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ABSTRACT

Information is provided on the activities of the First Independent Trust Company (FITCO) of Carmichael, California, which made loans to students participating in the Stafford Student Loan Program until California's State Banking Department closed it in May 1989. During the 11 years FITCO was in the Stafford program, it made over $1 billion in loans that were guaranteed by the California Student Aid Commission and the Higher Education Assistance Foundation. Most of FITCO's loans were made to students attending proprietary schools. FITCO had problems keeping current its loan origination fee payments to the United States Department of Education. Twenty-one audits and reviews of FITCO activities were identified, each of which found minor or major deficiencies in FITCO's operations. The report describes the chronology of events from when FITCO began, ceased operations and became involved in a lawsuit with the California Banking Department. The report describes the types of loans made under the Stafford Student Loan Program, lists selected milestones detailing FITCO's activities, presents an analysis of FITCO's remittance of loan origination fees, and offers a chronology of audits and reviews performed at FITCO. A list of 14 related General Accounting Office products is appended. (JDD)

United States General Accounting Office

GAO

Fact Sheet for the Chairman, Permanent Subcommittee on Investigations, Committee on Governmental Affairs, U.S. Senate

September 1990

STUDENT LOAN LENDERS

Information on the Activities of the First Independent Trust Company

GAO/HRD-90-183FS

GAO

United States
General Accounting Office
Washington, D.C. 20548

Human Resources Division

B-241253

September 25, 1990

The Honorable Sam Nunn
Chairman, Permanent Subcommittee
on Investigations
Committee on Governmental Affairs
United States Senate

Dear Mr. Chairman:

This report responds to your request for information on activities of the First Independent Trust Company (FITCO) of Carmichael, California. FITCO made loans to students participating in the Stafford Student Loan Program until California's State Banking Department closed it in May 1989. Specifically, you requested information describing the chronology of events from when FITCO began and ceased operations and afterwards. In addition, you asked that we (1) analyze FITCO's loan portfolio, (2) determine whether it owed monies to the Department of Education, and (3) summarize the audits and reviews of FITCO conducted by various organizations.

On September 19, 1990, we discussed the results of our work with your office. This fact sheet summarizes the information provided at that meeting.

Background

The Stafford Student Loan Program, formerly called the Guaranteed Student Loan Program, consists of three types of loans: Stafford loans, Parent Loans for Undergraduate Students (PLUS), and Supplemental Loans for Students (SLS). These types of loans differ somewhat in their terms and conditions (see app. I), but each is guaranteed by state or private nonprofit guaranty agencies against borrowers' death, disability, bankruptcy, and default. Banks, credit unions, and savings and loan associations are the primary providers of student loans. The federal government reinsures the guaranty agencies against death, disability, bankruptcy, and default.

Lenders participating in this program generate revenue by earning interest and receiving from the Department of Education a special allowance payment—to assure that student loans provide close to market rates of return. For Stafford loans (but usually not SLS and PLUS loans) federal interest payments are generally made while the student

remains in school and afterwards for a grace period,[1] and then the borrower becomes responsible for principal and interest payments. In contrast, the special allowance payment is paid to the lender throughout the life of the loan. Lenders can file quarterly for their interest subsidy payments.

From Stafford loan borrowers, lenders collect a 5-percent origination fee, which is deducted from each loan disbursement made to the borrowers. SLS and PLUS loans are not subject to these fees. The fee is remitted to the Department to help offset the government's cost of subsidizing these loans. In addition, lenders can collect an insurance premium of up to 3 percent from each loan disbursement, regardless of the type of loan. The premium is remitted to the guaranty agencies to help offset their administrative costs.

FITCO has made all three types of student loans. Its primary practice was to sell the loans it originated to a secondary market quickly,[2] often within a few days of their origination. FITCO could then use these loan proceeds to make new loans.

Scope and Methodology

As agreed with your office, we obtained the requested information primarily by interviewing and reviewing records provided by officials of the (1) California State Banking Department, (2) Department of Education headquarters and its San Francisco regional office (region IX), (3) California Student Aid Commission (CSAC), and (4) Higher Education Assistance Foundation (HEAF). We also spoke with and obtained documents from several other organizations that serviced or otherwise were involved in handling FITCO loans.

CSAC and HEAF guaranteed almost all the loans FITCO made and gave us a statistical analysis of the loans FITCO disbursed by fiscal year, type of loan, and kind of school borrowers attended. We analyzed loan information by grouping the schools in two categories—proprietary and nonproprietary.[3] We did not independently verify the information CSAC and HEAF provided.

[1]Generally between 6 and 12 months after a student leaves school.

[2]A lending institution that purchases guaranteed student loans from originating lenders to provide them funds to make new loans.

[3]CSAC provided us with information for its loans disbursed by nine types of schools. We used its category "vocational profit-making" to show proprietary schools, and combined the remaining eight types of schools to compute nonproprietary school information.

Our work was conducted between May and September 1990 in accordance with generally accepted government auditing standards.

Chronology of Events

Appendix II presents information on selected milestones in FITCO's activities, beginning with its start-up in September 1975, covering events leading to its closing in May 1989, and ending with a lawsuit the California Banking Department filed against FITCO's former officers in June 1990. Appendix II also includes the dates when CSAC and HEAF began guaranteeing FITCO's loans, 1979 and 1986, respectively, and highlights when FITCO was notified of possible problems concerning its operations.

Portfolio Analysis

During the 11 years FITCO was in the Stafford program, it made over $1 billion in loans that were guaranteed by CSAC and HEAF. Table 1 shows the amount of loan disbursements that were guaranteed by CSAC and HEAF, most of which were for Stafford loans.

Table 1: Net Disbursements by Type of Loan for CSAC and HEAF

Dollars in millions

	Guaranty agency	
Type of loan	**CSAC**	**HEAF**
Stafford	$383.6	$379.0
PLUS	17.7	10.7
SLS	118.1	179.0
Total	**$519.4**	**$568.7**

Most of FITCO's loans were made to students attending proprietary schools. Table 2 shows that $355.2 million (68 percent) of the $519.4 million in loans guaranteed by CSAC and $547.1 million (96 percent) of the $568.7 million in loans guaranteed by HEAF were made to students attending such schools.

Table 2: Net Disbursements by Type of School for CSAC and HEAF

Dollars in millions

	Guaranty agency	
Type of school	**CSAC**	**HEAF**
Proprietary	$355.2	$547.1
Nonproprietary	164.2	21.6
Total	**$519.4**	**$568.7**

Possible Monies Owed to the Department of Education

When a lender files its quarterly bill with the Department for interest and special allowance subsidy payments, the Department offsets any origination fees it is due. For example, if a lender is due $1 million in interest and special allowance and owes the Department $400,000 in origination fees, the Department would pay the lender $600,000. Conversely, if a lender owes more origination fees than interest and special allowance, it should send the Department a check for the difference.

Because FITCO sold its loans to secondary market lenders soon after it made them, it usually owed the Department loan origination fees. At one point, FITCO owed the Department over $13 million in fees from loans originated in 1987. These fees were not paid until April 1988.

Appendix III contains a detailed analysis of the problems FITCO had in keeping current its origination fee payments to the Department. For example, FITCO owed the Department about $5.5 million after it ceased operations in May 1989; however, in March 1990, the Department agreed with the State Banking Department (as the liquidator of FITCO) to settle this debt for $4.4 million. We confirmed through our analysis of the Department's records that FITCO actually owed the Department $5.5 million.

The Department said that it agreed to the $4.4 million amount after considering the litigation risk of pursuing the $5.5 million underpayment (i.e., the probability of prevailing), the resource drain on the federal government needed to pursue the litigation, and the time it would take to receive the $5.5 million. In addition, the Department indicated that the deadline for amending its $4.4 million claim with the State Banking Department had expired.

Summary of Reviews Conducted at FITCO

We identified 21 audits and reviews of FITCO activities conducted during the 14-year period by such organizations as the State Banking Department, the Department of Education, CSAC, and HEAF. (See app. IV.)

Each of the audits and reviews found minor or major deficiencies in FITCO's operations. An example of a minor deficiency was that FITCO failed to use new student addresses, which it knew, to mail delinquency letters. A major deficiency was that FITCO did not timely file its interest billings and owed the Department origination fees, such as the $13 million discussed earlier. In addition, State Banking Department audit reports cited problems in FITCO's financial operations as early as

December 1975 and found generally unsatisfactory conditions as early as November 1976.

As the result of CSAC's and HEAF's last reviews of FITCO in spring 1989, the two guaranty agencies began to terminate their relationship with FITCO. The two agencies found significant problems with FITCO's operations, including not paying the insurance premiums on loans it had made.

As agreed with your office, we did not obtain written comments on this fact sheet. We did, however, discuss its contents with Department of Education program officials and incorporated their comments where appropriate.

We are sending copies of this fact sheet to other congressional committees, the Department of Education, and other interested parties. Should you wish to discuss its contents, please call me on (202) 275-1793. Other major contributors are listed in appendix V.

Sincerely yours,

Franklin Frazier

Franklin Frazier
Director, Education
and Employment Issues

Contents

Abbreviations

CSAC	California Student Aid Commission
FITCO	First Independent Trust Company
GAO	General Accounting Office
HEAF	Higher Education Assistance Foundation
PLUS	Parent Loans for Undergraduate Students
SBD	California State Banking Department
SLS	Supplemental Loans for Students
UES	United Education and Software

Description of the Differences Between the Loan Types Made Under the Stafford Student Loan Program

The Stafford Student Loan Program consists of three types of loans. These loans differ somewhat in their terms and conditions.

Stafford Loans

Stafford loans, formerly called guaranteed student loans, have the largest volume of the three loan types (almost $10 billion in fiscal year 1989) and have been available since the program was created as part of the Higher Education Act of 1965. The loans are based on the student borrower's financial needs. However, borrowers do not have to demonstrate their credit worthiness. Other key facts are:

- Interest rates for new borrowers are currently 8 percent for the first 4 years of repayment and 10 percent after that.
- Maximum loan limits are $17,250 for undergraduates and $54,750 for graduate students.
- Borrowers generally have a 6-month grace period after leaving school before repayment begins.

PLUS Loans

These loans enable parents to borrow funds for each dependent student (those who are not generally responsible for their own financial support) enrolled at a school. These loans started in 1981 and are not needs-based. Other key facts are:

- Interest rates are variable and are determined once a year with a ceiling of 12 percent (11.49 percent is the rate now).
- Maximum loan limits for each dependent are $4,000 per year to a total of $20,000.
- Normally no grace period and payment of principal and interest generally must begin within 60 days after the loan is dispersed.

SLS Loans

These loans are available to undergraduates who are generally responsible for their own financial support, and graduate students. These loans started in 1982 and, like PLUS loans, are not needs-based.[1] Also, like PLUS loans, SLS loans usually have the same interest rate and borrowing limits, and have no grace period. However, legislation passed in December 1989 restricted the availability of SLS loans for such factors as the school's borrower-default rate and the borrower's lack of a high-school diploma or a general equivalency degree.

[1]SLS loans were part of the Auxiliary Loans to Assist Students program before 1986, and had terms and conditions similar to SLS; both are reported by the Department as SLS loans.

Selected Milestones Detailing FITCO's Activities

Table II.1: Timeframe of Selected Events Concerning FITCO

Date	Event
Sept. 2, 1975	FITCO began operations.
1979[a]	CSAC started guaranteeing FITCO loans.
Aug. 1986	HEAF started guaranteeing FITCO loans.
Dec. 1986-Mar. 1987	FITCO set up computer services in 600 schools in 43 states to facilitate processing of loan applications.
Jan. 15, 1987	Memo from Department of Education headquarters to region IX concerning FITCO's late processing of refunds and returned checks and its possible unreasonable time for processing the checks.
Jan. 26, 1987	Region IX recommended a monitoring system to ensure FITCO promptly submitted interest billings and paid origination fees.
Feb. 9, 1987	Region IX notified Department headquarters of its concern about FITCO's practice of supplying schools with personal computers and problems with FITCO's interest and special allowance payments, and origination-fee billings practices.
Mar. 23, 1987	Department notified FITCO to cease providing schools with computers and software to process loans because these actions constituted an improper inducement.
Aug. 5, 1987	The Department notified FITCO that charging schools a computer rental fee of $18.75 per month resolved its concern with this issue.
Apr. 14, 1988	FITCO paid the Department $13,328,471 for its 1987 loan origination fees.
Mar. 3, 1989	FITCO had not been timely in paying insurance premiums to HEAF on thousands of loans. HEAF stated it was willing to allow FITCO a reasonable time to pay insurance premiums in order to reinstate loan guarantees that had been canceled.
Mar. 6, 1989	HEAF notified the California Student Loan Finance Corporation (secondary market) that it may have purchased loans from FITCO that were not guaranteed because FITCO had not paid the insurance premiums.
Apr. 21, 1989	CSAC notified FITCO that it planned to discontinue guaranteeing its loans.
May 1989	The Department notified FITCO that, based on an audit, it owed about $1.1 million for the overpayment of interest and special allowance subsidy payments and an additional $4.4 million in loan origination fees.
May 1, 1989	FITCO stopped making student loans.
May 1, 1989	HEAF notified FITCO that it would no longer guarantee its Stafford, SLS, or PLUS loans.
May 5, 1989	The California State Banking Department (SBD) notified FITCO that more capital would be needed to continue operating.
May 10, 1989	A HEAF official stated that FITCO was inappropriately commingling school tuition refunds with monies used to make new loans or pay insurance premiums to HEAF.

(continued)

Date	Event
May 11, 1989	HEAF canceled conditional guarantees it previously issued on FITCO loans because of FITCO's nonpayment of insurance premiums.
May 12, 1989	HEAF filed suit against FITCO for failure to forward refunds to subsequent holders (secondary market lenders) of loans.
May 19, 1989	The Department notified HEAF that reinsurance coverage would be maintained for FITCO-originated loans, if FITCO or current holders of the loans would pay origination fees due.
May 19, 1989	SBD closed FITCO.
May 31, 1989	HEAF notified SBD that it intended to terminate its relationship with FITCO by not guaranteeing more loans.
June 9, 1989	SBD, as liquidator of FITCO, wanted to settle the nonpayment of insurance premiums with HEAF.
June 20, 1989	HEAF rejected SBD's offer to pay FITCO's insurance premiums due to HEAF.
Oct. 19, 1989	The Department filed its claim and supporting documentation with SBD.
Jan. 12, 1990	The Department accepted SBD's offer of $4.4 million in full satisfaction of all of FITCO's unpaid origination fees.
Jan. 16, 1990	The Department's Office of Inspector General informed the Department that a consultant for SBD indicated that the claim against FITCO for unpaid origination fees needed to be changed if possible. It reported that FITCO owed origination fees of $5.5 million.
Jan. 19, 1990	Department agreed to settle its claim against FITCO for the nonpayment of origination fees for $4.4 million.
Mar. 20, 1990	Final agreement between the Department and SBD citing payment of $4.4 million to satisfy all of FITCO's obligations.
June 19, 1990	SBD filed civil lawsuit against former officers of FITCO.

[a]A CSAC official could not provide GAO with the date that CSAC started guaranteeing student loans.

Additional Analysis of FITCO's Remittance of Loan Origination Fees

When FITCO's loan volume increased substantially in late 1986, the Department became concerned that FITCO's cash flow problems might affect its timely payment of loan origination fees because the fees could amount to several million dollars each quarter. In January 1987, a region IX official recommended to Department headquarters that a monitoring system be established to assure that interest billings are submitted promptly and origination fees paid.

Department headquarters replied by suggesting that the regional official monitor FITCO's filings by having FITCO send him a copy of each form 799 when filed.[1] This official could also confirm that the form 799 was eventually processed by requesting copies from Department headquarters.

In late 1987, CSAC reviewers asked for the Department's assistance in reviewing FITCO's interest billing forms. In January 1988, two region IX reviewers went to FITCO, including the official who suggested setting up a monitoring system. They found that FITCO had not remitted to the Department its loan origination fees for any loans originated in 1987. The forms for the first three quarters of 1987 were filed in December 1987, but the Department returned them to FITCO because they were incomplete.

Tables III.1 and III.2 detail the form 799 history for loan origination fees for FITCO's student loans. Table III.1 shows those origination fees for loans FITCO originated itself and covers the period June 1984 through March 1989.

[1]FITCO filed two form 799s, one for loans it originated directly and another for loans that were originated on behalf of FITCO by United Education and Software.

Table III.1: FITCO's Interest Subsidy Billings With Origination Fees for Loans It Originated (Lender Number 822374)

Form 799 for quarter ending	Date the Department processed form 799	Fees reported and not offset	Cumulative balance until Department was paid	Date Department received payment
06/84	10/28/84	$38,595.99	$38,595.99	
09/84	11/28/84	133,433.05	172,029.04	2/20/85
12/84	02/24/85	223,259.43	223,259.43	
03/85	04/28/85	335,336.77	558,596.20	
06/85	08/01/85	354,850.18	913,446.38	10/01/85
09/85	02/23/86	520,108.94	520,108.94	3/19/86
12/85	03/09/86	679,600.11	679,600.11	
03/86	08/20/86	286,665.79	966,265.90	
06/86	12/31/86	233,479.52	1,199,745.42	
09/86	02/11/87	543,655.24	1,743,400.66	
12/86	07/26/87	1,547,042.48	3,290,443.14	1/17/88
03/87	02/14/88	2,259,380.13	2,259,380.13	
06/87	02/14/88	3,413,841.54	5,673,221.67	
09/87	02/14/88	4,860,694.25	10,533,915.92	
12/87	02/28/88	2,794,555.30	13,328,471.22	4/14/88
03/88	11/27/88	2,252,481.82	2,252,481.82	
06/88	10/06/88	765,961.46	3,018,443.28	
09/88	06/14/89	799,181.13	3,817,624.41	
12/88	08/02/89	413,512.90	4,231,137.31	
03/89	07/10/89	(92,015.64)	4,139,121.67	

In addition to originating loans itself, FITCO had an arrangement with a third party—United Education and Software (UES)[2] —to process loans on its behalf. The interest subsidy billings for these loans also were not filed on time. Table III.2 shows the billing history for FITCO loans processed by UES, including their payment and nonpayment of origination fees.

[2]UES is a private organization that operated a data system that handled loan servicing and that owns and operates a group of private schools.

Table III.2: FITCO's Interest Subsidy Billings for Loans Processed by UES for FITCO (Lender Number 829877)

Form 799 for quarter ending	Date the Department processed form 799	Fees reported and not offset	Cumulative balance until Department was paid	Date Department received payment
09/84	12/17/86	$137,782.50	$137,782.50	
12/84	12/17/86	214,287.65	352,070.15	
03/85	12/17/86	237,807.65	589,877.80	
06/85	12/17/86	218,790.11	808,667.91	
09/85	12/17/86	81,325.80	889,993.71	
12/85	12/17/86	197,748.26	1,087,741.97	
03/86	12/17/86	218,443.54	1,306,185.51	
06/86	12/17/86	251,206.74	1,557,392.25	8/13/86
09/86	12/17/86	134,364.98	134,364.98	4/30/87
12/86	05/10/87	196,988.93	196,988.93	
03/87	05/03/87	496,130.25	693,119.18	7/23/87
06/87	05/19/88	545,145.70	545,145.70	
09/87	05/19/88	718,551.51	545,145.70	7/18/88[a]
12/87	05/19/88	617,719.84	1,162,865.54	
03/88	06/05/88	242,335.69	1,405,201.23	
06/88	01/05/89	($1,134.76)	1,404,066.47	

[a]FITCO only paid $718,551.51 on the July 18, 1988, payment instead of the full cumulative balance.

FITCO paid its origination fees in 1988, after the Department advised it to file subsequent reports on time and noted that its compliance would be closely monitored. However, a CSAC review in early 1989 revealed that FITCO had not filed its forms 799 for 1988 and estimated that FITCO owed the Department about $5.5 million in origination fees for loans originated in 1988.

FITCO filed its forms 799 for loans originated in 1988 and 1939 but did not pay origination fees due. FITCO reported it owed $5.5 million in such fees—$4.1 million for loans it processed and $1.4 million for loans originated by the UES.

The Department settled with SBD (as liquidator of FITCO) in March 1990 for $4.4 million on the outstanding origination fees. The agreement stated that the Department knew that FITCO owed origination fees that may have exceeded $5.5 million.

The Department said that it agreed to the $4.4 million amount after considering the litigation risk of pursuing the $5.5 million underpayment (i.e., the probability of prevailing), the resource drain on the federal

government needed to pursue the litigation, and how long it would take to receive the $7.5 million. In addition, the Department indicated that it had already filed its claim with SBD for $4.4 million, and that the deadline for amending that claim had expired.

Chronology of Audits and Reviews Performed at FITCO

Review number	Review date(s)	Who conducted the review
1	Dec. 16, 1975	State Banking Department
2	Nov. 5, 1976	State Banking Department
3	Dec. 9, 1977	State Banking Department
4	May 31, 1978	State Banking Department
5	Nov. 30, 1979	State Banking Department
6	Aug. 29, 1980	State Banking Department
7	Feb. 27, 1981	Department of Education
8	Mar. 31, 1981	State Banking Department
9	Feb. 24-23, 1982	Department of Education
10	Mar. 31, 1983	State Banking Department
11	June 27-29, 1984	California Student Aid Commission
12	July 27, 1984	Department of Education
13	Aug. 31, 1985	State Banking Department
14	Mar. 3-7, 1986	California Student Aid Commission
15	Nov. 17, 1986	State Banking Department
16	Nov. 19, 1987-Jan. 21, 1988	California Student Aid Commission
17	Jan. 27, 1988	Department of Education/ California Student Aid Commission
18	Mar. 1987-May 1988	Department of Education
19	Mar. 31, 1988	State Banking Department
20	Feb. 27-Mar. 24, 1989	California Student Aid Commission
21	Apr. 10-20, 1989	Higher Education Assistance Foundation

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Related GAO Products

Supplemental Student Loans: Legislative Changes Have Sharply Reduced Loan Volume (GAO/HRD-90-149FS, Aug. 3, 1990)

Financial Problems in the Stafford Student Loan Program (GAO/T-HRD-90-52, July 27, 1990)

Guaranteed Student Loans: Credit Bureau Reporting Practices by Guaranty Agencies and Lenders (GAO/HRD-90-71BR, Apr. 9, 1990)

Supplemental Student Loans: Who Are the Largest Lenders? (GAO/HRD-90-72FS, Feb. 21, 1990)

GAO Views on the Stafford Student Loan Program (GAO/T-HRD-90-13, Feb. 20, 1990)

Supplemental Student Loans: Who Borrows and Who Defaults (GAO/HRD-90-33FS, Oct. 17, 1989)

Guaranteed Student Loans: Analysis of Student Default Rates at 7,800 Postsecondary Schools (GAO/HRD-89-63BR, July 5, 1989)

Defaulted Student Loans: Preliminary Analysis of Student Loan Borrowers and Defaulters (GAO/HRD-88-112BR, June 14, 1988)

GAO's Views on the Default Task Force's Recommendations for Reducing Default Costs in the Guaranteed Student Loan Program (GAO/T-HRD-88-7, Feb. 2, 1988)

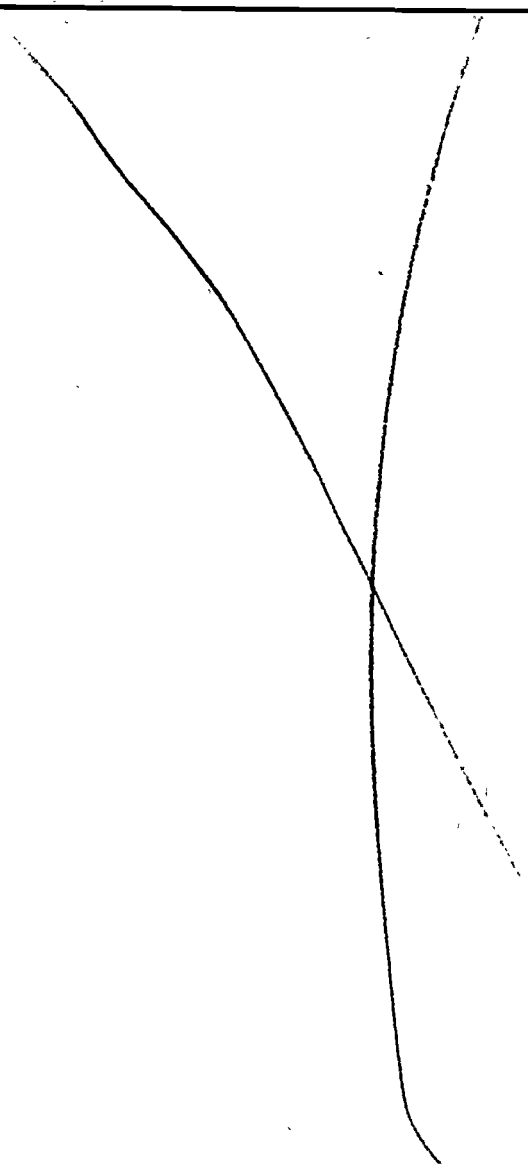
Guaranteed Student Loans: Potential Default and Cost Reduction Options (GAO/HRD-88-52BR, Jan. 7, 1988)

Guaranteed Student Loans: Analysis of Insurance Premiums Charged by Guaranty Agencies (GAO/HRD-88-16BR, Oct. 7, 1987)

Guaranteed Student Loans: Legislative and Regulatory Changes Needed to Reduce Default Costs (GAO/HRD-87-76, Sept. 30, 1987)

Defaulted Student Loans: Private Lender Collection Efforts Often Inadequate (GAO/HRD-87-48, Aug. 20, 1987)

Defaulted Student Loans: Guaranty Agencies' Collection Practices and Procedures (GAO/HRD-86-114BR, July 17, 1986)



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