

**CREDIT COUNSELING CORE ANALYSIS TOOL**  
**Part I**

| <b>Factors Showing Organization<br/>is Furthering<br/>Educational Purpose</b>   | <b>Comments</b>            | <b>Factors Showing Organization<br/>is Not Furthering<br/>Educational Purpose</b>  | <b>Comments</b>            |
|---|----------------------------|--|----------------------------|
| <b>COUNSELING SESSIONS</b>  | <b>COUNSELING SESSIONS</b> | <b>COUNSELING SESSIONS</b>   | <b>COUNSELING SESSIONS</b> |
| <b>1. Counselors ask clients to provide detailed information about the type, amount and source of all significant items of income, assets, liabilities (including secured and unsecured debt), and expenses.</b>  | <b>1.</b>                  | <b>1. Counselors ask clients to provide information on their income, assets, liabilities and expenses only to the extent necessary for the counselor to determine whether they qualify for a debt management plan.</b> | <b>1.</b>                  |
| <b>2. Counselors interview clients about their budget and finances, discussing topics including their employment, education, buying habits, significant expenditures, and any significant past or anticipated changes in their earnings, assets, expenses and liabilities, including the reason or cause for those changes.</b> | <b>2.</b>                  | <b>2. Counselors generally do not interview clients about their budget and finances except to the extent necessary to qualify the client for a debt management plan.</b>   | <b>2.</b>                  |
| <b>3. Based on this information, counselors develop and present to clients a number of options and strategies for</b>   | <b>3.</b>                  | <b>3. Counselors generally only present debt management plans as a possible option. They generally do not present</b>  | <b>3.</b>                  |

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|---|-----------|---|-----------|
| <p>addressing their debt problems, including creating and maintaining a budget, establishing debt management payment plans with creditors, negotiating directly with creditors on payment or interest rate relief, and filing for bankruptcy.</p> |           | <p>other alternatives for addressing the client's financial problems, such as budgeting, negotiating directly with creditors or bankruptcy.</p> |           |
| <p>4. The counselors will discuss the advantages and disadvantages of each of these options with clients and will make recommendations for which options are best suited to meet the clients' individual needs, goals and circumstances.</p>      | <p>4.</p> | <p>4. Counselors generally only recommend debt management plans as a possible option.</p>   | <p>4.</p> |
| <p>5. Counselors also provide referrals to other organizations for appropriate support services, such as</p>  | <p>5.</p> | <p>5. Counselors generally do not provide referrals to other organizations for appropriate support services.</p>                                | <p>5.</p> |

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| <b>employment, training, and<br/>psychological counseling.</b>  |   |  |   |
|---|---|--|---|
| <b>COUNSELOR EDUCATION<br/>&amp; TRAINING</b>   | <b>COUNSELOR EDUCATION<br/>&amp; TRAINING</b> | <b>COUNSELOR EDUCATION<br/>&amp; TRAINING</b>  | <b>COUNSELOR EDUCATION<br/>&amp; TRAINING</b> |
| <p><b>1. Counselors receive comprehensive training in counseling skills, personal finance, budgeting, and credit and debt management in live or interactive training sessions and through detailed written manuals.</b></p> | <p><b>1.</b></p>                              | <p><b>1. Counselors primarily receive training in marketing, qualifying for and establishing debt management plans. They receive only limited training in personal finance, budgeting, and credit and debt management.</b></p> | <p><b>1.</b></p>                              |
| <p><b>2. Counselors also receive training on how to develop options and recommendations that address the particular circumstances of each client.</b></p>   | <p><b>2.</b></p>                              | <p><b>2. Counselors do not receive training on how to develop options and recommendations that address the particular circumstances of each client.</b></p>  | <p><b>2.</b></p>                              |
| <p><b>3. Counselors are trained in identifying underlying personal problems (such as illness, loss of employment) that might contribute to financial problems and on making appropriate referrals.</b></p>                  | <p><b>3.</b></p>                              | <p><b>3. Counselors are not trained in identifying underlying personal problems that might contribute to financial problems or on making appropriate referrals.</b></p>  | <p><b>3.</b></p>                              |

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| <p><b>4. Counselors are evaluated on how thoroughly and effectively they develop and present options to match the particular circumstances of each client. They are not evaluated or compensated based on whether their clients enroll for additional services such as debt management plans.</b></p>   | <p><b>4.</b></p>                   | <p><b>4. Counselors are evaluated and compensated, in part, on how many clients they sign up for debt management plans.</b></p>  | <p><b>4.</b></p>                   |
| <p><b>OUTREACH/ADVERTISING</b></p>  | <p><b>OUTREACH/ADVERTISING</b></p> | <p><b>OUTREACH/ADVERTISING</b></p>   | <p><b>OUTREACH/ADVERTISING</b></p> |
| <p><b>1. The organization uses the Internet, mass media and direct mail to advertise its counseling and debt management services. The advertisements primarily focus on counseling services (based on visual prominence and relative amount of time and space devoted). Debt management plans are mentioned as only one possible option for addressing debt problems.</b></p> | <p><b>1.</b></p>                   | <p><b>1. The organization uses the Internet, phone solicitations, mass media and direct mail to advertise its counseling and debt management services. Its advertisements primarily promote debt management plans (based on prominence and relative amount of time and space devoted).</b></p> | <p><b>1.</b></p>                   |

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|   |  |  |                  |
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|   |  |  |                  |
| <p><b>2. The organization receives referrals from employers, union leaders, clergymen, community organizations or creditors, but does not purchase lists of, and pay for referrals of, debtors.</b></p> |  | <p><b>2. The organization receives referrals from employers, union leaders, clergymen, community organizations or creditors, and purchases lists of, and pays for referrals of, debtors, whom it contacts to offer services.</b></p> | <p><b>2.</b></p> |

**PART II**

**This part of the CAT is to be completed only if the organization fails to have all the factors (including all subelements) showing qualification for exemption.**

| <b>GOVERNANCE</b>  | <b>GOVERNANCE</b> | <b>GOVERNANCE</b>  | <b>GOVERNANCE</b> |
|--|-------------------|--|-------------------|
| <p>1. Community-based board that is independent of creditors, with a majority of representatives from a variety of segments of the community such as religious organizations, civic groups, labor unions, business groups, and educational institutions.</p> | <p>1.</p>         | <p>1. Small, related board or board dominated by creditors, banks, credit card companies, or others with a financial interest in the organization.</p> | <p>1.</p>         |

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| <b>FUNDING SOURCES</b>  | <b>FUNDING SOURCES</b> | <b>FUNDING SOURCES</b>  | <b>FUNDING SOURCES</b> |
|---|------------------------|---|------------------------|
| <p>1. Contributions and grants, including “fair share” payments, which may come in some instances from credit card companies and other creditors.</p> | <p>1.</p>              | <p>1. Funds labeled as “voluntary contributions” and/or grants are received in exchange for DMP services.<br/>Organization receives funds from entity with financial interest in the organization, and for which conditions are placed on the receipt of funding.</p> | <p>1.</p>              |