



Consumer Federation of America

NEW ONLINE PRICE DISCLOSURES BY DIGNITY MEMORIAL FUNERAL HOMES: ARE THEY ADEQUATE?

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Most of the some 1,300 U.S. funeral homes owned by Service Corporation International (SCI), and operating under the brand Dignity Memorial, recently began posting on their websites the General Price Lists (GPLs) that the Federal Trade Commission’s Funeral Rule requires funeral homes to provide to customers in person.² Are these disclosures adequate? Is it easy for consumers to identify and locate the price lists?

This study reports the findings of a survey of online price disclosure by 320 Dignity Memorial funeral homes in 46 cities and their environs. It found that nearly three-quarters (74.4%) of the homes posted GPLs. In the entire sample:

- in over one-third (34.7%) of all the websites, the GPL disclosures were adequate,
- in one-tenth (9.4%), the price postings were not prominent,
- in slightly less than one-third (30.3%), the postings appeared hidden, and
- in one-quarter (25.6%), the websites did not include the price lists.

While CFA judged about one-third of the price disclosures as adequate, we do not view them as optimal because the price lists usually are not mentioned on the website’s first screen; a viewer must scroll down the first page a bit to find a pricing button. In comments to the Federal Trade Commission, CFA recommended that the price list be noted in the website’s main menu or in a dropdown from this menu.³

Background

The Federal Trade Commission (FTC) is now considering whether to require funeral homes to disclose their General Price Lists (GPLs) online. The Funeral Rule that the FTC issued in 1984 required funeral homes to maintain a price list of services that is handed to prospective customers and to provide this price information by phone. The basis for this Rule is that funeral services are relatively complex and expensive products that are purchased infrequently at times of emotional stress. Thus, it is important that consumers have easy access to a standardized price list before purchasing products.⁴

In 1984, the Internet was not available, yet today is frequently used by consumers to conduct online product searches. Online price disclosure not only allows more informed buyer searches, especially by the many who are unable to visit a number of funeral homes to collect price lists.⁵

² Service Corporation International reports 1,472 funeral homes in North America in its 2022 Annual Report submitted to the Securities and Exchange Commission (February 15, 2023). The report indicates 163 of these homes were in Canada while six homes were in Puerto Rico, leaving 1,305 in the United States.

³ Comments of Stephen Brobeck, Senior Fellow, Consumer Federation of America, on the Federal Trade Commission’s Funeral Industry Practices Rule Regarding Funeral Rule, Advanced Notice of Proposed Rulemaking (ANPR), 16 CFR Part 453, Project No. P034410 (December 15, 2022).

⁴ Federal Trade Commission, Advance Notice of Proposed Rulemaking, Funeral Industry Practices Rule (November 2, 2022).

⁵ This group includes local individuals whose poor health or lack of transportation makes it difficult to visit area funeral homes to pick up price lists and also those out of town, such as children of the deceased, who plan funerals.

Online disclosure also facilitates pricing research and dissemination by third parties, including researchers, journalists, and consumer educators. By reducing information asymmetries between sellers and buyers, online price disclosure helps ensure that local funeral markets are price-competitive. If the Internet had existed in 1984, it seems likely that the FTC would have required funeral homes not only to provide price lists in person but also to post them on their websites.

In the past decade, surveys by the FTC and by organizations, including the Consumer Federation of America (CFA) and Funeral Consumers Alliance (FCA), have found that only about one-fifth of funeral homes post their price lists.⁶ With encouragement from consumer groups, in 2020, the FTC announced that it was considering updating the Funeral Rule to improve price competition. Then in October 2022, all four FTC commissioners voted in support of an advance notice of proposed rulemaking (ANPR) to update the agency’s price disclosure requirement under the Funeral Rule.⁷ At present, the FTC is presumably working on revisions to the Rule to be proposed at some future date.

Until recently, the SCI website template apparently did not give Dignity Memorial funeral homes the opportunity to post their price lists online. Several CFA and FCA price surveys between 2017 and 2022 found no Dignity Memorial homes that posted their General Price List on their website.⁸ In 2023, though, SCI restructured the basic website template, used by all Dignity Memorial funeral homes, to permit this price posting. CFA examined this new template and the way it was used by several hundred Dignity Memorial funeral homes.

Survey Methods

We decided to study a large sample of the some 1,300 Dignity Memorial funeral homes in the United States, making certain to survey homes from all areas of the country. We included those funeral homes listed by the Dignity Memorial website in 46 prominent cities located in 36 states. The states and cities are listed in Table 2. The Dignity Memorial website provides a list of funeral homes in a city and near suburbs but also allows a search in a broader area. Our final sample of 320 funeral homes includes some that were as far as 20 or even 30 miles from the city center.

The Dignity Memorial website template provides its funeral homes with four posting options that are each used by a number of homes. We have called and deemed these disclosures Adequate, Not Prominent, Hidden, and None.

⁶ Federal Trade Commission staff survey reported on in the agency’s October 20, 2022 release. Josh Slocum and Stephen Brobeck, *Online Price Posting at More Than 1,000 Funeral Homes in 35 State Capitals* (Consumer Federation of America/Funeral Consumers Alliance, June 2022).

⁷ FTC ANPR, *loc. cit.*

⁸ Slocum and Brobeck, *loc. cit.*

- **Adequate:** CFA has recommended to the FTC that it require funeral homes to include a link to the price list in the main menu of the website or in a dropdown from this menu. That would ensure prominent placement on the website’s home page. The Dignity Memorial website template does not provide this option but does allow the inclusion of a “View Pricing” button towards the top of the home page (see [Malec & Sons Funeral Home](#) in Chicago as an example). In the Adequate disclosure, this button links to a “Cremation & Burial Pricing” section much farther down the home page. This section usually gives a low price for a cremation and for a burial, then below this, includes a heading for “Price Lists,” with the first one being “Itemized Funeral and Cremation Services.” In our funeral homes sample, this itemized list always appeared to be the General Price List required by the FTC. In sum, this disclosure requires a little scrolling down the home page to a prices button, then two clicks to view the GPL.
- **Not Prominent:** Some websites also include the “Cremation and Burial Pricing” far down a lengthy home page but not the “View Pricing” button near the top of this page. Consumers would have to take the initiative to scroll down the home page to find this section (see [Drake & Son Funeral Home](#) in Chicago as an example). Many of those who rely on the home page’s main menu for website navigation may not do so. Accordingly, we view this type of price disclosure as lacking adequate prominence on the website.
- **Hidden:** A large number of websites (see [Woodlawn Funeral Home & Memorial Park in Chicago](#) as an example) include the “View Pricing” button on the home page, which links to a “Funeral and Cremation Property” section (farther down the home page) with prices of some products followed by a “View All Pricing” button. This button links to a “Products & Services” page which as one scrolls down the page, often includes price information on “Burial & Cremation” property, catered receptions, urns and caskets, and special celebrations. Well down the page below this information, there’s a heading for “Price Lists,” the first of which is “Itemized Funeral & Cremation Services.” We believe that the length of this search, the price information disclosed after the first and second downloads, and all of the non-GPL price information after the second download, will convince many consumers to stop searching for the General Price List before they reach it. Moreover, reaching the list requires three clicks.
- **No GPL Posting:** A number of websites did not include the price list at all. Some of these websites had a home page “View Pricing” button that linked to some price information which did not include the GPL. Other websites made little or no mention of the prices of products and services.

Distribution of Price Disclosures by Type and Area

Nearly three-quarters (74.4%) of the 320 sampled Dignity Memorial funeral homes posted their price lists. In the recent past, this posting percentage was zero. Now, any determined researcher should be able to find price lists on the websites of a large majority of Dignity Memorial homes. These postings are especially valuable to third parties researching prices.

However, these price postings are much less valuable to consumers because most postings are not prominent. As Table 1 indicates, the GPL postings on only 34.7 percent of the websites were deemed adequate, with 25.6 percent of the sampled funeral homes choosing not to post their prices at all.

Table 1: How 310 Sampled Funeral Homes Posted GPLs (%)

Adequate	34.7%
Not Prominent	9.4%
Hidden	30.3%
No Posting	25.6%

As Table 2 reveals, funeral homes in an area often post price lists in the same way.

- Nine of nine websites in Portland (OR), eight of nine in Sacramento (CA), seven of ten in San Diego, five of seven in San Antonio (TX), eight of nine in Oklahoma City, three of four in Jackson (MS), three of four in Columbus (OH), five of seven in Charlotte (NC), and five of seven in Orlando (FL) post prices adequately. California has had a price disclosure requirement since 2013, and only one of 30 sampled funeral homes in that state – Mt. Vernon Memorial Park in the Sacramento area – chose not to post a price list on their website.
- Homes surveyed in Tennessee tended to post price lists that were Not Prominent – five of seven in Memphis and nine of nine in Nashville. That was also the case for Little Rock (AR) – three of five – which is not far from Memphis.
- Five of seven funeral homes in the Bay Area (CA), five of six in New Orleans (LA), six of seven in Cleveland (OH), and six of eight in Philadelphia make their price lists difficult to find, effectively Hidden. One wonders if the funeral homes in each area communicated with each other about obscuring their GPLs.

- Five of five websites in Buffalo (NY), 18 of 19 in New York City (NY), and seven of nine in Hartford (CT) did not post GPLs. It is especially noteworthy that only nine of 49 funeral homes (18.4%) surveyed in five New England and New York cities – Buffalo, New York, Hartford, Boston (MA), and Portland (ME) – chose to post their General Price List somewhere on their website with only four posting the list adequately. Earlier CFA and FCA surveys also found that all funeral homes in the region, not just Dignity Memorial ones, usually did not post price lists.⁹

Table 2: Distribution of Website Price Postings by City and Region

AD = Adequate
NP = Not Prominent
HI = Hidden
NP = No Posting

Region/City	AD	NP	HI	NP
New England/New York				
Portland (ME)	1	0	1	3
Boston (MA)	0	0	4	7
Hartford (CT)	2	0	0	7
New York (NY)	1	0	0	18
Buffalo (NY)	0	0	0	5
Mid-Atlantic				
Philadelphia (PA)	0	0	6	2
Pittsburgh (PA)	2	0	3	0
Baltimore (MD)	4	0	2	0
Washington (DC)	6	0	3	1
Norfolk (VA)	2	0	2	2
Southeast				
Charlotte (NC)	5	0	2	0
Atlanta (GA)	1	0	2	4
Jacksonville (FL)	4	0	4	0
Orlando (FL)	5	0	2	0
Miami (FL)	3	0	3	2
Mobile (AL)	2	0	1	0

⁹ Slocum and Brobeck, loc. cit., p. 3.

Jackson (MS)	3	0	1	0
New Orleans (LA)	1	0	5	0
Little Rock (AR)	0	3	2	0
Memphis (TN)	1	5	1	1
Nashville (TN)	0	9	0	0
Midwest				
Louisville (KY)	2	0	3	2
Columbus (OH)	3	0	1	0
Cleveland (OH)	0	0	6	1
Indianapolis (IN)	1	1	1	5
Detroit (MI)	3	0	1	2
Chicago (IL)	5	2	4	0
Milwaukee (WI)	0	0	0	2
St. Louis (MO)	3	0	3	3
Kansas City (MO)	4	0	5	0
Des Moines (IA)	0	0	1	2
Omaha (NE)	0	0	1	1
Southwest				
Oklahoma City (OK)	8	0	0	1
Austin (TX)	1	1	4	2
San Antonio (TX)	5	1	1	0
Tucson (AZ)	1	0	1	1
Mountain				
Denver (CO)	2	0	5	1
Salt Lake City (UT)	0	0	2	0
Last Vegas (NV)	0	1	5	3
Pacific Coast				
Bakersfield (CA)	0	0	1	0
San Diego (CA)	7	1	2	0
Bay Area (CA)	3	6	1	0
Sacramento (CA)	8	0	0	1
Portland (OR)	9	0	0	0
Seattle (WA)	1	0	5	1
Honolulu (HI)	2	0	0	2

Conclusion

In several surveys through 2022, the Consumer Federation of America (CFA) and Funeral Consumers Alliance (FCA) found no Dignity Memorial Funeral Homes that posted General Price Lists (GPLs) on their websites. Yet, more recently, the Dignity Memorial website template was restructured to permit price posting by their some 1,300 funeral homes. An April 2023 survey by CFA of the websites of 320 of these homes found that three-quarters posted a GPL someplace on their website but that for most websites, these price lists were difficult to find. Even the one-quarter of all websites that CFA considered having adequate price postings could and should have posted them more prominently.

Our survey also revealed that in many areas, funeral homes tended to post (or not post) price lists in the same way. Funeral homes, for example, in the Pacific Coast region usually posted their GPLs adequately. In contrast, a large majority of New England and New York funeral homes, including 18 or 19 in the New York City area, refused to post price lists. Moreover, nearly one-third of all homes made it very difficult to find their posted price lists, seemingly trying to hide them.

We believe the catalyst for the decision by Service Corporation International, the parent company of the Dignity Memorial brand, to provide their funeral homes the option of disclosing price lists was the initiative taken by the Federal Trade Commission to seriously consider requiring online price posting. Given the unanimous support from FTC commissioners to pursue rulemaking, it appears likely that the agency will in the future issue a proposal for mandatory website inclusion of GPLs. In the meantime, consumers considering the purchase of services from Dignity Memorial funeral homes would benefit from taking the time to search for the General Price List on the websites of these homes.