

Report of Activity Under the Pilot Program for Responsible Small Dollar Loans January 1, 2015 through December 31, 2016

## Jan Lynn Owen <br> Commissioner of Business Oversight

June 30, 2017

Pursuant to legislation enacted in 2013, the Pilot Program for Increased Access to Responsible Small Dollar Loans (RSDL) has now been in operation for more than three years. The Pilot Program was designed to provide an alternative to deferred deposit transactions, or payday loans, and other more expensive forms of consumer credit.

As required by the authorizing legislation, the attached report contains detailed information gathered earlier this year from the lenders who participate in the Pilot Program. This report also can be found on the Department website at http://www.dbo.ca.gov/Licensees/Finance_Lenders/Publications.asp. If you have questions or comments about the report, please contact Charles Agbonkpolor, Examination Manager, at (213) 576-7611, or Charles.Agbonkpolor@dbo.ca.gov.

Jan Lynn Owen<br>Commissioner<br>Department of Business Oversight

# STATE OF CALIFORNIA EDMUND G. BROWN JR., GOVERNOR 

# ALEXIS PODESTA, SECRETARY BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY 

JAN LYNN OWEN, COMMISSIONER OF BUSINESS OVERSIGHT

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# Report of Activity Under the Pilot Program for Increased Access to Responsible Small Dollar Loans 

## January 1, 2015 through December 31, 2016 <br> INTRODUCTION

The Legislature and Governor in 2010 enacted the Affordable Credit Building Opportunities (ACBO) Pilot Program, placing it under the California Finance Lenders Law (CFLL). The goal was to increase consumers' access to capital by encouraging development of a more robust smalldollar loan market in California. The ACBO - established by SB 1146 (Florez) - took effect January 1, 2011. Its provisions applied to consumer loans of $\$ 250$ to $\$ 2,499$. To incentivize lenders' participation, the ACBO allowed them to charge borrowers marginally higher interest rates, and larger origination and delinquency fees, than permitted for CFLL consumer loans of that size made outside the program.

A stubbornly low lender participation rate led to the ACBO's demise. It was replaced by the Pilot Program for Increased Access to Responsible Small Dollar Loans (RSDL), created in 2013 under SB 318 (Hill). The RSDL - Financial Code section 22365 et seq. - took effect January 1, 2014. It will remain in effect until January 1, 2023.

The RSDL's enabling statute requires the Commissioner of the Department of Business Oversight (DBO) to post on the DBO website an annual report that summarizes utilization of the pilot program. The report must be posted by July 1 of each year through 2021.

The RSDL's purpose is the same as the ACBO's - to increase consumer access to small-dollar loans. The minimum loan amount under the RSDL is $\$ 300$, as opposed to $\$ 250$ under the ACBO. The maximum loan is the same, at $\$ 2,499$. Like the ACBO, the RSDL allows lenders to charge marginally higher interest rates than otherwise permitted by the CFLL. The RSDL also provides for underwriting standards, mandatory reporting of loans to credit bureaus, a cap on the share of gross monthly income that can be consumed by the loan payment, a ban on credit insurance, and a ban on requiring borrowers to waive their right to sue as a condition of obtaining a loan, among other provisions.

From the inception of SB 1146, pilot program lenders have been permitted to use "finders." The RSDL also continues to allow the use of "finders" to connect borrowers with lenders. Finders are not licensed by the State, and cannot provide advice or counseling to borrowers. They can distribute lenders' marketing materials, provide factual information about loan terms and conditions, help borrowers with loan applications and obtain borrowers' signatures on documents, among other functions. Finder fees are capped at $\$ 65$ per loan, plus $\$ 2$ per payment received by the finder on behalf of the licensee for the duration of the loan, when the finder receives borrower loan payments on the licensee's behalf. The fees are paid by lenders, cannot be based on the principal amount of loans, and cannot be passed on to borrowers.

The data provided in this report complies with the requirements of Financial Code section 22380. It summarizes unaudited data submitted by licensees in a format prescribed by the DBO.

## EXECUTIVE SUMMARY

## Lender Participation

From 2014 through 2016 the DBO received 18 applications from lenders to participate in the pilot program. Twelve were approved. Of the seven other applications, one was withdrawn, and six remained pending at the end of 2016. In 2014, five finders participated in the RSDL and in 2015 there were 11 finders. At the end of 2016, 14 lenders and 28 finders participated in the RSDL.

LENDER PARTICIPATION - APPLICATIONS AND APPROVALS

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| Beginning number of applications | 1 | 5 | 3 |
| Applications received | 7 | 1 | 10 |
| Applications approved | 3 | 3 | 6 |
| Applications rejected | 0 | 0 | 0 |
| Applications voluntarily withdrawn | 0 | 0 | 1 |
| Year-end applications pending | 5 | 3 | 6 |
| CFL license surrendered | 0 | 1 | 0 |
| Total participants at year-end | 6 | 8 | 14 |

## Lending Activity Data Highlights

- Loan and principal totals - Lenders approved 201,494 loans in 2016, representing increases of 22.6 percent over 2014 and 3.2 percent over 2015. The principal of all loans totaled $\$ 242.4$ million in 2016, an increase of 34.7 percent since 2014 and 7.7 percent over 2015.
- Loan applications - Borrower applications increased 17 percent over the period, from 328,744 in 2014 to 384,211 in 2016. The loan approval rate increased from 50 percent in 2014 to 52.4 percent in 2016.
- Dollar amounts - Loans made in the $\$ 300-\$ 499$ range increased nearly 2,300 percent over the period, from 891 in 2014 to 21,065 in 2016. Loans made in the highest range, $\$ 1,500$ to $\$ 2,499$, increased 39.7 percent, from 43,976 to 61,456 .
- Annual Percentage Rates - During the two-year period, 94.6 percent of loans in the $\$ 300-\$ 499$ range carried an annual percentage rate (APR) of 50 percent or more. In the $\$ 500-\$ 999$ range, 64.7 percent carried APRs of 50 percent or more, and 25.6 percent had APRs of 40 percent to 49.99 percent. In the $\$ 1,500-\$ 2,499$ range, 44.3 percent had APRs of 40 percent to 49.99 percent, and 39.2 percent had APRs of 35 percent to 39.99 percent.
- Finders - The use of finders, initiated by RSDL lenders in 2014, increased rapidly to 12 percent, or 47,267 of the loan applications, and 8.5 percent, or 17,170 of the loans made in 2016. Nearly 60 percent, or 10,265 , of the loans involving finders were for $\$ 500$ to $\$ 1,499$.
- Delinquencies - Of the 201,494 loans made in 2016, 18.2 percent were delinquent for seven to 29 days, 7.4 percent were delinquent for 30 to 59 days, and 5.3 percent were delinquent for 60 days or more.
- Multiple loans - The number of borrowers who took out more than one loan increased by 24.6 percent from 2014 to 2016. Of the multiple-loan borrowers in 2016, 15,879 took out two loans, 472 took out three loans and 18 took out four loans.
- Credit scores - Over the three-year period, more than 60 percent of borrowers who took out more than one loan received higher credit scores in the process. Those increases averaged 355 per borrower in 2014, 306 in 2015 and 134 in 2016.
- Loan term - Of the 201,494 loans made in 2016, 52.2 percent were for 360 days or more; 21.3 percent were for 270 to 359 days; 24.7 percent were for 180 to 269 days; and 1.6 percent were for 120 to 179 days.
- Borrower income - Of the 561,120 loans made from 2014 through 2016, 18.4 percent were to residents of low-income neighborhoods; 46.4 percent to residents of moderate-income neighborhoods; 22.4 percent to residents of middle-income neighborhoods; and 5.2 percent to residents of upper-income neighborhoods. The annual low-income ratio remained unchanged from 2014 to 2016.
- Loan purpose -Borrowers took out 30.4 percent of the loans in 2016 to build or repair credit; 20 percent to pay bills; 15 percent for medical or other emergencies; 7 percent to consolidate debt; 6.2 percent for non-vehicle purchases; 4.4 percent for vehicle purchases; 4.3 percent for vehicle repairs; 1.9 percent for purposes other than personal or household; and 10.4 percent for other, unspecified reasons.


## DATA SUMMARY

This report summarizes loan activity of the RSDL for the period January 1, 2014 through December 31, 2016.

The information in this section was obtained from statutorily-required annual reports participating lenders filed with the DBO.

Pursuant to Government Code section 6254(d)(2), lender-specific information disclosed in the annual reports is exempt from mandatory disclosure under the California Public Records Act. The data provided in this report represent the aggregate totals for participating lenders.

Number of Applications and Loans Made Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| Number of Applications | 546 | 17,899 | 47,267 |
| Number of Loans | 44 | 4,186 | 17,170 |
| Loans as \% of Applications | $8 \%$ | $23 \%$ | $36 \%$ |
| Total Principal Amount of Loans | $\$ 25,535$ | $\$ 3,024,689$ | $\$ 18,908,379$ |

Number of Applications and Loans Made Without Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| Number of Applications | 328,198 | 348,338 | 336,944 |
| Number of Loans | 164,300 | 191,096 | 184,324 |
| Loans as \% of Applications | $50 \%$ | $55 \%$ | $55 \%$ |
| Total Principal Amount of Loans | $\$ 179,942,616$ | $\$ 222,036,346$ | $\$ 223,489,745$ |

Number of Loans by Loan Term: Using Finder

| Loan Term | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| $90-119$ Days | 0 | 0 | 0 |
| $120-179$ Days | 6 | 1,200 | 2,734 |
| $180-269$ Days | 19 | 1,144 | 2,310 |
| $270-359$ Days | 17 | 1,027 | 4,831 |
| $\geq 360$ Days | 2 | 815 | 7,295 |

Number of Loans by Loan Term: Without Using Finder

| Loan Term | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| $90-119$ Days | 0 | 0 | 29 |
| $120-179$ Days | 2 | 0 | 587 |
| $180-269$ Days | 33,246 | 50,481 | 47,566 |
| $270-359$ Days | 47,398 | 45,740 | 38,152 |
| $\geq 360$ Days | 83,654 | 94,875 | 97,990 |

Number of Loans $\mathbf{\$ 3 0 0} \mathbf{- \$ 4 9 9 ,}$ by APR, Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ | Total |
| :---: | :---: | :---: | :---: | :---: |
| Up to $14.99 \%$ | 0 | 0 | 0 | 0 |
| $15.00 \%-19.99 \%$ | 9 | 6 | 0 | 15 |
| $20.00 \%-24.99 \%$ | 0 | 0 | 0 | 0 |
| $25.00 \%-29.99 \%$ | 0 | 0 | 0 | 0 |
| $30.00 \%-34.99 \%$ | 0 | 0 | 0 | 0 |
| $35.00 \%-39.99 \%$ | 0 | 12 | 25 | 37 |
| $40.00 \%-49.99 \%$ | 0 | 18 | 129 | 147 |
| $50.00 \%$ or more | 6 | 15 | 1,232 | 2,916 |
| Total Loans |  |  | 4,964 |  |

Number of Loans $\mathbf{\$ 3 0 0} \mathbf{- \$ 4 9 9}$, by APR, Without Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ | Total |
| :---: | :---: | :---: | :---: | :---: |
| Up to 14.99\% | 0 | 0 | 16 | 16 |
| $15.00 \%-19.99 \%$ | 0 | 0 | 5 | 5 |
| $20.00 \%-24.99 \%$ | 0 | 0 | 20 | 20 |
| $25.00 \%-29.99 \%$ | 4 | 2 | 61 | 67 |
| $30.00 \%-34.99 \%$ | 1 | 18 | 26 | 45 |
| $35.00 \%-39.99 \%$ | 71 | 27 | 103 | 149 |
| $40.00 \%-49.99 \%$ | 800 | 39 | 17,747 | 942 |
| $50.00 \%$ or more | 0 | 3,661 | 18,029 | 21,408 |
| Total Loans | 876 |  |  | 2,652 |

Number of Loans \$500-\$999, by APR, Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ | Total |
| :---: | :---: | :---: | :---: | :---: |
| Up to $14.99 \%$ | 0 | 0 | 0 | 0 |
| $15.00 \%-19.99 \%$ | 0 | 0 | 0 | 0 |
| $20.00 \%-24.99 \%$ | 0 | 0 | 0 | 0 |
| $25.00 \%-29.99 \%$ | 0 | 0 | 0 | 0 |
| $30.00 \%-34.99 \%$ | 0 | 0 | 0 | 0 |
| $35.00 \%-39.99 \%$ | 0 | 55 | 277 | 332 |
| $40.00 \%-49.99 \%$ | 0 | 42 | 4,694 | 282 |
| $50.00 \%$ or more | 26 | 1,769 | 5,211 | 6,489 |
| Total Loans | 26 | 1,866 | 7,103 |  |

Number of Loans \$500-\$999, by APR, Without Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ | Total |
| :---: | :---: | :---: | :---: | :---: |
| Up to $14.99 \%$ | 0 | 0 | 22 | 22 |
| $15.00 \%-19.99 \%$ | 0 | 0 | 10 | 10 |
| $20.00 \%-24.99 \%$ | 1 | 0 | 52 | 53 |
| $25.00 \%-29.99 \%$ | 377 | 475 | 577 | 1,429 |
| $30.00 \%-34.99 \%$ | 579 | 1,510 | 1,484 | 3,573 |
| $35.00 \%-39.99 \%$ | 3,057 | 5,280 | 6,841 | 13,178 |
| $40.00 \%-49.99 \%$ | 35,990 | 7,168 | 36,592 | 49,354 |
| $50.00 \%$ or more | 20,493 | 61,917 | 49,774 | 18,002 |
| Total Loans | 60,497 | 76,350 |  |  |

Number of Loans $\$ 1,000-\$ 1,499$, by APR, Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ | Total |
| :---: | :---: | :---: | :---: | :---: |
| Up to $14.99 \%$ | 0 | 0 | 0 | 0 |
| $15.00 \%-19.99 \%$ | 0 | 0 | 0 | 0 |
| $20.00 \%-24.99 \%$ | 0 | 0 | 0 | 0 |
| $25.00 \%-29.99 \%$ | 0 | 0 | 0 | 0 |
| $30.00 \%-34.99 \%$ | 0 | 4 | 33 | 37 |
| $35.00 \%-39.99 \%$ | 0 | 48 | 270 | 318 |
| $40.00 \%-49.99 \%$ | 1 | 572 | 3,566 | 4,139 |
| $50.00 \%$ or more | 1 | 210 | 1,185 | 1,396 |
| Total Loans | 2 | 834 | 5,054 | 5,890 |

Number of Loans $\mathbf{\$ 1 , 0 0 0} \mathbf{-} \mathbf{\$ 1 , 4 9 9}$, by APR, Without Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ | Total |
| :---: | :---: | :---: | :---: | :---: |
| Up to $14.99 \%$ | 0 | 0 | 10 | 10 |
| $15.00 \%-19.99 \%$ | 0 | 0 | 5 | 5 |
| $20.00 \%-24.99 \%$ | 6 | 0 | 35 | 41 |
| $25.00 \%-29.99 \%$ | 535 | 395 | 448 | 1,378 |
| $30.00 \%-34.99 \%$ | 686 | 1,749 | 1,811 | 4,246 |
| $35.00 \%-39.99 \%$ | 26,724 | 5,064 | 4,503 | 36,291 |
| $40.00 \%-49.99 \%$ | 24,303 | 32,584 | 32,337 | 89,224 |
| $50.00 \%$ or more | 6,698 | 19,141 | 19,785 | 45,624 |
| Total Loans | 58,952 | 58,933 | 58,934 | 176,819 |

Number of Loans $\$ \mathbf{1 , 5 0 0}$ - $\mathbf{\$ 2 , 4 9 9}$, by APR, Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ | Total |
| :---: | :---: | :---: | :---: | :---: |
| Up to $14.99 \%$ | 0 | 0 | 0 | 0 |
| $15.00 \%-19.99 \%$ | 0 | 0 | 0 | 0 |
| $20.00 \%-24.99 \%$ | 0 | 0 | 0 | 0 |
| $25.00 \%-29.99 \%$ | 0 | 0 | 0 | 0 |
| $30.00 \%-34.99 \%$ | 0 | 33 | 220 | 253 |
| $35.00 \%-39.99 \%$ | 0 | 143 | 2,872 | 3,015 |
| $40.00 \%-49.99 \%$ | 1 | 78 | 897 | 976 |
| $50.00 \%$ or more | 0 | 0 | 0 | 0 |
| Total Loans | 1 | 254 | 3,989 | 4,244 |

Number of Loans $\$ 1,500-\$ 2,499$, by APR, Without Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ | Total |
| :---: | :---: | :---: | :---: | :---: |
| Up to 14.99\% | 0 | 0 | 9 | 9 |
| $15.00 \%-19.99 \%$ | 6 | 0 | 7 | 13 |
| $20.00 \%-24.99 \%$ | 27 | 0 | 36 | 63 |
| $25.00 \%-29.99 \%$ | 1,156 | 666 | 734 | 2,556 |
| $30.00 \%-34.99 \%$ | 11,824 | 5,042 | 6,178 | 23,044 |
| $35.00 \%-39.99 \%$ | 22,490 | 13,849 | 22,567 | 58,906 |
| $40.00 \%-49.99 \%$ | 8,472 | 32,509 | 27,936 | 68,917 |
| $50.00 \%$ or more | 0 | 0 | 0 | 0 |
| Total Loans | 43,975 | 52,066 | 57,467 | 153,508 |

Number of Loans Made by Size Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| $\$ 300-\$ 499$ | 15 | 1,232 | 2,916 |
| $\$ 500-\$ 999$ | 26 | 1,866 | 5,211 |
| $\$ 1,000-\$ 1,499$ | 2 | 834 | 5,054 |
| $\$ 1,500-\$ 2,499$ | 1 | 254 | 3,989 |
| Total Loans | 44 | 4,186 | 17,170 |

Number of Loans Made by Size Without Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| $\$ 300-\$ 499$ | 876 | 3,747 | 18,149 |
| $\$ 500-\$ 999$ | 60,497 | 76,350 | 49,774 |
| $\$ 1,000-\$ 1,499$ | 58,952 | 58,933 | 58,934 |
| $\$ 1,500-\$ 2,499$ | 43,975 | 52,066 | 57,467 |
| Total Loans | 164,300 | 191,096 | 184,324 |

Borrowers Who Obtained More Than One Loan Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| Number of Borrowers Who Obtained 2 Loans | 0 | 381 | 1,749 |
| Number of Borrowers Who Obtained 3 Loans | 0 | 14 | 105 |
| Number of Borrowers Who Obtained 4 Loans | 0 | 0 | 4 |
| Total Number of Borrowers Who Obtained More Than One Loan | 0 | 395 | 1,858 |

Borrowers Who Obtained More Than One Loan Without Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| Number of Borrowers Who Obtained 2 Loans | 12,999 | 14,074 | $\mathbf{1 4 , 1 3 0}$ |
| Number of Borrowers Who Obtained 3 Loans | 133 | 317 | 367 |
| Number of Borrowers Who Obtained 4 Loans | 4 | 15 | 14 |
| Total Number of Borrowers Who Obtained More Than One Loan | 13,136 | 14,406 | 14,511 |

Credit Score Performance for Borrowers Who Obtained More Than One Loan Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| Number of Borrowers Who Obtained More Than One Loan | 0 | 395 | 1,858 |
| Number of Borrowers with Credit Scores That Increased <br> Over the Previous Loan | 0 | 81 | 893 |
| Percentage of Borrowers with Increased Credit Scores | $0 \%$ | $21 \%$ | $48 \%$ |
| Average Size of Increase (in points) in Credit scores | 0 | 28 | 309 |

Credit Score Performance for Borrowers Who Obtained More Than One Loan Without Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| Number of Borrowers Who Obtained More Than One Loan | 13,136 | 14,406 | 14,511 |
| Number of Borrowers with Credit Scores That Increased <br> Over the Previous Loan | 7,779 | 8,541 | 9,886 |
| Percentage of Borrowers with Increased Credit Scores | $59 \%$ | $59 \%$ | $68 \%$ |
| Average Size of Increase (in points) in Credit scores | 355 | 309 | 118 |

Number of Loans by Income Distribution of Census Tract Using Finder*

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| Low-Income | 24 | 616 | 2,362 |
| Moderate-Income | 11 | 1,599 | 6,214 |
| Middle-Income | 8 | 1,070 | 3,744 |
| Upper-Income | 1 | 409 | 1,662 |
| Not Known | 0 | 492 | 3,188 |
| Total Loans | 44 | 4,186 | 17,170 |

*Low-income census tract means median family income of less than 50 percent of the median for the metropolitan area. Moderate income census tract means median family income of 50 percent to 79 percent of the median for the metropolitan area. Middle-income census tract means median family income of 80 percent to 119 percent of the median for the metropolitan area. Upper-income census tract means median family income of 120 percent or more of the median for the metropolitan area.

Number of Loans by Income Distribution of Census Tract Without Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| Low-Income | 32,103 | 35,253 | 33,116 |
| Moderate-Income | 79,175 | 91,309 | 82,117 |
| Middle-Income | 36,992 | 44,059 | 40,066 |
| Upper-Income | 7,763 | 9,617 | 9,798 |
| Not Known | 8,267 | 10,858 | 19,227 |
| Total Loans | 164,300 | 191,096 | 184,324 |

Number of Loans by Borrower's Use of Bank Account/Check Cashing Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| Bank Account | 27 | 3,149 | 13,190 |
| No Bank Account | 17 | 1,037 | 3,980 |
| Borrowers With Bank Account Who Also <br> Used Check-Cashing Services | 4 | 724 | 3,371 |
| Borrowers With Bank Account Who Also <br> Used Payday Loan Services | 0 | 94 | 1,138 |

Number of Loans by Borrower's Use of Bank Account/Check Cashing Without Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| Bank Account | 137,644 | 161,380 | 153,923 |
| No Bank Account | 26,657 | 29,716 | 30,401 |
| Borrowers With Bank Account Who Also <br> Used Check-Cashing Services | 5,601 | 6,699 | 6,716 |
| Borrowers With Bank Account Who Also <br> Used Payday Loan Services | 4,083 | 8,100 | 7,242 |

Late Fees: Number and Percentage of Loans Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| Total Loans | 44 | 4,186 | 17,170 |
| \# Loans with Late Fees | 1 | 1,124 | 4,719 |
| \% Loans with Late Fees | $2 \%$ | $27 \%$ | $27 \%$ |

Late Fees: Number and Percentage of Loans Without Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| Total Loans | 164,300 | 191,096 | 184,324 |
| \# Loans with Late Fees | 44,103 | 49,810 | 52,843 |
| \% Loans with Late Fees | $27 \%$ | $26 \%$ | $29 \%$ |

Late Fees: Dollar Amount Data Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| Total Amount of Late Fees | $\$ 136$ | $\$ 66,438$ | $\$ 293,342$ |
| Total Principal Amount of Loans | $\$ 25,535$ | $\$ 3,024,689$ | $\$ 18,908,379$ |
| Late Fees as a Percentage of Loan Principal | $.5 \%$ | $2.2 \%$ | $1.6 \%$ |
| Average Late Fees | $\$ 11.33$ | $\$ 14.00$ | $\$ 14.00$ |

Late Fees: Dollar Amount Data Without Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| Total Amount of Late Fees | $\$ 2,211,832$ | $\$ 3,348,798$ | $\$ 3,051,095$ |
| Total Principal Amount of Loans | $\$ 179,942,616$ | $\$ 222,036,346$ | $\$ 223,489,745$ |
| Late Fees as a Percentage of Loan Principal | $1 \%$ | $1.5 \%$ | $1.4 \%$ |
| Average Late Fees | $\$ 12.14$ | $\$ 14.00$ | $\$ 13.49$ |

Number of Loans, by Purpose, Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| Medical | 0 | 91 | 492 |
| Other Emergency | 0 | 0 | 0 |
| Vehicle Repair | 2 | 389 | 1,378 |
| Vehicle Purchase | 0 | 277 | 1,128 |
| To Pay Bills | 8 | 1,375 | 4,792 |
| To Consolidate Debt | 13 | 236 | 988 |
| Purchase Goods or Services Other |  |  |  |
| Than a Vehicle |  |  |  |$\quad 11,009$| 5,341 |
| :---: |
| For Other Than Personal, Family, or Household <br> Purposes |
| Other |


| Number of Loans, by Purpose, Without Using Finder |
| :--- |
|  $\mathbf{2 0 1 4}$ $\mathbf{2 0 1 5}$ $\mathbf{2 0 1 6}$ <br> Medical 0 3,019 3,237 <br> Other Emergency 0 34,087 26,672 <br> Vehicle Repair 0 5,389 7,395 <br> Vehicle Purchase 0 5,986 7,864 <br> To Pay Bills 0 30,014 35,489 <br> To Consolidate Debt 0 11,032 13,190 <br> To Build or Repair Credit 0 75,552 55,975 <br> Purchase Goods or Services Other    <br> Than a Vehicle    |
| For Other Than Personal, Family, or Household <br> Purposes |
| Other |

Loans With at Least One Delinquency: Number and Percentage of Loans Made by Size, Using Finder: Delinquency Period 7-29 Days

|  | $\mathbf{2 0 1 4}$ |  | $\mathbf{2 0 1 5}$ |  | $\mathbf{2 0 1 6}$ |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | $\#$ | $\%$ | $\#$ | $\%$ | $\#$ | $\%$ |
| $\$ 300-\$ 499$ | 4 | $27 \%$ | 396 | $32 \%$ | 337 | $12 \%$ |
| $\$ 500-\$ 999$ | 1 | $4 \%$ | 510 | $27 \%$ | 651 | $12 \%$ |
| $\$ 1,000-\$ 1,499$ | 0 | $0 \%$ | 134 | $16 \%$ | 567 | $11 \%$ |
| $\$ 1,500-\$ 2,499$ | 0 | $0 \%$ | 26 | $10 \%$ | 324 | $8 \%$ |
| Total Loans All Sizes | 5 | $11 \%$ | 1,066 | $25 \%$ | 1,879 | $11 \%$ |

Loans With at Least One Delinquency: Number and Percentage of Loans Made by Size, Without Using Finder: Delinquency Period 7-29 Days

|  | $\mathbf{2 0 1 4}$ |  | $\mathbf{2 0 1 5}$ |  | $\mathbf{2 0 1 6}$ |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | $\#$ | $\%$ | $\#$ | $\%$ | $\#$ | $\%$ |
| $\$ 300-\$ 499$ | 45 | $5 \%$ | 712 | $19 \%$ | 3,228 | $18 \%$ |
| $\$ 500-\$ 999$ | 11,613 | $19 \%$ | 14,049 | $18 \%$ | 8,544 | $17 \%$ |
| $\$ 1,000-\$ 1,499$ | 14,237 | $24 \%$ | 11,838 | $20 \%$ | 10,333 | $18 \%$ |
| $\$ 1,500-\$ 2,499$ | 11,072 | $25 \%$ | 12,133 | $23 \%$ | 12,731 | $22 \%$ |
| Total Loans All Sizes | 36,967 | $22 \%$ | 38,732 | $20 \%$ | 34,836 | $19 \%$ |

Loans With at Least One Delinquency: Number and Percentage of Loans Made by Size, Using Finder: Delinquency Period 30-59 Days

|  | $\mathbf{2 0 1 4}$ |  | $\mathbf{2 0 1 5}$ |  | $\mathbf{2 0 1 6}$ |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | $\#$ | $\%$ | $\#$ | $\%$ | $\#$ | $\%$ |
| $\$ 300-\$ 499$ | 4 | $27 \%$ | 253 | $21 \%$ | 145 | $5 \%$ |
| $\$ 500-\$ 999$ | 1 | $4 \%$ | 270 | $14 \%$ | 202 | $4 \%$ |
| $\$ 1,000-\$ 1,499$ | 0 | $0 \%$ | 51 | $6 \%$ | 157 | $3 \%$ |
| $\$ 1,500-\$ 2,499$ | 0 | $0 \%$ | 5 | $2 \%$ | 92 | $2 \%$ |
| Total Loans All Sizes | 5 | $11 \%$ | 579 | $14 \%$ | 596 | $3 \%$ |

Loans With at Least One Delinquency: Number and Percentage of Loans Made by Size, Without Using Finder: Delinquency Period 30-59 Days

|  | $\mathbf{2 0 1 4}$ |  | $\mathbf{2 0 1 5}$ |  | $\mathbf{2 0 1 6}$ |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | $\#$ | $\%$ | $\#$ | $\%$ | $\#$ | $\%$ |
| $\$ 300-\$ 499$ | 26 | $3 \%$ | 353 | $9 \%$ | 1,745 | $10 \%$ |
| $\$ 500-\$ 999$ | 4,387 | $7 \%$ | 6,577 | $9 \%$ | 3,955 | $8 \%$ |
| $\$ 1,000-\$ 1,499$ | 4,729 | $8 \%$ | 4,541 | $8 \%$ | 4,180 | $7 \%$ |
| $\$ 1,500-\$ 2,499$ | 2,915 | $7 \%$ | 3,839 | $7 \%$ | 4,432 | $8 \%$ |
| Total Loans All Sizes | 12,057 | $7 \%$ | 15,310 | $8 \%$ | 14,312 | $8 \%$ |

Loans With at Least One Delinquency: Number and Percentage of Loans Made by Size, Using Finder: Delinquency Period 60 Days or More

|  | $\mathbf{2 0 1 4}$ |  | $\mathbf{2 0 1 5}$ |  | $\mathbf{2 0 1 6}$ |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | $\#$ | $\%$ | $\#$ | $\%$ | $\#$ | $\%$ |
| $\$ 300-\$ 499$ | 0 | $0 \%$ | 180 | $15 \%$ | 671 | $23 \%$ |
| $\$ 500-\$ 999$ | 1 | $4 \%$ | 199 | $11 \%$ | 812 | $16 \%$ |
| $\$ 1,000-\$ 1,499$ | 0 | $0 \%$ | 28 | $3 \%$ | 459 | $9 \%$ |
| $\$ 1,500-\$ 2,499$ | 0 | $0 \%$ | 2 | $1 \%$ | 141 | $4 \%$ |
| Total Loans All Sizes | 4 | $9 \%$ | 409 | $10 \%$ | 2,083 | $12 \%$ |

Loans With at Least One Delinquency: Number and Percentage of Loans Made by Size, Without Using Finder: Delinquency Period 60 Days or More

|  | $\mathbf{2 0 1 4}$ |  | $\mathbf{2 0 1 5}$ |  | $\mathbf{2 0 1 6}$ |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | $\#$ | $\%$ | $\#$ | $\%$ | $\#$ | $\%$ |
| $\$ 300-\$ 499$ | 17 | $2 \%$ | 353 | $9 \%$ | 1,065 | $6 \%$ |
| $\$ 500-\$ 999$ | 2,468 | $4 \%$ | 6,577 | $9 \%$ | 2,181 | $4 \%$ |
| $\$ 1,000-\$ 1,499$ | 2,531 | $4 \%$ | 4,541 | $8 \%$ | 2,304 | $4 \%$ |
| $\$ 1,500-\$ 2,499$ | 1,376 | $3 \%$ | 3,839 | $7 \%$ | 3,210 | $6 \%$ |
| Total Loans All Sizes | 6,392 | $4 \%$ | 15,310 | $8 \%$ | 8,760 | $5 \%$ |

Loans with at Least One Delinquency of 7 Days or More, Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :--- | :---: | :---: | :---: |
| Total \# of Loans Delinquent 7 Days or More | 7 | 2,054 | 4,558 |
| Total \# Not Subsequently Brought Current | 1 | 514 | 2,426 |
| \% Not Subsequently Brought Current | $14 \%$ | $25 \%$ | $53 \%$ |
| Average \# of Times Such Borrowers <br> Delinquent 7 Days or More | 1.3 | 2.2 | 1.7 |

Loans with at Least One Delinquency of 7 Days or More, Without Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :--- | :---: | :---: | :---: |
| Total \# of Loans Delinquent 7 Days or More | 55,416 | 69,352 | 57,908 |
| Total \# Not Subsequently Brought Current | 15,366 | 21,151 | 18,206 |
| \% Not Subsequently Brought Current | $28 \%$ | $30 \%$ | $31 \%$ |
| Average \# of Times Such Borrowers <br> Delinquent 7 Days or More | 3 | 3 | 2 |

Delinquency Comparison: Pilot Program Loans and Other CFLL Loans: Year 2014

|  | Pilot Program Loans |  |  |  | CFLL Loans |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Using Finder |  | w/o Using Finder |  | $\%$ |  |
|  | $\#$ | $\%$ | $\#$ | $\%$ | $\#$ | $4 \%$ |
| 1 Payment Past Due | 5 | $11 \%$ | 36,967 | $22 \%$ | 14,417 | $4 \%$ |
| 2 Payments Past Due | 1 | $2 \%$ | 12,057 | $7 \%$ | 5,412 | $1 \%$ |
| 3 or More Payments Past Due | 1 | $2 \%$ | 6,392 | $4 \%$ | 13,845 | $4 \%$ |

Delinquency Comparison: Pilot Program Loans and Other CFLL Loans: Year 2015

|  | Pilot Program Loans |  |  |  | CFLL Loans |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Using Finder |  | w/o Using Finder |  | $\%$ |  |
|  | $\#$ | $\%$ | $\#$ | $\%$ | $\#$ | $5 \%$ |
| 1 Payment Past Due | 1066 | $25 \%$ | 38,732 | $20 \%$ | 13,098 | $5 \%$ |
| 2 Payments Past Due | 579 | $14 \%$ | 15,310 | $8 \%$ | 6,210 | $2 \%$ |
| 3 or More Payments Past Due | 409 | $10 \%$ | 15,310 | $8 \%$ | 19,068 | $7 \%$ |

Delinquency Comparison: Pilot Program Loans and Other CFLL Loans: Year 2016

|  | Pilot Program Loans |  |  |  | CFLL Loans |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Using Finder |  | w/o Using Finder |  |  |  |
|  | $\#$ | $\%$ | $\#$ | $\%$ | $\#$ | $\%$ |
| 1 Payment Past Due | 1,879 | $11 \%$ | 34,836 | $19 \%$ | 12,815 | $5 \%$ |
| 2 Payments Past Due | 596 | $3 \%$ | 14,312 | $8 \%$ | 7,480 | $3 \%$ |
| 3 or More Payments Past Due | 2,083 | $12 \%$ | 8,760 | $5 \%$ | 17,347 | $6 \%$ |

Language in Which Loan Negotiated, Using Finder*

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| English | $\mathbf{2 4}$ | 1,512 | 2,969 |
| Spanish | 20 | 2,674 | 14,201 |
| Chinese | 0 | 0 | 0 |
| Tagalog | 0 | 0 | 0 |
| Vietnamese | 0 | 0 | 0 |
| Korean | 0 | 0 | 0 |
| Other | 0 | 0 | 0 |

*When a loan was negotiated in a language other than English, documents were provided in that language.
Language in Which Loan Negotiated, Without Using Finder*

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| English | 3,131 | 26,155 | 41,419 |
| Spanish | 161,169 | 164,941 | 142,905 |
| Chinese | 0 | 0 | 0 |
| Tagalog | 0 | 0 | 0 |
| Vietnamese | 0 | 0 | 0 |
| Korean | 0 | 0 | 0 |
| Other | 0 | 0 | 0 |

[^0]Refinance Loans Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| Number of Borrowers Who Applied for <br> Refinance Loan | $\mathbf{0}$ | 0 | 0 |
| Percentage of Borrowers Who Applied for <br> Refinance Loan | $0 \%$ | $0 \%$ | $0 \%$ |
| Number of Borrowers Who Obtained One or <br> More Refinance Loans | 0 | 0 | 0 |
| Percentage of Borrowers Who Refinanced Loan | $0 \%$ | $0 \%$ | $0 \%$ |
| Total Principal Amount of Refinance Loans Made | $\$ 0$ | $\$ 0$ | $\$ 0$ |

Refinance Loans Without Using Finder

|  | 2014 | 2015 | 2016 |
| :---: | :---: | :---: | :---: |
| Number of Borrowers Who Applied for Refinance Loan | 27,599 | 29,153 | 33,040 |
| Percentage of Borrowers Who Applied for Refinance Loan | 12\% | 11\% | 12\% |
| Number of Borrowers Who Obtained One or More Refinance Loans | 5,669 | 5,536 | 6,838 |
| Percentage of Borrowers Who Refinanced Loan | 3\% | 2\% | 3\% |
| Total Principal Amount of Refinance Loans Made | \$9,270,126 | \$9,331,260 | \$12,189,760 |

Detail of Refinance Loans Made Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| Number of Borrowers Who Refinanced Once | 0 | 0 | 0 |
| Percentage of Borrowers Who Refinanced Once | $0 \%$ | $0 \%$ | $0 \%$ |
| Number of Borrowers Who Refinanced Twice | 0 | $0 \%$ | 0 |
| Percentage of Borrowers Who Refinanced Twice | $0 \%$ | $0 \%$ | 0 |
| Number of Borrowers Who Refinanced More <br> Than Twice | 0 | $0 \%$ | $0 \%$ |
| Percentage of Borrowers Who Refinanced More <br> Than Twice | $0 \%$ | $0 \%$ | 0 |

Detail of Refinance Loans Made Without Using Finder

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| Number of Borrowers Who Refinanced Once | 5,624 | 5,497 | 6,810 |
| Percentage of Borrowers Who Refinanced Once | $3 \%$ | $\mathbf{2 \%}$ | $3 \%$ |
| Number of Borrowers Who Refinanced Twice | 45 | 39 | 28 |
| Percentage of Borrowers Who Refinanced Twice | $2 \%$ | $1 \%$ | $0.01 \%$ |
| Number of Borrowers Who Refinanced More <br> Than Twice | 0 | $0 \%$ | $0 \%$ |
| Percentage of Borrowers Who Refinanced More <br> Than Twice | $0 \%$ | $0 \%$ | 0 |

Refinance Loans Using Finder: Pre-Refinance Principal Pay Down, Late Payments, Additional Principal Extended

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| Average Percentage of Principal Paid Down <br> Before Obtaining Refinance Loan | $0 \%$ | $0 \%$ | $0 \%$ |
| Average Number of Late Payments Made on <br> Loan Refinanced | 0 | 0 | 0 |
| Average Amount of Additional Principal <br> Extended on Refinance Loans | $\$ 0$ | $\$ 0$ | $\$ 0$ |

Refinance Loans Without Using Finder: Pre-Refinance Principal Pay Down, Late Payments, Additional Principal Extended

|  | $\mathbf{2 0 1 4}$ | $\mathbf{2 0 1 5}$ | $\mathbf{2 0 1 6}$ |
| :---: | :---: | :---: | :---: |
| Average Percentage of Principal Paid Down <br> Before Obtaining Refinance Loan | $69 \%$ | $68 \%$ | $11 \%$ |
| Average Number of Late Payments Made on <br> Loan Refinanced | 0.3 | 1.0 | 0.1 |
| Average Amount of Additional Principal <br> Extended on Refinance Loans | $\$ 1,213$ | $\$ 1,251$ | $\$ 211$ |



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[^0]:    *When a loan was negotiated in a language other than English, documents were provided in that language.

