

Americans for Financial Reform 1629 K St NW, 10th Floor, Washington, DC, 20006 202.466.1885

December 1, 2015

The Honorable Richard Cordray, Director Consumer Financial Protection Bureau 1700 G Street NW Washington, DC 20552

RE: PROPOSED PAYDAY LOAN RULES

Dear Director Cordray:

We thank you for your leadership of the Consumer Financial Protection Bureau and the tremendous steps that the agency has taken toward securing consumers' rights in just a few short years.

We, the undersigned civil rights, consumer, labor, faith, veterans, seniors, and community organizations from all 50 states, write to strongly urge that you ensure the expected rulemaking concerning small dollar consumer lending effectively ends the debt trap scam. Payday, car-title, and high-cost installment loans, with annual rates of 300% or more simply dig borrowers into a hole. It's time to end the scam and put rules in place that will end abusive practices and slam shut the debt trap.

The CFPB's own research has well documented the debt trap created by payday lending, with the typical borrower indebted for more than 200 days a year and 75% of all payday loan fees generated by borrowers trapped by more than 10 loans a year. Beyond the research, all one needs to do is travel a street in a low-income community or community of color to witness the strikingly high concentration of payday and high-cost lenders. Additionally, these loans are particularly devastating to individuals with a fixed-income, such as seniors on retirement or Social Security Income.

Payday and high-cost lenders, who fail to ensure their loans are affordable and instead rely on aggressive collection tactics, rob borrowers of opportunities to secure a foothold in the mainstream financial services market. Rather, these lenders push safe options further out of reach by locking borrowers into a long-term debt trap and increasing the likelihood of a cascade of other harmful financial consequences such as bankruptcy, excessive overdraft fees, and involuntary bank closures. The resulting adverse impact on credit scores can make it even harder to ever find one's way back to mainstream financial services.

Payday lenders don't just destroy the financial futures of individuals but also of neighborhoods. As noted in the NAACP's recent Congressional testimony, "We need to rid our neighborhoods of predators and stop the proliferation of abusive predatory lending products that strip, rather than build, financial health and wealth in our communities."

The CFPB has before it this unique opportunity, and indeed obligation, to bring meaningful reform to the marketplace. We urge that any rule addressing high-cost payday, car title or installment loans, accomplish the following:

- 1. Require the lender to determine the borrower's ability to repay the loan, including consideration of income and expenses;
- 2. Not sanction any series of repeat loans or provide any safe harbor of poorly underwritten loans;
- 3. Establish an outer limit on length of indebtedness that is at least as short as the FDIC's 2005 guidelines 90 days in a twelve-month period.
- 4. Restrict lenders from requiring a post-dated check or electronic access to a borrower's checking account as a condition of extending credit.

The above principles are the foundation for an effective rule to end the debt trap. The recent release of Department of Defense proposed rules to update the Military Lending Act serves as a powerful reminder that rules need to be comprehensive to block evasions. The changes we are urging put predatory lenders on the same footing as other lenders, requiring them to play by the rules and make fair loans.

We greatly appreciate your attention to this critical issue. We look forward to working with you and the Bureau on establishing clear rules for consumers to have access to fair and affordable credit.

Should you have any questions or if you would like additional information, please feel free to contact Gynnie Robnett at gynnie@ourfinancialsecurity.org or at 202-466-5671.

Sincerely,

National Signatories

Advantage Credit Counseling Service, Inc. AFL-CIO Alliance for Just Society

¹ TESTIMONY OF HILARY O. SHELTON Director, NAACP Washington Bureau & Senior Vice President for Policy and Advocacy Before the Senate Committee on Banking, Housing, and Urban Affairs On "Assessing and Enhancing Protections in Consumer Financial Services" Thursday, September 18, 2014, http://business.cch.com/bfld/Shelton-09182014.pdf

Alliance for Retired Americans

American Civil Liberties Union

Americans for Financial Reform

Association for Enterprise Opportunity

Bend the Arc

CDFI Coalition

Center for Economic Justice

Center for Effective Government

Center for Responsible Lending

Coalition on Human Needs

Community Development Bankers Association

Community Development Venture Capital Alliance

Consumer Action

Consumer Federation of America

Consumers Union

Democratic Media

Ecumenical Poverty Initiative

Faith in Public Life

Gray Panthers

Habitat for Humanity International

Help Hotline Crisis Center

Homeownership Preservation Foundation

Jubilee USA Network

The Leadership Conference on Civil and Human Rights

League of United Latin American Citizens (LULAC)

NAACP

National Advocacy Center of the Sisters of the Good Shepherd

National Association of Consumer Advocates

National Consumer Law Center (on behalf of its low-income clients)

National Council of La Raza

National Development Council

National People's Action

NETWORK, A National Catholic Social Justice Lobby

Other98.com

Partners for the Common Good

PICO National Network

Public Citizen

Residential Resources, Inc.

Southern Poverty Law Center

U.S. PIRG

United Church of Christ Justice and Witness Ministries

United Food & Commercial Workers International Union, CLC

United for a Fair Economy

UNITE HERE

USAction
Working Families Organization

State and Local Signatories

Alabama

Alabama Appleseed
Alabama Arise
First Presbyterian Church of Birmingham
Gowen Consulting
Habitat for Humanity of Morgan County, Alabama
YWCA Birmingham
YWCA Central Alabama

Alaska

Alaska PIRG

Arkansas

Arkansans Against Abusive Lending Arkansas Advocates for Children And Families Southern Bancorp

Arizona

A New Leaf, MesaCAN
Arizona Community Action Association
Arizona PIRG
Catholic Community Services
First Presbyterian Church of Globe
Gila Community Food Bank
Gila County Community Action Program
Gila House Transitional Housing
International Rescue Committee
Northern Arizona Council of Governments
SW Center for Economic Integrity
Unisource Energy Corporation
Utility Assistance RV Senior Center
Valley of the Sun United Way
Western Arizona Council of Governments

California

Asian Law Alliance

California Association of Food Banks

California League of United Latin American Citizens (LULAC)

California Partnership

California Reinvestment Coalition

CALPIRG

City Heights Community Development Corporation

Community Legal Services in East Palo Alto

Consumer Credit Counseling of San Francisco

Consumers for Auto Reliability and Safety

East Bay Community Law Center

East LA Community Corporation

Faith in Community

Habitat for Humanity Greater San Francisco

LA County Consumer Affairs

Labor Community Services

Law Foundation of Silicon Valley

Mission Assets Fund

Mission SF Community Financial Center

Montbello Housing Development Corporation

Mutual Housing California

MyPath

New Economics for Women

Northbay Family Homes

Nuestra Casa de East Palo Alto

Opportunity Fund

Public Counsel

Ravenswood Family Health Center

Samaritan House

San Mateo County Labor Council

San Mateo County Union Community Alliance

St. Joseph's Family Center

T. Cooke and Associates

The Fair Housing Council of San Diego

The Well Community Church

Treasurer, City and County of San Francisco

United Policyholders

United Way Silicon Valley

West Valley Community Services

Working Partnerships USA

Yolo Mutual Housing Association

Youth Leadership Institute

Colorado

Bell Policy Center
Colorado Latino Leadership Advocacy Research Organization
Colorado Progressive Coalition
CoPIRG
NAACP Colorado Montana Wyoming State Area Conference
The Gathering Place

Connecticut

Connecticut Association for Human Services Connecticut Citizen Action Group ConnPIRG

Delaware

Delaware Alliance for Community Advancement Delaware Community Reinvestment Action Council, Inc.

Florida

100 Black Men of Jacksonville, Inc.

Avatar Company Inc.

Catalyst Miami

Diocese of Orlando

Florida Advisory Council on Small & Minority Business Development

Florida Alliance for Consumer Protection

Florida Center for Fiscal and Economic Policy

Florida PIRG

FreshMinistries

Globe/Miami Habitat for Humanity

Habitat for Humanity of East & Central Pasco County

Habitat for Humanity of Greater Orlando Area, Inc.

Habitat for Humanity of Jacksonville, Inc.

Habitat for Humanity of Marion County

Habitat for Humanity of Seminole County and Greater Apopka

Marion County Branch-NAACP

RAISE Florida Network

United Way of Northeast Florida

Georgia

Georgia PIRG

Georgia Rural Urban Summit

Georgia Watch
Gwinnett County Habitat for Humanity
Macon Area Habitat for Humanity

Hawaii

Habitat for Humanity West Hawaii

Idaho

Catholic Charities of Idaho Idaho Community Action Network

Illinois

8th Day Center for Justice

Center for Economic Progress

Chicago Appleseed Fund for Justice

Chicago Coalition for the Homeless

Chicago Consumer Coalition

Chicago Rehab Network

Citizen Action/Illinois

Community Action Partnership

Debt Counsel for Seniors and the Disabled

Democratic Women South Suburbs

DuPage Habitat for Humanity

Gospel Justice Initiative

Greater Chicago Food Depository

Heartland Alliance

Housing Action Illinois

Housing Helpers, Inc.

Illinois Asset Building Group

Illinois Coalition for Immigrant and Refugee Rights

Illinois People's Action

Illinois PIRG

Latino Policy Forum

Maywood Neighborhood Improvement Association

Maywood PC/ZBA

Metropolitan Tenants Organization

Monsignor John Egan Campaign for Payday Loan Reform

National Community Investment Fund

North Side Community Federal Credit Union

Northwest Side Housing Center (NWSHC)

Oak Park Regional Housing Center

Open Communities Partners In Community Building, Inc. **Project IRENE** South Suburban Housing Center Southwest Organizing Project St. Leonard's Ministries The Chicago Urban League The People's Lobby The Resurrection Project Westside Health Authority Women's Business Development Center **Woodstock Institute Greater Chicago Food Depository IIRON** USW/SOAR Dist. 7 Woodstock Institute

Indiana

Indiana Assets and Opportunity Network Dismas House of South Bend Northwest Indiana Reinvestment Alliance

Iowa

Americans for Democratic Action Iowa
Child and Family Policy Center
CWA Iowa State Council
Iowa Alliance for Retired Americans
Iowa Catholic Conference
Iowa Citizens for Community Improvement
Iowa Community Action Association
Iowa PIRG
Iowa Valley Habitat for Humanity
League of United Latin American Citizens - Iowa
South Central Iowa Federation of Labor AFL-CIO

Kansas

Kansas Appleseed Sunflower Community Action

Kentucky

Kentucky Coalition Against Domestic Violence Kentucky Equal Justice Center Kentucky Youth Advocates

Louisiana

Consumer Assistance Council, Inc.
Habitat for Humanity LA
Jesuit Social Research Institute
Lafayette Habitat for Humanity
Louisiana Budget Project
One Voice
Representative Ted James, Louisiana State Representative
Together Baton Rouge
Together Louisiana
United Way of Acadiana

Maine

Maine Center for Economic Policy Maine People's Alliance Maine Small Business Coalition Maine Women's Lobby

Maryland

Habitat for Humanity Metro Maryland, Inc. Kinetics Faith & Justice Network Maryland CASH Campaign Maryland Consumer Rights Coalition Maryland PIRG Progressive Maryland Public Justice Center

Massachusetts

Massachusetts Consumers' Coalition MASSPIRG

Michigan

Community Economic Development Association of MI Disability Advocates Michigan United New Development Corporation

PIRGIM

Minnesota

ISAIAH

Joint Religious Legislative Coalition Legal Services Advocacy Project Minnesotans for a Fair Economy Minnesotans for Fair Lending

Mississippi

Coalition for a Prosperous Mississippi

Missouri

Communities Creating Opportunity
Consumer Council of Missouri
GRO - Grass Roots Organizing
Metro Organization for Racial and Economic Equity
Metropolitan Congregations United
Metropolitan St. Louis Equal Housing and Opportunity Council
Missouri Faith Voices
Missouri PIRG
Missouri ProVote
Progress Missouri
St. Louis City NAACP
Truman Heritage Habitat for Humanity

Montana

Indian People's Action Montana Organizing Project Rural Dynamics, Inc. (RDI)

Nebraska

Nebraska Appleseed

Nevada

DREAM Big Vegas Nevada Advocates for Planned Parenthood Affiliates Progressive Leadership Alliance of Nevada

New Hampshire

Granite State Organizing Project New Hampshire Legal Assistance NHPIRG United Valley Interfaith Project

New Jersey

AFSCME, Administrative Council 1
Center for Independent Living of South Jersey Inc.
Housing and Community Development Network of New Jersey Ironbound Community Corporation
La Casa de Don Pedro
National Housing Institute
New Jersey Citizen Action
New Jersey State Industrial Union Council
New Jersey Tenants Organization
NJ State Industrial Union Council
NJPIRG
Paterson Habitat for Humanity
Universal Improvement Association

New Mexico

Community Action Agency of Southern New Mexico New Mexico Fair Lending Coalition Center for Economic Integrity - New Mexico Office NMPIRG Southwest Center for Economic Integrity Tewa Women United Young Children's Health Center

New York

Albany County Rural Housing Alliance, Inc.
Better Neighborhoods, Inc.
Bronx Legal Services
Brooklyn Cooperative FCU
Buffalo Urban League
Central NY Citizens in Action
Community Voices Heard (CVH)
Cypress Hills Local Development Corp.

District Council 37 Municipal Employees Legal Services

Fifth Avenue Committee & Neighbors Helping Neighbors

Habitat for Humanity New York City

Long Island Housing Services, Inc.

Margert Community Corporation

MFY Legal Services, Inc.

New Economy Project

NYPIRG

Syracuse Habitat for Humanity Inc.

VOCAL-NY

Western New York Law Center

North Carolina

Action NC

Asheville Area Habitat for Humanity

Brunswick County Habitat for Humanity

CCCS of Greater Greensboro, A division of Family Service of the Piedmont Inc.

Congregations for Social Justice

Credit Counseling Agencies of North Carolina Association

Episcopal Diocese of North Carolina

Financial Pathways of the Piedmont

Financial Protection Law Center

Foothills Credit Counseling, Inc.

Habitat for Humanity of Burke County

Habitat for Humanity of Charlotte

Habitat for Humanity of Wake County

Legal Services Southern Piedmont

A. Philip Randolph Institute

North Carolina Housing Coalition

North Carolina Latino Coalition

Durham CAN

NCPIRG

NC State AFL-CIO

North Carolina Assets Alliance

North Carolina Consumers Council, Inc.

North Carolina Council of Churches

North Carolina Justice Center

OnTrack Financial Education & Counseling

Pisgah Legal Services

Reinvestment Partners

The Clarke Connection

The Collaborative of NC

Triangle Family Services

UNC Consumer Financial Transactions Clinic Women AdvaNCe The Support Center Community Empowerment Fund Lincoln/Lancaster County Habitat for Humanity

North Dakota

North Dakota Economic Security and Prosperity Alliance (NDESPA)

Ohio

Charleta B. Tavares, Ohio State Senator Cincinnati AFL-CIO Labor Council COHHIO

Communities United For Action

Contact Center Inc.

Defiance County Residential Housing, Inc.

Diocese of Southern Ohio

Habitat for Humanity - MidOhio

Habitat for Humanity of Coshocton County

Habitat for Humanity of Fayette County Ohio

Habitat for Humanity Of Findlay Hancock County

Habitat for Humanity of Greater Stark and Carroll Counties

Habitat for Humanity of Holmes County, Ohio

Habitat for Humanity of Logan Co.

Habitat for Humanity of Mahoning County

Habitat for Humanity of Southeast Ohio

Habitat for Humanity of Summit County

Hunger Network in Ohio

Legal Aid Society of Southwest Ohio LLC

Leighty and Snider, Inc.

Lutheran Social Services

Maumee Valley Habitat for Humanity

Neighborhood Housing Services of Greater Cleveland

New Home Development

NHSGC Consumer Law Center

Northwest Ohio Housing Coalition

Ohio Association of Food Banks

Ohio CDC Association

Ohio Coalition for Responsible Lending

Ohio Council of Churches

Ohio Organizing Collaborative

Ohio Partners for Affordable Energy

Ohio PIRG

Ohio Poverty Law Center

Orrville Area United Way

Policy Matters Ohio

Preble City Habitat for Humanity

ProgressOhio

Sandusky County Habitat for Humanity

The Center for Child & Family Advocacy, Inc.

The Ohio Council of Behavioral Health & Family Services Providers

The People's Empowerment Coalition of Ohio

Toledo Fair Housing Center

Oklahoma

Oklahoma Policy Institute

Oregon

Economic Fairness Oregon Oregon Action Oregon Consumer League Oregon Food Bank OSPIRG

Pennsylvania

ACTION Housing, Inc.

Berks Community Action Program

Bucks County Women's Advocacy Coalition

Clarifi

Community Legal Services of Philadelphia

Habitat for Humanity of Bucks County

Habitat for Humanity of Greater Pittsburgh

Habitat for Humanity PA

Health, Education, and Legal Assistance Project: A Medical-Legal Partnership

Housing Alliance of Pennsylvania

Just Harvest

Keystone Progress

Keystone Research Center

Lancaster Area Habitat for Humanity

League of Women Voters of PA

Lehigh Valley Black News Network

Libertae

Lutherans Advocacy Ministry Pennsylvania

Military Officers Association of America - Pittsburgh Chapter

PA Alliance for Retired Americans

PA Council of Chapters Military Officers Association of America

PathWays PA

PennPIRG

Pennsylvania Council of Churches

Pennsylvanians Organized to Witness Empower & Rebuild

Philadelphia Unemployment Project

Society of St. Vincent de Paul, Archdiocese of Philadelphia

Soroptimist International of Bucks County

The Peace Center

Unitarian Universalist Pennsylvania Legislative Advocacy Network

United Way of Erie County

Westmoreland Community Action

Rhode Island

NeighborWorks Blackstone River Valley

Rhode Island Interfaith Coalition to Reduce Poverty

Rhode Island State Council of Churches

RIPIRG

The Community Relations Council of the Jewish Alliance of Greater Rhode Island

South Carolina

Columbia Consumer Education Council

South Carolina Appleseed Legal Justice Center

South Dakota

Lakota Federal Credit Union

Lakota Funds

Tennessee

Christian Community Services, Inc.

Cocke Co. Habitat for Humanity

Community Housing Partnership of Williamson County

Eastern 8 Community Development Corporation

Family Promise of Roane County

Franklin Housing Commission

Gibson County Habitat for Humanity

Habitat for Humanity of Anderson County

Habitat for Humanity of Catawba Valley

Habitat for Humanity of Cleveland TN

Habitat for Humanity of Greater Chattanooga Area

Habitat for Humanity of Greater Memphis

Habitat for Humanity of Greater Nashville

Habitat for Humanity of Loudon County

Habitat for Humanity of Paris/Henry COunty

Habitat for Humanity of Tennessee

Habitat for Humanity of Warren County

Habitat for Humanity of Wilson County

Habitat for Humanity Sumner County

Habitat of Humanity of Williamson County

Highland Rim Habitat for Humanity

Loudon County Habitat for Humanity

Mi Techo, Inc.

New Level Community Development Corporation

Putnam County Habitat for Humanity

Roane County Habitat for Humanity

Rutherford County Area Habitat for Humanity

Tennessee Citizen Action

Tennessee Housing Development Agency

Texas

Anti-Poverty Coalition of Greater Dallas

Austin Community College American Federation of Teachers Local 6249

Austin Poverty Initiative

Austin Voices for Education and Youth

Calvary Baptist Church

Center for Public Policy Priorities

Christian Women's Job Corps

Citizens for Responsible Lending

CitySquare

Dismas Inc.

East Waco Community Center (EWCC)

Education Austin

Helping Hands Ministry of Belton

Liveable City

RAISE Texas

Strong Famlies Coalition of Greater Tarrant County

Texas Appleseed

Texas Catholic Conference

TexPIRG

United Way of Greater Houston

United Way of Metropolitan Dallas

Workers Defense Project
YMCA Fort Worth & Tarrant County

Utah

Utah Coalition of Religious Communities

Vermont

VPIRG

Virginia

Virginia Citizens Consumer Council
Virginia Interfaith Center
Virginia Organizing
Virginia Partnership to Encourage Responsible Lending
Virginia Poverty Law Center

Washington

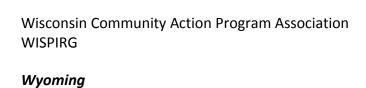
Alliance for a Just Society
Columbia Legal Services
Consumer Justice Law Center, LLC
Kittitas County Habitat for Humanity
Lewiston-Clarkston Partners Habitat for Humanity
OneAmerica
Skagit Habitat for Humanity
Statewide Poverty Action Network
Tacoma/Pierce County Habitat for Humanity
Washington Community Action Network
WashPIRG

West Virginia

Huntington WV Area Habitat for Humanity, Inc. Mountain State Justice in West Virginia Southern Appalachian Labor School West Virginia Center on Budget and Policy WV Citizen Action Group

Wisconsin

Habitat for Humanity- La Crosse Area Habitat for Humanity of Langlade County



Wyoming Coalition Against Domestic Violence and Sexual Assault

Following are the partners of Americans for Financial Reform.

All the organizations support the overall principles of AFR and are working for an accountable, fair and secure financial system. Not all of these organizations work on all of the issues covered by the coalition or have signed on to every statement.

- AARP
- A New Way Forward
- AFL-CIO
- AFSCME
- Alliance For Justice
- American Income Life Insurance
- American Sustainable Business Council
- Americans for Democratic Action, Inc
- Americans United for Change
- Campaign for America's Future
- Campaign Money
- Center for Digital Democracy
- Center for Economic and Policy Research
- Center for Economic Progress
- Center for Media and Democracy
- Center for Responsible Lending
- Center for Justice and Democracy
- Center of Concern
- Center for Effective Government
- Change to Win
- Clean Yield Asset Management
- Coastal Enterprises Inc.
- Color of Change
- Common Cause
- Communications Workers of America
- Community Development Transportation Lending Services
- Consumer Action
- Consumer Association Council
- Consumers for Auto Safety and Reliability
- Consumer Federation of America
- Consumer Watchdog
- Consumers Union
- Corporation for Enterprise Development
- CREDO Mobile
- CTW Investment Group
- Demos
- Economic Policy Institute
- Essential Action
- Green America
- Greenlining Institute
- Good Business International

- Government Accountability Project
- HNMA Funding Company
- Home Actions
- Housing Counseling Services
- Home Defenders League
- Information Press
- Institute for Agriculture and Trade Policy
- Institute for Global Communications
- Institute for Policy Studies: Global Economy Project
- International Brotherhood of Teamsters
- Institute of Women's Policy Research
- Krull & Company
- Laborers' International Union of North America
- Lawyers' Committee for Civil Rights Under Law
- Main Street Alliance
- Move On
- NAACP
- NASCAT
- National Association of Consumer Advocates
- National Association of Neighborhoods
- National Community Reinvestment Coalition
- National Consumer Law Center (on behalf of its low-income clients)
- National Consumers League
- National Council of La Raza
- National Council of Women's Organizations
- National Fair Housing Alliance
- National Federation of Community Development Credit Unions
- National Housing Resource Center
- National Housing Trust
- National Housing Trust Community Development Fund
- National NeighborWorks Association
- National Nurses United
- National People's Action
- National Urban League
- Next Step
- OpenTheGovernment.org
- Opportunity Finance Network
- Partners for the Common Good
- PICO National Network
- Progress Now Action
- Progressive States Network
- Poverty and Race Research Action Council
- Public Citizen
- Sargent Shriver Center on Poverty Law
- SEIU
- State Voices
- Taxpayer's for Common Sense
- The Association for Housing and Neighborhood Development

- The Fuel Savers Club
- The Leadership Conference on Civil and Human Rights
- The Seminal
- TICAS
- U.S. Public Interest Research Group
- UNITE HERE
- United Food and Commercial Workers
- United States Student Association
- USAction
- Veris Wealth Partners
- Western States Center
- We the People Now
- Woodstock Institute
- World Privacy Forum
- UNET
- Union Plus
- Unitarian Universalist for a Just Economic Community

List of State and Local Partners

- Alaska PIRG
- Arizona PIRG
- Arizona Advocacy Network
- Arizonans For Responsible Lending
- Association for Neighborhood and Housing Development NY
- Audubon Partnership for Economic Development LDC, New York NY
- BAC Funding Consortium Inc., Miami FL
- Beech Capital Venture Corporation, Philadelphia PA
- California PIRG
- California Reinvestment Coalition
- Century Housing Corporation, Culver City CA
- CHANGER NY
- Chautauqua Home Rehabilitation and Improvement Corporation (NY)
- Chicago Community Loan Fund, Chicago IL
- Chicago Community Ventures, Chicago IL
- Chicago Consumer Coalition
- Citizen Potawatomi CDC, Shawnee OK
- Colorado PIRG
- Coalition on Homeless Housing in Ohio
- Community Capital Fund, Bridgeport CT
- Community Capital of Maryland, Baltimore MD
- Community Development Financial Institution of the Tohono O'odham Nation, Sells AZ
- Community Redevelopment Loan and Investment Fund, Atlanta GA
- Community Reinvestment Association of North Carolina
- Community Resource Group, Fayetteville A
- Connecticut PIRG
- Consumer Assistance Council
- Cooper Square Committee (NYC)

- Cooperative Fund of New England, Wilmington NC
- Corporacion de Desarrollo Economico de Ceiba, Ceiba PR
- Delta Foundation, Inc., Greenville MS
- Economic Opportunity Fund (EOF), Philadelphia PA
- Empire Justice Center NY
- Empowering and Strengthening Ohio's People (ESOP), Cleveland OH
- Enterprises, Inc., Berea KY
- Fair Housing Contact Service OH
- Federation of Appalachian Housing
- Fitness and Praise Youth Development, Inc., Baton Rouge LA
- Florida Consumer Action Network
- Florida PIRG
- Funding Partners for Housing Solutions, Ft. Collins CO
- Georgia PIRG
- Grow Iowa Foundation, Greenfield IA
- Homewise, Inc., Santa Fe NM
- Idaho Nevada CDFI, Pocatello ID
- Idaho Chapter, National Association of Social Workers
- Illinois PIRG
- Impact Capital, Seattle WA
- Indiana PIRG
- Iowa PIRG
- Iowa Citizens for Community Improvement
- JobStart Chautauqua, Inc., Mayville NY
- La Casa Federal Credit Union, Newark NJ
- Low Income Investment Fund, San Francisco CA
- Long Island Housing Services NY
- MaineStream Finance, Bangor ME
- Maryland PIRG
- Massachusetts Consumers' Coalition
- MASSPIRG
- Massachusetts Fair Housing Center
- Michigan PIRG
- Midland Community Development Corporation, Midland TX
- Midwest Minnesota Community Development Corporation, Detroit Lakes MN
- Mile High Community Loan Fund, Denver CO
- Missouri PIRG
- Mortgage Recovery Service Center of L.A.
- Montana Community Development Corporation, Missoula MT
- Montana PIRG
- New Economy Project
- New Hampshire PIRG
- New Jersey Community Capital, Trenton NJ
- New Jersey Citizen Action
- New Jersey PIRG
- New Mexico PIRG
- New York PIRG
- New York City Aids Housing Network

- New Yorkers for Responsible Lending
- NOAH Community Development Fund, Inc., Boston MA
- Nonprofit Finance Fund, New York NY
- Nonprofits Assistance Fund, Minneapolis M
- North Carolina PIRG
- Northside Community Development Fund, Pittsburgh PA
- Ohio Capital Corporation for Housing, Columbus OH
- Ohio PIRG
- OligarchyUSA
- Oregon State PIRG
- Our Oregon
- PennPIRG
- Piedmont Housing Alliance, Charlottesville VA
- Michigan PIRG
- Rocky Mountain Peace and Justice Center, CO
- Rhode Island PIRG
- Rural Community Assistance Corporation, West Sacramento CA
- Rural Organizing Project OR
- San Francisco Municipal Transportation Authority
- Seattle Economic Development Fund
- Community Capital Development
- TexPIRG
- The Fair Housing Council of Central New York
- The Loan Fund, Albuquerque NM
- Third Reconstruction Institute NC
- Vermont PIRG
- Village Capital Corporation, Cleveland OH
- Virginia Citizens Consumer Council
- Virginia Poverty Law Center
- War on Poverty Florida
- WashPIRG
- Westchester Residential Opportunities Inc.
- Wigamig Owners Loan Fund, Inc., Lac du Flambeau WI
- WISPIRG

Small Businesses

- Blu
- Bowden-Gill Environmental
- Community MedPAC
- Diversified Environmental Planning
- Hayden & Craig, PLLC
- Mid City Animal Hospital, Pheonix AZ
- UNET



