cost of money to the lenders, should decline, the interest income would be more adequate to cover lender costs, and the placement and conversion fees would be reduced or eliminated. I am enclosing a table showing the varying placement and conversion fees at various levels of the cost of money.

I hope that this information will be helpful to the Subcommittee.

Sincerely yours.

JOSEPH W. BARR, Under Secretary of the Treasury.

Attachment A

COMPARISON OF RELATIVE FEDERAL GOVERNMENT COSTS FOR NDEA AND **GUARANTEED STUDENT LOAN PROGRAMS**

[Present values in dollars 1]

	NDEA	GSLP
Federal capital contribution Interest receipts, deduct Payment for institutions' administrative cost. Cancellations, 10 and 15 percent. Interest paid on behalf of borrowers. Insurance reserve matching seed money. Placement and conversion fees.	115, 064 249, 300	25,942
Total cost	3 713, 694	³ 579, 407

¹ Based on costs incurred by Federal Government for 500 students borrowing \$4,000 each with 10-year repayment cycle, 5½-percent discount rate. Present value is the standard method used for comparing 2 or more streams of receipts and payments which have different time patterns. It is based on the concept that a dollar at some time in the future is worth less than a dollar today. Neither calculation includes the cost of any defaults.

2 With proposed reinsurance plan; under present funding of insurance reserves, with 50-50 matching and no reinsurance, the Federal insurance reserve cost would be \$29,710.

3 Elimination of the cancellation feature would reduce the NDEA total cost to \$464,394. Addition of a comparable cancellation feature to GSLP would increase the GSLP total cost to \$828,972.

ATTACHMENT B

COMPARISON OF DIRECT COST ALLOWANCES IN NATIONAL DEFENSE AND GUARANTEED STUDENT LOAN PROGRAMS

I. NDEA student loan program

The statutory ceiling on the amount a college may withdraw from the Loan Fund to cover administrative costs is 1 percent of the aggregate loan volume outstanding at the end of each fiscal year, or one-half of reasonable administrative costs, whichever is the lesser.

For 1965-66, half of the institutions operated under the 1 percent outstanding balance rule, and the remainder one-half of reasonable cost. The amount of administrative payment per loan made during the year averages at \$26 per loan in the 1 percent category and \$13 per loan in the one-half of reasonable cost category.

II. Guaranted student loan program

The proposal now before the Congress is to provide fee payments to lenders at the time each annual loan is placed on the books and at the time the "inschool" notes are consolidated and converted to installment payout notes.

The amount of the fee in any given year would range from \$0 to \$35, depending upon the cost of money or the net return on alternative investments. At present, the fee is estimated at \$25 for both placement and conversion.

The fees, when payable, generally would constitute only a portion of the revenue available to lenders to cover administrative expenses; so long as the cost of money is less than the 6 percent interest received by lenders, some portion of the interest income can be applied toward administrative expenses. The \$25 fee used in the following comparison assumes a cost of money of approximately 51/2 percent, leaving 1/2 percent to cover a portion of administrative expenses.

It should be noted, however, that although this ½ percent is revenue to the lender, it is not a cost to the Federal government in the case of students qualifying for interest subsidies; in other cases, the cost is borne by the student. (Under the NDEA program, all of the administrative payments are costs to

the Federal Government.)