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INDEPENDENT REGULATORY
REVIEW COMMISSION

Mr. Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

November 16, 2009

Dear Mr. Coccodrilli:

I am writing you today in my capacity as president of The Association for Independent Growth. I would like to express my opposition to the regulations proposed by the State Board of Funeral Directors regarding the pre-need activities of unlicensed employees.

The ability to prearrange their funeral is extremely important to the hundreds of mentally and physically handicapped consumers we serve on a daily basis. Prearranging not only ensures dignified services at the time of their passing, but remains an absolute necessity for many consumers who are potential recipients of federal and state aid. In an era where many of our consumers are outliving their family members, prearranging also helps to ensure that the wishes of the consumer and their family are met at the time of their passing.

While I applaud the State Board of Funeral Directors for removing the face-to face requirement, by not allowing a unlicensed employees to communicate with consumers regarding funeral services or merchandise, make financial arrangements for funeral services or merchandise, prepare worksheets for the provision of funeral services or merchandise, or enter into contracts with consumers for funeral services or merchandise, I fear that the effect of these regulations will be to reduce the availability of pre-need funeral arrangements for the consumers we serve. By doing so, the regulations will inevitably increase the cost of those services, placing an unnecessary financial burden on our organization or our consumers.

I urge the commission to disapprove the regulations before it with respect to pre-need activities of unlicensed employees and urge the Board to consider more consumer friendly options for regulating pre-need.

I thank you in advance for reviewing my concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Bucci", written in a cursive style.

Joseph Bucci

The Association for Independent Growth, Inc.

Corporate Office

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From: Coulter, Leslie [lcoulter@taiginc.org]
Sent: Monday, November 16, 2009 10:57 AM
To: IRRC
Subject: TAIG Response to Proposed Regulations
Attachments: TAIG Response to Proposed Regulations.doc

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REVIEW COMMISSION

Hello,

The attached document is TAIG's response to the Proposed Regulations by the State Board of Funeral Directors.