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INDEPENDENT REGULATORY
REVIEW COMMISSION

Commonwealth of Pennsylvania
Independent Regulatory Review Commission
333 market Street, 14th Floor
Harrisburg, PA 17101-2210

Dear Commissioners,

We have learned recently of a proposed regulation, 16A-4816, that would require licensure of funeral home sales staff. As we understand this proposal, only licensed funeral directors would be permitted to complete sale of services to clients. Funeral Consumers Alliance of Western Pennsylvania (FCAWP) supports this proposal.

FCAWP is a 501(c)3 non-profit organization of some 3000 members in Western Pennsylvania, dedicated to educating and protecting those who pre-plan their own funerals and who arrange funerals for loved ones. Consumers, especially elders, may all too easily be at risk in making plans under the guidance of unlicensed funeral home employees. These employees may work on commission, and we are concerned over the possibility, if not likelihood, that they will not make clear to a client the funeral home's legal obligations under Federal and State law, e.g. the 1984 Funeral Rule. Sales staff dealing with the public may not be the ones responsible for actually providing the services that are sold, thus leading to a disconnect between what is promised and what is finally delivered to the client. This opportunity for abuse would be greatly reduced by enacting Regulation 16A-4816.

We urge you to approve the proposed regulation to protect both client and reputable funeral homes.



Arlene Stromberg, President
Funeral Consumers Alliance of western Pennsylvania