

Calling for Information About Funeral Pricing

**An FTC Staff Review of the Consumer Experience
When Contacting Funeral Providers Over the Phone**



Staff Report of the Bureau of Consumer Protection
Federal Trade Commission

November 20, 2024

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I. Introduction

When the Commission enacted the Funeral Rule in 1982, the Commission stated that, “in many instances, at least where death has not been anticipated, all efforts to get price information must occur in an extremely short time span” and that “the gathering of price information by telephone may often constitute the only practical way in which price information may be obtained before a funeral provider is selected. The record reveals, however, that funeral providers often fail to provide price information over the telephone when asked.”¹

As the Commission considers whether to propose amendments to the Funeral Rule, Commission staff sought to test whether funeral providers are currently giving out price information over the phone, how easy it was for consumers to obtain that information, and the clarity and comprehensiveness of the information provided. To that end, Commission staff placed and reviewed undercover calls to 278 randomly selected funeral providers from around the country, in an attempt to recreate the typical consumer experience.

Staff’s review found that most funeral providers gave responses to at least some consumer questions about their pricing and services. However, at times, FTC staff had to make multiple calls to the funeral provider before they were able to reach someone who could answer their questions, particularly outside of business hours. For some funeral providers, especially outside of business hours and after three attempts, FTC staff were not able to obtain any price information.²

“[A]t times, FTC staff had to make multiple calls to the funeral provider... particularly outside of business hours. For some funeral providers, especially outside of business hours and after three attempts, FTC staff were not able to obtain any price information.”

In addition, certain funeral providers gave price information that failed to provide the specificity, completeness, or accuracy of information generally required in a General Price List. Instead, for example, these funeral providers gave ranges of pricing, estimated or approximate pricing, package pricing, inconsistent pricing, or price quotes that omitted mandatory costs and/or common optional costs.

Some providers shared what appeared to be more detailed and transparent price information by referring staff to the price lists on their website or by emailing price information to staff.³

Consumers facing the unexpected loss of a loved one may need to obtain complete and accurate price information quickly and at any hour of the day or night. The results of staff’s review suggest that these


¹ Original Funeral Rule Statement of Basis and Purpose, 47 FR 42260, 42268 (Sept. 24, 1982).

² It is, however, understandable that funeral providers may not be immediately available to provide price information at any hour of the day, and the Funeral Rule does not require such availability.


³ The Funeral Rule does not currently require such methods of sharing in connection with phone inquiries.

consumers may be unable to obtain price information via a phone call as quickly as they may need it or when they need price information outside of the funeral provider’s business hours. For consumers grieving and facing time constraints, phone calls can be a less reliable, and less accurate option to obtain price information compared to reviewing a copy of a price list.

FTC staff called the same 278 funeral providers both during and after business hours to ask for funeral pricing information


 **During business hours**
(after three calls or less):

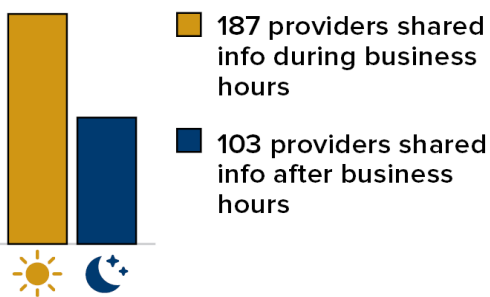



 **After business hours**
(after three calls or less):

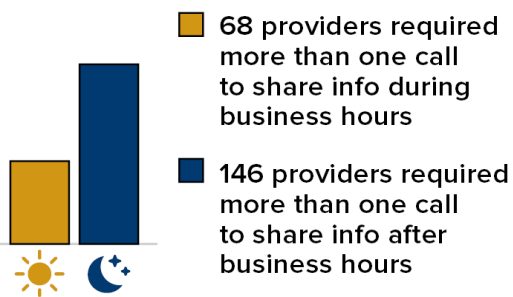


It sometimes took multiple tries to get this price information

 **On the first call:**



 **More than one call:**



The amount of information callers got varied

142 providers 

Gave answers that included estimates, ranges, or approximations

93 providers 

Gave package pricing for at least some services

37 providers 

Quoted different prices for the same services on different calls

II. The Funeral Rule’s Price Information Requirements

The FTC enacted the Funeral Rule 40 years ago with the stated goals to lower barriers to price competition in the funeral goods and services market, and to facilitate informed consumer choice.⁴ The Rule helps to ensure that: (1) consumers have access to sufficient information to permit them to make informed decisions; (2) consumers are not required to purchase goods and services that they do not want (e.g., funeral providers cannot sell only bundled packages) and that they are not required by law to purchase; and (3) material misrepresentations are not used to influence consumers’ decisions.⁵

One of the Rule’s key provisions requires funeral providers to give consumers accurate, itemized price information and other disclosures about funeral goods and services. Under the Rule, a funeral provider must give a person who visits the provider’s funeral home a General Price List (GPL) when the provider begins to discuss the types of funeral goods or services offered or their prices. The funeral provider’s GPL must list the goods and services they offer and their itemized prices, along with specific disclosures. When someone visits a funeral home in person, a funeral provider must also show a Casket Price List (CPL) and Outer Burial Container Price List (OBCPL) when asked about those items or their prices, and before showing the items or pictures of them.⁶

The Rule requires a funeral provider to give accurate information from the itemized price lists, and other readily available information that reasonably answers questions about the provider’s offerings and prices, to anyone who inquires about the provider’s offerings or prices on the telephone.⁷ FTC business guidance provides further clarification and examples.⁸ If a funeral provider is busy with an arrangements conference when a consumer calls, the funeral provider “can take a message and return the call at a later time.”⁹ Also, funeral providers “may have an employee answering ... phones who can respond to easier questions regarding [their] offerings and prices by referring to the printed price lists, but who refers more difficult questions to [the funeral director].”¹⁰ If the funeral director is unavailable at the time of the call, the “employee can take a message so that [the funeral director] can return the call later.”¹¹

⁴ Original Funeral Rule Statement of Basis and Purpose, 47 FR 42260 (Sept. 24, 1982). The Rule became effective on April 30, 1984 and was amended effective July 19, 1994.

⁵ Amended Funeral Rule Statement of Basis and Purpose, 59 FR 1592 (Jan. 11, 1994).

⁶ 16 C.F.R. § 453.2. The Rule also prohibits providers from: misrepresenting legal, crematory, and cemetery requirements; embalming for a fee without permission; requiring the purchase of a casket for direct cremation; requiring consumers to buy certain funeral goods or services as a condition for furnishing other funeral goods or services; and engaging in other deceptive or unfair practices.

⁷ 16 C.F.R. § 453.2(b)(1).

⁸ Federal Trade Commission, *Complying with the Funeral Rule* (Apr. 2019), at 17, https://www.ftc.gov/system/files/documents/plain-language/565a-complying-with-funeral-rule_2020_march_508.pdf.

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.*

Funeral providers “do not have to give price and other information after business hours if it is not [their] normal practice to do so. [They] can tell consumers who call during non-business hours that [they] will provide the information during regular business hours. However, if a consumer calls after hours to inquire about an at-need situation, and it is [the funeral provider’s] practice to make funeral arrangements during non-business hours, [the funeral provider] should provide price or other information the consumer requests.”¹²

III. Call Review Procedure Overview

In conducting this review, staff sought to replicate consumers’ experience of attempting to obtain price information from funeral providers on a phone call. The review was conducted as part of staff’s ongoing efforts to monitor and enhance compliance with the Funeral Rule, and to assess the Rule’s effectiveness in preventing unfair and deceptive acts in the market for funeral services.¹³

As described in more detail in Appendix A, between February 2023 and December 2023, Commission staff randomly selected 300 funeral providers from the largest, middle, and smallest metropolitan and micropolitan areas in the country, and ultimately included 278 of them in the review.

For each of the randomly selected funeral providers, staff placed an undercover call during business hours (9am-5pm in the provider’s time zone), and another undercover call to the same funeral provider outside of normal business hours (“after business hours”). On the calls, staff asked for pricing information, typically for direct cremation, cremation and a memorial service, and cremation and a viewing.¹⁴

Staff followed the same protocol for business hours calls and after business hours calls. During each time period, staff made up to three attempts to obtain price information from each funeral provider.

- If staff obtained pricing information from the funeral provider during the first call or the funeral provider answered the call but said it would not provide price information to staff on the first call, staff would not attempt to contact the funeral provider again.
- If the funeral provider failed to answer the first phone call or if the first call was answered by someone who was unable to answer staff’s pricing questions (e.g., if the call was answered by an

¹² *Id.*

¹³ For example, FTC staff sent 39 warning letters to funeral providers across the country after investigators discovered several violations of the Funeral Rule during the undercover phone sweep. Press Release, *FTC Sends Warning Letters to Funeral Homes After First Undercover Phone Sweep* (Jan. 25, 2024), <https://www.ftc.gov/news-events/news/press-releases/2024/01/ftc-sends-warning-letters-funeral-homes-after-first-undercover-phone-sweep>.

¹⁴ On some calls, staff asked for pricing information about burial services as well.

answering service), staff would attempt to call the funeral provider again during the same time frame (i.e., during business hours or after hours).¹⁵

- If, on the second phone call, staff obtained pricing information from the funeral provider or the funeral provider answered the second call but did not provide price information, staff would not attempt to contact the funeral provider again. But if the funeral provider failed to answer the second phone call or if the call was answered by someone who was unable to answer staff's pricing questions (e.g., if the call was answered by an answering service), staff would attempt to call the funeral provider again.
- If staff was unable to make contact or get pricing information during a third call attempt, staff did not make any further calls to that funeral provider.

On each call, FTC staff introduced themselves as consumers seeking information about prices for funeral services for a loved one and/or family member. Staff primarily asked for prices for three services: direct cremation (or cremation only, with no service), cremation and a memorial service (or a service without the body present), and cremation with a visitation (or a service with the body present). To help clarify which fees were included in the quoted prices, FTC staff typically asked the following questions: (a) what the prices included, (b) whether the quoted prices included the cost to obtain death certificates or the cost to obtain flowers or food, and (c) if there were any additional fees that the family should be aware of.

During the calls, if the funeral provider offered to email or text price information to staff, staff generally accepted that offer and provided an email address or phone number where the funeral provider could send the information.

IV. Challenges Reaching Funeral Providers for Pricing Over the Phone

Staff encountered numerous challenges in collecting price information over the phone, including the need to call more than once, less availability after business hours, and lack of detail on prices. However, 200 funeral providers (or 71.9% of all funeral providers called) gave FTC staff answers to their pricing questions during *both* business hours and after business hours – though sometimes it took more than one attempt.

¹⁵ On the first call attempt, staff always left a phone number where the funeral provider could return the call. Sometimes, the funeral provider would return the message. If so, and if FTC staff was able to answer the phone call (or immediately return the phone call), they would do so. If price information was provided on that return call, that was counted as a call where price information was provided for purposes of this review.

Sometimes, it took staff multiple attempts to obtain this price information. FTC staff reached 86 funeral providers (or 30.9% of all funeral providers called) and obtained price information on the first attempt during both business hours and after business hours. For 69.1% of all funeral providers called, either during and/or after business hours, FTC staff either did not receive price information from the funeral provider, or they had to make more than one phone call to try to obtain price information or wait for a return call. That's 192 funeral providers.

“For 69.1% of all funeral providers called[], either during and/or after business hours, FTC staff either did not receive price information from the funeral provider, or they had to make more than one phone call.”

Staff successfully obtained price information on the first call more frequently during business hours. During business hours, staff received price information from 187 funeral providers (or 67.3% of all funeral providers called) on the first call attempt. After business hours, staff received price information from 103 funeral providers (or 37.1% of all funeral providers called) on the first call attempt.

The level of detail of price information provided on the calls varied. On many calls, the funeral providers answered every question posed by staff. On other calls, funeral providers answered only some of staff's questions, or did not answer any questions.¹⁶

A. Staff Was Unable to Obtain Any Price Information from Some Funeral Providers

In calls placed during business hours only, FTC staff obtained price information from 257 funeral providers. Staff was unable to obtain price information from 21 funeral providers (7.6% of providers called). Staff made three attempts with respect to 18 of those providers; the other 3 declined to provide price information on the first call or promised to email price information and then never sent the email.

After business hours, staff obtained price information from 205 funeral providers. Staff was unable to obtain price information from 73 funeral providers (26.3%). This includes 14 funeral providers who told FTC staff that they would need to contact the providers during business hours to obtain price information.¹⁷ Staff made three after hours attempts with respect to each of the other 59 providers.

¹⁶ On the phone, funeral providers typically gave pricing for direct cremation, or cremation without a service. Some funeral providers, however, declined to give pricing over the phone about cremation with a memorial service or cremation with a visitation, especially outside of their normal business hours, when they were away from the office.

¹⁷ As noted above, FTC business guidance states that funeral providers “do not have to give price and other information after business hours if it is not your normal practice to do so.” Complying with the Funeral Rule, at 17.

B. Staff Had to Call Some Funeral Providers Multiple Times to Obtain Price Information

Sometimes, funeral providers did not answer the call placed by FTC staff, and staff had to call multiple times to obtain price information. During business hours, 33 funeral providers (11.9% of providers called) did not answer at least one call from FTC staff. After business hours, 49 funeral providers (17.6%) did not answer at least one call from FTC staff.

Sometimes, the call was answered by an employee, an answering service, or other representative who was unable to answer staff's questions. During business hours, FTC staff had to call 68 funeral providers (24.5%) more than once or wait for a return call to obtain information about prices. Typically, the person who answered the phone said that the funeral provider was busy and they would return the phone call later.¹⁸ For example, on one of the business hours calls, the funeral provider employee who answered said "with this being a funeral home, they are always in and out, so it is hard to find a good time" for the funeral director to answer calls. On another business hours call to a different provider, the employee who answered said, "I am not at the office right now, so I do not have anything in front of me," and asked if he could call back later.

After business hours, FTC staff had to call 146 funeral providers (52.5% of all funeral providers called after hours) multiple times or wait for a return call to obtain information about prices. Often, on night calls, the phone was answered by an answering service or other funeral provider employee who stated that they were unable to give price information. For example, some funeral directors declined to answer questions about pricing at night or were unwilling to provide pricing for anything except for direct cremation, because they said they were away from the office and did not have the price list in front of them. Other funeral directors were willing to answer questions about pricing after business hours, even though they were away from the office and did not have their price lists with them. At times, those funeral providers were only able to give estimated price information on the call.

C. Technical Issues on Calls

For 34 funeral providers, technical problems arose during calls (regardless of whether placed during or after hours and regardless of whether it was a first, second, or third attempted call), including disconnected calls or issues with call quality, which made it hard for FTC staff and/or the funeral provider to understand each other.

V. Information Provided During Phone Calls

During most phone calls, funeral providers were willing to answer questions about pricing.¹⁹ Many, but not all, provided detailed explanations to staff's questions. However, even in these calls, funeral

¹⁸ In some states, only funeral directors are authorized to provide pricing information to consumers.

¹⁹ Staff did not explore whether the prices given over the phone were consistent with the prices on the funeral provider's price lists or the prices that the funeral provider typically charges consumers. The review also did not

providers gave price information that was less precise, clear, and comprehensive than what consumers may need to understand the costs of funeral arrangements before making an informed decision.

A. Some Providers Gave Estimated and Approximate Price Information or Price Ranges

Of the 278 funeral providers called, 142 (or 51.1%) answered at least some questions about pricing with estimates, ranges, or approximations.

First, several funeral providers said they were providing prices that they acknowledged were estimates only or a “ballpark” or a “guesstimate estimate.”²⁰

- One funeral provider representative was willing to quote prices for direct cremation, but with respect to “a visitation or doing a service somewhere else” – the provider said “it gets more vague for me to ballpark it over the phone, but I can do a pretty decent job.”
- Another representative of a funeral provider said the quoted price was “just off the top of my head. It could be less. It could be a little more.” He offered to give a closer number the next day.
- A funeral provider representative said “It’s hard to say. Um. I mean, a direct cremation is a simple price. But when it comes down to a viewing, there’s more things. Like, the price can - can vary. There is not a set price, at least for our funeral home, to sit here and say hey you know what it’s gonna cost you \$4,000. Because what if you don’t want something in that \$4,000 range. What if I have to put you in a different range? What if you say I don’t want to do that and want to do this. Well, it’s not for me to decide what you guys want to do.”
- On one call, the funeral provider representative quoted a price for a memorial service, and said she thought that the service would last for a few hours. She said: “We just redid our prices so I am a little fuzzy on that.”

“Several funeral providers said they were providing prices that they acknowledged were estimates only or a ‘ballpark’ or a ‘guesstimate estimate.’”

Second, some funeral providers said that they needed to provide ranges for prices for certain offerings, such as cremation with a visitation, because the price could change depending on the options selected by the family.

test whether a consumer making arrangements would have to pay additional fees that were not disclosed on the phone call.

²⁰ The funeral provider who offered to give a “guesstimate estimate” noted that a General Price List is available on its website.

- For example, on one call, a funeral provider representative said that the price for a particular service “could be anywhere from \$3,000 to about \$9,000 depending on what you select and the services you want.”
- Another representative of the funeral provider said, the cost of a “formal funeral” can be between \$5,000 and \$6,000. “It’s just hard to gauge.... You have to tell us specifically what you want, and, just about every item, you know, there is a cost, you know, for that, for that particular item.”
- On another call, the funeral provider representative said that the price for a visitation before cremation could vary by about \$4,000 depending upon the casket selected and the size of the deceased.
- On one call, the representative of the funeral provider said that the question posed about pricing was “a little bit of a complex question. It is tough to give – sort of – that general of a breakdown, to give you specifics. I mean, I can give you a range. But it’s tough to, you know, it’s, it’s tough without specifics to give you an accurate estimate....”
- Another provider representative quoted the price of a service as ranging between \$4,800 and \$5,600, “because there are just things you can add on. There’s not everything that you have to get. But to give you a general price guideline.... You don’t have to get flowers. Of course, if you want to, we have the local florists that we refer you too. But that doesn’t include floral. And that’s why I gave you the range of \$4,800 to \$5,600 because those are added things and kind of going from there.”
- One said the price for a visitation ranges from \$6,500 to \$9,000: “it depends on how many added parts there are.”
- One said: “Depending on exactly what she wants” there is a memorial package that cost a set amount, but “that varies a little bit depending on some choices and the specifics of it.... There is some wiggle room there depending on certain selections.”

Third, on several after-business hours calls, FTC staff reached a funeral director who was away from the office and did not have information about pricing with them. In that instance, several funeral providers said that they could only provide estimated prices. Some of those funeral providers offered to call FTC staff back the next morning with more exact pricing. For example, some funeral provider representatives said, in after business hours calls:

- “If you wanted to have a visitation beforehand. And I’m sorry, because I’m at home, uh, because I don’t have, I don’t have our price list right in front of me, so I’m trying to do this from my head. If you call back, if you call back in the morning uh after 9 o’clock then we’ll actually be in the office and I’ll have our general price list in front of us and I can ... go over it in maybe a little bit more detail. But I just want to help you the best I can tonight.”
- “Unfortunately, I’m just not at the office. I’m going to give you pretty much of a ballpark figure if you don’t mind.”
- “I’m at home so I am not in the office where all these details are.”

- If selecting cremation with a viewing, “you are going to be probably, I’m not right at the desk right now, but you’re going to be probably ... around \$6,600, in that neighborhood.”
- “If it is okay with you, I can call you tomorrow morning after 8 o’clock and I can give you some more uh exact information.... I’m giving you ballpark figures. But, I mean, tomorrow, if I am in the office, I can give you an exact total.”
- “I can do the best I can. We’re not, you know, we’re not in the office at the time and I do not have all the information at, at my hand. But I do have a pretty good idea of what, especially ranges, and some general ideas.”
- “Oh my gosh, I’m blanking.... I honestly cannot remember right now. It’s on the top of my head.... Let’s see if I can’t find something really quick. I just had my file and I cannot find my file. What I can do is I can absolutely give you a call back tomorrow when we’re in office for more specifics for that.... I thought I had one of my pricing guides here at the house with me, and unfortunately, I don’t.”
- “I can kind of give you a little bit of information. And I can give you some pricing. I can’t give you a comprehensive list. Uh, I’m - We’re not in the office right now. And the whole point of talking to you about prices, but I mean, I cannot go over the exact pricing for everything. I can always email you the price list if that is something that would be helpful for you. But I can certainly talk about [] services and things that we can do and some general costs for you.”
- “I’m not in the office right now. Um. Give me one moment. I’m sorry. So, I might have to call you back in the morning once I’m in the office.... [And then provided price information].”
- “I’m not at the funeral home right now so the prices that I’m going to give you are kind of off the top of my head, so please do not hold me exactly to it.”

Similarly, during business hour calls, if the funeral provider was away from the office when FTC staff called, the funeral provider representative often was unable to quote exact prices on the call.

- For example, one representative of the funeral provider said, “I’m not looking at it in front of me now. I’m just doing this off the top of my head. I’m already gone for the day.... I’m not looking at my price list. I’m sorry you caught me off guard... I already gone home for the day. But um that’s what it is I’m pretty sure.” The provider offered to call back in the morning.
- In another example, FTC staff reached a representative of the funeral provider who was out of the office and said “I don’t have the exact total price on that because I am in the car, but it [the price for visitation] is just under \$4,000.”

Fourth, some funeral providers expressed that they were uncomfortable providing specific price information over the phone.

- For example, one funeral provider representative refused to provide pricing about a visitation or memorial service over the phone, because he said, it depended on what the individual wanted and “I’m at a handicap because I’m doing this over the phone. I’m giving you generalities.”

- When asked to provide a variety of prices, one funeral provider representative said “So you are basically calling looking for prices. I mean, you have to know what you want, to start.... If you are calling around to funeral home and to funeral home, you have to compare apples to apples.... I can tell you politely, the more people you talk to, the more laws you’re gonna learn, and you will get multiple different prices.... I am trying to be polite with you. It’s like buying a car, do you want to buy a Kia or do you want to buy a Bentley.”
- One funeral provider representative said “[e]xplaining a lot of this over the phone is kind of difficult, because there is a lot of things thrown at you. You know, if at any time, they would ever like to sit down or you want to come in I can give you a copy of the General Price List where everything is broken down and can show you exactly how it works, make a lot more sense of it.”
- One funeral provider representative said about answering questions about prices, “it’s kind of hard to do over the phone”; he said “I kind of chuckle with people. It’s like calling a car dealership [and asking] how much is a car. But there’s all these little in between.”
- Another said “[w]ithout having an idea of what type of service you are looking at, it’s really hard to give you an exact quote” but offered to provide a price list via email.

Some funeral providers wanted the caller to have made up their mind about all the details of the funeral arrangement before providing price information.

- One representative of the funeral provider said “I don’t really like to quote prices over the phone because a lot of time families say well you told me this on the phone, but you haven’t really – they come in, people come in and make arrangements and they want something different.”
- In another example, the funeral provider representative said it’s “very hard to ... give you prices, because I don’t know what you want to do.... It’s very hard. I explain as much as I can with people over the phone, I don’t have anything to hide.... But I think people should sit down and say this is what we like.”
- Another said, “We can’t quote you a price on a service, you know, on a complete service, because you have to tell us, you know, what all you want. That is the same thing whether it’s a cremation or a funeral. I can have a funeral director give you a call, if that’s what you would like to do, and, again, our funeral price list is on our website.... As a family, those would be some of the things that you really need to decide before you, before you do talk to a funeral director. Now, a funeral director’s job is to help you get to that decision.... They can - they can explain to you everything that is involved in the funeral. Because, again, there are a lots of choices to be made.”
- Another funeral provider representative said “[i]t’s really hard [to quote a price], you know, without knowing specifically what they want.”
- One funeral provider representative declined to answer all questions about costs, saying “it all depends.”

- Another representative of the funeral provider answered questions about costs generally, but said “[d]o you know what they are wanting? Can you be more specific? ... [The cost] depends, would [sic] be at our funeral home? Would it be in the evening? Would it be open casket? ... You would have to ask them these questions and then I could give you a more clear answer.”

Fifth, on some of the calls, the funeral provider representative suggested that consumers would need to come into the office to obtain more accurate information.

- One funeral provider representative said: “If there comes a time that your ex-wife would like to sit down and discuss some things, then, I mean, we can get more specific depending upon what she would want.”
- Another representative said that the caller was welcome to come into the office to meet in person and get a “kind of a firmer number” and give you a “better idea of the actual cost.”
- When asked if there were other fees the family should know about, one funeral provider representative said “when you have time, you can always come in and do a pre-need, in other words you can do it and set it up in advance, and pay on it. [The funeral director] can give you better than I can, the funeral director can give you every little, if there is a - I don’t see any hidden costs in here, but you know, everything that you need to know. You come in, make an appointment. He will sit down and give you everything you need to know. Or you can, just get all the information on paper and have it right in front of you.... He can give you a run down better than I can. I’m kind of like off the top of my head here going through the papers. But it’s about - the price is just about right though what I gave you.”
- Another said “I can kind of give you a range. I can’t give you an exact price without you coming in and making specific selections.” When asked why the price range was so large, the funeral provider said, “it’s a huge selection of options you can choose from” and the price depends on what you select.
- One said “[i]t is very hard, uh, to give a ballpark because of needing to know the exact particulars of what you are doing for service. So, if they are going to use us they are going to have to come in and see us.... And [after] they make some definitive plans, then they’ll leave here with a full itemization, because funeral service, it’s not really like a package.”
- One funeral provider representative said that the total price would not be clear “until [the funeral director] sit[s] down with the family and see exactly what they would like.”
- One said “[t]here are so many variables, you know? I mean, the best thing to do would be to come in and talk to us. Because every, every service is different and it depends on a lot of different things in regards to, you know, what your plans are and everything.”

B. Some Funeral Providers Highlighted Package Pricing

When consumers visit a funeral provider, the Funeral Rule requires the provider to give them a copy of the GPL that they can keep that contains itemized prices.²¹

During staff's calls, most funeral providers gave out itemized pricing for direct cremation (or cremation without any related services). Many funeral providers also gave out itemized prices for the other services that staff asked about, including (a) cremation and a memorial service and (b) cremation and a visitation,²² but others did not. At least 93 funeral providers (33.5%) provided prices for at least one package on a call, without giving information about the itemized prices for components constituting that package. For example, one funeral provider explained on the call "[o]ur pricing comes in packages."

C. Some Funeral Providers Quoted Inconsistent Prices

Most funeral providers offered consistent pricing for the same services on both the business hours call and the after business hours call. However, at least 37 funeral providers did not. These providers quoted different prices for the same services on different calls.²³ For example, one funeral provider quoted a price of \$2,995 for direct cremation during the business hours call. During the after business hours call a day later, the funeral provider quoted \$3,595 for the same service.

On some calls, funeral providers offered price quotes that were different for what appeared to be the same goods and services, but staff could not determine with certainty whether the services being described on each call were identical.²⁴ The problem was exacerbated by the fact that different funeral providers used different terms for the same service, requiring FTC staff to ask follow-up questions or have the funeral provider explain quoted prices in detail to understand the offer.

D. On Some Calls, Providers Did Not Present Some Fees Unless Prompted

On some calls, funeral providers appeared to make sure that the caller understood all costs that would be involved in a particular service, including relevant third-party fees. For example, these funeral providers

²¹ 16 C.F.R. § 453.2(b)(4).

²² Staff's analysis assumed that funeral providers were offering itemized pricing if it was not clear that the prices were part of a package. It is possible that additional funeral providers quoted package prices without specifically noting that those were prices for packages.

²³ In addition, FTC staff noticed differences in price when the funeral provider explicitly said that the price quote was an estimate only. (See Section V.A, above). While these funeral providers informed FTC staff that the prices were estimates and likely not exact, staff was nonetheless unable to obtain consistent price information.

²⁴ Based on staff's experience on the calls, in many instances, funeral providers gave details on the call to explain the goods and services included in the quoted price. On other calls, funeral providers were less clear about what goods and services the price quote entailed, making it challenging for staff to compare prices offered by the same provider or fully understand what goods and services were included in the quoted amount.

explained that consumers might need to pay additional required third-party fees or government fees²⁵ and that some services involved other optional expenses, such as the costs to have flowers, food, or musicians present at a memorial service.

Some funeral providers did not affirmatively present to the caller additional fees that are common in at least some funeral arrangements (see Table 1 below). Some of the undisclosed fees were items that some consumers would be required to pay, such as government fees or other third-party fees that may arise due to uncontrollable circumstances (such as fees based on where the body is located).²⁶ Other fees related to optional goods and services that are common enough that some consumers might reasonably expect the fees to be included in the quoted price. In total, 221 funeral providers gave information about at least one such additional fee once the caller specifically asked about the fee in question, or asked if there were other fees that the family should be aware of.²⁷

Table 1: Fees That Funeral Providers Did Not Describe Until Prompted

| Fees | Number Of Funeral Providers Who Did Not Affirmatively Present This Fee |
|--|---|
| The cost to acquire any death certificate or more than X death certificates. | 144 |
| Flowers | 129 |
| Food | 53 |
| Urn | 48 |
| Newspaper obituary | 37 |
| Stipend for the Clergy/Officiant | 36 |
| Guest book/registry book/prayer cards programs | 17 |
| Cremation permit fee | 10 |
| Medical examiner fee | 8 |
| Fees if the deceased weighed over X pounds | 8 |
| Other state, local, or county fees | 7 |

²⁵ For example, in some areas, consumers must pay a mandatory medical examiner fee or a cremation permit fee. Additionally, in many areas, the appropriate state or local government agency will charge the family of the deceased to obtain a death certificate.

²⁶ The Rule permits funeral providers to charge only one non-declinable fee for their own services, which is for the “services of [the] funeral director and staff” (or “the basic services fee”). 16 C.F.R. § 453.4(b). Funeral providers also may require the payment of a fee due to any “legal, cemetery, or crematory requirement which the funeral provider represents to persons as compelling the purchase of funeral goods or funeral services for the funeral which that person is arranging.” 16 C.F.R. § 453.3(d)(2); 16 C.F.R. § 453.4(b)(ii).

²⁷ As noted above, staff did not conduct in-person test shops to determine whether funeral providers disclosed all relevant fees on the phone call.

| | |
|---|---|
| Fees dependent on the location where the deceased body needs to be picked up (e.g., fees if body is outside the local area or if there is no refrigeration at the place of death) | 8 |
| Cremation container fee | 5 |
| Taxes | 5 |
| Fee to hold service on the weekend | 5 |
| Rental casket | 5 |
| Stipend for musician | 5 |
| Fee to hold the service in a location other than the funeral provider | 5 |
| Crematory fee to conduct a cremation | 3 |
| Fee to remove a pacemaker (if the deceased had a pacemaker) | 2 |
| Other ubiquitous service fees | 2 |
| DVD | 2 |
| Mailing remains/transfer of remains out of state | 2 |
| Funeral provider facility fee | 1 |
| Fee to broadcast ceremony on the internet | 1 |

Notably, some funeral providers affirmatively told consumers that their prices were “all-inclusive,” but later told consumers that they would have to pay more than the quoted “all-inclusive” price.

- For example, one funeral provider representative said that the direct cremation price included “everything from start to finish.” Later during the call, the provider said that consumers also have to pay a medical examiner’s fee and for death certificates, but clarified that those are not the funeral provider’s fees.
- In another example, a representative of the funeral provider said the package price is “going to include every element that you need for the service and for cremation.” When asked if there were other fees that they should be aware of, the funeral provider said that the package price “doesn’t include what we call cash advance items.”²⁸

²⁸ Cash advance items are “any item described to a purchaser as a ‘cash advance,’ ‘accommodation,’ ‘cash disbursement,’ or similar term. A cash advance item is also any item obtained from a third party and paid for by the funeral provider on the purchaser’s behalf.” 16 C.F.R. § 453.1(b).

- Another funeral provider representative said that its direct cremation price “includes everything. Some places will give you the price and will not include the container.” Later in the call, after being asked what else the price includes, the funeral provider said that “death certificates would be extra.”
- One funeral provider representative said that the quoted price “include[s] everything that we do,” but said later that the cost of urns was extra.
- Another said the price is “all-inclusive,” but when asked noted that it did not include death certificates.

VI. Discussions Regarding Electronic Price Information

On some calls, in addition to or instead of giving price information on the phone, funeral providers suggested that the caller review price information either on their website or in the email or text the provider would send.

Specifically, 43 funeral providers suggested that the caller review the price information on their website. And another 67 funeral providers offered to email price information to the caller and two said they would text price information to the caller.

Additionally, one funeral provider told FTC staff that funeral arrangements could be made on its website.

A. Some Funeral Providers Referred to Pricing Information On Their Website

A total of 43 funeral providers encouraged FTC staff to go to their website to find price information.²⁹ Their representatives offered the following explanations for this recommendation:

- “We have a website [mentions website url]. And all the things that I went over with you are on the website as well.... Yeah so, it’s like obviously, that is a lot of information at once so if you need any clarification you can go over there and click on our [] location and it will list all of the packages, along with our General Price List.”
- “And if um you want to look at our price list on our website, it is [url]. And you can also see in the merchandise section the caskets that we offer.... I just know I hit you with a lot of information, so seeing that price list I know can help a lot.”
- “That’s why we make that website as easy as can be [to use]. That way people are able to navigate it if we are not right there in the office to send the pdfs and stuff to you.”

²⁹ Generally, funeral providers offered this information in addition to providing price information on the phone. However, some funeral providers declined to provide the information on the phone and just directed FTC staff to their website.

- The website “is kind of a good place to start... it allows you to look at everything and get an idea.... If you go and look at our prices, it will tell you literally everything.... It’s a good thing. Then, you can look at it and kind of discuss it, and then call back if you have more questions.”
- “But, you know what I can do is send you, and it is on our website as well, our General Price List, but I can email it to you so you can access it easily. And then, uh, you can go down our list and everything is itemized.... You can go down the list and take a look at what services you are interested in and then you could just, do the calculations.”
- “Everything is broken down on the website. Yeah. It - it has every single thing. Like, it’ll explain everything that is included, it’ll tell you what that price is for, it’ll tell you what you can take away and add, and so on and so forth.”

Some funeral provider representatives warned the caller that the price lists on their websites might be confusing.

- For example, one funeral provider representative said the following about the price lists on its website, “if you are not familiar with how it works it might be a little confusing for you. But if you wanted to stop by the office tomorrow I could review stuff or you can call if you have questions.”
- Another stated, “The price list is a little bit, is a little bit, confusing. That’s why you know, you want to be talking to a funeral director when you get ready to make those decisions.”
- One representative of the funeral provider noted that the price list that they would email is “somewhat confusing and that is because of the way we are regulated, how we have to spell things out. So what happens is that people generally tend to go through the price list and they add up everything on the price list. Well, not everything on our price list is required. So that’s why when I give you a couple of different estimates, I’ll show you examples of if you did this type of a service here are the costs that apply.”
- Another said, “I could send you a copy of our General Price List, but it is kind of hard to understand without being in with one of us.”

Other funeral provider representatives stated that the price information on its website is fairly easy to understand.

- For example, one funeral provider representative described the pricing information on its website as “pretty self-explanatory.”
- Another said the price list on its website is “pretty clear and has lots of information.”
- And one said “[i]f you get a price list in front of you, it’s - all funeral homes are pretty much the same categories, they’re all, they’re all regulated to be the same, so you can compare them easy.”

B. Some Funeral Providers Offered to Email and/or Text Price Information

A total of 67 funeral providers offered to text or email price information to the caller.³⁰ FTC staff received a variety of price information from the funeral providers: 26 emailed their GPL,³¹ 2 emailed a filled-out statement of goods and services selected, 3 emailed price estimates, 4 emailed a price quote, and 4 emailed information about the packages they offer. In addition, one funeral provider texted FTC staff a list of prices for cremation and cremation services.

Funeral provider representatives offered the following explanations for why they wanted to email the price information:

- “If you would like, what I can do [] if you want to give me your email address, I know I am throwing out all these numbers and words, umm I can send you a quote via email, that way you can sit down with your family, look that stuff over and kind of get a better idea, if you would like.”
- “It would be better for you if you provide me with an email address. I can email it to you. That way you would have it in writing and everything that’s included in that.... I can give you that quote, but I always like to put it in writing. That way, if you call back, you’re talking to one of the directors, you already know what the price is and everything is.”
- The General Price List “will have everything on it that you know, that you will keep a look out for.”
- “It’s just easier if you see it then me explaining it to you” and “it will be completely broken down the way I am going to send it to you” by email.
- “That way, um, you know, it may be a little easier for you that way you have actually in front of you instead of, you know, just taking [] notes down via phone.”
- “Just always know, this [the prices being given over the phone] um is more of a quote. I mean, I could send you something over email, if you want to see my General Price List. Umm.. I don’t think there is anything else.”
- “There’s a lot of different types of services. There’s a lots of different line items. So it would probably be better for you to just take a look” at the emailed price list.
- “I’m happy to send you an email. Sometimes it would be easier for some people to see those sort of items laid out, and I can send you the packages that we offer.”

³⁰ Most funeral providers who emailed price information to FTC staff also answered questions about price on the phone call, but not all did.

³¹ Some of these providers also included other documents in the email, such as a Casket Price List and a list of pricing for packages.

- “I can email you a quote price breakdown if you want me to, like a quote, would that be easier for you?... I’ll break everything down, so you have um the itemization of what things are.”
- An emailed price list “is just easier to see it in front of you.”
- “[W]hat might work a little better. Since there’s a lot of different options for cremation. Umm is if I can have your email, I can just send you some estimates for direct cremation and then you can build from there.”
- “I’ll go ahead and send you um a price list just so if you need to look back or forgot to ask something... that way um you have a resource you can look at.”
- “What I will also do is send an email with a breakdown of everything to review with your family, cause sometimes it is easier to see everything in print.”
- One representative of the funeral provider, who was reached at night, who was away from the office and did not have all the information in hand, offered to send an email with price information “to explain that a little bit better.”

On at least five occasions, when funeral providers said that they would email price information to staff, FTC staff did not receive an email from the funeral provider.

VII. Summary Of Findings

Key findings from the review are listed below:

- For 200 funeral providers (or 71.9% of all funeral providers called), FTC staff were able to call and receive answers to their pricing questions after three or fewer call attempts during both business hours and after business hours. The other 78 funeral providers either did not give price information during the business hours call, or during the after business hours call, or both.
 - For calls during business hours, staff obtained price information from 257 funeral providers (92.1% of providers called). Staff was unable to obtain price information from the other 21 funeral providers during business hour calls after three or fewer call attempts.
 - For calls after business hours, staff obtained price information from 205 funeral providers (73.7% of providers called). Staff was unable to obtain price information from the other 73 funeral providers during business hour calls after three or fewer call attempts.
- Sometimes it took staff multiple attempts to obtain price information. On the first attempted call during both time periods (business hours and after business hours), staff received price information from 86 funeral providers (or 30.9% of all funeral providers called). For the remaining 192 funeral providers (or 69.1% of all funeral providers called), during either business hours and/or after business hours, staff either did not obtain price information or they had to make more than one phone call or wait for a return call before obtaining price information.

- During business hours, staff received price information from 187 funeral providers (or 67.2% of all funeral providers called) on the first call attempt. After business hours, staff received price information from only 103 funeral providers (or 37.1% of all funeral providers called) on the first call attempt.
- During business hours, 33 funeral providers (11.9% of providers called) did not answer at least one call from FTC staff. After business hours, 49 funeral providers (17.6% of providers called) did not answer at least one call from FTC staff.
- During business hours, FTC staff had to call 68 funeral providers (24.4%) more than once or wait for a return call to obtain information about prices. After business hours, FTC staff had to call 146 funeral providers (52.5% of all funeral called) multiple times or wait for a return call to obtain information about prices.
- 142 funeral providers (51.1% of all funeral providers called) answered at least some questions about pricing with estimates, ranges, or approximations.
- At least 93 funeral providers (33.5% of all funeral providers called) provided prices for at least one package on a call, without giving information about the itemized price for that service.
- At least 37 funeral providers quoted different prices for the same services on different calls.
- A total of 221 funeral providers (79.5% of all funeral providers called) did not tell the caller about at least one additional fee until the caller asked about the fee in question or whether there are additional fees generally.
- A total of 43 funeral providers suggested that the caller review the price information on their website. Also, 67 funeral providers offered to email price information to the caller, and 2 funeral providers said that they would text price information to the caller.

Appendix A

FTC staff designed the call review to include funeral providers serving a variety of locations of differing populations in the United States. Using the U.S. Census Bureau’s statistical information for Metro- and Micropolitan areas in the United States,³² staff selected 15 statistical areas from the top Metropolitan areas, 12 statistical areas from the top Micropolitan areas, and 10 statistical areas from middle, and bottom³³ of the Metro- and Micropolitan area lists, for a total of 67 areas.

Staff varied the number of funeral providers selected from each of the population areas to reach 300 funeral providers: identifying 10 providers from each of the top fifteen Metropolitan areas (5 from the primary city (or cities) and 5 from the surrounding suburban, exurban, and other areas); 5 providers from each of the middle; 3 providers from bottom Metropolitan areas; 2-3 providers from each of the top twelve Micropolitan areas; 2 providers from each of the middle ten Micropolitan areas; and 1-2 providers from each of the bottom Micropolitan areas.

Staff identified the funeral providers located in each Metro- and Micropolitan area in one of two ways. First, where possible, FTC staff obtained a list of all registered funeral providers in the area. Second, staff conducted a search using the Google search engine to find funeral providers in each location, by searching for the name of each city and town located in the Metro- and Micropolitan area in question and the term “funeral.” Once a list of all funeral providers was compiled, staff randomly selected funeral providers to call from each statistical region.

After completing the call review, staff removed from the study 20 funeral providers where the testing methodology had not been strictly followed. Staff also removed from the study 1 funeral provider that was owned by the same company as another funeral provider on the list,³⁴ and 1 company that offered only mortuary services.

³² This information can be found at <https://www.census.gov/data/tables/time-series/demo/popest/2010s-total-metro-and-micro-statistical-areas.html>.

³³ In 2022, staff did a review of funeral provider websites in the 10 statistical areas from the top, middle, and bottom of the Metro- and Micropolitan area lists. Staff felt it was important for this study to look at different geographical areas, to ensure that we were looking at consumer experiences across a diverse set of areas. To that end, for this call review, staff placed calls to funeral providers in the top 15 Metropolitan areas, instead of the top 10. Also, for the top Micropolitan area and the bottom Metro- and Micropolitan areas, staff pulled 22 funeral providers in each category and selected statistical areas to be called by considering (a) whether staff reviewed funeral provider websites in the statistical area in 2021, and (b) whether the statistical area was close in location to other statistical areas already represented in the review.

³⁴ On occasion, when calling funeral providers, staff determined that the company either was no longer in business or it did not offer funeral services to the public. In all but one instance, staff randomly selected a replacement funeral provider from the existing list.

Of the randomly selected funeral providers, several primarily communicated in a language other than English. Where feasible, FTC staff that is fluent in that language spoke with the funeral provider.³⁵

Below is a list of the geographical areas, the number of funeral providers contacted in each area, and the number of funeral providers included in the review.

| | Geographical Area | Total funeral providers called | Total funeral providers included in review |
|--|---|---------------------------------------|---|
| Top Metropolitan Areas (Populations of 19 to 3.6 million) | | | |
| 1 | New York-Newark-Jersey City, NY-NJ-PA Metro Area | 10 | 8 |
| 2 | Los Angeles-Long Beach-Anaheim, CA Metro Area | 10 | 10 |
| 3 | Chicago-Naperville-Elgin, IL-IN-WI Metro Area | 10 | 10 |
| 4 | Dallas-Fort Worth-Arlington, TX Metro Area | 10 | 6 |
| 5 | Houston-The Woodlands-Sugar Land, TX Metro Area | 10 | 8 |
| 6 | Washington-Arlington-Alexandria, DC-VA-MD-WV Metro Area | 10 | 10 |
| 7 | Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Metro Area | 10 | 10 |
| 8 | Atlanta-Sandy Springs-Alpharetta, GA Metro Area | 10 | 10 |
| 9 | Miami-Fort Lauderdale-Pompano Beach, FL Metro Area | 10 | 9 |
| 10 | Phoenix-Mesa-Chandler, AZ Metro Area | 10 | 10 |

³⁵ Staff was unable to complete the call review methodology for one funeral provider where only a limited number of staff fluent in the relevant language (Mandarin) were available. The funeral provider was excluded from this survey as a result, but staff did confirm that the funeral provider would provide price information over the phone.

| | | | |
|--|--|----|----|
| 11 | Boston-Cambridge-Newton, MA-NH Metro Area | 10 | 10 |
| 12 | San Francisco-Oakland-Berkeley, CA Metro Area | 10 | 9 |
| 13 | Detroit-Warren-Dearborn, MI Metro Area | 10 | 10 |
| 14 | Seattle-Tacoma-Bellevue, WA Metro Area | 10 | 10 |
| 15 | Minneapolis-St. Paul-Bloomington, MN-WI Metro Area | 10 | 10 |
| Middle Metropolitan Areas (Populations of 274,966 to 262,258) | | | |
| 1 | Atlantic City-Hammonton, NJ Metro Area | 5 | 5 |
| 2 | Bremerton-Silverdale-Port Orchard, WA Metro Area | 5 | 4 |
| 3 | College Station-Bryan, TX Metro Area | 5 | 5 |
| 4 | Amarillo, TX Metro Area | 5 | 4 |
| 5 | Erie, PA Metro Area | 5 | 5 |
| 6 | Norwich-New London, CT Metro Area | 5 | 5 |
| 7 | Tuscaloosa, AL Metro Area | 5 | 5 |
| 8 | Laredo, TX Metro Area | 5 | 5 |
| 9 | Santa Cruz-Watsonville, CA Metro Area | 5 | 4 |
| 10 | Lynchburg, VA Metro Area | 5 | 5 |
| Bottom Metropolitan Areas (Populations of 95,184 to 58,639) | | | |
| 1 | Corvallis, OR Metro Area | 3 | 3 |
| 2 | Fairbanks, AK Metro Area | 3 | 3 |
| 3 | Grants Pass, OR Metro Area | 3 | 3 |
| 4 | Columbus, IN Metro Area | 3 | 3 |
| 5 | Kokomo, IN Metro Area | 3 | 3 |

| | | | |
|--|---|---|---|
| 6 | Elmira, NY Metro Area | 3 | 3 |
| 7 | Pine Bluff, AR Metro Area | 3 | 3 |
| 8 | Parkersburg-Vienna, WV Metro Area | 3 | 3 |
| 9 | Cumberland, MD-WV Metro Area | 3 | 3 |
| 10 | Carson City, NV Metro Area | 3 | 3 |
| Top Micropolitan Areas (Populations of 223,471 to 108,891) | | | |
| 1 | Roseburg, OR Micro Area | 3 | 3 |
| 2 | Hilo, HI Micro Area | 3 | 3 |
| 3 | Richmond-Berea, KY Micro Area | 3 | 3 |
| 4 | Lebanon, NH-VT Micro Area | 3 | 3 |
| 5 | Jamestown-Dunkirk-Fredonia, NY Micro Area | 3 | 3 |
| 6 | Augusta-Waterville, ME Micro Area | 3 | 3 |
| 7 | Bozeman, MT Micro Area | 2 | 2 |
| 8 | Wooster, OH Micro Area | 3 | 3 |
| 9 | Holland, MI Micro Area | 3 | 3 |
| 10 | Eureka-Arcata, CA Micro Area | 3 | 3 |
| 11 | Lumberton, NC Micro Area | 3 | 3 |
| 12 | Tullahoma-Manchester, TN Micro Area | 3 | 3 |
| Middle Micropolitan Areas (Populations of 44,021 to 43,378) | | | |
| 1 | Freeport, IL Micro Area | 2 | 2 |
| 2 | Huntingdon, PA Micro Area | 2 | 2 |
| 3 | Mount Pleasant, TX Micro Area | 2 | 2 |
| 4 | McAlester, OK Micro Area | 2 | 1 |
| 5 | Ponca City, OK Micro Area | 2 | 1 |

| | | | |
|---|-----------------------------------|-----|-----|
| 6 | Greenville, MS Micro Area | 2 | 1 |
| 7 | Auburn, IN Micro Area | 2 | 2 |
| 8 | Vicksburg, MS Micro Area | 2 | 1 |
| 9 | Cedartown, GA Micro Area | 2 | 1 |
| 10 | Stephenville, TX Micro Area | 2 | 2 |
| Bottom 10 Micropolitan Areas (Populations of 19,330 to 12,413) | | | |
| 1 | Ketchikan, AK Micro Area | 1 | 0 |
| 2 | Spirit Lake, IA Micro Area | 2 | 2 |
| 3 | Fairfield, IA Micro Area | 2 | 2 |
| 4 | Winnemucca, NV Micro Area | 1 | 1 |
| 5 | Vermillion, SD Micro Area | 2 | 2 |
| 6 | Brownsville, TN Micro Area | 2 | 0 |
| 7 | Helena-West Helena, AR Micro Area | 2 | 2 |
| 8 | Portales, NM Micro Area | 1 | 1 |
| 9 | Los Alamos, NM Micro Area | 1 | 0 |
| 10 | Craig, CO Micro Area | 1 | 1 |
| | Totals | 300 | 278 |