



Garden State Consumer Credit Counseling

February 3, 2012

VIA EMAIL
pabankreg@pa.gov

Office of Chief Counsel
Department of Banking
17 N. Second Street, Suite 1300
Harrisburg, PA 17101-2290
Attn: Public Comment on Regulation 3-50

RECEIVED
IRRC
2012 FEB - 7 A 8:51

Re: Proposed Rulemaking-Debt Management Act Continuing Education Requirements

Dear Sir/Madam:

On behalf of Garden State Consumer Credit Counseling, Inc. d/b/a Novadebt ("Novadebt") submits this letter in response to the Notice of Proposed Rulemaking and Request for Public Comment issued by the Pennsylvania Department of Banking regarding continuing education requirements for debt management services licensees.

Novadebt is a 501(c)(3) non-profit consumer credit and housing counseling agency headquartered in Freehold, NJ. We have provided guidance to over a million consumers in need since 1991 from our 10 offices, located in 8 states. Novadebt's certified counselors provide one on one counseling, comprehensive budget analysis, educational material and guidance to available sources of help. Novadebt has been approved by the Executive Office of the U.S. Trustee to provide both pre-filing bankruptcy counseling and pre-discharge bankruptcy education programs. We are also an approved multi-state housing counseling agency in accordance with the standards set forth by the U.S. Department of Housing and Urban Development (HUD). Our organization is a founding member of the Association of Independent Consumer Credit Counseling Agencies (AICCCA) and a member of the National Foundation for Credit Counseling (NFCC).

Pennsylvania has proposed regulation that, if passed, will require continuing education for "counselors, supervisors and managers". Novadebt supports this proposed regulation which would require continuing education for these individuals. It is important that all employees who are counseling clients and those who supervise them are qualified and up to date.

We would suggest several points be clarified:

225 Willowbrook Road
Freehold, NJ 07728

800-77-BILLS
732-409-6281 Fax 732-409-6284

www.gardenstateccc.org
www.novadebt.org



The Agency You Can Trust!





Garden State Consumer Credit Counseling

- Define managers as “employees who directly supervise counselors”. Board members, senior management and other managers who do not counsel clients should not be included in this requirement.
- Revise the term credit counselor to “certified credit counselor” and define the term as “an individual certified by a training program or certifying organization, approved by the Department that authenticates the competence of individuals providing education and assistance to other individuals in connection with debt-management services.”
- Accept proof from third-party accredited organizations that certify counselors, such as the NFCC, that the requirements have been met. The NFCC requires 24 hours of professional development credits for an individual to be recertified every two years. Other certifying organizations have similar requirements. We suggest that this be clarified in the proposed regulation. Certifying agencies could submit a one time explanation of the continuing education requirements to insure that they meet the requirements.

When some states have looked to implement or revise their educational programs or requirements, they have asked for active participation from the industry. In our experience, this has taken the form of a survey, panel or working group should the Department need additional input.

Should you have any further questions I may be reached by phone at: 800-772-4557 ext. 80158 or via email at: sniemiec@novadebt.org.

Thank you for seeking public comment to the proposed Rulemaking. We greatly appreciate the opportunity to provide feedback.

Respectfully submitted,

Susan Niemiec
Compliance Manager

225 Willowbrook Road
Freehold, NJ 07728

800-77-BILLS
732-409-6281 Fax 732-409-
6284

www.gardenstateccc.org
www.novadebt.org



The Agency You Can Trust!

