



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

June 2017

California Department of Business Oversight
Jan Lynn Owen, Commissioner



DEPARTMENT OF BUSINESS OVERSIGHT*Ensuring a Fair and Secure Financial Services Marketplace for all Californians*

Jan Lynn Owen
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 Agbonkolor, Examination Manager, at (213) 576-7611, or Charles.Agbonkolor@dbo.ca.gov.

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INTRODUCTION

The Legislature and Governor in 2010 enacted the Affordable Credit Building Opportunities (ACBO) Pilot Program, placing it under the California Finance Lenders Law (CFL). The goal was to increase consumers' access to capital by encouraging development of a more robust small-dollar 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 CFL 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 CFL. 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

	2014	2015	2016
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

	2014	2015	2016
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

	2014	2015	2016
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	2014	2015	2016
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
≥ 360 Days	2	815	7,295

Number of Loans by Loan Term: Without Using Finder

Loan Term	2014	2015	2016
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
≥ 360 Days	83,654	94,875	97,990

Number of Loans \$300-\$499, by APR, Using Finder

	2014	2015	2016	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	1,196	2,762	3,964
Total Loans	15	1,232	2,916	4,163

Number of Loans \$300-\$499, by APR, Without Using Finder

	2014	2015	2016	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	51	149
40.00% - 49.99%	800	39	103	942
50.00% or more	0	3,661	17,747	21,408
Total Loans	876	3,747	18,029	22,652

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

	2014	2015	2016	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	240	282
50.00% or more	26	1,769	4,694	6,489
Total Loans	26	1,866	5,211	7,103

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

	2014	2015	2016	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	4,841	13,178
40.00% - 49.99%	35,990	7,168	6,196	49,354
50.00% or more	20,493	61,917	36,592	119,002
Total Loans	60,497	76,350	49,774	186,621

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

	2014	2015	2016	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 \$1,000-\$1,499, by APR, Without Using Finder

	2014	2015	2016	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 \$1,500-\$2,499, by APR, Using Finder

	2014	2015	2016	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

	2014	2015	2016	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

	2014	2015	2016
\$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

	2014	2015	2016
\$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

	2014	2015	2016
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

	2014	2015	2016
Number of Borrowers Who Obtained 2 Loans	12,999	14,074	14,130
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

	2014	2015	2016
Number of Borrowers Who Obtained More Than One Loan	0	395	1,858
Number of Borrowers with Credit Scores That Increased 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

	2014	2015	2016
Number of Borrowers Who Obtained More Than One Loan	13,136	14,406	14,511
Number of Borrowers with Credit Scores That Increased 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*

	2014	2015	2016
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

	2014	2015	2016
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

	2014	2015	2016
Bank Account	27	3,149	13,190
No Bank Account	17	1,037	3,980
Borrowers With Bank Account Who Also Used Check-Cashing Services	4	724	3,371
Borrowers With Bank Account Who Also Used Payday Loan Services	0	94	1,138

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

	2014	2015	2016
Bank Account	137,644	161,380	153,923
No Bank Account	26,657	29,716	30,401
Borrowers With Bank Account Who Also Used Check-Cashing Services	5,601	6,699	6,716
Borrowers With Bank Account Who Also Used Payday Loan Services	4,083	8,100	7,242

Late Fees: Number and Percentage of Loans Using Finder

	2014	2015	2016
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

	2014	2015	2016
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

	2014	2015	2016
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

	2014	2015	2016
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

	2014	2015	2016
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
To Build or Repair Credit	11	1,009	5,341
Purchase Goods or Services Other Than a Vehicle	5	225	917
For Other Than Personal, Family, or Household Purposes	0	112	412
Other	5	472	1,722

Number of Loans, by Purpose, Without Using Finder

	2014	2015	2016
Medical	0	3,019	3,237
Other Emergency	0	34,087	26,672
Vehicle Repair	0	5,389	7,395
Vehicle Purchase	0	5,986	7,864
To Pay Bills	0	30,014	35,489
To Consolidate Debt	0	11,032	13,190
To Build or Repair Credit	0	75,552	55,975
Purchase Goods or Services Other Than a Vehicle	5	9,592	11,573
For Other Than Personal, Family, or Household Purposes	0	2,167	3,576
Other	0	14,258	19,353

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

	2014		2015		2016	
	#	%	#	%	#	%
\$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**

	2014		2015		2016	
	#	%	#	%	#	%
\$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**

	2014		2015		2016	
	#	%	#	%	#	%
\$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**

	2014		2015		2016	
	#	%	#	%	#	%
\$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**

	2014		2015		2016	
	#	%	#	%	#	%
\$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**

	2014		2015		2016	
	#	%	#	%	#	%
\$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

	2014	2015	2016
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 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

	2014	2015	2016
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 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			
	#	%	#	%	#	%
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			
	#	%	#	%	#	%
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*

	2014	2015	2016
English	24	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*

	2014	2015	2016
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

*When a loan was negotiated in a language other than English, documents were provided in that language.

Refinance Loans Using Finder

	2014	2015	2016
Number of Borrowers Who Applied for Refinance Loan	0	0	0
Percentage of Borrowers Who Applied for Refinance Loan	0%	0%	0%
Number of Borrowers Who Obtained One or 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

	2014	2015	2016
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 Than Twice	0	0	0
Percentage of Borrowers Who Refinanced More Than Twice	0%	0%	0%

Detail of Refinance Loans Made Without Using Finder

	2014	2015	2016
Number of Borrowers Who Refinanced Once	5,624	5,497	6,810
Percentage of Borrowers Who Refinanced Once	3%	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 Than Twice	0	0	0
Percentage of Borrowers Who Refinanced More Than Twice	0%	0%	0%

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

	2014	2015	2016
Average Percentage of Principal Paid Down Before Obtaining Refinance Loan	0%	0%	0%
Average Number of Late Payments Made on Loan Refinanced	0	0	0
Average Amount of Additional Principal Extended on Refinance Loans	\$0	\$0	\$0

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

	2014	2015	2016
Average Percentage of Principal Paid Down Before Obtaining Refinance Loan	69%	68%	11%
Average Number of Late Payments Made on Loan Refinanced	0.3	1.0	0.1
Average Amount of Additional Principal Extended on Refinance Loans	\$1,213	\$1,251	\$211



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