licensee or licensed embalmer in a Virginia licensed funeral establishment under Virginia Code § 54.1-2805 and 18VAC65-20-236?

Background:

In 2018, Chapter 186 of the 2018 Acts of Assembly amended [Virginia Code § 54.1-2805](#) to allow students who are “duly enrolled in a mortuary education program in the Commonwealth” and not otherwise registered with the Board as funeral service or embalming interns “to assist in embalming while under the immediate supervision of a funeral service licensee or embalmer...provided that such embalming occurs in a funeral service establishment licensed by the Board and in accordance with regulations promulgated by the Board.”

In 2019, the Board promulgated regulations to establish the requirements for students assisting with embalming in [18VAC65-20-236](#).

Answer:

The Board of Funeral Directors and Embalmers interprets Virginia Code § 54.1-2805 and 18VAC65-20-236 to allow students to assist in embalming in accordance with the requirements of Virginia Code § 54.1-2805 and 18VAC65-20-236 who are duly enrolled in a mortuary education program that either: 1) is physically located in the Commonwealth of Virginia; or 2) provides online programs and teaching to persons located in the Commonwealth of Virginia.