



Consumer Federation of America

Online Price Posting At More Than 1,000 Funeral Homes In 35 State Capitals

Joshua Slocum¹
Funeral Consumers Alliance

Stephen Brobeck
Consumer Federation of America

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¹ FCA's Nastassia Strackbein also contributed to the report.

Introduction

The Federal Trade Commission (FTC) is now considering whether to update its [Funeral Rule](#). This pro-consumer regulation, first issued in 1984, includes a requirement that funeral homes maintain General Price Lists (GPLs) and hand them to prospective customers whenever a funeral arrangements discussion begins. These price lists, as the industry now acknowledges, reduce deception and fraud and provide important information to customers who infrequently purchase relatively expensive funeral goods and services, often under adverse conditions.² However, the value of this information is greatly limited by the fact that consumers can obtain it only by physically visiting funeral homes.³

Unless funeral price lists are posted online, those outside the industry cannot practically obtain information about the prices at all funeral homes in a market, except in very small ones. It is too difficult to visit a wide variety of homes to pick up the lists, especially when those collecting the information are located in a different area. Consumers, especially out-of-town family members, cannot be expected to do so, and third-party aggregators of this information – consumer groups, reporters, researchers, and other consumer information providers – even find this requirement onerous.⁴ Without online price posting, funeral prices may appear to be transparent but in reality are not. Contrary to one of the FTC’s stated purposes of the Rule, it does not “ensure that consumers have access to sufficient information to permit them to make informed decisions about which goods and services they wish to purchase.”⁵

A recent nationwide survey documented the fact that consumers are engaging in little comparison price shopping for funeral services. The Consumer Federation of America (CFA) commissioned a nationwide consumer survey by Ipsos, an international research and marketing firm, about funeral home prices. Ipsos surveyed 2,009 representative Americans online in May 2022. Its researchers asked respondents: “If you have ever helped plan a funeral, to the best of your recollection, did you visit funeral homes to collect their price lists?” Of the 2009 respondents, 1,116 said that they had helped plan a funeral. Among this group, 38.6 percent said they “didn’t remember seeing a price list at any funeral home,” and 41.4 percent said they “visited only one home to obtain their price list.” Only one-fifth (20.0%) said they had visited more than one funeral home to obtain their price list, with a large majority of this group saying they had visited only two or three.

² The June 15, 2020 comment of Service Corporation International (SCI) to the Federal Trade Commission stated that “the current requirements of the Funeral Rule are working to protect consumers from unfair and deceptive acts and/or practices that would violate Section 5 of the FTC Act” and requested no weakening of the Rule. SCI owns more than 1,900 U.S. funeral homes.

³ The Funeral Rule also requires funeral homes to give price quotes by phone, but consumers cannot obtain by phone the full price information and consumer rights disclosures that appear on the General Price List.

⁴ In 2018, the Consumer Federation of America spent 15 hours over a two-day period trying to pick up price lists from some 60 Baltimore (MD) funeral homes. These lists could have been downloaded from websites in less than an hour.

⁵ Trade Regulation Rule, Funeral Industry Practices, 47 Federal Regulation 42260 (1982).

It is very easy and inexpensive for funeral homes with websites to post existing price lists online so that they can be easily accessed by consumers and by third-party consumer information providers. When California required its funeral homes to post prices online, to our knowledge none of them objected that it was difficult or costly to do so.⁶ Posting prices, then, reveals whether a funeral home wishes to facilitate consumers knowing the price of their funeral services and allowing a comparison of those prices with the services of other funeral providers.

To better understand the willingness of funeral homes to make this information easily accessible to consumers, in April and May 2022, CFA and the Funeral Consumers Alliance (FCA) surveyed more than 1,000 funeral homes nationwide to learn whether they posted online the price lists that the FTC requires they maintain. This report discusses the method, findings, and implications of the survey. These findings provide evidence that a large majority of funeral homes make it inconvenient for consumers to learn product prices. The findings also emphasize the importance of the FTC updating its Funeral Rule to require online price posting.

Survey Method and Findings

In 2017, FCA and CFA surveyed online price disclosures at funeral homes in or near 25 state capital cities.⁷ The survey found that 16 percent of 193 homes with active websites posted a general price list on their website. Nearly five years later, we decided to expand the sample to include an additional ten cities, most of them relatively large, and to include from each city all those funeral homes listed in a Google search. Some of these homes were 30 to 40 miles from city centers, which ensured that our sample included not just city and suburban funeral homes but also those in contiguous rural areas.

If funeral homes used a distinct name, even if they were part of a larger network, we counted them as a separate unit in our sample. For instance, we treated the 102 funeral homes that are part of the Dignity Memorial network as separate homes. On the other hand, we treated funeral homes bearing the same core name as one unit in our sample, even if they had different identified locations. For example, we considered a Richardson Lakeview, Richardson Downtown, and Richardson West Side to be just one funeral home in our sample (if they shared the same website).

As the table below indicates, 18 percent of the 1046 funeral homes in our sample posted general price lists on their websites (these price-posting funeral homes are listed in the appendix to this report). The percentage of online posters among the 193 homes in the 2017 survey has increased since then. For these 193 homes, the percentage that

⁶ The California law contains a loophole that allows funeral homes, as an alternative to posting their price list, to list their services along with a statement that a GPL is “available on request.” The minority of funeral homes that chose this option spent more time and expense creating this page than they would if they had simply posted a PDF of their price list.

⁷ Joshua Slocum, Stephen Brobeck, A Needle in a Haystack: Finding Funeral Prices Online in 26 State Capitals (Funeral Consumers Alliance, Consumer Federation of America, January 2018).

posted prices online increased from 16 percent to 24 percent.⁸ This increase may largely reflect greater consumer and media focus on the issue together with heightened FTC concern about industry price competition, the subject of its 2020 request for public comment.

Table 1: Funeral Homes in Cities Posting Price Lists

City	Total Number*	Number Posting	Percentage
Albany, NY	53	5	9.4
Atlanta, GA	85	5	5.9
Augusta, ME	9	1	11.1
Austin, TX	32	9	28.1
Baton Rouge, LA	35	4	14.3
Bismarck, ND	7	0	0.0
Boise, ID	27	7	25.9
Boston, MA	123	12	9.8
Charleston, WV	25	4	16.0
Cheyenne, WY	3	0	0.0
Columbus, OH	59	8	13.6
Concord, NH	19	5	26.3
Denver, CO	62	15	24.2
Des Moines, IA	20	2	10.0
Dover, DE	12	0	0.0
Frankfurt, KY	9	0	0.0
Harrisburg, PA	31	5	16.1
Helena, MT	4	3	75.0
Jackson, MS	22	1	4.5
Jefferson City, MO	9	0	0.0
Lansing, MI	9	2	22.2
Montpellier, VT	3	1	33.3
Nashville, TN	60	9	15.0
Olympia, WA	6	3	50.0
Phoenix, AZ	69	14	20.3
Pierre, SD	2	0	0.0
Raleigh, NC	46	1	2.2
Sacramento, CA	45	31	69.9
Salem, OR	14	4	28.6

⁸ In 2017, thirty of 193 funeral homes posted a full GPL (16%). In 2022, 46 of these funeral homes posted a GPL (24%).

Salt Lake City, UT	27	5	18.5
Santa Fe, NM	7	0	0.0
Springfield, IL	18	5	27.8
Tallahassee, TN	12	2	16.6
Topeka, KS	14	6	42.9
Washington, DC	68	22	32.4
Total	1046	191	18.3%

*Funeral homes with websites.

With one exception, there seems to be no easy explanation for differences in the disclosure rate among cities. No state except California requires price posting, and its legislation contains a loophole that was used by 30 percent of the funeral homes in the Sacramento area.⁹ We examined several factors that might make a difference – population size, education level of population, and the ratio of funeral homes to population – but the only factor somewhat correlated with online price disclosure rates was geographic. One can observe a trend toward higher disclosure rates as one moves west. Nine of the 16 cities (56%) west of the Mississippi River, but only five of 19 cities (36%) east of the river, had disclosure rates 20 percent or higher. In the Mountain and Pacific states, seven of ten state capitals (70%) had disclosure rates of at least 20 percent. This pattern could reflect factors such as differences in population mobility, growth, and age of funeral establishments. It is possible that funeral homes in areas with younger populations and more dynamic economies are more receptive to posting prices online.

The one factor that explains why a number of funeral homes do not post prices online is affiliation with Dignity Memorial, which is part of Service Corporation International (SCI), a company overseeing about ten percent of the 19,000 funeral homes in the country. All of the more than 1,900 Dignity Memorial “locations” use the same basic website, and none of them, at least none of the several hundred we have researched over the past decade, disclose prices on their websites. All of these homes, though, do include a section on “funeral, cremation, and cemetery costs” that lists all of the services associated with funerals and cremations and average national costs for each. Past research by FCA and CFA suggests that Dignity Memorial homes tend to charge higher prices than do other funeral homes, which may help explain why they refuse to post prices online.¹⁰

Might the 102 Dignity Memorial funeral homes in our sample have influenced any of the remaining 752 non-posting funeral homes in our sample? Possibly, but apparently not to a great extent. In Sacramento, for example, all six Dignity Memorial homes resorted to the legal loophole that allows them to avoid posting prices. But only eight of the remaining 39 area funeral homes chose not to post, and a number of the 31 who did post noted this posting on the home page of their websites. In Phoenix, where

⁹ See note 5.

¹⁰ Joshua Slocum, *Death with Dignity? A Report on SCI/Dignity Memorial High Prices and Refusal to Disclose These Prices* (Funeral Consumers Alliance, Consumer Federation of America, March 2017).

14 of 69 funeral homes (20%) chose to post, 16 of the remaining homes are part of Dignity Memorial.

Implications for Consumers and Regulators

The current Funeral Rule helps protect consumers against deceptive and fraudulent practices, but it does not ensure that consumers have adequate information to make informed decisions about funeral services. Decisions can be informed only when they take into account prices of competing funeral homes. The difficulty of comparison shopping for funeral services is revealed both by the Ipsos survey data and by the wide range of funeral prices. Much research has documented this huge price range.¹¹ In a ten-city survey of cremation prices, for example, FCA and CFA found that the highest price was typically at least four times greater than the lowest price.¹²

Requiring funeral homes with websites to conspicuously post their general price lists would benefit consumers, and promote price competition, both directly and indirectly. Consumers who viewed online price disclosures would, for the first-time outside California, be able to compare prices of a large number of funeral homes with relatively little effort, facilitating decisions that maximized consumer value.

If prices were posted online, consumers would also have greater access to price information collected and disseminated by third-party aggregators – consumer groups, journalists, researchers, and other consumer information providers. It is noteworthy that, reflecting current barriers to collecting price data, major consumer information disseminators such as Consumer Reports have not collected and published information on funeral prices. The only data on widespread industry pricing is collected by the funeral industry, which reports periodically one the average cost of a full-service funeral.

Even consumers that did not utilize online price disclosures would benefit from their requirement. As has occurred in other markets, accessible price information in the funeral services marketplace would likely persuade funeral homes charging especially high prices to moderate them.¹³ This price moderation would especially benefit households with lower incomes and less education who are, in general, the least able and likely to comparison shop. It would also benefit Black and Hispanic households who may tend to spend more on funerals than other households.¹⁴

¹¹ The Funeralocity website often shows that the highest price for a funeral service is three to four times as high as the lowest price for that service.

¹² Joshua Slocum, Stephen Brobeck, Cremation Services: Highly Variable and Misleading Pricing, Lack of Disclosure, and Violation of Federal Rules (Funeral Consumers Alliance, Consumer Federation of America, September 2016).

¹³ See for example: Florian Zettelmeyer et al, “How The Internet Lowers Prices: Evidence from Matched Survey and Auto Transaction Data,” NBER Working Paper No. 11515 (July 2005).

¹⁴ See Comments of Stephen Brobeck, Consumer Federation of America, on the Funeral Industry Practices Rule to the Federal Trade Commission (April 3, 2020), p. 2.

Consumers would also benefit indirectly because conspicuous price posting would enable the Federal Trade Commission to more effectively monitor and enforce industry compliance with the Funeral Rule. Periodically, the FTC monitors this compliance and has always found that a significant minority of surveyed homes failed to meet the rule’s standards. In June 2020, the agency reported that in its most recent compliance review, 17 of 90 funeral homes failed to comply with these standards. It is noteworthy that not only nearly 20 percent of surveyed homes failed to comply, but also that the FTC apparently had the resources to visit just 90 homes, only one-half of one percent of some 19,000 U.S. funeral homes. The rate of non-compliance may be as high because many funeral homes think that it is unlikely that the FTC will ever monitor their compliance.

While the FTC’s on-site inspections review more than the availability of price lists is important to continue, agency monitoring would be greatly facilitated by having access to online price disclosures. It would be relatively easy, as this research has shown, to learn if funeral homes actually posted prices and did so conspicuously. It would also give the FTC easy access to large numbers of price lists that could be examined for their compliance with Rule requirements. In 2020 research on California funeral home price disclosures, FCA and CFA found that several price lists appeared to lack legally required consumer options.¹⁵

Full-service funerals typically cost more than \$7,000, include a large number of specific services, and are frequently purchased by bereaved family members who often are given tight deadlines by hospitals that need to dispose of bodies. These factors strongly influenced the content of the current Funeral Rule. But when the Rule was developed, there was no sensible way for the FTC to ensure that consumers and third-party aggregators had practical access to prices of many funeral homes in an area. The Internet now makes this access possible, and the requirement that funeral homes maintain general price lists makes it very simple for homes to post these lists on their websites, as about one-fifth now do.

Consumers strongly support mandatory online price disclosures by funeral homes with websites. In its May 2022 survey commissioned by CFA, Ipsos asked the 2,009 respondents the following question: “For many years, funeral homes have been required to maintain price lists of their services that are given to customers visiting the funeral homes. Do you think that those funeral homes with websites should also be required to post their price lists?” Three-quarters of respondents (75%) said that they favored this requirement while only three percent said they opposed it. Widespread support for required price posting exists among all income, education, gender, ethnic, age, and regional groups.¹⁶

¹⁵ Joshua Slocum, Stephen Brobeck, Hidden Funeral Prices: An Evaluation of California Funeral Home Price Disclosure and Lack of Disclosure (Funeral Consumers Alliance, Consumer Federation of America, September 2019).

¹⁶ Twenty-two percent said they had “no opinion” on the issue.

APPENDIX: FUNERAL HOMES WITH COMPLETE ONLINE PRICES

ALBANY, NY	MONTPELLIER, VT
Cannon Funeral Home	Guare & Sons Funeral Home
New Comer Cremations & Funerals	
Bond Funeral Home	NASHVILLE, TN
A.J. Cunningham Funeral Home	Phillips-Robinson Funeral Home
Simmons Funeral Home	Crawford Mortuary & Crematory
	Nashville Funeral and Cremation
ATLANTA, GA	Compassion Funeral & Cremation Services
Murray Brothers Funeral Home	Nashville Cremation Center
Plummer Funeral Home	Cremation and Funeral Services of Tennessee
A.S. Turner Funeral Home & Crematory	Lumen Cremation
Mayes Ward-Dobbins Funeral Home	Dickson Funeral Home & Cremation Center
Byrd & Flanigan Crematory and Funeral Service	Woodard Funeral Home
AUGUSTA, ME	OLYMPIA, WA
Gallant Funeral Home	American Memorial Association
	eCare Mortuary
AUSTIN, TX	Funeral Alternatives of Washington
All Faiths Funeral & Cremation Services	
King-Tears Mortuary	PHOENIX, AZ
Green Cremation Texas	Accu-Care Cremation & Funerals
Heart of Texas Cremation & Burial Service	Holy Cross Catholic Cemetery and Funeral Home
The Gabriels Funeral Chapel and Crematory	Cremation Center of Arizona
Ramsey Funeral Home and Crematorium	Avenidas Funeral Chapel
Providence Funeral Home	Richardson Funeral Home
Elgin Funeral Home	Tempe Mortuary
Providence-Jones Family Funeral Home and Crematory	Menke Funeral & Cremation Center
	Palm Valley Funeral Home
BATON ROUGE, LA	Bunker Family Funeral Homes
Winnfield Funeral Home	A Wise Choice Cremation & Funeral Services
Charlet Funeral Home	At Season's End Mortuary
Hambrick's Family Mortuary	Saint Francis Catholic Cemetery
Williams & Southall Funeral Home	Angels Cremation and Burials
	Holy Redeemer Catholic Cemetery
BISMARCK, ND (none)	
	PIERRE, SD (none)
BOISE, ID	

Alden-Waggoner Funeral Chapel & Crematory	RALEIGH, NC
Bowman Funeral Parlor	Ellis D. Jones & Sons
Cremation Society of Idaho	
Accent Funeral Home and Cremation	SACRAMENTO, CA
All Valley Cremation	Cremations Only
Haren-Wood Funeral Chapel and Crematory	North Sacramento Funeral Home
Serenity Funeral Chapel	Thompson Rose Chapel
	Morgan Jones Funeral Home
BOSTON, MA	Ramsey Wallace Funeral Home & Chapel
Spencer Funeral Home	W.F. Gormley & Sons Funeral Chapel
Casper Funeral & Cremation Services	Sunset Lawn Chapel of the Chimes
Mann and Rodgers Funeral Home & Cremation Services	Evergreen Memorial Sacramento
Kfoury-Keefe Funeral Home	East Lawn Mortuary
Brezniak Funeral Directors	George L. Klumpp Chapel of Flowers
Boston Cremation	All Seasons Funeral Service
Goodrich Funeral Home	Sacramento Memorial Lawn
Schlossberg Chapel	River Cities Funeral Chapel
Anderson-Bryant Funeral Home	Affordable Cremation & Funeral Center
Conley Funeral Home	St. Mary Cemetery & Funeral Center
Mackey Funeral Home	Sierra View Funeral Chapel and Crematory
Peck Funeral Home	ABC Cremation Society
	East Lawn Elk Grove Memorial Park & Mortuary
CHARLESTON, WV	Simple Traditions
Snodgrass Funeral Home	Nor-Cal Crematory
Keller Funeral Home	Nautilus Cremation Society
Fidler & Frame Funeral Home	Herberger Family Elk Grove Funeral Chapel
Harding Family Group	Calvary Cemetery & Funeral Center
	Price Funeral Chapel
CHEYENNE, WY (none)	Lowest Cost Cremation and Burial
	Catholic Funeral and Cemetery Services
COLUMBUS, OH	Cochrane and Wagemann Funeral Directors
Leaf Cremation of Ohio	Chapel of the Valley Cremation and Funeral Care
Shaw-Davis Funeral Homes	Miller Funeral Home
Newcomer Cremations, Funerals, Receptions	Blue Oaks Cremation & Burial Services
Edwards Funeral Service	Heritage Oaks Memorial Chapel
O.R. Woodyard Co. Funeral & Cremation Services	
Pfeifer Funeral Home	SALEM, OR
Hoskinson Funeral and Cremation Service	Crown Memorial Center, Cremation & Burial

Hodapp Funeral Homes	Weddle Funeral Service
	Unger Funeral Chapel
CONCORD, NH	North Santiam Funeral Service
Phaneuf Funeral Homes & Crematorium	
Cremation Society of New Hampshire	SALT LAKE CITY, UT
Jellison Funeral Home	Serenicare
Goodwin Funeral Home	City View Mortuary
Peabody Funeral Homes & Crematorium	Peel Funeral Home
	Premier Funeral Services
DENVER, CO	Serenity Funeral Home
Pipkin Braswell Funeral Home & Cremation	
Mile High Mortuary & Cremation Service (??)	SANTA FE, NM (none)
Latina Funerals & Cremations	
A Better Place Funeral & Cremation Services	SPRINGFIELD, IL
Fairmount Funeral Home, Cemetery & Crematory	Butler Funeral Home & Cremation Tribute Center
Newcomer Cremations, Funerals, Receptions	Boardman-Smith Funeral Home
The Natural Funeral	Family Care Cremation
Harris Funeral Directors	Vancil-Murphy Funeral Home and Creation Services
Drinkwine Family Mortuary	Cremation Services of Central Illinois
Abbott Funeral Services	
Apollo Funeral & Cremation Services	TALLAHASSEE, FL
Heflebower Funeral & Cremation Services	Fairchild Funeral Home
Tabor-Rice Funeral Home	Lifesong Funerals and Cremations
Be A Tree Cremation	
The Natural Funeral	TOPEKA, KS
	Penwell-Gabel Funeral Home
DES MOINES, IA	Dove Cremations & Funerals
Hamilton's Funeral & After Life Services	Chapel Oaks Funeral Services
Des Moines Cremation	Parker-Price Funeral Home
	Lamb-Roberts-Price Funeral Home
DOVER, DE (none)	Feltner Funeral Home
FRANKFORT, KY (none)	WASHINGTON, DC
	McGuire Funeral Service
HARRISBURG, PA	Devol Funeral Home
Kreamer & Lum Funeral Home & Crematory	Robinson Funeral Home
Hoffman Funeral Home & Crematory	Stewart Funeral Home
Central Pennsylvania Cremation Society	John T. Rhines Funeral Home
Buse Funeral Home	Ronald Taylor II Funeral Home

Sullivan Funeral Home	Snead Funeral Home and Cremation Service
	Roger J. Mason Funeral Service
HELENA, MT	D.L. McLaughlin Funeral Home
Retz Funeral Home & Crematory	Capitol Mortuary
Big Sky Cremations	Tri-State Funeral Service
Simple Cremation Montana	Torchinsky Hebrew Funeral Home
	Henry S. Washington & Sons Funeral Home
JACKSON, MS	Alexander Pope Funeral Home
Smith Mortuary	Morris Funerals and Cremation Services
	Philip D. Rinaldi Funeral Service
JEFFERSON CITY, MO (none)	Francis J. Collins Funeral Home
	Gasch's Funeral Home
LANSING, MI	Chambers Funeral Home & Crematorium
Skinner Funeral Homes	Freeman Funeral Services
Burkhead-Green-Kilgo Funeral Home	Heaven Bound Cremation Services
	Thibadeau Mortuary Service