



Funeral Consumers Alliance of Western Massachusetts

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Board of Registration in Embalming and Funeral Directing
1000 Washington Street
Boston, MA 02118

Re: Public Invited to Comment on Revision of State Regulations

We welcome the opportunity to comment on the rules and regulations of this Board. Our mission is to educate the public about rights and options for final arrangements, and to protect the consumer's right to choose meaningful, dignified, and affordable funeral services. We are a non-profit volunteer-run organization.

We applaud the proposed revisions to 239 CMR 4.00 (Pre-Need Funeral Contract and Arrangements) as seen in the draft dated December 2014. Many families in our region lost pre-paid funds in the Ryder scandal. For additional protection against embezzlement, one suggestion would be to establish a fund, as in some states, to reimburse consumers in case of default on prepaid funeral funds.

We were unable to find the "Buyer's Guide to Pre-Need Funeral Contracts" specified 4.02 number 4. Does it exist? Has it been updated? (We are aware of criticisms of a 1993 version.)

We agree with the proposed changes (as of December 2014 draft) to 239 CMR 3.00 regarding food and beverages in funerals establishments.

There are other sections of the regulations about which we have questions. We are glad that the Governor's Executive Order 562 (section 4) calls for regulations to be "clear, concise and written in plain and readily understandable language." The existing regulations are difficult to read, requiring much back and forth between sections, and puzzling over jargon (Type 3? Type 6?) that impedes understanding unless one keeps the glossary of each section handy. Some typos and incorrect references were noted in a few places. This long complex document could benefit from a fresh re-writing. We would be happy to discuss the specifics of these smaller points, sharing the notes we make as we examined the document. Please inform us of the next steps in the revision process. Thank you.

Sincerely,

Sandra N. Ward
President