

# GEITNER/GIVNISH FUNERAL HOME, INC.

A *Life Celebration*™ Home

6230 North 5th Street  
Philadelphia, PA 19120-1425  
Phone: (215) 224-6300  
Fax: (215) 224-1927  
John F. Givnish, Supervisor

2639

October 2, 2007

Mr. Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, Pennsylvania 17101

**RE:** Proposed Regulation #16A-4815 (Pre-Need Funeral Arrangements);  
#16A-4816 (Pre-Need Activities of Unlicensed Employees)

Dear Chairman Coccodrilli:

I am writing you regarding rulemaking that has been proposed by the State Board of Funeral Directors (Board). I am opposed this rulemaking and urge the IRRC to pay particular attention to the aforementioned regulations. For your convenience, I am enclosing a copy of my comments on the Proposed Rulemaking concerning Preneed Funeral Arrangements (Reference No. 16A-4815). Upon completion, I will forward to you my comments regarding the most recent regulations proposed by the Board (Reference No. 16A-4816).

Since 1978, my family business has actively marketed the sale of prearranged funerals to the public. Since 1988, we have serviced over 11,000 prearranged families, saving them over \$10,000,000.00. Over the past 5 years, we have expanded our pre-need offerings to assist those most in need, offering discounted funerals to handicapped Consumers served by The Association for Independent Growth (TAIG), NHS Human Services, The Cardinal Krol Center, COMHAR, Liberty Resources and several organizations within the HIV community. Additionally, the Philadelphia FOP Lodge #5, The Philadelphia Emerald Society, The AFL-CIO of Philadelphia and the Montgomery County FOP Lodge #14 have endorsed our prearrangement program.

We have worked with the above referenced organizations because they understand that pre-arranging ones funeral provides several key benefits to consumers. First, through prearrangement, an individual can ensure that their wishes will be met at the time of need. Second, the "emotional overspending" that often occurs on at-need funerals is eliminated because consumers are able to make informed decisions on their own time, not on the worst day of their lives. Third, by prearranging, consumers retain the leverage. They are able to make decisions at a time of clarity, shop for the best prices and services

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[www.lifecelebration.com](http://www.lifecelebration.com)

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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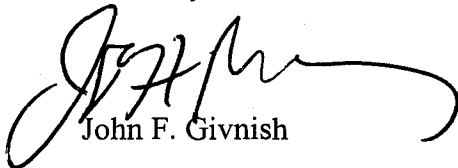
and make educated, informed choices. Fourth, a properly established prearrangement may assist an individual in qualifying for Medicaid. Additionally, our plan provides that consumers can pay their funeral over time for as little as \$35.00 per month with no interest or financing charges.

On August 25, 2007 and again on September 29, 2007, the State Board of Funeral Directors proposed rulemaking which would essentially render our prearranged services illegal. The Board, failing to cite the existence of a problem, or indicate a valid solution, proposed regulations that would, among other things: (1) restrict the right of funeral directors to use third party providers for merchandise sales on a pre-need basis 16A-4815); and (2) require a funeral directors license to offer pre-arranged funeral services *or merchandise* to the public. Given the fact that funeral directors are required to accept third party merchandise on an at-need basis and funeral arrangements can be made by unlicensed individuals on an at need basis, it is clear to me that the Boards motives are at best disingenuous. Additionally, the requirement that only licensed funeral directors be able to provide pre-need merchandise is akin to suggesting that you have to be a podiatrist to sell shoes!

The Board has inferred that the proposed regulations are necessary to protect the public. Since the regulations as proposed would eliminate our ability to offer discounted prearranged funerals to union members, group home consumers, and often uninsurable individuals with HIV, I fail to see what "public", the Board is seeking to protect.

I thank you for taking the time to review my objections. I am happy to discuss this matter with you further and would welcome the opportunity to be heard at a public hearing. Should you have any questions, or require any additional information, please do not hesitate to contact me at (215) 205-9552.

Sincerely,



John F. Givnish

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A *Life Celebration*™ Home

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Philadelphia, PA 19120-1425  
Phone: (215) 224-6300  
Fax: (215) 224-1927  
John F. Givnish, Supervisor

Michelle T. Smey, Administrative Officer  
State Board of Funeral Directors  
Bureau of Professional and Occupational Affairs  
Commonwealth of Pennsylvania  
P.O. Box 2649  
Harrisburg, PA 17105-2649

September 21, 2007

Dear Board Members:

Thank you for the opportunity to comment on the proposed rulemaking concerning preneed funeral arrangements (Reference No. 16A-4815).

As background, for three generations and nearly eighty years, my family has owned and operated funeral businesses in the Commonwealth of Pennsylvania. I have been a licensed funeral director for nearly thirty years and my four brothers have all been licensed funeral directors for most of their adult lives. Our family business has actively marketed preneed since 1978. Therefore, I feel that I am qualified to comment on the proposed rulemaking.

The ability to prearrange their funeral is a valuable benefit to consumers. Leading consumer organizations have hailed pre-arrangement as an important tool for estate planning by seniors. Pre-arranging a funeral has three major benefits. First, it allows families to obtain the peace of mind that comes with knowing that your wishes will be met. Second, it allows consumers avoid the “emotional overspending” that often occurs at the time of a loved ones passing. Third, a properly established prearrangement may assist an individual in qualifying for Medicaid.

The Board has determined that the regulations regarding preneed funeral arrangements need to be updated to “conform to existing practices in the funeral industry and to provide adequate protection to the consumer...” In proposing new regulations, it is important that the Board give consideration to, and be consistent with: (1) The Federal Trade Commission; (2) The Future Interment Law; (3) Pennsylvania Funeral Directors Law, (4) Federal and state court decisions; and (5) The Boards purpose of *enforcing the law and formulating regulations that are not inconsistent with the law and are necessary to provide safeguards to the public.*

In reviewing the proposed rulemaking, it is apparent that the “updating” of the regulations would have the following effect: First, funeral directors would be required to completed additional, unnecessary paperwork. Second, the reporting requirements would

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restrict the privacy rights of funeral directors and consumers alike. Third, the restrictions on partnering or owning a merchandise company would interfere with the right to contract currently enjoyed by consumers and funeral directors. Fourth, the proposals, in total, serve to diminish the value of existing preneed contracts held by funeral directors and virtually eliminate the availability of preneed funerals to the public. I fail to see how these regulations serve the purposes stated by the Board.

Specifically, I offer the following:

### **Depositing Prepaid Funds**

Proposed § 13.224(a) would require a funeral entity to deposit the entire amount of the funds received for prepaid services *and* merchandise in trust within 10 days. Additionally, § 13.224(a) proposes to limit the ability of funeral directors to create, control or otherwise use a merchandise company, for the purposes of depositing less than 100% of the funds in trust.

The greatest protection the Board can provide to consumers is to propose regulations that promote the availability of pre-arranged funerals. Prearranging provides consumers the opportunity to eliminate the emotional overspending that often occurs at the time of loss, while ensuring that ones wishes will be met at their time of need. In keeping with that understanding, The Future Interment Law allows for the retention of 30% of the funds deposited by consumers for merchandise purchases. In doing so, this provides merchandise companies the ability to not only offer prearranged merchandise, but to promote prearranging to their clients.

The current regulations do not restrict a funeral entity from using a merchandise company for the sale of preneed merchandise. Proposed §13.224(a) would restrict the creation, control or otherwise use of a merchandise company by a funeral director for the purpose of retaining 30% money. If adopted, the proposed rules will provide a competitive advantage to third party merchandise sellers in the sale of preneed merchandise, reducing the number of funeral directors offering prearrangements, thereby limiting the options available to consumers. Proposed § 13.224(a) is inconsistent with both the Future Interment Law and current practice within the industry and I fail to see how it will provide added protection for consumers. In fact, as proposed, the regulations will eliminate the leverage currently held by consumers.

### **Reporting Requirements**

Under proposed §§ 13.224(b) through 13.224(d)(3), a funeral director would be required to report to the Board all preneed accounts on a quarterly basis. The report would need to include (1) a list of all accounts of preneed funeral funds held at any time during the quarter by the funeral entity; (2) the date the funds were received; (3) the name and address of the person for whose benefit the funds are received; (4) the name and address of the banking institution in which the account is held; (5) the account balance at the beginning of the period, (6) principal added, (7) interest or other earnings (8) disbursements or other transfers; and (9) the balance at the end of the period.

Currently, a funeral director must submit to the Board a written report every time the funeral director enters into a prepaid contract or performs under a prepaid contract. The Board states that the current reports are "time-consuming to prepare and review", and "the reports provide little value to the Board, the regulated community or the public". While this may be true, it is clear that the proposed regulations will create additional issues for consumers and funeral directors alike. First, the proposed rules would require funeral directors to provide personal and financial information about their customers to the Board, an entity comprised in part of competing funeral directors. Second, the rules would infringe on the right to privacy currently enjoyed by preneed consumers. Third, it is difficult for me to understand how the Board can properly review this additional information if, by their own admission, the current reports are time-consuming to review.

While I do not agree that the current structure provides inadequate safeguards to the public, the information requested could be made available without jeopardizing the expectation of privacy held by consumers and without undue burden on funeral directors. In New Jersey, for example, much of the information required by the proposed rule is required to be maintained by the funeral home and to be made available for inspection.

Section 13.224(d)(4) would require a funeral entity that has sold or otherwise ceased all or part of its preneed business to report to the Board how the preneed funds were distributed. Each distribution should identify the recipients and the amounts of the funds.

Currently, if a funeral entity ceases or sells their preneed business, the funeral home taking over the business is required to certify that they will honor the preneed contracts of the predecessor.

This proposal would require funeral directors to provide personal and financial information regarding their customer lists to the Board. For the reasons stated above, I urge the Board to reconsider their approach to this matter.

### **Preneed Contract Limitations**

Under the proposed rulemaking in §13.227, (1) all preneed contracts must be in writing; (2) a funeral director could not collect fees that exceed the fees for the goods and services on the funeral entity's general price list at the time of the service; and (3) a preneed contract could not incorporate a contract for funeral merchandise entered into by someone other than a funeral director.

We agree that all funeral contracts should be in writing. Not allowing a funeral director to collect fees that are not currently on their GPL at the time of service is also a reasonable proposition. However, not allowing a funeral home to incorporate a contract for funeral merchandise entered into by a non funeral director serves no legitimate purpose.

Currently, there are no licensure restrictions on the sale of funeral merchandise. In fact, retailers such as Costco and online merchandisers have recently entered this arena. On an at-need basis, the National Funeral Directors Association guides that "a funeral home

should never refuse to service a family because they indicate that they will be using a third-party casket. The funeral home may not discriminate in any manner against the family..." While not allowing a funeral director to incorporate a contract for third party merchandise on a pre-need basis, but requiring him to accept third party merchandise on an at-need basis, the proposed regulation not only fails to conform to existing practice in the industry, it is contrary to the existing practices.

### **Transfer of Preneed Funds to Another Funeral Entity**

Proposed § 13.228 would require a funeral director to allow a consumer to transfer their preneed funeral account and funds to another funeral director or funeral entity of the customer's choosing. The funeral director would be required to forward the entire amount of the preneed funds within 30 days of notice from the consumer.

While we currently allow consumers to cancel their contract within thirty days of signing, and we routinely transfer preneed funds to competing funeral homes, it is neither proper nor necessary for the Board to mandate that we do so. This is a matter of contract between the parties and should not be dictated by the Board. The proposed regulations would expand current protections provided by state and federal law, at the cost of eliminating the competitive advantage enjoyed by those firms that allow for the transfer and/or cancellation of the contract.

As proposed, the rules provide an additional quandary for funeral directors, one on which the Board must provide guidance. The regulations in no way address how a funeral director should handle the transfer of a contract of an individual receiving assistance, or an otherwise irrevocable contract. Additionally, the regulations do not limit the transferability of the contracts in any way. In not addressing these issues, the Board is an area ripe for fraudulent and deceptive activity by consumers and funeral directors alike. At a minimum, the Board should provide additional guidance with respect to these areas.

### **Acquiring or Ceasing a Preneed Business**

Proposed § 13.229 would require (1) a funeral entity that acquires the preneed contracts or funds from another preneed business to notify each customer and provide them with the opportunity to transfer the contract and the funds to another funeral entity; and (2) require a funeral director ceasing preneed business to notify each consumer and provide them with the opportunity to transfer the funds to a funeral director of their choosing.

Currently, if a funeral entity ceases or sells their preneed business, the funeral home taking over the business is required to certify that they will honor the contracts of the predecessor. If the new entity is willing to honor the contracts that they have acquired, and must certify that they will, the public is protected. In requiring the acquiring owner to notify each consumer, the proposed regulations serves to devalue the business of those individuals who have been proactive in preneed. By doing so, the regulations will undoubtedly reduce the number of funeral directors offering preneed, thereby reducing competition, the greatest form of protection the public can enjoy.

Again, I would like to thank the Board for allowing me to comment on the proposed rulemaking. I welcome the opportunity to discuss these matters in an open forum and encourage the Board to review the preceding comments with the eye on proposing rules that are consistent with existing practice within the industry, are necessary to protect the rights of consumers, promote competition within, and provide clarity to, the funeral industry.

Very truly yours,

---

John F. Givnish

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ENDORSEMENTS**



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22 South 22nd Street, 2nd Floor  
Philadelphia, PA 19103

Tel: 215-665-9800  
Fax: 215-665-1973  
Email: council@philafkio.org

February 9, 2007

### ***Pro-Union Preferred Partners Referral***

To: John Givnish  
Givnish Family Funeral Homes  
1010 Fox Chase Rd.  
Jenkintown, PA 19046

This document certifies that for the time period of 1/15/2007 to 1/15/2008, John Givnish, Givnish Family Funeral Homes has been accepted into the Philadelphia Council AFL-CIO endorsed PhillyUnions.com Pro-Union Preferred Partners Program and is a Certified Pro-Union Preferred Partner, having successfully completed the Program's application, screening and Partnership requirements.

The PhillyUnions.com Pro-Union Preferred Partners Program and Network is designed to recognize, reward and promote those businesses and professionals who have demonstrated a strong commitment to our union community by operating union or union-friendly, by recognizing union standards, and by contributing to and supporting important Philadelphia Council AFL-CIO endorsed programs benefiting the Philadelphia area union community.

As a Certified Pro-Union Preferred Partner, John Givnish, Givnish Family Funeral Homes has earned the recommendation and endorsement of the Philadelphia Council AFL-CIO. We encourage you to consider them for your patronization.

We thank you for your consideration and for supporting those who support our Philadelphia area union community.

Sincerely,

  
Patrick J. Eiding  
President

PJE/kal

PhillyUnions.com is the online communication network and Pro-Union Source of the Philadelphia Council AFL-CIO, serving the entire Philadelphia area union community and providing free web and communication services to over 100 Philadelphia area unions and labor activist organizations.

For additional details, information and verification pertaining to the above Pro-Union Preferred Partner as well as the PhillyUnions.com Pro-Union Preferred Partners Program and Network, please visit PhillyUnions.com at: [www.phillyunions.com](http://www.phillyunions.com), call 215-333-7400, or contact the Philadelphia Council AFL-CIO at 215-665-9800.

# Certificate of Pro-Union Partnership

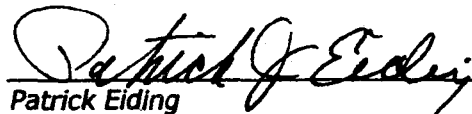



This document certifies that for the period of 1/15/2007 to 1/15/2008, by the authority of the Philadelphia Council AFL-CIO and PhillyUnions.com, in recognition of successfully completing the application, screening and Partnership requirements, Givnish Family Funeral Homes has hereby officially achieved the status of **Pro-Union Preferred Partner**.

This Preferred status is granted to those who have demonstrated a true commitment to the Philadelphia area union community by operating union and/or union-friendly, by recognizing union standards, and by supporting important Philadelphia Council AFL-CIO endorsed programs which benefit the Philadelphia area union community.

Therefore, the Philadelphia Council AFL-CIO and PhillyUnions.com hereby endorse the above Pro-Union Preferred Partner and encourage Philadelphia area union members, families and supporters to patronize them accordingly.

Signed:

  
Patrick Eiding  
President  
Philadelphia Council AFL-CIO

  
Joseph J. Dougherty III  
President  
PhillyUnions.com



November 22, 2004

To Whom It May Concern:

The Association for Independent Growth, Inc. (TAIG) provides supervised housing and related services for adults with mental illness and mental retardation throughout Philadelphia. Over 200 individuals receive such services in eighty (80) homes and apartments.

For over fifteen (15) years, TAIG has utilized Givnish Funeral Homes to ensure that its service recipients are laid to rest with dignity and respect. Through prearranged funerals as well as last minute arrangements, Givnish has repeatedly managed services which have been meaningful and special to families, friends and TAIG staff.

I highly recommend Givnish Funeral Homes to other providers of long term care services.

Sincerely,

Joseph R. Bucci  
President

Corporate Office  
4700 Wissahickon Avenue  
Suite 100  
Philadelphia, PA 19144  
Tel: 215.320.2040  
Fax: 215.320.2041  
www.taiginc.org

*The Association for Independent Growth, Inc.*

TAIG Pottstown  
238-44 High Street  
Suite 102-103  
Pottstown, PA 19464  
Tel: 610.705.9800  
Fax: 610.705.9811



AFL-CIO

## SCHOOL EMPLOYEES LOCAL NO. 1201



ORGANIZED 1898

455 N. 5th STREET • PHILADELPHIA, PENNSYLVANIA 19123

Phone (215) 923-5488 • Fax (215) 923-5534

Affiliated with the Philadelphia Council AFL-CIO, PA AFL-CIO

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Recording Secretary  
DENISE WARD

Guardian  
JAMES E. JOHNSON

Dear Member,

In keeping with our continued efforts to provide financial saving and value to the members of the NCFO, the leadership committee is pleased to provide our members with the details of the NCFO Funeral Benefit Plan.

Statistics show that over 84% of Americans agree that making their funeral arrangements ahead of time is a good idea. We, too, recognize that it is the responsible, loving thing to do. That is why your Executive Board has negotiated with Givnish Family Funeral Homes to provide this "Planning Program" to our constituents, their extended families and friends.

We negotiated this plan for our members because we do not want our families to face a member's death unprepared. With substantial discounts to the members of the NCFO, their extended families and friends, this program provides a unique benefit to you and your family. This program will give you ample reason to act now, establish your plans, and provide protection for your family.

The program negotiated on your behalf provides several key benefits, including:

- A **significant discount** for our members, their families and friends on their funeral plans;
- A simple enrollment process. No health questions, no medical exams;
- Low Monthly Savings Plan (as low as \$35.00 per month);
- Simplified arrangements recorded and kept on file at a Preferred Provider Funeral Home until the day they are needed most;

As a fellow NCFO member, I urge you to take advantage of this one of a kind Planning Program. For more information or to register to receive your discount, please visit [www.lifecelebration.com](http://www.lifecelebration.com), or you may contact a representative at 1-800-448-6474. Please see additional information on the next page.

Respectfully,

George Ricchezza  
President

Dennis Biondo  
Administrator

**Fraternal Order of Police  
Philadelphia Lodge #5**

1336 Spring Garden Street  
Philadelphia, PA 19123  
(215) 629-3600



Dear Member,

In keeping with our continued efforts to provide financial saving and value to the members of FOP Lodge #5, the leadership committee is pleased to provide our members with the details of the FOP Lodge #5 Funeral Benefit Plan.

Statistics show that over 84% of Americans agree that making their funeral arrangements ahead of time is a good idea. We, too, recognize that it is the responsible, loving thing to do. That is why your Executive Board has negotiated with Givnish Family Funeral Homes to provide this "Planning Program" to our constituents, their extended families and friends.

We negotiated this plan for our members because we do not want our families to face a member's death unprepared. With substantial discounts to the members of Lodge #5, their extended families and friends, this program provides a unique benefit to you and your family. This program will give you ample reason to act now, establish your plans, and provide protection for your family.

The program negotiated on your behalf provides several key benefits, including:

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- Low Monthly Savings Plan (as low as \$35.00 per month);
- Simplified arrangements recorded and kept on file at a Preferred Provider Funeral Home until the day they are needed most;

As a fellow FOP member, I urge you to take advantage of this one of a kind Planning Program. For more information or to register to receive your discount, please visit [www.lifecelebration.com](http://www.lifecelebration.com), or you may contact a representative at 1-800-448-6474. Please see additional information on the next page.

Respectfully,

A handwritten signature in cursive script that reads "Robert V. Eddis".

Robert V. Eddis  
President

**IMMEDIATE PAST PRESIDENT**  
THOMAS MOMME  
Lower Providence Twp.

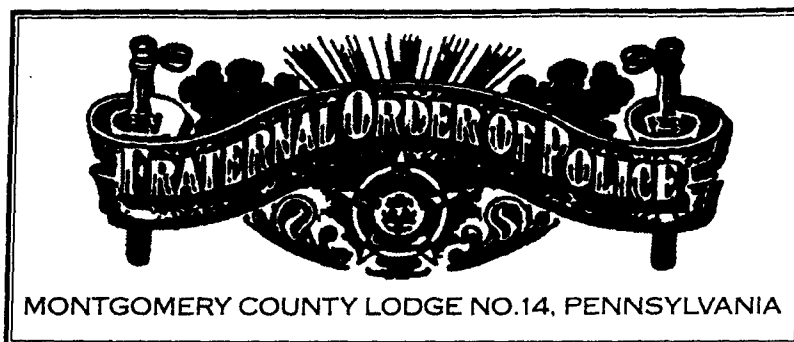
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Fax: 215-277-5881

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1823 Piccadilly Circle  
Allentown, PA 18103  
Phone: 610-797-7126  
Fax: 610-797-0104

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Chairman - Souderton  
PAUL KITTREDGE, SR.  
Montco Sheriff's Dept.  
JOHN J. BLAKE  
Whitpain Twp. (Ret.)  
GEORGE BILLGER  
Lower Moreland Twp. (Ret.)  
WAYNE A. CASSEL  
Upper Gwynedd Twp. (Ret.)

**CHAPLAIN**  
JOHN PRATH  
Montco Detectives (Ret.)

**LODGE ATTORNEYS**  
BRIAN SULLIVAN, ESQ.  
BLAKE DUNBAR, ESQ.

May, 2007

Dear Member,

In keeping with our continued efforts to provide financial saving and value to the members of the Fraternal Order of Police Lodge #14, I am pleased to provide our members with the details of the FOP Lodge #14 Funeral Benefit Plan.

Statistics show that over 84% of Americans agree that making their funeral arrangements ahead of time is a good idea. We, too, recognize that it is the responsible, loving thing to do. That is why we have negotiated with Givnish Family Funeral Homes to provide this "Planning Program" to our constituents, their extended families and friends.

We negotiated this plan for our members because we do not want our families to face a member's death unprepared. With substantial discounts to the members of the FOP Lodge #14, their extended families and friends, this program provides a unique benefit to you and your family. This program will give you ample reason to act now, establish your plans, and provide protection for your family.

The program negotiated on your behalf provides several key benefits, including:

- A **significant discount** for our members, their families and friends on their funeral plans;
- A simple enrollment process. No health questions, no medical exams;
- Low Monthly Savings Plan (as low as \$35.00 per month);
- Simplified arrangements recorded and kept on file at a Preferred Provider Funeral Home until the day they are needed most;

As a fellow FOP Lodge #14 member, I urge you to take advantage of this one of a kind Planning Program. For more information or to register to receive your discount, please visit [www.lifecelebration.com](http://www.lifecelebration.com), or you may contact a representative at 1-800-448-6474. Please see additional information on the next page.

Respectfully,

Stephen Neuffer  
President



Philadelphia Emerald Society  
P.O. Box 2430  
Philadelphia, PA 19147

May, 2007

Dear Member,

In keeping with our continued efforts to provide financial saving and value to the members of the Philadelphia Emerald Society, I am pleased to provide our members with the details of the Philadelphia Emerald Society Funeral Benefit Plan.

Statistics show that over 84% of Americans agree that making their funeral arrangements ahead of time is a good idea. We, too, recognize that it is the responsible, loving thing to do. That is why we have negotiated with Givnish Family Funeral Homes to provide this "Planning Program" to our constituents, their extended families and friends.

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Respectfully,

Harry Marnie  
President

# GIVNISH FAMILY FUNERAL HOMES

Exclusive providers of *Life Celebration*™

1010 Fox Chase Road  
Rockledge, PA 19046  
Phone: (215) 663-1838  
Fax: (215) 663-8156  
Toll Free: (800) 448-6474  
[www.lifecelebration.com](http://www.lifecelebration.com)

## INTRODUCING



### *PRE-ARRANGED FUNERAL BENEFIT PROGRAM*

This unique program is now available to consumers, employees and attendants, their extended families, and friends.

**The Liberty Resources Pre-Arranged Funeral Benefit Program provides several key benefits, including:**

- A **significant discount** on their funeral plans;
- A **Simple Enrollment Process**. No health questions or medical exams. No one is turned down;
- A **low monthly savings plan** with payments as low as \$35.00 per month, while still locking in today's cost for your funeral;
- **Guaranteed Pricing** at any one of thirty affiliate funeral homes throughout Pennsylvania and New Jersey;
- **Portability** to transfer your arrangements to the funeral home of your choice;
- **Peace of Mind** that comes with knowing that your plans are in place in the event of your passing;
- **Free** protection for your children, grandchildren and great grandchildren; and
- **Discounted** headstones and monuments also available.

Since nearly 84% of Americans agree that making your arrangements ahead of time is a good idea, we are offering this **deeply discounted** program to Liberty Resources consumers, employees and attendants, their extended families and friends to have a cost-effective, simple way to join the over one million Americans who pre-plan their funeral each year.

For more information, contact Givnish Family Funeral Homes at **(800) 448-6474**, or visit us at **[www.lifecelebration.com](http://www.lifecelebration.com)**. Be sure to identify yourself as a member or friend of Liberty Resources to receive your **Free Will Kit, Living Will and Emergency Record Guide** as an additional benefit.