



October 6, 2016

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

RE: PROPOSED PAYDAY LOAN RULE/Docket No: CFPB-2016- 0025 or RIN 3170-AA40

Dear Director Cordray:

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

We, the undersigned 724 civil rights, consumer, labor, faith, veterans, seniors, business, and community organizations from all 50 states, write to urge that you ensure the current rulemaking concerning payday, car title, and high-cost installment loans ends the debt trap. A strong rule must be free of loopholes that will allow predatory practices to continue. Unaffordable payday, car-title, and high-cost installment loans simply dig borrowers into a deeper hole of debt. It's time to put a strong rule in place that will end abusive practices, and slam shut the debt trap. The debt trap is well documented by the CFPB's own research, showing that 75% of all payday loan fees are due to borrowers trapped in more than 10 loans a year, and that 80% of all car title loans are due to borrowers trapped in more than 7 loans a year.<sup>1</sup> Additional research shows that consumers in states with high-cost payday and car title loans lose approximately \$8 billion in payday and car title fees annually.<sup>2</sup> As noted in a coalition statement reacting to the release of the rule proposal, "This rule has the potential to make a significant and positive impact in the lives of ordinary Americans, particularly racial and ethnic minority Americans, by protecting them from financial predatory lenders," said Hilary Shelton, director of the NAACP's Washington bureau.<sup>3</sup>

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<sup>1</sup> CONSUMER FINANCIAL PROTECTION BUREAU, PAYDAY LOANS AND DEPOSIT ADVANCE PRODUCTS: A WHITE PAPER OF INITIAL DATA FINDINGS (2013), available at <http://1.usa.gov/1aX9ley>.

<sup>2</sup> Diane Standaert and Delvin Davis, Center for Responsible Lending, Payday and Car Title Lenders Drain \$8 Billion in Fees Every Year (2016), available at [http://www.responsiblelending.org/sites/default/files/nodes/files/research-publication/crl\\_statebystate\\_fee\\_drain\\_may2016\\_0.pdf](http://www.responsiblelending.org/sites/default/files/nodes/files/research-publication/crl_statebystate_fee_drain_may2016_0.pdf).

<sup>3</sup> Coalition Press Release Statement, available at <http://ourfinancialsecurity.org/2016/06/joint-statement-afr-9-organizations-call-payday-rule-called-good-beginning/>.



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 can make it even harder to ever find one's way back to mainstream financial services.

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. Predatory lenders don't just destroy the financial futures of individuals but also of neighborhoods.

The proposed rule takes a right general approach by establishing an ability-to-repay principle –including consideration of income and expenses. This is extremely significant; while a longstanding tenet of responsible lending, it is one ignored by these abusive industries driven by unaffordable loans. It is a particularly important standard for high-cost loans where lenders have the right to seize a borrower's bank account, property or wages. However, current loopholes in the proposed rule could allow lenders to continue exploiting people in our communities with their debt trap lending. For example, the rule contains dangerous exceptions to the ability-to- repay requirements, does not provide sufficient protections against flipping of unaffordable loans, and does not go far enough to ensure people have enough money to live on after repaying the loan.

We urge that the CFPB to make the following adjustments to the rule:

- An ability-to-repay test, based on income and expenses, with no exceptions: Apply it to every single loan where the lender takes control over the borrower's checking account, car, other property, or wages.
- Stronger protections against flipping loans: Ensure borrowers can't be stuck in so-called two-week loans for three months or more, and prevent serial flipping of longer-term loans.
- Enhance strong state laws: The rule must not undermine states that prohibit these high-cost abusive loans, and it should deem a violation of state law an unfair practice.
- Close the loopholes: Ensure lenders can't game the rule in a way that leaves borrowers without enough money to live on.

There are currently 14 states plus the District of Columbia that enforce rate caps that effectively prohibit these dangerous payday loans, and families are better off. Capping the rates on payday and car title loans at about 36% is the most effective way to prevent these harms. The CFPB must not

undermine these strong state laws, and must go further to deem that making or offering a loan in violation of a state law is an unfair, abusive, and deceptive practice.

The above principles are the foundation to ensure the proposed rule can effectively end the debt trap. We greatly appreciate your attention to this critical issue. We look forward to working with the CFPB on establishing clear rules to prevent unfair and abusive lending practices.

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

Sincerely,

**National**

9to5, National Association of Working Women

AFL-CIO

African American Health Alliance

African American Ministers In Action

Alliance for Justice

Allied Progress

American Federation of State, County and Municipal Employees (AFSCME)

Americans for Financial Reform

Association of Farmworker Opportunity Programs (AFOP)

Campaign for America's Future

Catholics in Alliance for the Common Good

CDFI Coalition

Center for Community Change

Center for Popular Democracy

Center for Responsible Lending

Coalition on Human Needs

Communications Workers of America (CWA)

Consumer Action

Consumer Federation of America

Consumers Union

Corporation for Enterprise Development (CFED)

Daily Kos

Ecumenical Poverty Initiative

Franciscan Action Network

Good Jobs First

Jobs With Justice

Leadership Conference on Civil and Human Rights

League of United Latin American Citizens

Main Street Alliance

MHAction



Mi Familia Vota  
MomsRising  
NAACP  
National Advocacy Center of the Sisters of the Good Shepherd  
National A. Philip Randolph Institute  
National Association of Consumer Advocates  
National Association of Consumer Bankruptcy Attorneys  
National CAPACD - Coalition for Asian Pacific American Community Development  
National Center for Law and Economic Justice  
National Community Reinvestment Coalition (NCRC)  
National Consumer Law Center (on behalf of its low income clients)  
National Council of La Raza  
National Domestic Workers Alliance  
National Employment Law Project  
National Fair Housing Alliance  
National Partnership for Women & Families  
National Rural Social Work Caucus  
NETWORK Lobby for Catholic Social Justice  
People Demanding Action  
People's Action  
PICO National Network  
Progressive Congress Action Fund  
Provincial Council of the Clerics of St. Viator  
Public Citizen  
Racial and Ethnic Health Disparities Coalition  
Restaurant Opportunities Centers-United  
Sargent Shriver National Center on Poverty Law  
Southern Poverty Law Center  
Student Action  
The Capital Good Fund  
The National Reentry Network for Returning Citizens  
U.S. PIRG  
Union for Reform Judaism  
UNITE HERE International Union  
United for a Fair Economy  
Voices for Progress  
Working Families Organization

**Alabama**

Alabama Arise  
Alabama CBF  
Alabama Faith Council  
Alliance for Responsible Lending in Alabama (ARLA)

Arise Calhoun County  
Auburn Unitarian Universalist Fellowship  
Beloved Community Church (Birmingham)  
Birmingham Progressive Christian Alliance  
Church Women United Birmingham Alabama  
Community Foundation of Greater Birmingham  
Doctors Adams and Snow, Counseling and Consulting, LLC  
Fairhope Friends Meeting  
Family Counseling Center of Mobile, Inc.  
Gowen Consulting  
Greater Birmingham Ministries  
Heritage Training and Career Center  
JustFaith Community  
North Alabama Conference of the United Methodist Church Advocacy and Justice Team  
OLV JustFaith Community  
Phillips Temple CME Church  
Progressive Women of Northeast Alabama  
The Women's Fund of Greater Birmingham  
Tuscaloosa Citizens Against Predatory Practices  
United Methodist Inner City Mission  
VOICES for Alabama's Children  
YWCA Central Alabama

### **Alaska**

Alaska Public Interest Research Group (AKPIRG)

### **Arizona**

Arizona Coalition to End Sexual and Domestic Violence  
Arizona Community Action Association  
Arizona PIRG  
Catholic Community Services of Southern Arizona  
Center for Economic Integrity  
Children's Action Alliance  
Living United for Change in Arizona (LUCHA)  
Progress Now Arizona  
Protecting Arizona's Family Coalition  
United Way of Tucson and Southern Arizona

### **Arkansas**

Arkansas Advocates for Children and Families  
Arkansans Against Abusive Payday Lending  
Northcentral Arkansas Development Council, Inc.  
OMNI Center for Peace, Justice & Ecology

Faith Voices Arkansas

**California**

Ascension Lutheran Church  
Asian Law Alliance  
Boyle Heights East LA Coalition  
CA Labor Federation  
California Association of Food Banks  
California Reinvestment Coalition  
CALPIRG  
CAMEO  
Community Action Marin  
Consumer Federation of California  
Consumers for Auto Reliability and Safety  
Contra Costa AFL-CIO Labor Council  
Daughters of Charity Province of Los Altos Hills  
Family Emergency Shelter Coalition  
Law Foundation of Silicon Valley  
MAAC  
Mission Asset Fund  
Mission Economic Development Agency (MEDA)  
Montebello Housing Development Corporation  
MyPath  
Neighborhood Housing Services of the Inland Empire  
People Organized for Westside Renewal (POWER)  
PolicyLink  
Public Law Center  
Renaissance Entrepreneurship Center  
RESULTS San Francisco  
The Multicultural Real Estate Alliance for Urban Change  
United Way Bay Area  
United Ways of California

**Colorado**

Bell Policy Center  
CLLARO  
Colorado AFL-CIO  
Colorado Center on Law and Policy  
Colorado People's Alliance  
CoPIRG  
Denver Area Labor Federation, AFL-CIO  
Doing Justice LLC  
Generation Latino

Highlands Church Denver  
NAACP CO MT WY State Conference  
Rose of Sharon Tabernacle  
Servicios de La Raza  
The Interfaith Alliance of Colorado

### **Connecticut**

Connecticut Appleseed Center for Law & Justice, Inc.  
Connecticut Association for Human Services  
Connecticut Citizen Action Group  
Connecticut Fair Housing Center  
Connecticut Legal Services, Inc.  
Connecticut Voices for Children  
ConnPIRG  
New Haven Legal Assistance Association

### **Delaware**

A. P. R. I.  
CROSS  
Delaware Alliance for Community Advancement  
Delaware Community Reinvestment Action Council, Inc.  
Delaware Financial Literacy Institute  
Delaware Housing Coalition  
Edgemoor Revitalization Cooperative, Inc  
Sussex Unity

### **District of Columbia**

Institute for Policy Studies, Global Economy Project  
Mommie Activist and Sons

### **Florida**

Catalyst Miami  
Central Florida Jobs with Justice  
Centro de Ayuda para los Hispanos Inc.  
CoreHealth Services  
Faith in Florida  
Farmworker Association of Florida Inc.  
Florida AFL-CIO  
Florida Alliance for Consumer Protection  
Florida Alliance for Retired Americans  
Florida Council of Churches

Florida Consumer Action Network  
Florida PIRG  
Jacksonville Area Legal Aid, Inc.  
John Flickinger - Jubilee Consultants & Beacon College Prep  
Life Changers Global Nation Ministries  
Progress Florida  
RCMA Redlands Christian Migrant Association  
Rural Neighborhoods  
Treasure Coast (FL) Chapter of The Links, Inc  
War on Poverty-Florida/RAISE Florida Network

### **Georgia**

Atlanta North Georgia Labor Council AFL/CIO  
CASH Prosperity Campaign  
Georgia PIRG  
Georgia State AFL-CIO  
Georgia Watch  
Green Forest CDC  
Southern Professional Solutions  
Urban Asset Builders

### **Hawaii**

Faith Action for Community Equity  
Hawaii Appleseed Center for Law & Economic Justice  
Hawaiian Community Assets

### **Idaho**

Idaho Community Action Network  
Radio Voz Latina  
United Vision of Idaho

### **Illinois**

AFSCME Council 31  
AIDS Foundation of Chicago  
BCMw Community Services  
Bloomington & Normal Trades & Labor Assembly  
Chicago Federation of Labor  
Chicago Student Action  
Citizen Action of Illinois  
Coalition to Restore Democracy  
Community Renewal Society  
First Presbyterian Church  
Friends of Bell Smith Springs

Grassroots Collaborative  
Heartland Alliance for Human Needs & Human Rights  
Heaven's View Christian Fellowship  
Housing Action Illinois  
Illinois Alliance for Retired Americans  
Illinois Asset Building Group  
Illinois Coalition for Immigrant and Refugee Rights  
Illinois Federation of Teachers  
Illinois Main Street Alliance  
Illinois People's Action  
Illinois PIRG  
Jane Addams Senior Caucus  
Jewish Council on Urban Affairs  
Metropolitan Tenants Organization  
Monsignor John Egan Campaign for Payday Loan Reform  
Move to Amend Kane  
Mt. Zion Baptist Church  
NWSC Move to Amend  
ONE Northside  
Partners In Community Building, Inc.  
Project IRENE  
SEIU Illinois  
Springfield & Central Illinois Trades & Labor Council  
St. John AME Church, Springfield IL  
The People's Lobby  
U2Cando  
Woodstock Institute  
YWCA of Quincy

## **Indiana**

Business Ownership Initiative  
City of Gary Community Development Division  
Coalition for Homelessness Intervention and Prevention  
ELCA IN/KY Synod CORE Team  
Families First Indiana, Inc.  
HomesteadCS  
Indiana Assets & Opportunity Network  
Indiana Association for Community Economic Development  
Joshua's Hand, Inc.  
Jubilee Initiative For Financial Inclusion  
The Julian Center  
Northwest Indiana Reinvestment Alliance  
PDL Strategy Team

SEIU Healthcare Illinois Indiana  
Wabash County YMCA

### **Iowa**

BioLogistics LLC  
Iowa Citizen Action Network  
Iowa Citizens for Community Improvement  
Iowa Federation of Labor, AFL-CIO  
Iowa PIRG  
Iowa Student Action  
South Central Iowa Federation of Labor, AFL-CIO  
Voting For You

### **Kansas**

Kansas AFL-CIO  
Sunflower Community Action

### **Kentucky**

Catholic Conference of Kentucky  
Fahe  
Gateway Homeless Coalition, Inc.  
Homeless & Housing Coalition of Kentucky  
Kentucky Center for Economic Policy  
Kentucky Coalition Against Domestic Violence  
Kentucky Council of Churches  
Kentucky Equal Justice Center  
Kentucky Habitat for Humanity, Inc.  
Kentucky Resources Council, Inc.  
Kentucky Youth Advocates  
Lawrence and Augusta Hager Educational Foundation  
Metropolitan Housing Coalition  
Sisters of Charity of Nazareth Congregational Leadership  
Sisters of Charity of Nazareth Western Province Leadership  
The Coalition for the Homeless, Inc.

### **Louisiana**

Central Trades & Labor Council  
Fund 17  
Jesuit Social Research Institute, Loyola University New Orleans

### **Maine**

CA\$H Maine  
Maine Center for Economic Policy



Maine People's Alliance  
S. Fernald's Country Store

### **Maryland**

Baltimore CASH Campaign  
Baltimore Neighborhoods, Inc.  
Benedictine Sisters of Baltimore  
CAFE Montgomery MD  
Diversified Housing Development, Inc.  
HomeFree-USA  
Housing Options & Planning Enterprises, Inc.  
Maryland Consumer Rights Coalition  
Maryland and DC AFL-CIO  
Maryland PIRG  
PeterCares House  
Prince George's CASH Campaign  
Progress Maryland  
Public Justice Center  
Workplace Fairness  
Xaverian Brothers

### **Massachusetts**

CNAHS  
Consumer Advisory Commission  
Greater Boston Labor Council  
Mass. Association of CDCs  
Massachusetts Communities Action Network  
MASSPIRG  
Neighbor to Neighbor Massachusetts  
New Beginnings -SMOC  
Revere Consumer Affairs Office  
SMOC Behavioral Healthcare  
St. Andrews Episcopal Church  
The Midas Collaborative

### **Michigan**

Belmont Community Council  
Coalition of Church and Community  
Community Development Advocates of Detroit  
Community Economic Development Association of Michigan (CEDAM)  
Economic Justice Alliance of Michigan  
Detroit Action Commonwealth

Good Jobs Now  
Greater Lansing Housing Coalition  
Greater Mt. Tabor Baptist Church  
Groundcover News  
International Hope Center  
Metropolitan A.M.E. Zion Church  
Michigan Citizen Action  
Michigan League for Public Policy  
Michigan Poverty Law Program  
Michigan United  
PIRG in Michigan (PIRGIM)  
Pleasant Grove Baptist Church  
Progress Michigan  
Restaurant Opportunities Center (ROC) Michigan  
Sanctuary of the Holy Spirit Church  
Triumphant Life Christian Church  
Upper Peninsula Regional Labor Federation  
Western Upper Peninsula Community Labor Council

### **Minnesota**

Minnesota AFL-CIO  
Exodus Lending  
Holy Trinity Lutheran Church, ELCA  
ISAIAH  
Lutheran Advocacy - Minnesota  
New Creation Church  
TakeAction Minnesota

### **Missouri**

Communities Creating Opportunity  
Eastern Jackson County Justice Coalition  
Empower Missouri  
Faith Voices for Jefferson City  
Faith Voices of Southwest Missouri  
Heartland District United Methodist Women  
Homeowners Against Deficient Dwellings  
Metro Organization for Racial and Economic Equity  
Metro St. Louis Coalition for Inclusion and Equity, M-SLICE  
Missourians Organizing for Reform and Empowerment (MORE)  
Missouri Community Action Network  
Missouri Faith Voices  
Missouri Jobs with Justice  
Missouri PIRG

Quinn Chapel African Methodist Episcopal Church  
SEIU MO/KS State Council  
United Methodist Women

### **Mississippi**

Coalition for a Prosperous Mississippi  
East Biloxi Community Collaborative  
Mississippi Center for Justice  
Mississippi Human Services Coalition

### **Montana**

Agadas Integrated Wellness  
Angela's Piazza: Women's Drop-In Center  
Central Montana Central Labor Council  
Emmaus Campus Ministry, ELCA  
First English Lutheran Church Billings  
Greater Yellowstone Central labor Council  
Homeward, Inc.  
Indian People's Action  
Laborers' Local #1686  
MEA-MFT  
Missoula Area Central Labor Council, AFL-CIO  
Montana Organizing Project  
Montana PIRG  
Montana State AFL-CIO  
Montana State Council of Professional Fire Fighters  
Montana State Firemen's Association  
NeighborWorks Great Falls  
Royal Realty, Inc  
Rural Dynamics Inc.  
Southwestern Montana Central Labor Council  
YWCA Great Falls

### **Nebraska**

Nebraska State AFL-CIO  
Voices for Children in Nebraska

### **Nevada**

FUSED - Students for Social Change  
Legal Aid Center of Southern Nevada  
Lutheran Episcopal Advocacy in Nevada  
Progressive Leadership Alliance of Nevada (PLAN)  
Saint Therese of the Little Flower Catholic Church

## **New Hampshire**

Granite State Organizing Project (GSOP)  
Nashua Soup Kitchen and Shelter, Inc.  
New Hampshire Citizens Alliance  
New Hampshire Legal Assistance  
NHPIRG  
United Valley Interfaith Project

## **New Jersey**

CWA Local 1081  
GLP LLC  
Housing Community Development Network of New Jersey  
Hudson County Central Labor Council  
National Organization for Women of New Jersey  
New Jersey Citizen Action  
New Jersey Organizing Project  
New Jersey Tenants Organization  
NJ PIRG  
Northern NJ chapter, National Organization for Women  
Sandkamp Woodworks LLC

## **New Mexico**

Southwest Organizing Project  
Catholic Charities of Southern New Mexico  
New Mexico Conference of Churches  
New Mexico Fair Lending Coalition  
New Mexico Voices for Children  
NMPIRG  
Partnership for Earth Spirituality  
Tierra del Sol Housing Corporation  
Ward 11A Progressive Democrats

## **New York**

Affordable Housing Partnership  
Association for Neighborhood and Housing Development  
Bronx Legal Services  
Brooklyn Coop Federal Credit Union  
Brooklyn Legal Services  
Brooklyn Legal Services Corporation A  
Brooklyn-wide Interagency Council of the Aging Educational Fund  
Center for NYC Neighborhoods  
Central New York Citizens in Action

Chhaya CDC  
Church Women United in New York State  
Citizen Action of New York  
Community Capital New York  
Community Voices Heard  
Cultural Renaissance for Economic Revitalization  
DC 37 Municipal Employees Legal Services  
Demos  
Ellicott District Community Development, Inc.  
ERASMUS NEIGHBORHOOD FEDERATION  
Fifth Avenue Committee  
Foreclosure Resisters, Inc.  
Grow Brooklyn  
Hebrew Free Loan Society  
IMPACCT BROOKLYN  
JASA/Legal Services for the Elderly  
The Legal Aid Society  
Legal Services NYC  
Lower East Side People's Federal Credit Union  
Manhattan Legal Services  
Margert Community Corporation  
MFY Legal Services, Inc.  
Neighborhood Trust Financial Partners  
Neighbors Helping Neighbors, Inc.  
New York Communities For Change  
New Economy Project  
New York Legal Assistance Group  
New York State AFL-CIO  
New York Statewide Senior Action Council, Inc.  
Northwest Bronx Community Clergy Coalition  
Picture the Homeless  
PUSH Buffalo  
Queens Legal Services  
Rensselaer County Housing Resources, Inc.  
Restaurant Opportunities Center of New York  
Rockland Housing Action Coalition  
Staten Island Legal Services  
Syracuse United Neighbors  
Syracuse University College of Law Consumer Law Clinic  
Teamsters Local 237  
The Financial Clinic  
Tompkins County (NY) Workers' Center

Troy Rehabilitation and Improvement Program  
UNHS HomeOwnershipCenter  
Unity Fellowship of Christ Church  
University Neighborhood Housing Program  
Urban Homesteading Assistance Board  
VOCAL New York  
Westchester Residential Opportunities Inc.  
Western New York Council on Occupational Safety and Health  
Western New York Law Center  
The Working World

### **North Carolina**

Asheville Area Habitat for Humanity  
Carolina Jews for Justice  
Carolina Small Business Development Fund  
Center for Financial and Human Dignity  
Centre for Homeownership & Economic Development  
Church Women United in Raleigh and Wake County  
Community Link  
Crystal Coast Habitat for Humanity  
Ecusta Credit Union  
Financial Protection Law Center  
Forward Together Moral Movement  
Mountain People's Assembly  
NC Justice Center  
NC State AFL-CIO  
NCPiRG  
North Carolina Council of Churches  
Olive Hill Community Economic Development Corporation, Inc  
Reinvestment Partners

### **North Dakota**

Community Action Partnership Dickinson/Williston Regions  
Community Action Partnership of North Dakota  
Family Voices of North Dakota  
Great Plains Food Bank  
North Dakota AFL-CIO  
North Dakota Economic Security and Prosperity Alliance  
Red River Valley Community Action  
West River Head Start

### **Ohio**

BREAD Organization

CDCRC, Inc.  
Cleveland Tenants Organization  
Coalition on Homelessness & Housing in Ohio (COHHIO)  
Common Good Ohio  
Communities United for Action  
Defiance County Residential Housing, Inc.  
Greater Cleveland Food Bank  
HOLA Ohio  
Neighborhood Housing Services of Greater Cleveland  
NeighborWorks Collaborative of Ohio  
New Home Development Company, Inc.  
Northwest Ohio Housing Coalition  
Ohio Association of Foodbanks  
Ohio Council of Churches  
Ohio PIRG  
Policy Matters Ohio  
Progress Ohio  
RESULTS Columbus  
Sheet Metal Workers' Local 33 Toledo District  
The Home Ownership Center of Greater Cincinnati  
Toledo Fair Housing Center  
Working in Neighborhoods

### **Oklahoma**

Mosaic United Methodist Church, OKC  
Oklahoma Women's Coalition  
Oscar Romero Catholic Worker House  
Voices Organized In Civic Engagement (VOICE) Education Fund

### **Oregon**

Equity Atlas, Inc.  
Hawthorne Auto Clinic  
Innovative Changes  
Oregon AFL-CIO  
Oregon Center for Public Policy  
Oregon Coast Community Action  
Oregon Food Bank  
Oregon State PIRG  
UNITE Oregon

### **Pennsylvania**

ACTION Housing Inc.  
BCWAC

Bucks County Women's Advocacy Coalition  
CADCOM  
Ceiba  
Clarifi  
Community Action Association of Pennsylvania  
Community Action Committee of the Lehigh Valley  
Community Legal Services of Philadelphia  
Essential Energy  
Family Service of Chester County  
Habitat for Humanity Pennsylvania  
Health, Education, and Legal Assistance Project (HELP: MLP)  
Homeownership Counseling Association of Delaware Valley  
Housing Alliance of PA  
Housing Authority in the County of Beaver  
Just Harvest: A Center for Action Against Hunger  
Lancaster Lebanon Habitat for Humanity  
Keystone Progress  
Keystone Research Center  
Making Work Pay PA Coalition  
Mary House, Inc.  
Military Officers Association of America, Pennsylvania Council of Chapters  
Montgomery County Community Action Development Commission  
Nazareth Housing Services  
Neighborhood Allies  
Pa AFL-CIO  
PathWays PA  
PennPIRG  
Pennsylvania Council of Churches  
Pennsylvania Utility Law Project  
Philadelphia Unemployment Project  
Pittsburgh Community Reinvestment Group  
Reinvestment Fund  
Southwest (Philadelphia) Community Development Corporation  
Tabor Community Services  
THE ONE LESS FOUNDATION  
The Society of Saint Vincent de Paul - Diocesan Council of Pittsburgh  
The Society of Saint Vincent de Paul Philadelphia  
Unitarian Universalist Pennsylvania Legislative Advocacy Network (UUPLAN)  
Urban Affairs Coalition

### **Rhode Island**

Amicable Congregational United Church of Christ  
Community Baptist Church

First Baptist Church of East Greenwich, RI  
National Association for the Advancement of Colored People Providence Branch  
Rhode Island Jobs With Justice  
Rhode Island State Council of Churches  
RIPIRG  
The American Baptist Churches of Rhode Island  
The Economic Progress Institute  
The Rhode Island Interfaith Coalition to Reduce Poverty  
Warwick Central Baptist Church

### **South Carolina**

AFLCIO  
SC Appleseed Legal Justice Center  
South Carolina AFL-CIO

### **South Dakota**

No to Usury (South Dakota)  
South Dakotans for Responsible Lending

### **Tennessee**

Dominion Financial Management, Inc.  
New Level Community Development Corp  
Knoxville-Oak Ridge Area Central Labor Council  
Tennessee Citizen Action

### **Texas**

A2Z Real Estate Consultants  
Border Interfaith- El Paso  
Brazos Valley Affordable Housing Corp.  
Brownsville Literacy Center  
Builders of Hope CDC  
Calder Baptist Church  
Calvary Baptist Church  
Catholic Charities of Southeast Texas  
Center for Public Policy Priorities  
Chinese Community Center  
Christian Restoration Community-R.C.P.  
CIS of Cameron County  
Citizens for Responsible Lending  
CitySquare  
East Village Condominium Owners Inc.  
Faith in Texas  
Family Promise of East Bell County

Friendship of Women, Inc.  
Greater Longview United Way  
Habitat for Humanity of Camp County TX, Inc.  
Health Services of North Texas  
Helping Hands Ministry of Belton, Inc.  
Hispanic Baptist Convention of Texas  
Home Sweet Home Community Redevelopment Corp  
Irving Cares  
Joyce E. Tate REALTORS  
Longview Interfaith Hospitality Network  
Mathis Economic Development Corporation  
Mexican American Unity Council, Inc.  
Midland CDC  
New Hope Housing, Inc.  
RAISE Texas  
RESULTS Houston US Poverty  
Self Employed Certified Financial Coach  
Sr. Phylis Peters from Proyecto Juan Diego  
St.Vincent de Paul - Sacred Heart Catholic Church Conference  
Texas AFL-CIO  
Texas Appleseed  
Texas Baptist Christian Life Commission  
TexPIRG  
The Women's Resource of Greater Houston  
United Way of Central Texas  
United Way of Greater Houston  
United Way of Metropolitan Dallas  
United Way of Southern Cameron County  
United Way of Tarrant County  
United Ways of Texas  
Valley Interfaith  
Waco Regional Baptist Association

### **Utah**

Community Action Partnership of Utah  
Community Action Services and Food Bank  
Utah RESULTS Group

### **Vermont**

Rights and Democracy  
Three Squares Cafe Inc  
VPIRG

## **Virginia**

Greater Wards Corner Area Business Association  
Housing Opportunities Made Equal of Virginia, Inc.  
Legal Aid Justice Center  
Metta Yoga & Meditation  
Surovell Isaacs Petersen & Levy PLC  
The Consumer Law Group, P.C.  
Valley Interfaith Council  
Virginia Interfaith Center for Public Policy  
Virginia Organizing  
Virginia Poverty Law Center

## **Washington**

Economic Opportunity Institute  
Faith Action Network  
Kulshan Community Land Trust  
Molly Moon's Homemade Ice Cream  
North Central Washington Central Labor Council  
OneAmerica  
Skagit Habitat for Humanity  
Solid Ground  
Statewide Poverty Action Network  
Washington Community Action Network  
Washington State Labor Council, AFL-CIO  
WashPIRG

## **West Virginia**

Covenant House of West Virginia  
Mountain State Justice  
National Association of Social Workers, West Virginia Chapter  
Partnership of African American Churches  
United Way of the River Cities  
West Virginia AFL-CIO  
West Virginia Alliance for Sustainable Families  
West Virginia Center on Budget and Policy  
West Virginia Citizen Action Group  
West Virginia Council of Churches  
West Virginians for Affordable Health Care  
WV Economic Justice Project - American Friends Service Committee  
WV Healthy Kids and Families Coalition  
WV State Building and Construction Trades

## **Wisconsin**

CEO Pipe Organs/Golden Ponds Farm  
Citizen Action of Wisconsin  
Coalition of Wisconsin Aging Groups  
Consumer Justice Law Center, LLC  
ESTHER, Fox Cities affiliate of WISDOM  
Fons Law Office  
H&R Properties of River Falls  
JOSHUA Justice Organization Sharing Hope United for Action  
Legal Aid Society of Milwaukee, Inc.  
Madison-area Urban Ministry  
Metropolitan Milwaukee Fair Housing Council  
NAOMI North central Area congregations Organized to Make an Impact  
One Wisconsin Institute  
Reedsburg Area Concerned Citizens  
SOPHIA a member of Wisdom  
Urban Economic Development Association of Wisconsin  
Wisconsin Business Alliance  
Wisconsin Council of Churches  
Wisconsin Council on Children and Families  
Wisconsin Faith Voices for Justice  
Wisconsin Jobs Now  
WISPIRG  
YWCA La Crosse

**Wyoming**

Wyoming State AFL-CIO