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January 27, 2027

The Honorable Joseph J. Solomon, Jr., Chair  
House Committee on Corporations  
State House, Room 101  
82 Smith St.  
Providence, RI 02908

**RE: H 7070 – An Act Relating to Businesses and Professions – Funeral Director/Embalmer and Funeral and Home Establishments**

Dear Chair Solomon:

Please accept this letter regarding H 7070, legislation that would provide for the operation and duties of natural organic reduction for the contained, accelerated conversion of human remains to soil as well as alkaline hydrolysis. Disposition facilities would be used for either cremation, alkaline hydrolysis, or natural organic reduction. The Rhode Island Department of Health (RIDOH) is in conceptual support of natural organic reduction and alkaline hydrolysis, which aim to reduce the environmental impact of burial. Natural organic reduction reduces a body to organic material before, or instead of, burial by using non-toxic means to create soil rather than using toxic means to create ash.

RIDOH thanks the sponsors for working with RIDOH to ensure that the legislation includes an adequate regulatory structure for natural organic reduction by including specific requirements for natural organic reduction and alkaline hydrolysis and oversight by RIDOH's Office of State Medical Examiners (OSME). RIDOH also thanks the sponsors for including language to ensure that the Vital Records statute reflects that OSME must authorize all natural reductions prior to the process, just as the OSME authorizes all cremations now.

We do, however, wish to inform the committee that prior to implementing the requirements of H7070 RIDOH would require additional funding to license and effectively regulate this new class of disposition facility. RIDOH would require at least one additional FTE, at a total annual estimated cost of \$111,707 (salary and benefits) and identify a subject matter expert to inspect the facilities. The current funeral home and crematory inspector is contracted at \$200 per inspection. Further, RIDOH will need to update the Vital Records RIVERS system, the OSME system, and likely the bi-directional interface between the two systems to accommodate that method of disposition as an option. RIDOH is about to embark on a new upgraded system for OSME that is unlikely to be completed until Fall, so we cannot provide an estimate on the costs at this time.

Before any systems changes can be made, it is critical to identify and secure the funding necessary to make and sustain the changes. In the absence of such funding, RIDOH will be unable to effectuate its

goals. Thank you for the opportunity to comment on this bill.

Sincerely,

A handwritten signature in black ink, reading "Jerome M. Larkin" with a stylized flourish at the end.

Jerome M. Larkin, MD  
Director

CC: The Honorable Members of the House Committee on Corporations  
The Honorable Michelle E. McGaw  
Nicole McCarty, Chief Legal Counsel  
Lynne Urbani, Director of House Policy

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