

August 16, 2017

Ms. Toni Miller
Policy Manager & Community Partner Liaison
Arizona Department of Health Services
Bureau of Vital Records
1818 W. Adams, Phoenix, Arizona 85007

Dear Ms. Miller,

On behalf of the Arizona Funeral, Cemetery and Cremation Association (AFCCA), I am writing to discuss the new Arizona Department of Public Health system D.A.V.E. for death certificates and permit issuance. Over the past few months the association and its members have participated in multiple discussions focused on the implementation of the new system. We sincerely appreciate the Department's willingness to engage the various stakeholders during this process. AFCCA fully supports the move to electronic reporting for death certificates and looks forward to greater efficiencies provided by the new system. However, during the stakeholder process the following issues have been raised and continue to be issues of concern for our members.

AFCCA is particularly concerned with the following:

1. Onboarding of Medical Certifiers. While we understand that there is a statute that requires all death certificates to be filed and signed electronically, we anticipate that mandating that all physicians comply at implementation of this system will be difficult. Funeral homes already encounter doctors that do not want to sign the death certificate and will list multiple excuses and reasons they can't or won't sign the death record. We would expect these same individuals will be the exact doctors who will refuse training or onboarding to the D.A.V.E. system. Who will ensure these doctors register and be trained if they choose not to respond to an email sent to them? Since funeral homes are in contact with these physicians most, will it then be their responsibility to make sure these doctors are trained?
2. Cause of death validations. There have been instances where doctors will ask Funeral Directors "Well what did he/she die of?" We need to make sure that cause of death validators and kickbacks are 100% the physicians responsibility as funeral directors are not qualified to make that diagnosis. We also feel that it can't go back to medical examiner if the deceased was a 95-year-old who died at home.
3. Permit issued once death certificate is recorded. This is raising a huge concern. The reality of this issue is that funeral homes will now need to delay disposition until all vitals are received to ensure the families will

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not need make corrections/amendments. This not only means that families will need to postpone services, it also means funeral home prep rooms could become backlogged with persons waiting for disposition.

4. Public fiduciary deaths and international ship out delays. How are these records going to be handled? Many of these take much longer than the 7-day statute allow for and may be what is currently over 7 days in the systems now.
5. Correction fees/family responsibility of corrections. The hassle that families will incur when they are required to physically go to the county office with all necessary paperwork to make corrections and amendments will be completely overwhelming for most families. Many of those who funeral homes assist are elderly and this would prove to be very difficult, if not impossible, to expect them to make these changes on their own.
6. After hour support from the state. It has been brought to our attention that the State Bureau of Vital Records will not have non-business hour support after implementation of the system. Not having the ability to follow through with family wishes because it's a weekend or holiday will not only be frustrating for families, but many who adhere to strict religious beliefs and customs will not be able to perform their burials or cremations unless the record is certified by the physician and a permit requested during business hours.
7. Lack of training. Our funeral homes have expressed much frustration with the lack of training on the new system. When VSIMS launched, they had the ability to demo the product and get a feel for it. Can there be a demo installed on a server that will allow for our funeral homes to click through and see how it works? We do like the idea of a pilot program for funeral homes to give feedback to the state and to correct any issues before the official launch.
8. There is also concern of the lack of overlap dates of when VSIMS ends and D.A.V.E. begins. This presents a huge problem when dealing with open death records in VSIMS that are not ready to complete to the county or do not have permits.
9. Fetal permits for <20 weeks or <350 grams. There absolutely must be a work around for this. Funeral directors work with many families each year, that although the state of Arizona considers their baby a "product of conception" and deemed "medical waste", they have a need and desire to cremate or bury their child. If the state no longer issues permits for these stillbirths, I would hope there will still be a way the family can contract with funeral homes to take possession of their baby and perform disposition according to family desires. Also, that cemeteries and crematories would acknowledge the stillbirth and allow disposition to take place.

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As previously stated, we support and understand the value of the D.A.V.E. system. We respectfully request that the outstanding concerns be addressed and solutions discussed before the system goes into effect. We believe by addressing these concerns before the system goes live it will result in a smoother transition for all parties involved.

We are committed to continuing to work on these issues and identify reasonable solutions. In addition, the association is committed to continuing to provide any assistance necessary to communicate to our members and other funeral industry partners. As a successful implementation of this system is most important to the industry and the families that we serve. We appreciate your consideration of our request.

Sincerely,

Heather Long
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CC Colby Bower

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