

165 Consumer Advocacy, Workers' Rights, Racial Justice, Faith Based, Community Advocacy Groups, and Academics Support the CFPB's Paycheck Advance Interpretive Rules

Comment Intake—2024 Paycheck Advance Interpretive Rule
c/o Legal Division Docket Manager
Consumer Financial Protection Bureau
1700 G Street NW, Washington, DC 20552

August 29, 2024

RE: Truth in Lending (Regulation Z); Consumer Credit Offered to Borrowers in Advance of Expected Receipt of Compensation for Work; Docket No. CFPB–2024–0032

The undersigned consumer, labor, civil rights, legal services and community organizations write in strong support of the Consumer Financial Protection Bureau's proposed interpretive rule on emerging paycheck advance products, sometimes marketed as "earned wage" products.

Workers should not have to pay to be paid, and we support the CFPB's efforts to guard against predatory lending in the workplace and to prevent evasion of consumer protection laws by new forms of payday loans.

Lenders should not be allowed to disguise 300% APR loans in so-called "tips," expedite fees or other junk fees, or by claiming that their loans are not loans. Advances of wages or other income, repaid later, are loans regardless how they are styled. All payday advances need clear cost and fee disclosures. Workers of color and lower-income workers are particularly susceptible to predatory lending practices as they may have less access to traditional banking services and products and are also less likely to be paid a living wage.

Thank you for proposing this important rule.

Sincerely,

National Groups

20/20 Vision

Accountable.US

Action Center on Race and the Economy

American Federation of Labor and Congress of Industrial Organizations (AFL-CIO)

American Federation of Teachers (AFT)

Americans for Financial Reform Education Fund (AFREF)

Autistic Women & Nonbinary Network

Blue Future

Capital Good Fund

Center for Economic Justice

Center for Elder Law and Justice

Center for Fair Housing, Inc

Center for Responsible Lending

Coalition on Human Needs

Coastal Enterprises, Inc.

Consumer Action

Consumer Federation of America (CFA)

Consumer Reports

Consumer Watchdog

Culinary Union
Economic Policy Institute
Faith in Action
Impact Fund
Jewish Women International
Local Initiatives Support Corporation (LISC)
National Association for Latino Community Asset Builders (NALCAB)
National Association for the Advancement of Colored People (NAACP)
National Association of Consumer Advocates
National Association of Social Workers
National Center for Law and Economic Justice
National Community Action Partnership
National Community Reinvestment Coalition (NCRC)
National Consumer Law Center (on behalf of its low-income clients)
National Consumers League
National Disability Institute
National Disability Rights Network (NDRN)
National Employment Law Project
National Women's Law Center
NETWORK Lobby for Catholic Social Justice
Public Justice
Truth in Advertising, Inc. (TINA.org)
U.S. PIRG
United Church of Christ
United for Respect

Alabama

Central Alabama Fair Housing Center

Alaska

AKPIRG

Arizona

Center for Economic Integrity
Tucson Diocesan Council, Society of St. Vincent de Paul
Tucson Jewish Free Loan
William E. Morris Institute for Justice

Arkansas

Arkansans Against Abusive Payday Lending
Arkansas Community Organizations
Omni Center for Peace Justice & Ecology

California

American Federation of State, County and Municipal Employees (AFSCME) California
California Federation of Teachers, CFT--A Union of Educators & Classified Professionals, AFT, AFL-CIO
California School Employees Association
Community Legal Services in East Palo Alto
Consumer Federation of California
Contra Costa Senior Legal Services

Housing and Economics Advocates
Mission Asset Fund
Prof. Alysson Snow, University of San Diego School of Law*
Prof. Scott Maurer, Santa Clara Law*
Public Counsel
Rise Economy
Service Employees International Union-United Healthcare Workers West (SEIU-UHW)
Western Center on Law & Poverty

Colorado

Towards Justice
CoPIRG (Colorado Public Interest Research Group)

Connecticut

Connecticut American Federation of Labor and Congress of Industrial Organizations (AFL-CIO)
Connecticut Legal Services, Inc.
Prof. Annie Harper, Yale School of Medicine*

Delaware

Delaware Community Reinvestment Action Council, Inc.

District of Columbia

Institute of Local Self-Reliance
Legal Aid DC
Prof. Emeritus of Law Arthur E. Wilmarth, Jr., George Washington University Law School*
Public Advocacy for Kids (PAK)
Workplace Fairness
Young Invincibles
Tzedek DC

Florida

Jacksonville Area Legal Aid, Inc.

Georgia

Alliance 85
Atlanta Legal Aid Society, Inc.
Georgia Advancing Communities Together, Inc.
Georgia Watch
Prof. Emeritus Mark Budnitz, Georgia State University College of Law*

Hawaii

Hawaii Appleseed Center for Law & Economic Justice
Maui Economic Opportunity, Inc.

Illinois

Citizen Action/Illinois
Legal Action Chicago
Shriver Center on Poverty Law

Indiana

Prof. Emerita Judith Fox, Notre Dame Law School*

Louisiana

HousingLOUISIANA

Kentucky

Kentucky Equal Justice Center

Maine

Maine Center for Economic Policy

Maine Equal Justice

Maine People's Alliance

Maryland

CASH Campaign of Maryland

Maryland Legal Aid

Public Justice Center (Maryland)

Massachusetts

Lawrence Community Works

Massachusetts Action for Justice

The Neighborhood Developers

Michigan

Michigan Poverty Law Program

Minnesota

Exodus Lending/Minnesotans for Fair Lending

Legal Services Advocacy Project

MN Second Chance Coalition

Prof. Prentiss Cox, University of Minnesota Law School*

Nebraska

Economic Empowerment Center DBA Lending Link

Nevada

Legal Aid Center of Southern Nevada

Nevada Coalition of Legal Service Providers

Progressive Leadership Alliance of Nevada

Prosperity Works

New Jersey

Communities First Initiative

Communications Workers of America Local 1081 (CWA Local 1081)

New Jersey Appleseed Public Interest Law Center

New Jersey Citizen Action

New Jersey Working Families Alliance

New Mexico

Prosperity Works

New York

Brooklyn Cooperative Federal Credit Union
Cypress Hills Local Development Corporation
Empire Justice Center
Fifth Avenue Committee, Inc
Genesee Co-op Federal Credit Union
Lower East Side People's FCU
New Economy Project
New Yorkers for Responsible Lending
NYS Community Equity Agenda
PathStone Enterprise Center
Prof. Dennis Fan, Columbia Law School*
Prof. Susan Block-Lieb, Fordham Law School*
Western New York Law Center
WESPAC Foundation, Inc.
Westchester Residential Opportunities, Inc.

North Carolina

Charlotte Center for Legal Advocacy
Financial Protection Law Center
North Carolina Justice Center
Pisgah Legal Services
True Ridge

Ohio

Ohio Poverty Law Center
Famicos Foundation

Oklahoma

Oklahoma Policy Institute
VOICE, Voices Engaged in Civic Engagement Oklahoma City

Oregon

CASA of Oregon
Oregon Consumer Justice
Oregon Consumer League
Service Employees International Union Oregon (SEIU Oregon)

South Carolina

Columbia Consumer Education Council, Inc.
SC Association for Community Economic Development
South Carolina Appleseed Legal Justice Center

Tennessee

Shelby County, Tennessee Trustee

Texas

Every Texan
Pathfinders
RAISE Texas
Texas Appleseed
United Way of Central Texas
Zan Wesley Holmes Community Outreach Center

Utah

Prof. Christopher Peterson, University of Utah*
Community Partnership Action of Utah

Virginia

Dr. Irene Leech, Virginia Tech*
Legal Aid Justice Center
Virginia Citizens Consumer Council
Virginia Organizing
Virginia Poverty Law Center

West Virginia

Mountain State Justice, Inc.

*signing as an individual, organization listed for identification only