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Public Hearing on

B26-0047 – Funeral Directors Licensing Reform Amendment Act of
2025

Committee on Health, Chairperson Henderson

Monday, March 23, 2026, 12:30 pm

Testimony of Emilia Calma

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Good afternoon, Chairperson Henderson, and members of the Committee. My name is Emilia Calma, and I am the Director the Wilkes Initiative for Housing Policy at the D.C. Policy Center, an independent non-partisan think tank advancing policies for a strong, competitive, and vibrant economy in the District of Columbia. Thank you for the opportunity to testify on the Funeral Directors Licensing Reform Amendment Act of 2025.

Two years ago, I testified in opposition to the creation of a new embalming license.¹ The legislation is back, and so am I, because the underlying problem has not changed. This bill creates new barriers to workforce participation without meaningful evidence that it will improve the safety or quality of funeral services for District residents. That failure is not unique to this legislation. In fact, it is emblematic of how occupational licensing operates across the country.

The research on occupational licensing has grown substantially in recent years, and it tells a consistent story: licensing requirements routinely raise prices for consumers, restrict employment opportunity for workers, and produce little to no measurable improvement in service quality or public safety. The Funeral Directors Licensing Reform Amendment Act fits this pattern precisely, and the Council should examine it through that lens before moving forward.

What this legislation does

The bill creates a standalone embalmer's license, a credential that already exists within the funeral director's license. Under current D.C. law, a funeral director's license requires a candidate to have embalmed at least 25 human remains, served as an apprenticeship in a funeral home, and receive a degree in mortuary science.² The embalming requirement is in line with mortuary science curriculums, which typically include embalming as a core component.

The bill also increases the time and training burden required to enter the profession. Previously, a two-year associate's degree in mortuary science combined with a one-year apprenticeship was sufficient. The new legislation requires effectively at least 2,000 hours of work as an intern, raising the cost and time required to enter a field that is already quite small.³ Establishing a new licensing category, board, and regulatory infrastructure for an

¹ Calma, E. (2024). Creating an embalmer's license in the District will not increase opportunity for workers. D.C. Policy Center. <https://www.dcpolicycenter.org/publications/embalmers-license-testimony/>

² Board of Funeral Directors. DC Department of Licensing and Consumer Protection. Found at <https://dlcp.dc.gov/page/board-funeral-directors>

³ The funeral industry is among the smallest licensed occupations in the country. Nationally, there are fewer than 25,000 morticians, undertakers, and funeral arrangers (Bureau of Labor Statistics, May 2022). Applying D.C.'s population share, the District likely has fewer than 150 funeral workers total.

Calma, E. (2024). Creating an embalmer's license in the District will not increase opportunity for workers. D.C. Policy Center. <https://www.dcpolicycenter.org/publications/embalmers-license-testimony/>

occupation of this size imposes administrative costs on the District that are deeply disproportionate to any conceivable benefit.

Licensing creates barriers without improving quality

This bill exemplifies a pattern that occupational licensing researchers have documented across dozens of professions. Studies of occupational licensing have similarly found that licensing requirements are associated with higher prices,⁴ less competition, no increases in consumer satisfaction,⁵ and no increases in quality of service or public safety.⁶ Licensing primarily functions as a barrier to entering the workforce, reducing the labor pool and raising costs for firms and consumers alike without commensurate gains in service quality. This is especially relevant to the funeral industry. Studies have shown that occupational licensing of funeral services have contributed to increased prices⁷ and reduced labor force participation.⁸

Consequences for workers, particularly women and people of color

A recurring finding in the occupational licensing literature is that licensing requirements do not fall equally on all workers. Women, immigrants, people of color, and those with lower incomes face disproportionate barriers to entry under stricter licensing regimes. As occupations become more regulated through licensing, the share of workers who are women, Black, and foreign-born Hispanic workers declines.⁹ If the Council's goal is to make it easier for women, immigrants, or career-changers to enter this profession, this bill moves in the wrong direction.

What the evidence supports

⁴ Occupational Licensing: A Framework for Policymakers. (2015). Department of the Treasury Office of Economic Policy, the Council of Economic Advisers, and the Department of Labor.

https://obamawhitehouse.archives.gov/sites/default/files/docs/licensing_report_final_nonembargo.pdf

⁵ Farronato, C., Fradkin, A., Larsen, B., and Brynjolfsson, E. (2024). "Consumer Protection in an Online World: An Analysis of Occupational Licensing." *American Economic Journal: Applied Economics* 16 (3): 549–79. DOI: 10.1257/app.20210716

⁶ Plemmons, A., Deyo, D. & Rhine, W. (2026). The industry costs and benefits of occupational licensing: measuring differences in establishment behavior and quality. *J Regul Econ* 69, 8.

<https://doi.org/10.1007/s11149-025-09502-y>

⁷ Pizzola, B., Tabarrok, A. (2017). Occupational licensing causes a wage premium: Evidence from a natural experiment in Colorado's funeral services industry. *International Review of Law and Economics*, Volume 50, Pages 50-59, ISSN 0144-8188, <https://doi.org/10.1016/j.irl.2017.04.005>.

⁸ Robinson, G. (2017). *Regulating Death: Occupational Licensing and Efficiency in the Deathcare Industry*, 29 *Loy. Consumer L. Rev.* 343. Available at: <https://lawecommons.luc.edu/lclr/vol29/iss3/3>

⁹ Dodini, S. (2023). The spillover effects of labor regulations on the structure of earnings and employment: Evidence from occupational licensing. *Journal of Public Economics*. Volume 225, 104947, ISSN 0047-2727, <https://doi.org/10.1016/j.jpubeco.2023.104947>.

There are occupations where market failures or genuine safety concerns justify a licensing requirement. The question is whether the specific requirements proposed are proportionate to the risk and whether licensing is even the right tool.

The Funeral Directors Licensing Reform Amendment Act creates additional barriers to workforce entry in a small industry, raises costs for District residents, and imposes administrative burdens without evidence that it will improve the quality of services. These are predictable consequences of occupational licensing expansion, documented across professions, and confirmed by decades of research. The District should decline to needlessly add another credential to funeral directing and embalming and instead consider how licensing reform can better serve D.C. workers and the residents who rely on their services.