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California Department of
Financial Protection and Innovation

Annual Report of Activity Under Small Dollar Loan Pilot Program

Report Required by Financial Code Section 22380

PROTECTING CONSUMERS
FOSTERING TRUST & INNOVATION

DFPI 
DEPARTMENT OF FINANCIAL
PROTECTION & INNOVATION



DEPARTMENT OF FINANCIAL
PROTECTION & INNOVATION

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EXECUTIVE SUMMARY

The Department of Financial Protection and Innovation (DFPI) protects consumers and fosters trust by regulating companies and individuals offering financial products. The DFPI licenses and regulates finance lenders, brokers, and Property Assessed Clean Energy (PACE) program administrators pursuant to the California Financing Law (CFL). The Pilot Program for Increased Access to Responsible Small Dollar Loans (Pilot Program) was designed to increase consumers' access to capital by encouraging more robust small-dollar lending in California. The minimum loan amount is \$300 and the maximum loan amount is \$7,499.

There were 17 approved Pilot Program participants in 2021 and 15 filed annual reports. Two Pilot Program participants failed to file a report; however, both participants reported no Pilot Program loan activity for the last three years.

The law allows participants to use finders, which are individuals or companies helping to bring a licensee and a prospective borrower together for the purpose of negotiating a loan contract. Although not licensed by the Department, finders are subject to regulatory examinations. However, there were no registered finders during 2021, and therefore, there were no finders that were subject to regulatory examination. From 2019 to 2021, 29 consumer complaints about the Pilot Program lenders and finders were received. Of the 29 complaints, the most common were disputes related to payments.

The DFPI is required to publish information for each specific finder whose services were used by a licensee in connection with the loans or loan application, along with the specific finder's identity. During 2021, there were no Pilot Program lenders who used finder services.

The findings for the prior year of 2020 are based on a limited data collection and do not represent the entire Pilot Program activity for that year. The Pilot Program lender Aura Financial LLC (Aura) filed for bankruptcy at the beginning of 2021 and failed to file the 2020 CFL annual report. In 2019, Aura's loan activity represented 40% of the total Pilot Programs loans made.

Key Findings

- Pilot Program lenders approved 96,574 loans in 2021.
- The annual total principal amount of loans made in 2021 was \$119 million.
- The number of borrower applications received in 2021 was 277,264.
- The top 2 reasons for borrowing were to purchase goods or services other than a vehicle and to pay bills, as reported by 48 percent of borrowers in 2021.
- The percentage of loans with an annual percentage rate (APR) of 50 percent or more has decreased in 2021. The majority of the loans made in 2021 carried an APR of 35 percent to 39.99 percent.

To learn more about the Increased Access to Responsible Small Dollar Loans Pilot Program, visit the DFPI website at <https://dfpi.ca.gov/about-the-increased-access-to-responsible-small-dollar-loans-pilot-program/>.

BACKGROUND

In 2010, the Affordable Credit Building Opportunities Pilot Program was enacted and placed under the California Financing Law (CFL). The goal was to increase consumers' access to capital by encouraging a more robust small-dollar loan market in California. The program's provisions, which took effect January 1, 2011, applied to consumer loans of \$250 to \$2,499.

To incentivize lenders' participation, borrowers could be charged marginally higher interest rates and larger origination and delinquency fees than permitted for CFL consumer loans of that size made outside the program. A low lender participation rate led to the program's demise. It was replaced in 2013 by the Pilot Program for Increased Access to Responsible Small Dollar Loans. This Pilot Program took effect January 1, 2014 and sunsets January 1, 2028 (Financial Code section 22365 *et seq.*).

Pilot Program lenders may still charge marginally higher interest rates than otherwise permitted under the CFL. The Pilot Program provides underwriting standards, mandatory reporting 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.

Pilot Program participants are also permitted to use "finders." Finders are not licensed by the DFPI and cannot provide advice or counseling to borrowers. Finders can distribute lenders' marketing materials, provide factual information about loan terms and conditions, help borrowers with loan applications, and obtain borrowers' signatures on documents. The finder may be paid \$2 per payment received on the borrower's behalf for the loan's duration. The fees are paid by lenders, cannot be based on the principal amount of the loans, and cannot be passed on to borrowers.

In 2018, Assembly Bill 237 introduced the following changes to the Pilot Program, effective on January 1, 2019:

- Increasing the maximum loan amount from \$2,499 to \$7,499 and establishing a debt-to-income cap of 50 percent of the borrower's monthly income for a loan of no more than \$2,500 or 36 percent of the borrower's monthly income for a loan greater than \$2,500.
- Requiring the DFPI to examine each finder used by a Pilot Program licensee at least once every 24 months.
- Authorizing DFPI to charge a Pilot Program licensee that uses one or more finders a fee to offset the costs of the finder examinations.
- Increasing Pilot Program licensees' reporting requirements to include specific information on each finder whose services were used.
- Requiring program licensees to perform reasonable background checks on their finders.
- Requiring program licensees to reduce the interest rates on loans made to borrowers who obtain subsequent loans and meet certain requirements.

The DFPI is required to post a report every year on its internet website summarizing utilization of its Pilot Program pursuant to Financial Code section 22380. This report and prior reports can be found on the DFPI's website at <https://dfpi.ca.gov/california-financing-law-publications/>.

LENDER PARTICIPATION AND ACTIVITY

This report summarizes loan activity in the Pilot Program for the period January 1, 2019, through December 31, 2021. The full licensing data is provided in the Appendix.

Pilot Program Participation

From 2019 through 2021, the DFPI received 16 applications for CFL lenders to participate in the Pilot Program, and 8 applications were approved during this period. During 2021, a total of 17 lenders participated in the Pilot Program.

In 2019, a total of 182 finders were approved, operating from 722 finder locations. As a result of the only Pilot Program lender who had used finder services exiting from the Pilot Program at the end of 2020, the numbers of approved finders and finder locations decreased in 2020. During 2021, there were no registered finders in the Pilot Program.

Table 1: Lender Applications and Approvals

	2019	2020	2021
Application as of January 1	3	8	3
Applications received	9	2	5
Applications approved	3	3	2
Applications denied	1	0	0
Applications voluntarily withdrawn	0	4	0
Year-end applications pending	8	3	3
CFL license surrendered	0	1	0
CFL license revoked	1	0	2
Withdrawal from Pilot Program	0	2	1
Total participants at year-end	18	18	17

Pilot Program Lending Activity Highlights

The following categories are highlights from the 2021 annual report:

- **Loan Size** – Of the 96,574 loans made in 2021, 3 percent of the loans made were in the range between \$300 to \$499; 34 percent were in the range between \$500 to \$999; 32 percent were in the range between \$1,000 to \$1,499; 28 percent were in the range between \$1,500 to \$2,499; and 3 percent in the range between \$2,500 to \$7,499.
- **Loan Term** – Of the 96,574 loans made in 2021, 98 percent were for 360 days or more and less than 2 percent of the loans were for 90 to 359 days.
- **Annual Percentage Rates** – Of the 96,574 loans made in 2021, 93 percent carried an APR of 35 to 39.99 percent, and less than 1 percent of the loans carried an APR of 40 percent or more.
- **Delinquencies** – Of the 97,346 loans serviced in 2021, 29 percent were delinquent for 7 to 29 days, 15 percent were delinquent for 30 to 59 days, and 10 percent were delinquent for 60 days or more.
- **Multiple Loans** – The total number of borrowers who obtained more than one loan in 2021 was 4,977, representing 5 percent of total loans made in 2021.
- **Borrower Income** – Of the 96,574 loans made in 2021, 17 percent were to borrowers with income less than \$20,000; 60 percent were to borrowers with income between \$20,000 to \$44,999; 22 percent were to borrowers with income between \$45,000 to \$139,000, and one percent of the loans were made to borrowers with income \$140,000 and above.
- **Loan Purpose** – In 2021, 28 percent of the borrowers took out loans to purchase goods or services other than a vehicle purchase; 19 percent to pay bills; 12 percent for medical and other emergency; 11 percent to build or repair credit; 10 percent to consolidate debt; 6 percent for vehicle repair; 4 percent for vehicle purchases; less than 1 percent for purposes other than personal or household; and 9 percent for other unspecified reasons.

VIOLATIONS FOUND DURING EXAMINATIONS

The information provided in this section was obtained from regulatory examinations the DFPI conducted of finance lenders who participated in the Pilot Program from January 1, 2019, through December 31, 2021. These examinations were conducted under the authority of Financial Code section 22380(d) and its predecessor statute.

The purpose of regulatory examinations is to obtain information about whether lenders and finders who participate in the Pilot Program have complied with the program's regulations. Over the three-year period, the DFPI conducted 6 regulatory examinations of 17 lenders who participated in the Pilot Program. Total number of lenders that were subject to regulatory examination were three in 2019, three in 2020, and six in 2021. Finder violations are attributed to Pilot Program lenders.

Table 2: Number and Type of Violations (Lender)

Violation Description	CFL Section	2019	2020	2021
Net worth deficiency	22104	1	0	0
Current officers list not maintained; Investigation of person responsible	22105 & 1409 CCR	2	2	8
Other business activity not approved	22154	1	0	0
Documents not provided for examination	22156, 22376, 22377	0	3	0
Licensing authority not disclosed on advertisement	22161 & 1550 CCR	0	1	1
Borrower disclosures did not contain accurate information	22161	4	14	5
Advertisement misleading and/or not preapproved	22161	0	3	0
Inaccurate data provided in the CFL RSDL Annual Report	22170(a)	0	6	3
ACH and disallowed fees charged on loans with a bona fide principal amount of less than \$5,000	22200, 22201, 22202, 22303, 22304, 22307	1	2	0
Loans charged interest over the maximum allowed	22308, 22352(b), 22370(b)	1	0	0
Loan documents contained blank spaces	22333	1	0	0
Borrowers charged delinquency fees exceeding the maximum allowed	22352(e) & 222370(f)	2	2	0
Administrative fee overcharge for refinanced loans	22370(c)(3) & 22370(c)(4)	0	0	0
Borrowers not asked about outstanding payday loans	22370(f)(4)(B), 22370(i)(4)(A)	0	1	0
Borrower not asked about other debt obligations	22370(i)(4)(B)(i)	0	1	0
Borrower's payment history not provided to credit reporting agency	22370(i)(2)	1	0	0
Borrowers non provided with credit reporting agency information	22370(i)(3)	2	0	0
Loans made to borrowers who did not have the ability to repay the loan	22370(i)(4)	3	0	0
Finder location not registered	22371	1	0	0

During 2021, there were no registered finders in the Pilot Program, and therefore, there were no finders that were subject to regulatory examinations.

Table 3: Number and Type of Violations (Finder)

Violation Description	CFL Section	2019	2020	2021
Borrower not provided with loan documents in preferred language	22368	2	4	0
Borrower not asked about outstanding payday loans	22370(i)(4)(B)(ii)	1	0	0
Finder services not performed at registered physical locations	22372	0	1	0
Borrower not provided with complete disbursement and/or payment receipts	22372(b)(1) & (2)	2	12	0
Disbursement and payment records not maintained	22372(b)(2)(D)	0	1	0
Borrower provided with loan-related marketing materials not approved by lender	22372(c)(2)	2	0	0
Bad business practice - Internal controls absent	22372 & 1426 CCR	0	1	0
Borrower not provided with written copy of the disclosure notice	22373	6	11	0
Fees paid to finder exceed the maximum allowed	22374	2	6	0
Finder doing business without registering with DFPI	22375(a)	0	1	0
Current list of registered finder locations not maintained	22375(a)	1	9	0
Finder services provided not disclosed in Lender/Finder agreement	22376	0	2	0
Undisclosed compensation paid to finder employees	22376	0	5	0

COMPLAINT INFORMATION

There were 29 complaints received by the DFPI about Pilot Program lenders from January 1, 2019, through December 31, 2021. Of the 29 complaints received from 2019 through 2021, two complaints were about finders.

Table 4: Pilot Program Lender Complaints

	2019	2020	2021
Number of Complaints	5	11	13

The table below summarizes the issues covered in the complaints. A single complaint can cover multiple issues.

Table 5: Complaints by Complaint Reason

	2019	2020	2021	Total
Administrative dispute	0	0	0	0
Charging excessive interest	0	1	1	2
Identity theft allegation	1*	0	0	1
Mishandled transaction	0	1	1	2
Poor customer service	1	1	0	2
Payment dispute	1	6	7	14
Unauthorized withdrawals	1	0	0	1
Unauthorized credit report inquiry	1*	0	1	2
Unethical behavior tactics	0	2	3	5

*Consumer complaints about finders.

RECOMMENDATIONS FOR IMPROVING PROGRAM

The current version of the Pilot Program has been operational only since January 1, 2019.

The DFPI recommends policymakers give the program more time to gather data prior to pursuing additional programmatic changes. The multiple statutory changes enacted since program inception did increase the number of lenders participating in the program, but the total remains less than 20.

The DFPI will continue to consult with licensees, consumer advocates, and policymakers on increasing lender participation and other suggestions.

APPENDIX

LICENSING DATA

The information provided in this section was obtained from statutorily required annual reports that participating Pilot Program lenders filed with the DFPI.

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.

As of March 15, 2022, two Pilot participants failed to submit their annual reports. However, both participants reported no Pilot Program loan activity for the last three years.

Table 6: Applications and Loans Made Using Finder

	2019	2020	2021
Number of Applications	310,153		0
Number of Loans	124,943	NOT	0
Loans as Percentage of Applications	40%	REPORTED	0
Total Principal Amount of Loans	\$213,669,100		\$0

Table 7: Applications and Loans Made Without Using Finder

	2019	2020	2021
Number of Applications	474,737	242,098	277,264
Number of Loans	197,561	94,778	96,574
Loans as Percentage of Applications	42%	39%	35%
Total Principal Amount of Loans	\$214,763,498	\$94,015,692	\$119,461,132

Table 8: Loans by Loan Term: Using Finder

Loan Term	2019	2020	2021
90-119 Days	0		0
120-179 Days	24,930	NOT	0
180-269 Days	13,687	REPORTED	0
270-359 Days	10,012		0
≥ 360 Days	76,313		0

Table 9: Loans by Loan Term: Without Using Finder

Loan Term	2019	2020	2021
90-119 Days	53	9	0
120-179 Days	1,607	217	501
180-269 Days	67,996	17,667	827
270-359 Days	24,208	7,110	161
≥ 360 Days	103,697	69,775	95,085

Table 10: Loans \$300-\$499, by ARP, Using Finder

	2019	2020	2021
Up to 14.99%	0		0
15% - 19.99%	0		0
20% - 24.99%	0	NOT	0
25% - 29.99%	0	REPORTED	0
30% - 34.99%	176		0
35% - 39.99%	665		0
40% - 49.99%	4		0
50% or more	24,388		0
Total Loans	25,233		0

Table 11: Loans \$300-\$499, by ARP, Without Using Finder

	2019	2020	2021
Up to 14.99%	0	0	0
15% - 19.99%	0	0	1
20% - 24.99%	0	1	4
25% - 29.99%	362	0	2
30% - 34.99%	24	10	6
35% - 39.99%	209	1,644	2,604
40% - 49.99%	3	1	0
50% or more	18,119	2,874	0
Total Loans	18,717	4,530	2,617

Table 12: Loans \$500-\$999, by APR, Using Finder

	2019	2020	2021
Up to 14.99%	0		0
15% - 19.99%	0		0
20% - 24.99%	0	NOT	0
25% - 29.99%	0	REPORTED	0
30% - 34.99%	1,105		0
35% - 39.99%	1,121		0
40% - 49.99%	1,167		0
50% or more	12,423		0
Total Loans	15,816		0

Table 13: Loans \$500-\$999, by APR, Without Using Finder

	2019	2020	2021
Up to 14.99%	85	1	0
15% - 19.99%	0	2	9
20% - 24.99%	4	107	373
25% - 29.99%	611	14	31
30% - 34.99%	3,157	1,068	647
35% - 39.99%	644	23,228	31,725
40% - 49.99%	28,577	8,836	11
50% or more	62,040	17,775	18
Total Loans	95,118	51,031	32,814

Table 14: Loans \$1,000-\$1,499, by APR, Using Finder

	2019	2020	2021
Up to 14.99%	0		0
15% - 19.99%	0		0
20% - 24.99%	0	NOT	0
25% - 29.99%	0	REPORTED	0
30% - 34.99%	409		0
35% - 39.99%	1,000		0
40% - 49.99%	17,451		0
50% or more	4,035		0
Total Loans	22,895		0

Table 15: Loans \$1,000-\$1,499, by APR, Without Using Finder

	2019	2020	2021
Up to 14.99%	178	13	0
15% - 19.99%	0	0	3
20% - 24.99%	43	15	93
25% - 29.99%	371	10	42
30% - 34.99%	730	274	482
35% - 39.99%	555	7,792	30,457
40% - 49.99%	20,715	6,072	70
50% or more	9,251	2,883	50
Total Loans	31,843	17,059	31,197

Table 16: Loans \$1,500-\$2,499, by APR, Using Finder

	2019	2020	2021
Up to 14.99%	0		0
15% - 19.99%	0		0
20% - 24.99%	0	NOT	0
25% - 29.99%	0	REPORTED	0
30% - 34.99%	782		0
35% - 39.99%	11,101		0
40% - 49.99%	12,847		0
50% or more	0		0
Total Loans	24,730		0

Table 17: Loans \$1,500-\$2,499, by APR, Without Using Finder

	2019	2020	2021
Up to 14.99%	0	0	0
15% - 19.99%	5	0	3
20% - 24.99%	131	21	131
25% - 29.99%	473	55	744
30% - 34.99%	1,884	742	1,365
35% - 39.99%	9,557	13,053	24,379
40% - 49.99%	31,013	8,217	501
50% or more	3,031	2	15
Total Loans	46,094	22,090	27,138

Table 18: Loans \$2,500-\$4,999, by APR, Using Finder

	2019	2020	2021
Up to 14.99%	0		0
15% - 19.99%	0		0
20% - 24.99%	0	NOT	0
25% - 29.99%	1	REPORTED	0
30% - 34.99%	7,461		0
35% - 39.99%	28,806		0
40% - 49.99%	0		0
50% or more	0		0
Total Loans	36,268		0

Table 19: Loans \$2,500-\$4,999, by APR, Without Using Finder

	2019	2020	2021
Up to 14.99%	0	0	0
15% - 19.99%	0	0	0
20% - 24.99%	0	0	0
25% - 29.99%	2,441	0	58
30% - 34.99%	96	7	1,086
35% - 39.99%	670	57	856
40% - 49.99%	0	0	20
50% or more	0	0	0
Total Loans	3,207	64	2,020

Table 20: Loans \$5,000-\$7,499, by APR, Using Finder

	2019	2020	2021
Up to 14.99%	0		0
15% - 19.99%	0		0
20% - 24.99%	0	NOT	0
25% - 29.99%	0	REPORTED	0
30% - 34.99%	0		0
35% - 39.99%	0		0
40% - 49.99%	0		0
50% or more	0		0
Total Loans	0		0

Table 21: Loans \$5,000-\$7,499, by APR, Without Using Finder

	2019	2020	2021
Up to 14.99%	0	0	0
15% - 19.99%	0	0	0
20% - 24.99%	0	0	0
25% - 29.99%	2,580	0	10
30% - 34.99%	0	0	777
35% - 39.99%	0	4	1
40% - 49.99%	0	0	0
50% or more	2	0	0
Total Loans	2,582	4	788

Table 22: Loans Made by Size Using Finder

	2019	2020	2021
\$300-\$499	25,233		0
\$500-\$999	15,816		0
\$1,000-\$1,499	22,895	NOT	0
\$1,500-\$2,499	24,730	REPORTED	0
\$2,500-\$4,999	36,268		0
\$5,000-\$7,499	0		0
Total Loans	124,942		0

Table 23: Loans Made by Size Without Using Finder

	2019	2020	2021
\$300-\$499	18,717	4,530	2,617
\$500-\$999	95,118	51,031	32,814
\$1,000-\$1,499	31,843	17,059	31,197
\$1,500-\$2,499	46,094	22,090	27,138
\$2,500-\$4,999	3,207	64	2,020
\$5,000-\$7,499	2,582	4	788
Total Loans	197,561	94,778	96,574

Table 24: Who Obtained More Than One Loan Using Finder

	2019	2020	2021
Number of Borrowers Who Obtained 2 Loans	15,234		0
Number of Borrowers Who Obtained 3 Loans	1,072	NOT	0
Number of Borrowers Who Obtained 4 Loans	85	REPORTED	0
Total Number of Borrowers Who Obtained More Than One Loan	16,391		0

Table 25: Who Obtained More Than One Loan Without Using Finder

	2019	2020	2021
Number of Borrowers Who Obtained 2 Loans	19,663	6,783	4,702
Number of Borrowers Who Obtained 3 Loans	1,302	280	237
Number of Borrowers Who Obtained 4 Loans	73	24	38
Total Number of Borrowers Who Obtained More Than One Loan	21,038	7,087	4,977

Table 26: Credit Score Performance for Borrowers Who Obtained

	2019	2020	2021
Number of Borrowers Who Obtained More Than One Loan	16,387		0
Number of Borrowers with Credit Scores That Increased Over the Previous Loan	8,352	NOT	0
Number of Borrowers Who Started With No Credit Score Before Obtaining Successive Loan	5,820	REPORTED	0
Percentage of Borrowers with Increased Credit Scores	51%		0
Average Size of Increase (in points) in Credit Scores (Borrowers with Increased Scores Only)	184		0
Average Size of Increase/Decrease in Credit Scores for All Borrowers	89		0

Table 27: Credit Score Performance for Borrowers Who Obtained

	2019	2020	2021
Number of Borrowers Who Obtained More Than One Loan	21,035	7,087	4,977
Number of Borrowers with Credit Scores That Increased Over the Previous Loan	12,213	5,320	3,143
Number of Borrowers Who Started With No Credit Score Before Obtaining Successive Loan	7,058	2,337*	1,101
Percentage of Borrowers with Increased Credit Scores	58%	75%	63%
Average Size of Increase (in points) in Credit Scores (Borrowers with Increased Scores Only)	253	358	161
Average Size of Increase/Decrease in Credit Scores for All Borrowers	147	273	62

*Revised previously reported data.

Table 28: Loans by Income Distribution of Census Tract Using Finder*

	2019	2020	2021
Low-Income	22,120		0
Moderate-Income	54,131		0
Middle-Income	30,522	NOT	0
Upper-Income	16,799	REPORTED	0
Not Known	1,370		0
Total Loans	124,942		0

Table 29: Loans by Income Distribution of Census Tract Without Using Finder

	2019	2020	2021
Low-Income	31,360	15,779	56,641
Moderate-Income	83,237	41,188	23,648
Middle-Income	44,705	22,750	7,714
Upper-Income	12,236	6,540	3,706
Not Known	26,023	8,521	4,865
Total Loans	197,561	94,778	96,574

* "Low-income" census tract means median family income 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 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.

Table 30: Loans by Income Distribution Using Finders

	2019	2020	2021
Less than \$20,000	19,885		0
\$20,000 - \$44,999	83,235	NOT	0
\$45,000 - \$139,999	21,327	REPORTED	0
\$140,000 and Above	495		0
Total Loans	124,942		0

Table 31: Loans by Income Distribution Without Using Finders

	2019	2020	2021
Less than \$20,000	32,652	12,086	16,161
\$20,000 - \$44,999	126,309	61,182	58,153
\$45,000 - \$139,999	37,344	20,741	21,098
\$140,000 and Above	1,256	769	1,162
Total Loans	197,561	94,778	96,574

Table 32: Loans by Borrower's Use of Bank Account/Check Cashing Using Finder

	2019	2020	2021
Bank Account	99,143		0
No Bank Account	25,799	NOT	0
Borrowers With Bank Account Who Also Used Check-Cashing Services	19,544	REPORTED	0
Borrowers With Bank Account Who Also Used Payday Loan Services	2,752		0

Table 33: Loans by Borrower's Use of Bank Account/Check Cashing Without Using Finder

	2019	2020	2021
Bank Account	168,199	82,765	83,536
No Bank Account	29,362	12,013	13,038
Borrowers With Bank Account Who Also Used Check-Cashing Services	4,654	0	0
Borrowers With Bank Account Who Also Used Payday Loan Services	6,143	0	12

Table 34: Late Fees: Loans Using Finder

	2019	2020	2021
Number of Loans with Late Fees	23,860	NOT	0
Total Loans	124,942	REPORTED	0
Percentage of Loans with Late Fees	19%		0%

Table 35: Late Fees: Loans Without Using Finder

	2019	2020	2021
Number of Loans with Late Fees	55,456	22,284	31,201
Total Loans	197,561	94,778	96,574
Percentage of Loans with Late Fees	28%	24%	32%

Table 36: Late Fees - Dollar Amount Data Using Finder

	2019	2020	2021
Total Amount of Late Fees	\$1,448,542		\$0
No Bank Account Total Principal Amount of Loans	\$213,669,100	NOT	\$0
Late Fees as a Percentage of Loan Principal	0.7%	REPORTED	0.0%
Average Late Fees	\$14		\$0

Table 37: Late Fees - Dollar Amount Data Without Using Finder

	2019	2020	2021
Total Amount of Late Fees	\$3,799,164	\$1,483,945	\$1,908,535
No Bank Account Total Principal Amount of Loans	\$214,763,498	\$94,015,692	\$119,461,132
Late Fees as a Percentage of Loan Principal	1.8%	1.6%	1.6%
Average Late Fees	\$12	\$12	\$12

Table 38: Loans, by Purpose, Using Finder

	2019	2020	2021
Medical	2,580		0
Other Emergency	0		0
Vehicle Repair	6,536		0
Vehicle Purchase	5,853	NOT	0
To Pay Bills	32,803	REPORTED	0
To Consolidate Debt	3,359		0
To Build or Repair Credit	38,141		0
Purchase Goods or Services Other Than a Vehicle Purchase	327		0
For Other Than Personal, Family, or Household Purposes	4,155		0
Other	31,188		0

Table 39: Loans, by Purpose, Without Using Finder

	2019	2020	2021
Medical	5,447	2,049	2,472
Other Emergency	18,055	8,952	9,195
Vehicle Repair	11,268	4,973	5,409
Vehicle Purchase	9,216	4,280	4,163
To Pay Bills	37,553	18,859	18,880
To Consolidate Debt	15,799	7,803	9,455
To Build or Repair Credit	25,472	10,695	10,583
Purchase Goods or Services Other Than a Vehicle Purchase	50,783	30,042	27,320
For Other Than Personal, Family, or Household Purposes	276	46	290
Other	23,692	7,079	8,807

Table 40: Loans With at Least One Delinquency: Made by Size, Delinquency Period Using Finder: 7-29 Days

	2019		2020		2021	
\$300-\$499	2,399	10%			0	0%
\$500-\$999	1,668	11%			0	0%
\$1,000-\$1,499	2,300	10%	NOT		0	0%
\$1,500-\$2,499	2,455	10%	REPORTED		0	0%
\$2,500-\$4,999	2,862	8%			0	0%
\$5,000-\$7,499	0	0%			0	0%
Total Loans All Sizes	11,684				0	

Table 41: Loans With At Least One Delinquency: Loans Made by Size, Delinquency Period Without Using Finder: 7-29 Days

	2019		2020		2021	
\$300-\$499	2,683	14%	267	6%	944	36%
\$500-\$999	18,346	19%	7,483	15%	12,303	37%
\$1,000-\$1,499	6,076	19%	2,837	17%	8,956	29%
\$1,500-\$2,499	10,351	22%	7,010	32%	5,688	21%
\$2,500-\$4,999	439	14%	4	6%	503	25%
\$5,000-\$7,499	386	15%	0	0%	112	14%
Total Loans All Sizes	38,281		17,601		28,506	

Table 42: Loans With at Least One Delinquency: Made by Size, Delinquency Period Using Finder: 30-59 Days

	2019		2020		2021	
\$300-\$499	1,086	4%			0	0%
\$500-\$999	530	3%			0	0%
\$1,000-\$1,499	776	3%	NOT		0	0%
\$1,500-\$2,499	703	3%	REPORTED		0	0%
\$2,500-\$4,999	896	2%			0	0%
\$5,000-\$7,499	0	2%			0	0%
Total Loans All Sizes	3,991				0	

Table 43: Loans With At Least One Delinquency: Made by Size, Delinquency Period Without Using Finder: 30-59 Days

	2019		2020		2021	
\$300-\$499	1,429	8%	95	2%	689	26%
\$500-\$999	8,352	9%	2,749	5%	6,625	20%
\$1,000-\$1,499	2,356	7%	900	5%	4,356	14%
\$1,500-\$2,499	3,484	8%	2,064	9%	2,321	9%
\$2,500-\$4,999	266	8%	0	0%	126	6%
\$5,000-\$7,499	248	10%	0	0%	27	3%
Total Loans All Sizes	16,135		5,808		14,144	

Table 44: Loans With at Least One Delinquency: Made by Size, Using Finder: 60 Days or More

	2019		2020		2021	
\$300-\$499	3,050	12%			0	0%
\$500-\$999	1,402	9%			0	0%
\$1,000-\$1,499	1,523	7%	NOT		0	0%
\$1,500-\$2,499	1,152	5%	REPORTED		0	0%
\$2,500-\$4,999	1,537	4%			0	0%
\$5,000-\$7,499	0	0%			0	0%
Total Loans All Sizes	8,664				0	

Table 45: Loans With at Least One Delinquency: Made by Size, Without Using Finder: 60 Days or More

	2019		2020		2021	
\$300-\$499	1,037	6%	55	1%	612	23%
\$500-\$999	4,553	5%	1,446	3%	4,661	14%
\$1,000-\$1,499	1,210	4%	481	3%	2,807	9%
\$1,500-\$2,499	1,760	4%	1,550	7%	1,508	6%
\$2,500-\$4,999	246	8%	1	2%	305	15%
\$5,000-\$7,499	197	8%	1	25%	16	2%
Total Loans All Sizes	9,003		3,534		9,909	

Table 46: Loans with at Least One Delinquency of 7 Days or More, Using Finder

	2019	2020	2021
Total Number of Loans Delinquent 7 Days or More	24,339		0
Total Number Not Subsequently Brought Current	13,842	NOT	0
Percentage Not Subsequently Brought Current	57%	REPORTED	0%
Average Number of Times Such Borrowers Delinquent 7 Days or More	1.6		0

Table 47: Loans with at Least One Delinquency of 7 Days or More,

	2019	2020	2021
Total Number of Loans Delinquent 7 Days or More	63,415	26,943	52,559
Total Number Not Subsequently Brought Current	21,515	7,452	17,327
Percentage Not Subsequently Brought Current	34%	28%	33%
Average Number of Times Such Borrowers Delinquent 7 Days or More	2.7	6.7	2

**Table 48: Delinquency Comparison:
Pilot Program Loans and Other CFL Loans: Year 2020**

	Pilot Program Loans				CFL Loans	
	Using Finder	w/o Using Finder*				
One Payment Past Due	NOT	16,634	10%	91,833	2%	
Two Payments Past Due	REPORTED	5,469	3%	68,829	2%	
Three or More Payments Past Due		2,660	2%	103,821	3%	

*Revised from previously reported percentages for loans serviced in 2020.

**Table 49: Delinquency Comparison:
Pilot Program Loans and Other CFL Loans: Year 2021**

	Pilot Program Loans				CFL Loans	
	Using Finder	w/o Using Finder				
One Payment Past Due	0	0%	28,506	29%	195,285	4%
Two Payments Past Due	0	0%	14,144	15%	143,961	3%
Three or More Payments Past Due	0	0%	9,909	10%	318,090	6%

Table 50: Language in Which Loan Negotiated: Using Finder*

	2019	2020	2021
English	11,201		0
Spanish	113,741		0
Chinese	0	NOT	0
Tagalog	0	REPORTED	0
Vietnamese	0		0
Korean	0		0
Other	0		0

Table 51: Language in Which Loan Negotiated: Without Using Finder*

	2019	2020	2021
English	85,147	42,974	52,960
Spanish	112,414	51,804	43,614
Chinese	0	0	0
Tagalog	0	0	0
Vietnamese	0	0	0
Korean	0	0	0
Other	0	0	0

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

Table 52: Refinance Loans Using Finder

	2019	2020	2021
Borrowers Who Applied for Refinance Loan	11,198		0
Borrowers Who Applied for Refinance Loan	10%	NOT	0%
Borrowers Who Obtained One or More Refinance Loans	9,422	REPORTED	0
Percentage of Borrowers Who Obtained One or More Refinance Loans	9%		0%
Total Principal Amount of Refinance Loans Made	\$21,857,500		\$0

Table 53: Refinance Loans Without Using Finder

	2019	2020	2021
Borrowers Who Applied for Refinance Loan	39,296	23,652	13,790
Borrowers Who Applied for Refinance Loan	22%	27%	15%
Borrowers Who Obtained One or More Refinance Loans	11,500	8,935	3,188
Percentage of Borrowers Who Obtained One or More Refinance Loans	7%	10%	3%
Total Principal Amount of Refinance Loans Made	\$32,901,544	\$8,970,186	\$10,642,374

Table 54: Detail Of Refinance Loans Made Using Finder

	2019	2020	2021
Borrowers Who Refinanced Once	9,455		0
Borrowers Who Refinanced Once	9%		0%
Borrowers Who Refinanced Twice	0	NOT	0
Borrowers Who Refinanced Twice	0%	REPORTED	0%
Borrowers Who Refinanced More Than Twice	0		0
Borrowers Who Refinanced More Than Twice	0%		0%

Table 55: Detail Of Refinance Loans Made Without Using Finder

	2019	2020	2021
Borrowers Who Refinanced Once	11,741	8,827	3,097
Borrowers Who Refinanced Once	7%	10%	3%
Borrowers Who Refinanced Twice	1,224	108	0
Borrowers Who Refinanced Twice	0.7%	0.1%	0.0%
Borrowers Who Refinanced More Than Twice	411	0	0
Borrowers Who Refinanced More Than Twice	0%	0%	0%

Table 56: Refinance Loans Using Finder: Pre-Refinance Principal Pay Down, Late Payments, Additional Principal Extended

	2019	2020	2021
Average Percentage of Principal Paid Down Before Obtaining Refinance Loan	24%	NOT	0%
Average Number of Late Payments Made on Loan Refinanced	2.94	REPORTED	0
Average Amount of Additional Principal Extended on Refinance Loans	\$1,823		\$0

Table 57: Refinance Loans Without Using Finder: Pre-Refinance Principal Pay Down, Late Payments, Additional Principal Extended

	2019	2020	2021
Average Percentage of Principal Paid Down Before Obtaining Refinance Loan	49%	73%	66%
Average Number of Late Payments Made on Loan Refinanced	9.7	5.6	3.7
Average Amount of Additional Principal Extended on Refinance Loans	\$1,169	\$1,393	\$3,082

Table 58: Total Number of Finders by Finder Type

	2019	2020	2021
Check Cashiers	10		0
Money Transmitters	43	NOT	0
Others*	31	REPORTED	0
Payday Lenders and/or Finance Lenders	1		0

*Others include Tax Preparer, Insurance Agents, Variety Stores, and Other Service Providers.



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