
Office of Cemetery Oversight
Advisory Council Business
Meeting Minutes

DATE: January 29, 2026

TIME: 09:30 AM

LOCATION: 100 S Charles St, Tower 1
Baltimore, MD 21201
(via Google Meet)

MEMBERS PRESENT: Yvonne Fisher, *Chair, Consumer Member*
Bruce Hultquist, *Religious Representative*
David Zinner, *Consumer Member*
Walter Tegeler, *Monument Company Representative*
David (Dave) Thompson, *Consumer Member*
Erich March, *For-Profit Representative-Cemeterian*
John (Ron) Pearcey, *Nonprofit Representative-Cemeterian*

MEMBERS ABSENT: Christopher Palmer, *Consumer Member*
Craig Huff, *For-Profit Representative-Cemeterian*
J. Michael Bennett, *For-Profit Representative-Cemeterian*

STAFF PRESENT: Matthew Venuti, *Assistant Attorney General*
Deborah Rappazzo, *Executive Director*
Octavia Shorter, *Licensing Specialist*
Dreama Anderson, *Investigator*
Michael Ryan, *Financial Compliance Administrator*
Javon Williams, *Director of Fiscal Services*
Ajah Harris, *Policy Director O&P*

OTHERS PRESENT: Lily Buerkle, **Willow Green Funerals**
Adrian Gardner, **Willow Green Funerals**
Nathan Malloy, esq., **March Funeral Establishment**, and
www.labor.maryland.gov

Maryland State Funeral Directors Association
Seth Viddal, **The Natural Funeral — Colorado**
Terry Brown
Josh Forbes
James Thomas
Haley Morris

Roll Call/Quorum Announced and Meeting Called to Order

The meeting was called to order at 9:37 AM by Chair Fisher. A quorum was confirmed.

Approval of Today's Agenda

Today's agenda was reviewed and unanimously approved.

Approval of November 12, 2025, Meeting Minutes

The minutes of the November 12, 2025, meeting were reviewed. A motion to approve was made by Council Member, Zinner and seconded by Council Member, March. The motion carried unanimously.

Public Comment — Natural Organic Reduction Regulations (NOR)

AAG Venuti, opened the public comment portion, noting that NOR was legalized by the Green Death Care Act (2024) and that Office of Cemetery Oversight's (OCO) proposed regulations were published on December 26, 2025. The public comment period had ended, and comments were being received and reviewed.

Lily Buerkle (Willow Green Funerals)

Ms. Berkeley thanked the Council and OCO for the work completed to date and highlighted two main substantive concerns:

1. **“Stainless steel mandate”** — concern that the draft requires all vessels used in NOR to be stainless steel and that it may unintentionally apply to curing bins, creating significant cost and limiting viable operator models.
2. **Testing requirements clarity** — concern that the draft language is unclear as to whether testing is required in each instance or according to a schedule; recommendation to clarify the intended standard for inspection/enforcement.

Erich March, Council Member and March Funeral Establishment

Council Member March referenced an email received from the Maryland State Funeral Directors Association raising numerous issues and noted the list was extensive.

Matthew Venuti, AAG (OCO)

AAG Venuti noted that many of the issues mentioned were related to alkaline hydrolysis, which would be addressed at a future meeting (anticipated in February).

Nathan Malloy (Maryland State Funeral Directors Association / King Memorial Park)

Mr. Malloy raised multiple concerns including:

- Need for stronger coordination between OCO regulations and Board of Morticians regulations so operators and consumers have a consistent framework.
- Suggested amendments related to NOR regulations, including:
 - Adding certified/trackable mail requirements for notices of proposed action to permit holders.
 - Clarifying standards for reduction of remains (noting differences with cremation/alkaline hydrolysis language).
 - Clarifying handling/sterilization and disposal of medical devices.
 - Reconciling refrigeration temperature requirements (40°F vs 44°F).
 - Correcting typos and updating terminology (e.g., “undertakers” to “morticians”).

Council Discussion / Clarifications

- Council Member March asked about bone reduction in NOR; Ms. Berkeley and Mr. Venuti clarified that bones are mechanically reduced/pulverized after the process.

Seth Viddal (The Natural Funeral — Colorado)

Mr. Viddal:

- Thanked Maryland for the process and stated the draft regulations reflect best practices seen in other states.
- Provided technical clarification that bone condition at the end of the process is comparable to approximately 50 years of natural aging before mechanical reduction.
- Supported the intent of stainless-steel requirements for the main vessel but recommended flexibility for curing containers, as the curing stage is passive and can be safely conducted in other impervious materials.

Additional Discussion

- Council Member Zinner asked whether operators could begin offering NOR services before regulations were finalized; OCO stated it is legal under state law but there is no regulatory framework to enforce compliance at this time.
- Coordination with the Board of Morticians was discussed, including the challenge of bandwidth and structure differences between OCO and a citizen board.
- A bill was referenced that may move crematories to the State of Morticians; impact on NOR remains to be determined.

Close of NOR comment Period

OCO stated comments would be reviewed and that updates/changes would be determined, including whether reproposal would be required.

Executive Director's Report

Executive Director Rappazzo:

- Thanked attendees for NOR feedback and described ongoing weekly work on the regulations.
- Introduced Michael Ryan as the new Financial Compliance Administrator.
- Announced the appointment of a new consumer member, Tamika Simmons (CPA), expected to attend at the next meeting.
- Noted that former crematory representative Clarence Boston relocated to Georgia and the Council will need a replacement crematory representative.

Old Business

Fee increase discussion:

Council Member Zinner raised concerns about prior fee increases being implemented in large increments and retroactively, suggesting smaller increases over time and avoiding retroactive application. Discussion followed regarding fiscal responsibility and analysis.

Direct consumer contracting with crematories / home funerals:

Nathan Mallloy asked whether consumers may contract directly with a crematory without using a funeral establishment. OCO indicated a consumer can contract directly; additional discussion addressed death certificate process challenges, and a suggestion was made to invite Vital Records (and potentially MDH/Board of Morticians) for a future meeting to clarify requirements.

New Business

OCO provided an update on modernization and automation efforts, including moving toward online applications and improvements to the cemetery search feature on the OCO website.

Investigator's Report

Investigator Anderson (OCO) reported activity from November 13, 2025, through January 26, 2026, including complaint balances and inspections:

- November: began with 15 open complaints; ended with 13 open complaints.
- December: began with 13 open complaints; ended with 9 open complaints.
- January: began with 9 open complaints; ended with 11 open complaints.
- 18 inspections were completed during the period (mid-November through
- January), including burial goods businesses and cemeteries.

Discussion included inspection cadence goals and general observations (maintenance issues such as trees/roads; no major business violations noted).

Financial Compliance Administrator's Report

Financial Compliance Administrator Ryan (OCO) provided a report on assets under management (2024):

- Perpetual care: \$83 million to \$90 million (8.66% return)
- Pre-need: \$126.6 million to \$128.6 million (2.19% return)
- Inflation rate for 2024 for 2024 noted as 2.9%

He reported that approximately 20 out of 72 reports were still outstanding and described outreach and assistance being provided to cemeteries to support compliance.

Licensing Specialist's Report

Licensing Specialist Shorter (OCO) reported that from July 2025 through January 2026, the office processed 229 licenses, continuing renewals and new applications while ensuring records remain accurate and up to date.

Legislative Update

AAG Venuti (OCO) provided a legislative update noting:

- One bill directly impacting OCO: Pet Cremation and Burial Services Consumer Protection Act (consumer disclosure requirements for entities registered with OCO offering pet cremation or pet plots; does not create a new licensing requirement).
- Two bills affecting cemeteries:
 1. Bill regarding actions to establish a process for sale/transfer/alternate use of cemetery property.
 2. Abandoned cemeteries acquisition and disposition bill allowing governmental units to condemn and transfer abandoned cemetery property to a descendant group.

Discussion followed regarding applicability to neglected/abandoned cemeteries, historical cemeteries, and enforcement/condemnation authority.

Public Comment

No additional public comment was recorded beyond earlier discussion.

Adjournment

A motion to adjourn was made by Chair Yvonne Fisher and unanimously approved. The meeting adjourned at 11:19 AM.

Next Meeting: February 26, 2026, at 9:30 AM (virtual)

Chair's Signature: _____

Date: _____