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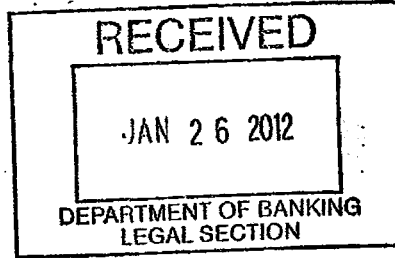
# Money Management INTERNATIONAL

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January 26, 2012

VIA FACSIMILE

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



RECEIVED  
IRRC  
2012 JAN 30 A 9553

RE: Pennsylvania Debt Management Services Act (Act) Continuing Education Requirements

To Whom It May Concern:

Thank you for the Pennsylvania Banking Department's (Department) announcement regarding proposed continuing education requirement rules (Rules) and for allowing Money Management International, Inc. (MMI) to provide the following comments. We provided similar comment this past summer and appreciate many of the changes that have been made to the Rules.

MMI is the largest, tax-exempt, non-profit credit counseling agency in the nation and operates six telephone contact centers and over 100 in-person counseling offices in more than 20 states. MMI provides professional financial guidance, counseling, community-wide educational programs, and debt management assistance. We are licensed or registered in all states that require it of agencies, including Pennsylvania, and have been approved by the Executive Office for U.S. Trustees to provide both pre-filing bankruptcy counseling and pre-discharge bankruptcy education programs in all judicial districts. MMI is also an approved housing counseling agency in accordance with the standards set forth by the U.S. Department of Housing and Urban Development (HUD). MMI is a member of two major credit counseling industry trade associations, the Association of Independent Consumer Credit Counseling Agencies (AICCCA) and the National Foundation for Credit Counseling (NFCC), and is accredited by the Council on Accreditation. In 2010, over 500,000 consumers contacted MMI looking for financial education and guidance on a wide range of issues, including credit card debt, budgeting problems, debt prioritization, housing counseling, bankruptcy counseling, and pre-discharge bankruptcy education.

While we appreciate that the Department is required to promulgate Rules relating to the Act, the continuing education requirements continue to be unique and not in line with what many providers of certification programs allow or offer. For example, the NFCC, MMI's third-party certification provider and that of many

A Nonprofit Community Service Organization

Accredited by the  
Council on Accreditation

Member of the  
National Foundation for Credit Counseling


Member of the  
Association of Independent Consumer Credit Counseling Agencies

other Act licensees, does not allow individuals who do not actually counsel clients to maintain a counselor certification. As MMI promotes supervisors and managers from within almost exclusively, these individuals have, in fact, been certified at one point, but they cannot maintain their certification since they no longer counsel clients. In keeping with the Act, our supervisors and managers do receive significant ongoing education; however, the continuing education is provided in-house.

Accordingly, we respectfully request that the Department only require an independent certifying organization for counselors and allow internal continuing education for supervisors and managers. We also ask that the Department allow experiential learning to meet the requirements for such internal training since such learning is endorsed by independent certifying organizations.

We appreciate your attention to ensuring the Act is properly administered and would welcome any further questions or feedback you would like to discuss. I can be reached at 713.394.3331 or [Zynda.Sellers@moneymanagement.org](mailto:Zynda.Sellers@moneymanagement.org).

Sincerely,

  
Zynda Sellers  
General Counsel