

From: Furman University, Forrest Stuart
Subject: Reg Z - Truth In Lending

Comments:

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Public Comments on Regulation Z; Docket No. R-1353: Truth in Lending:

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General Comment:RE: Self-certification form requirement for private educational loans.

Proposed language for this process states that institutions will provide to the applicant the self-certification form required under 34 CFR 601.11 (d) and the information required to complete the form. It goes on to state that schools must provide:

- ? The applicant's cost of attendance (COA)
- ? The applicant's expected family contribution (EFC) (if FAFSA completed)
- ? The applicant's estimated financial assistance (EFA)

It further states that schools will provide the difference of the COA and EFA.

There is already a mechanism in place for certification of educational loans, and there is no reason to have a separate one for private educational loans. If a lender sends a certification request to a school, we electronically provide the above information and much more, including: enrollment status, anticipated graduation date (AGD), and the date of the request

Furthermore, we have systems in place to provide this information in a secure manner and, in most cases, a common platform. This benefits the student, the school, and the lender. Having to provide a separate self-certification to the student is duplicative, unnecessary, and quite expensive from a human resources standpoint.

Therefore, since schools currently provide this information directly to the lending entity, this secure and viable transmission of information covers all

aspects of current T-IV regulations and ensures compliance.

It has been communicated that the intent of Congress was to combat what is known as direct to consumer loans (DTC loans). I agree that this is a problem and is very troublesome. To ensure that students do not borrow above the cost of attendance, certification of the loans are important. However, since we have a certification mechanism in place, let's not add another layer of paperwork.

Legal counsel from the Federal Reserve Board has noted, during negotiated rule-making, they will view these comments and may make appropriate decisions. We applaud this cooperative response and do hope my comment is strongly considered.

Thank you for your consideration of these comments.