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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, regulates financial services, and fosters responsible innovation. 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.

Fourteen out of 15 approved Pilot Program participants filed annual reports in 2022. The Pilot Program participant that did not file 2022 data is no longer licensed by the DFPI.

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. There was one registered finder during 2022; however, no regulatory examination was conducted during the calendar year. From 2020 to 2022, 31 consumer complaints were filed against Pilot Program lenders and finders, with payment disputes as the most common type.

Key Findings

- The number of Pilot Program lenders has declined from 17 in 2021 to 15 in 2022.
- Pilot Program lenders approved 70,375 loans in 2022, a 27 percent decrease since 2021.
- The annual total principal amount of loans made in 2022 was \$96 million, a 19 percent decrease since 2021.
- The number of borrower applications received in 2022 was 230,734, a 17 percent decrease since 2021.
- The top two reasons for borrowing were to purchase goods or services other than a vehicle and to pay bills, which together make up 50 percent of borrowers in 2022.
- The majority of the loans made in 2022 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 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 lender 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 for loans under \$2,500. The allowable interest rate charges for loans from \$2,500 to \$7,499 are similar to those allowed under Assembly Bill 539, which became effective January 1, 2020. 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.

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 years' reports can be found on the DFPI's website at 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, 2020 through December 31, 2022. The full licensing data is provided in the Appendix.

Pilot Program Participation

From 2020 through 2022, the DFPI received eight applications for CFL lenders to participate in the Pilot Program, and six applications were approved during this period. During 2022, a total of 15 lenders participated in the Pilot Program. One lender was approved in 2022 and operated from 101 locations.

Table 1: Lender Applications and Approvals

	2020	2021	2022
Application as of January 1	8	3	3
Applications received	2	5	0
Applications approved	3	2	1
Applications denied	0	0	0
Applications voluntarily withdrawn	4	0	1
Year-end applications pending	3	3	1
CFL license surrendered	1	0	2
CFL license revoked	0	2	1
Withdrawal from Pilot Program	2	1	0
Total participants at year-end	18	17	15

Pilot Program Lending Activity Highlights

The following categories are highlights from the 2022 annual report:

- **Loan Size** – Of the 70,375 loans made in 2022, one percent of the loans made were in the range between \$300 to \$499; 25 percent were in the range between \$500 to \$999; 30 percent were in the range between \$1,000 to \$1,499; 40 percent were in the range between \$1,500 to \$2,499; 3 percent were in the range between \$2,500 to \$4,999; and one percent in the range between \$5,000 to \$7,499.
- **Loan Term** – Of the 70,375 loans made in 2022, 97 percent were for 360 days or more and less than three percent of the loans were for 90 to 359 days.
- **Annual Percentage Rates** – Of the 70,375 loans made in 2022, 90 percent carried an APR of 35 to 39.99 percent, and six percent of the loans carried an APR of 40 percent or more.
- **Delinquencies** – Of the 70,375 loans serviced in 2022, 35 percent were delinquent for 7 to 29 days, 19 percent were delinquent for 30 to 59 days, and 15 percent were delinquent for 60 days or more.
- **Multiple Loans** – The total number of borrowers who obtained more than one loan in 2022 was 4,033, representing six percent of total loans made in 2022.
- **Borrower Income** – Of the 70,375 loans made in 2022, 18 percent were to borrowers with income less than \$20,000, 56 percent were to borrowers with income between \$20,000 to \$44,999, 25 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 2022, 31 percent of the borrowers took out loans to purchase goods or services other than a vehicle purchase, 19 percent to pay bills, 11 percent for medical and other emergency, seven percent to build or repair credit, 10 percent to consolidate debt, four percent for vehicle repair; four percent for vehicle purchases, less than one percent for purposes other than personal or household, and 13 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, 2020 through December 31, 2022. 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 laws and regulations. Over the three- year period, the DFPI conducted 11 regulatory examinations of 15 lenders who participated in the Pilot Program. Total number of lenders that were subject to regulatory examination were three in 2020, six in 2021, and three in 2022. The increase in the number of 2022 violations for many categories listed below are attributed to fact that DFPI examined licensees with higher amount of loan activity during the 2022 cycle. Finder violations are attributed to the Pilot Program lenders and included in reports of examinations which require corrective action for all violations listed in the table below.

Table 2: Number and Type of Violations (Lender)

Violation Description	CFL Section	2020	2021	2022
Current officers list not maintained; Investigation of person responsible	22105 & 1409 CCR	2	8	1
Unauthorized Activities	22100, 22151, 22155	0	0	3
Books and Records: documents not provided, inaccurate information, right to rescind, adverse action not provided, payment due date	22156, 22161, 22333, 22370(b), 22376, 22377, 1787.2 et seq Civil Code	17	5	32
Advertisement: misleading, not approved, and licensing authority not disclosed	22161 & 1550 CR	4	1	4
Overpayment not refunded	22161	0	0	1
Inaccurate data provided in the CFL and RSDL Annual Report	22170(a)	6	3	4
ACH and disallowed fees charged on loans with a bona fide principal amount of less than \$5,000	22200, 22201, 22202, 22303, 22304, 22307	2	0	4
Annual Percentage Rate exceeds maximum	22304.5 and 22346	0	0	30
Administrative fee exceeds maximum allowed	22305, 22370(c)(3) & (4), 22370(e)(1)(B)	0	0	9
Loan interest rate: exceeded the maximum allowed, not reduced for repeat borrower, compounded in restructured loans	22308, 22309, 22370(b)	0	0	8
Loan term exceeds maximum allowed	22334	0	0	6
Delinquency fees exceed the maximum allowed	22370(f), 22370(g)	2	0	3
Improper loan refinance	22370(e)(3)	-	-	15
Loans made to borrowers who did not have the ability to repay	22370(i)(4)(A)	0	0	2
Debt collecting practice is unfair and abusive	1788 et seq. Civil Code	0	0	1

There were no registered Finders in 2021, accordingly, no regulatory Finder examinations were performed in 2021 or 2022. Finders registered in 2022 will be subject to future regulatory examinations to satisfy statutory requirements.

Table 3: Number and Type of Violations (Finder)

Violation Description	CFL Section	2020	2021	2022
Borrower not provided with loan documents in preferred language	22368	4	0	0
Borrower not asked about outstanding payday loans	22370(i)(4)(B)(ii)	0	0	0
Finder services not performed at registered physical locations	22372	1	0	0
Borrower not provided with complete disbursement and/or payments receipts	22372(b)(1) & (2)	12	0	0
Disbursement and payment records not maintained	22372(b)(2)(D)	1	0	0
Borrower provided with loan-related marketing materials not approved by lender	22372(c)(2)	0	0	0
Bad business practice - Internal controls absent	22372 & 1426	1	0	0
Borrower not provided with written copy of the disclosure notice	22373	11	0	0
Fees paid to finder exceed the maximum allowed	22374	6	0	0
Finder doing business without registering with DFI	22375(a)	1	0	0
Current list of registered finder locations not maintained	22375(a)	9	0	0
Finder services provided not disclosed in Lender/Finder agreement	22376	2	0	0
Undisclosed compensation paid to finder employees	22376	5	0	0

COMPLAINT INFORMATION

There were 55 complaints received by the DFPI about Pilot Program lenders and finders from January 1, 2020 through December 31, 2022.

Table 4: Pilot Program Lender Complaints

	2020	2021	2022
Number of Complaints	11	13	31

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

Table 5: Complaints by Complaint Reason

	2020	2021	2022	Total
Administrative dispute	0	0	6	6
Charging excessive interest	1	1	9	11
Identity theft allegation	0	0	2	2
Mishandled transaction	1	1	2	4
Poor customer service	1	0	1	2
Payment dispute	6	7	5	18
Unauthorized withdrawals	0	0	0	0
Unauthorized credit report inquiry	0	1	0	1
Unethical behavior tactics	2	3	6	11

RECOMMENDATIONS FOR IMPROVING PROGRAM

The current version of the Pilot Program has been operational 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 fewer 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, 2023, one Pilot participant failed to submit its annual report. However, the participant is no longer licensed by the DFPI.

Table 6: Applications and Loans Made Using Finder

	2020	2021	2022
Number of Applications		0	3,696
Number of Loans	NOT	0	765
Loans as Percentage of Applications	REPORTED	0	21%
Total Principal Amount of Loans		\$0	\$1,223,599

Table 7: Applications and Loans Made Without Using Finder

	2020	2021	2022
Number of Applications	242,098	277,264	227,038
Number of Loans	94,778	96,574	69,610
Loans as Percentage of Applications	39%	35%	31%
Total Principal Amount of Loans	\$94,015,692	\$119,461,132	\$95,089,134

Table 8: Loans by Loan Term: Using Finder

Loan Term	2020	2021	2022
90-119 Days		0	0
120-179 Days	NOT	0	0
180-269 Days	REPORTED	0	0
270-359 Days		0	0
≥ 360 Days		0	765

Table 9: Loans by Loan Term: Without Using Finder

Loan Term	2020	2021	2022
90-119 Days	9	0	3
120-179 Days	217	501	561
180-269 Days	17,667	827	1,325
270-359 Days	7,110	161	145
≥ 360 Days	69,775	95,085	67,576

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

	2020	2021	2022
Up to 14.99%		0	2
15% - 19.99%		0	0
20% - 24.99%	NOT	0	0
25% - 29.99%	REPORTED	0	0
30% - 34.99%		0	0
35% - 39.99%		0	3
40% - 49.99%		0	44
50% or more		0	7
Total Loans		0	56

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

	2020	2021	2022
Up to 14.99%	0	0	0
15% - 19.99%	0	1	0
20% - 24.99%	1	4	0
25% - 29.99%	0	2	0
30% - 34.99%	10	6	0
35% - 39.99%	1,644	2,604	202
40% - 49.99%	1	0	0
50% or more	2,874	0	533
Total Loans	4,530	2,617	735

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

	2020	2021	2022
Up to 14.99%		0	0
15% - 19.99%		0	0
20% - 24.99%	NOT	0	0
25% - 29.99%	REPORTED	0	0
30% - 34.99%		0	0
35% - 39.99%		0	34
40% - 49.99%		0	173
50% or more		0	0
Total Loans		0	207

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

	2020	2021	2022
Up to 14.99%	1	0	0
15% - 19.99%	2	9	0
20% - 24.99%	107	373	0
25% - 29.99%	14	31	0
30% - 34.99%	1,068	647	96
35% - 39.99%	23,228	31,725	16,028
40% - 49.99%	8,836	11	17
50% or more	17,775	18	1,279
Total Loans	51,031	32,814	17,420

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

	2020	2021	2022
Up to 14.99%		0	0
15% - 19.99%		0	0
20% - 24.99%	NOT	0	0
25% - 29.99%	REPORTED	0	0
30% - 34.99%		0	0
35% - 39.99%		0	38
40% - 49.99%		0	52
50% or more		0	0
Total Loans		0	90

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

	2020	2021	2022
Up to 14.99%	13	0	0
15% - 19.99%	0	3	0
20% - 24.99%	15	93	0
25% - 29.99%	10	42	0
30% - 34.99%	274	482	237
35% - 39.99%	7,792	30,457	19,568
40% - 49.99%	6,072	70	514
50% or more	2,883	50	597
Total Loans	17,059	31,197	20,916

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

	2020	2021	2022
Up to 14.99%		0	0
15% - 19.99%		0	0
20% - 24.99%	NOT	0	0
25% - 29.99%	REPORTED	0	0
30% - 34.99%		0	3
35% - 39.99%		0	186
40% - 49.99%		0	4
50% or more		0	0
Total Loans		0	193

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

	2020	2021	2022
Up to 14.99%	0	0	2
15% - 19.99%	0	3	0
20% - 24.99%	21	131	0
25% - 29.99%	55	744	1
30% - 34.99%	742	1,365	1,474
35% - 39.99%	13,053	24,379	25,946
40% - 49.99%	8,217	501	802
50% or more	2	15	29
Total Loans	22,090	27,138	28,254

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

	2020	2021	2022
Up to 14.99%		0	0
15% - 19.99%		0	0
20% - 24.99%	NOT	0	0
25% - 29.99%	REPORTED	0	0
30% - 34.99%		0	4
35% - 39.99%		0	215
40% - 49.99%		0	0
50% or more		0	0
Total Loans		0	219

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

	2020	2021	2022
Up to 14.99%	0	0	0
15% - 19.99%	0	0	0
20% - 24.99%	0	0	0
25% - 29.99%	0	58	0
30% - 34.99%	7	1,086	776
35% - 39.99%	57	856	651
40% - 49.99%	0	20	160
50% or more	0	0	0
Total Loans	64	2,020	1,587

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

	2020	2021	2022
Up to 14.99%		0	0
15% - 19.99%		0	0
20% - 24.99%	NOT	0	0
25% - 29.99%	REPORTED	0	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

	2020	2021	2022
Up to 14.99%	0	0	0
15% - 19.99%	0	0	0
20% - 24.99%	0	0	0
25% - 29.99%	0	10	5
30% - 34.99%	0	777	550
35% - 39.99%	4	1	143
40% - 49.99%	0	0	0
50% or more	0	0	0
Total Loans	4	788	698

Table 22: Loans Made by Size Using Finder

	2020	2021	2022
\$300-\$499		0	56
\$500-\$999		0	207
\$1,000-\$1,499	NOT	0	90
\$1,500-\$2,499	REPORTED	0	193
\$2,500-\$4,999		0	219
\$5,000-\$7,499		0	0
Total Loans		0	765

Table 23: Loans Made by Size Without Using Finder

	2020	2021	2022
\$300-\$499	4,530	2,617	735
\$500-\$999	51,031	32,814	17,420
\$1,000-\$1,499	17,059	31,197	20,916
\$1,500-\$2,499	22,090	27,138	28,254
\$2,500-\$4,999	64	2,020	1,587
\$5,000-\$7,499	4	788	698
Total Loans	94,778	96,574	69,610

Table 24: Who Obtained More Than One Loan Using Finder

	2020	2021	2022
Number of Borrowers Who Obtained 2 Loans		0	4
Number of Borrowers Who Obtained 3 Loans	NOT	0	0
Number of Borrowers Who Obtained 4 Loans	REPORTED	0	0
Total Number of Borrowers Who Obtained More Than One Loan		0	4

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

	2020	2021	2022
Number of Borrowers Who Obtained 2 Loans	6,783	4,702	3,814
Number of Borrowers Who Obtained 3 Loans	280	237	198
Number of Borrowers Who Obtained 4 Loans	24	38	21
Total Number of Borrowers Who Obtained More Than One Loan	7,087	4,977	4,033

Table 26: Credit Score Performance for Borrowers Who Obtained More Than One Loan Using Finder

	2020	2021	2022
Number of Borrowers Who Obtained More Than One Loan		0	4
Number of Borrowers with Credit Scores That Increased Over the Previous Loan	NOT	0	0
Number of Borrowers Who Started with No Credit Score Before Obtaining Successive Loan	RERORTED	0	0
Percentage of Borrowers with Increased Credit Scores		0%	0%
Average Size of Increase (in Points) in Credit Scores		0	0

Table 27: Credit Score Performance for Borrowers Who Obtained More Than One Loan Without Using Finder

	2020	2021	2022
Number of Borrowers Who Obtained More Than One Loan	7,087	4,977	4,563
Number of Borrowers with Credit Scores That Increased Over the Previous Loan	5,320	3,143	3,538
Number of Borrowers Who Started with No Credit Score Before Obtaining Successive Loan	6	0	0
Percentage of Borrowers with Increased Credit Scores	75%	63%	78%
Average Size of Increase (in Points) in Credit Scores	358	161	115

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

	2020	2021	2022
Low-Income		0	322
Moderate-Income		0	295
Middle-Income	NOT	0	129
Upper-Income	REPORTED	0	17
Not Known		0	2
Total Loans		0	765

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

	2020	2021	2022
Low-Income	15,779	56,641	34,897
Moderate-Income	41,188	23,648	19,733
Middle-Income	22,750	7,714	8,001
Upper-Income	6,540	3,706	3,237
Not Known	8,521	4,865	3,742
Total Loans	94,778	96,574	69,610

*"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

	2020	2021	2022
Less than \$20,000		0	65
\$20,000 - \$44,999	NOT	0	449
\$45,000 - \$139,999	REPORTED	0	244
\$140,000 and Above		0	7
Total Loans		0	765

Table 31: Loans by Income Distribution Without Using Finders

	2020	2021	2022
Less than \$20,000	12,086	16,161	12,324
\$20,000 - \$44,999	61,182	58,153	38,985
\$45,000 - \$139,999	20,741	21,098	17,506
\$140,000 and Above	769	1,162	795
Total Loans	94,778	96,574	69,610

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

	2020	2021	2022
Bank Account		0	364
No Bank Account	NOT	0	401
Borrowers With Bank Account Who Also Used Check-Cashing Services	REPORTED	0	0
Borrowers With Bank Account Who Also Used Payday Loan Services		0	1

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

	2020	2021	2022
Bank Account	82,765	83,536	61,183
No Bank Account	12,013	13,038	8,427
Borrowers With Bank Account Who Also Used Check-Cashing Services	0	0	0
Borrowers With Bank Account Who Also Used Payday Loan Services	0	12	19

Table 34: Late Fees: Loans Using Finder

	2020	2021	2022
Number of Loans with Late Fees	NOT	0	98
Total Loans	REPORTED	0	765
Percentage of Loans with Late Fees		0%	13%

Table 35: Late Fees: Loans Without Using Finder

	2020	2021	2022
Number of Loans with Late Fees	22,284	31,201	27,290
Total Loans	94,778	96,574	69,610
Percentage of Loans with Late Fees	24%	32%	39%

Table 36: Late Fees - Dollar Amount Data Using Finder

	2020	2021	2022
Total Amount of Late Fees		\$0	\$1,920
No Bank Account Total Principal Amount of Loans	NOT	\$0	\$1,223,599
Late Fees as a Percentage of Loan Principal	REPORTED	0.0%	0.2%
Average Late Fees		\$0	\$13

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

	2020	2021	2022
Total Amount of Late Fees	\$1,483,945	\$1,908,535	\$1,317,194
No Bank Account Total Principal Amount of Loans	\$94,015,692	\$119,461,132	\$95,089,134
Late Fees as a Percentage of Loan Principal	1.6%	1.6%	1.4%
Average Late Fees	\$12	\$12	\$11

Table 38: Loans, by Purpose, Using Finder

	2020	2021	2022
Medical		0	29
Other Emergency		0	23
Vehicle Repair		0	30
Vehicle Purchase	NOT	0	20
To Pay Bills	REPORTED	0	45
To Consolidate Debt		0	10
To Build or Repair Credit		0	39
Purchase Goods or Services Other Than a Vehicle		0	134
For Other Than Personal, Family, or Household Purposes		0	0
Other		0	435

Table 39: Loans, by Purpose, Without Using Finder

	2020	2021	2022
Medical	2,049	2,472	1,897
Other Emergency	8,952	9,195	5,840
Vehicle Repair	4,973	5,409	3,119
Vehicle Purchase	4,280	4,163	2,698
To Pay Bills	18,859	18,880	13,571
To Consolidate Debt	7,803	9,455	7,314
To Build or Repair Credit	10,695	10,583	4,626
Purchase Goods or Services Other Than a Vehicle	30,042	30,042	21,906
For Other Than Personal, Family, or Household Purposes	46	290	254
Other	7,079	8,807	8,385

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

	2020		2021		2022	
\$300-\$499			0	0%	21	38%
\$500-\$999			0	0%	55	27%
\$1,000-\$1,499	NOT		0	0%	23	26%
\$1,500-\$2,499	REPORTED		0	0%	50	26%
\$2,500-\$4,999			0	0%	8	4%
\$5,000-\$7,499			0	0%	0	0%
Total Loans All Sizes			0		157	

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

	2020		2021		2022	
\$300-\$499	267	6%	944	36%	55	7%
\$500-\$999	7,483	15%	12,303	37%	6,506	37%
\$1,000-\$1,499	2,837	17%	8,956	29%	7,960	38%
\$1,500-\$2,499	7,010	32%	5,688	21%	8,508	30%
\$2,500-\$4,999	4	6%	503	25%	912	57%
\$5,000-\$7,499	0	0%	112	14%	448	64%
Total Loans All Sizes	17,601		28,506		24,389	

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

	2020		2021		2022	
\$300-\$499			0	0%	1	2%
\$500-\$999			0	0%	6	3%
\$1,000-\$1,499	NOT		0	0%	2	2%
\$1,500-\$2,499	REPORTED		0	0%	5	3%
\$2,500-\$4,999			0	0%	0	0%
\$5,000-\$7,499			0	0%	0	0%
Total Loans All Sizes			0		14	

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

	2020		2021		2022	
\$300-\$499	95	2%	689	26%	95	4%
\$500-\$999	2,749	5%	6,625	20%	2,744	22%
\$1,000-\$1,499	900	5%	4,356	14%	4,673	22%
\$1,500-\$2,499	2,064	9%	2,321	9%	4,318	15%
\$2,500-\$4,999	0	0%	126	6%	466	29%
\$5,000-\$7,499	0	0%	27	3%	188	27%
Total Loans All Sizes	5,808		14,144		13,559	

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

	2020	2021	2022	
\$300-\$499		0 0%	6	11%
\$500-\$999		0 0%	12	6%
\$1,000-\$1,499	NOT	0 0%	3	3%
\$1,500-\$2,499	REPORTED	0 0%	0	0%
\$2,500-\$4,999		0 0%	0	0%
\$5,000-\$7,499		0 0%	0	0%
Total Loans All Sizes			21	

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

	2020		2021		2022	
\$300-\$499	55	1%	612	23%	122	17%
\$500-\$999	1,446	3%	4,661	14%	3,071	18%
\$1,000-\$1,499	481	3%	2,807	9%	3,611	17%
\$1,500-\$2,499	1,550	7%	1,508	6%	3,178	11%
\$2,500-\$4,999	1	2%	305	15%	341	21%
\$5,000-\$7,499	1	25%	16	2%	99	14%
Total Loans All Sizes	3,534		9,909		10,422	

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

	2020	2021	2022
Total Number of Loans Delinquent 7 Days or More		0	192
Total Number Not Subsequently Brought Current	NOT	0	8
Percentage Not Subsequently Brought Current	REPORTED	0%	4%
Average Number of Times Such Borrowers Delinquent 7 Days or More		0	1

Table 47: Loans with at Least One Delinquency of 7 Days or More, Without Using Finder

	2020	2021	2022
Total Number of Loans Delinquent 7 Days or More	26,943	52,559	48,370
Total Number Not Subsequently Brought Current	7,452	17,327	14,318
Percentage Not Subsequently Brought Current	28%	33%	30%
Average Number of Times Such Borrowers Delinquent 7 Days or More	6.7	2	2.7

**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	18%	91,833	2%
Two Payments Past Due	REPORTED	5,469	6%	68,829	2%
Three or More Payments Past Due		2,660	3%	103,821	3%

**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	30%	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: Delinquency Comparison:
Pilot Program Loans and Other CFL Loans: Year 2022**

	Pilot Program Loans		CFL Loans			
	Using Finder	W/o Using Finder				
One Payment Past Due	157	21%	24,389	35%	553,216	3%
Two Payments Past Due	14	2%	13,559	19%	359,472	2%
Three or More Payments Past Due	21	3%	10,422	15%	265,127	1%

Table 51: Language in Which Loan Negotiated: Using Finder*

	2020	2021	2022
English		0	465
Spanish		0	300
Chinese	NOT	0	0
Tagalog	REPORTED	0	0
Vietnamese		0	0
Korean		0	0
Other		0	0

Table 52: Language in Which Loan Negotiated: Without Using Finder*

	2020	2021	2022
English	42,974	52,960	34,935
Spanish	51,804	43,614	34,675
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 53: Refinance Loans Using Finder

	2020	2021	2022
Borrowers Who Applied for Refinance Loan		0	2
Borrowers Who Applied for Refinance Loan	NOT	0%	0%
Borrowers Who Obtained One or More Refinance Loans	REPORTED	0	0
Percentage of Borrowers Who Obtained One or More Refinance Loans		0%	0%
Total Principal Amount of Refinance Loans Made		\$0	\$0

Table 54: Refinance Loans Without Using Finder

	2020	2021	2022
Borrowers Who Applied for Refinance Loan	23,652	13,790	11,449
Borrowers Who Applied for Refinance Loan	27%	15%	17%
Borrowers Who Obtained One or More Refinance Loans	8,935	3,188	5,082
Percentage of Borrowers Who Obtained One or More Refinance Loans	10%	3%	8%
Total Principal Amount of Refinance Loans Made	\$8,970,186	\$10,642,374	\$15,523,775

Table 55: Detail of Refinance Loans Made Using Finder

	2020	2021	2022
Borrowers Who Refinanced Once		0	0
Borrowers Who Refinanced Once		0%	0%
Borrowers Who Refinanced Twice	NOT	0	0
Borrowers Who Refinanced Twice	REPORTED	0%	0%
Borrowers Who Refinanced More Than Twice		0	0
Borrowers Who Refinanced More Than Twice		0%	0%

Table 56: Detail of Refinance Loans Made Without Using Finder

	2020	2021	2022
Borrowers Who Refinanced Once	8,827	3,097	4,759
Borrowers Who Refinanced Once	10%	3%	7%
Borrowers Who Refinanced Twice	108	0	291
Borrowers Who Refinanced Twice	0.1%	0.0%	0%
Borrowers Who Refinanced More Than Twice	0	0	31
Borrowers Who Refinanced More Than Twice	0%	0%	0%

Table 57: Refinance Loans Using Finder: Pre-Refinance Principal Pay Down, Late Payments, Additional Principal Extended

	2020	2021	2022
Average Percentage of Principal Paid Down Before Obtaining Refinance Loan	NOT	0%	0%
Average Number of Late Payments Made on Loan Refinanced	REPORTED	0	0
Average Amount of Additional Principal Extended on Refinance Loans		\$0	\$0

Table 58: Refinance Loans Without Using Finder: Pre-Refinance Principal Pay Down, Late Payments, Additional Principal Extended

	2020	2021	2022
Average Percentage of Principal Paid Down Before Obtaining Refinance Loan	73%	66%	57%
Average Number of Late Payments Made on Loan Refinanced	5.6	3.7	3.8
Average Amount of Additional Principal Extended on Refinance Loans	\$1,393	\$3,082	\$2,012

Table 59: Total Number of Finders by Finder Type

	2020	2021	2022
Check Cashiers		0	0
Money Transmitters	NOT	0	2
Others*	REPORTED	0	0
Payday Lenders and/or Finance Lenders		0	0

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



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