



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 763 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.¹ 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.² 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.³

¹ 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>.

² 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.

³ 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 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
Sisters of Mercy South Central Community
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 Church of Christ Justice and Witness Ministries
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.
First Presbyterian Church
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
Emerge! Center Against Domestic Abuse
Living United for Change in Arizona (LUCHA)
Pima County Interfaith Civic Education Organization (PCICEO)

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 Los Angeles County
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
FRESC: Good Jobs · Strong Communities
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
Solita's House, Inc.
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
Housing Partnerships, Inc.
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
The Diversity & Inclusion Institute For Change
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

Antioch Baptist Missionary Baptist Church
Belmont Community Council
Clearview Christian Ministries
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
Mt. Lebanon Baptist Church
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

Americans for Indian Opportunity
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
Santa Fe Neighborhood Law Center
Southwest Organizing Project
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
Business Center for New Americans
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 Development Corporation of Long Island
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
Fordham Law School Feerick Center for Social Justice
Foreclosure Resisters, Inc.
Grow Brooklyn
Hebrew Free Loan Society
Housing and Family Services of Greater New York, Inc.
Human Development Services of Westchester
IMPACCT BROOKLYN
JASA/Legal Services for the Elderly
La Fuerza Unida CDC
Legal Services for the Elderly, Disabled or Disadvantaged of WNY
Legal Services NYC
Long Island Housing Services, Inc.

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
NYS CDFI Coalition
PathStone Enterprise Center
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 Cooperative Federal
Syracuse United Neighbors
Syracuse University College of Law Consumer Law Clinic
Teamsters Local 237
The Coalition for Debtor Education
The Financial Clinic
The Legal Aid Society
The Working World
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
Washington Heights and Inwood Development Corporation
WEDI
Westchester Residential Opportunities Inc.
Western New York Council on Occupational Safety and Health
Western New York Law Center

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
High Plains Fair Housing Center
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.
AIM Angels In Motion
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 Opportunity Center, Inc.
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
NeighborWorks Western Pennsylvania
Open Hearth, Inc.
Pennsylvania AFL-CIO
PathWays PA
PennPIRG
Pennsylvania Council of Churches
Pennsylvania Utility Law Project
Philadelphians Organized to Witness, Empower & Rebuild (POWER)
Philadelphia Unemployment Project
Pittsburgh Community Reinvestment Group
Reinvestment Fund
Southwest (Philadelphia) Community Development Corporation
Tabor Community Services
THE ONE LESS FOUNDATION
The Philadelphia Association of Community Development Corporations
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)
United Methodist Advocacy in Pennsylvania
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
Lady Loren Productions
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
Southeastern Vermont Community Action
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 Partnership to Encourage Responsible Lending
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