PREDATORY INSTALLMENT LENDING IN THE STATES: 2020

National Consumer Law Center
Fighting Together for Economic Justice

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NCLC National Consumer Law Center
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ABOUT THE NATIONAL CONSUMER LAW CENTER

Since 1969, the nonprofit National Consumer Law Center® (NCLC®) has used its expertise in consumer law and energy policy to work for consumer justice and economic security for low-income and other disadvantaged people, in the United States. NCLC's expertise includes policy analysis and advocacy; consumer law and energy publications; litigation; expert witness services; and training and advice for advocates. NCLC works with nonprofit and legal services organizations, private attorneys, policymakers, and federal and state governments and courts across the nation to stop exploitive practices, help financially stressed families build and retain wealth, and advance economic fairness.

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ABOUT THE AUTHOR

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Margot Saunders is senior counsel to NCLC. Margot has testified before Congress on dozens of occasions regarding a wide range of consumer law matters, including predatory lending, payments law, electronic commerce, and other financial credit issues. She is a co-author of NCLC's *Consumer Banking and Payments Law* and a contributor to numerous other legal manuals. Margot has often served as an expert witness in consumer credit cases, providing opinions on predatory lending, electronic benefits, servicing, and credit math issues. She is a graduate of Brandeis University and the University of North Carolina School of Law.

ACKNOWLEDGEMENTS

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EXECUTIVE SUMMARY

Caps on interest rates and loan fees are the primary vehicle by which states protect consumers from predatory lending. Yet these caps are under attack. In state after state, high-cost lenders are mounting campaigns to persuade policymakers to discard or weaken these bulwark protections. This report surveys the battleground as of 2020. It reports on the annual percentage rates (APRs) that the 50 states and the District of Columbia allow nonbank lenders to charge for a sample $500 six-month loan and a sample $2,000 two-year loan.

States have made a number of significant changes since NCLC's last report on the topic, *Predatory Installment Lending in 2017: States Battle to Restrain High-Cost Loans.* **California, Colorado, New Mexico,** and **Ohio** improved their laws, imposing APR caps where none had existed or reducing existing caps. **Iowa** and **Oklahoma** went in the opposite direction, increasing the APRs allowed for installment loans.

As a result, as of early 2020, 45 states and the **District of Columbia** have rate caps for a $500, six-month installment loan. The median rate cap among those that cap rates is 38.5% APR. Of these jurisdictions, 20 states and the **District of Columbia** cap the APR for a $500 six-month loan at 36% or less. Twelve states impose a cap between 36% and 60%, and 13 states cap the APR for this loan at more than 60% APR.

The lending laws in two states—**Delaware** and **Missouri—**do not place any limit whatsoever on the cost of a $500 six-month loan. **Ohio** had formerly been in this category until it closed loopholes in 2017 that had allowed lenders to evade its caps. In addition, three states—**Idaho, Utah,** and **Wisconsin**—do not impose any cap other than that the terms of the loan cannot be "unconscionable"—a legal principle that bans terms that shock the conscience. **New Mexico** had formerly been in this category, but it imposed a cap—albeit a very high one (175%)—in 2017.

As for our sample $2,000 two-year loan, as of early 2020, 42 states and the **District of Columbia** cap the APR, at a median of 31%. Of those, the great majority—32 states and the **District of Columbia—**impose a APR of 36% or less. Eight states cap it between 36% and 60% APR, and two states**—Illinois** and **New Mexico—**cap the APR for this loan at more than 60%.

The lending laws in three states—**Delaware, Missouri,** and **North Dakota**—do not place any cap on the cost of a $2,000 two-year loan. **Ohio** was in this category until the 2017 amendments to its lending laws closed loopholes that had allowed lenders to evade the applicable caps. In addition, five states—**Alabama, Idaho, South Carolina, Utah**, and **Wisconsin**—do not impose any cap other than that the terms of the loan cannot be "unconscionable." **New Mexico** had formerly been in this category, but since its 2017 amendments went into effect it has imposed a 175% cap on this loan.

Recommendations

To protect consumers from high-cost installment loans, states should:

- **Examine consumer lending bills carefully.** Predatory lenders often propose bills that obscure the true interest rate, for example by presenting it as 24% per year plus 7/10ths of a percent per day instead of 279%. Or the bill may list the per-month rate rather than the annual rate. Get a calculation of the full APR, including all interest, all fees, and all other charges, and reject the bill if it is over 36%.
- **Place clear, loophole-free caps on interest rates for both installment loans and open-end credit.** Rate caps on installment loans will be ineffective if lenders can evade them through open-end lines of credit with low interest rates but high fees.
- **Adopt a tiered rate with caps below 36% for large loans.** A maximum APR of 36% is appropriate for smaller loans, such as those of $1,000 or less, but states should consider a lower rate for larger loans.
- **Prohibit loan fees or strictly limit them** in order to prevent fees from being used to undermine the interest rate cap and acting as an incentive for loan flipping.
- **Ban the sale of credit insurance and other add-on products,** which primarily benefit the lender and increase the cost of credit.

In addition, states should make sure that their loan laws address other potential abuses. States should:

- Require lenders to evaluate the borrower's ability to repay any credit that is extended.
- Prohibit mechanisms, such as security interests in household goods and post-dated checks, that coerce repayment of unaffordable loans.
- Require proportionate rebates of all up-front loan charges when loans are refinanced or paid off early.
- Limit balloon payments, interest-only payments, and excessively long loan terms. An outer limit of 24 months for a loan of $1,000 or less and 12 months for a loan of $500 or less might be appropriate, with shorter terms for higher-rate loans.
- Employ robust licensing and reporting requirements, including default and late payment rates, for lenders.
- Include strong enforcement mechanisms. Make unlicensed or unlawful loans void and uncollectable and provide a private right of action with attorneys' fees.
- Minimize differences between state installment loan laws and state open-end credit laws so that high-cost lenders do not simply transform their products into open-end credit.
- Tighten up other lending laws, including credit services organization laws, to prevent evasions.

INTRODUCTION

Caps on interest rates and loan fees are the primary vehicle by which states protect consumers from predatory lending. Yet these caps are under attack. In state after state, high-cost lenders are mounting campaigns to persuade policymakers to discard or weaken these bulwark protections.

This report surveys the battleground as of 2020. It reports on the annual percentage rates (APRs) that the 50 states and the District of Columbia allow nonbank lenders to charge for a sample $500 six-month loan and a sample $2,000 two-year loan. States vary greatly in the level of protection they provide for their residents, with some limiting APRs to reasonable, affordable levels but others allowing triple-digit APRs or imposing no cap at all. States have made a number of significant changes since NCLC's last report on the topic, *Predatory Installment Lending in 2017: States Battle to Restrain High-Cost Loans*.[1]

In addition to limiting the cost of the loan for the borrower, limits on finance charges encourage lenders to ensure that the borrower has the ability to repay the loan. Excessive interest rates enable lenders to profit from loans even if many borrowers eventually default.[2] Knowing that it will be made whole even if the borrower defaults, or that it can recoup defaults from exorbitant rates on others, the lender has little incentive to ensure that each borrower can actually afford to repay the loan in full on its terms.

High-cost loans are disproportionately concentrated among borrowers of color.[3] These loans not only strip financial resources from borrowers and snare them in a debt trap, but the financial stress they cause is also associated with poorer health.[4]

This report is the fourth in our series of reports on installment lending in the states:

- *A Larger and Longer Debt Trap?: Analysis of States' APR Caps for a $10,000 Five-Year Installment Loan* (Oct. 2018)
- *Predatory Installment Lending in 2017: States Battle to Restrain High-Cost Loans* (Aug. 2017)
- *Installment Loans: Will States Protect Borrowers from a New Wave of Predatory Lending?* (July 2015)

This report updates the information about APR caps for the $500 and $2,000 closed-end loans but not for the open-end loans or the $10,000 closed-end loan previously analyzed. Our previous calculations for those loans remain largely accurate though some states have made changes.

WHY THE APR IS THE GOLD STANDARD FOR MEASURING THE COST OF A LOAN

The APR is the gold standard for measuring the true cost of a loan. The APR provides a common, apples-to-apples comparison of the cost of two different loans, even when used to borrow different amounts for different periods of time, and accounts for the possibility of rollovers.

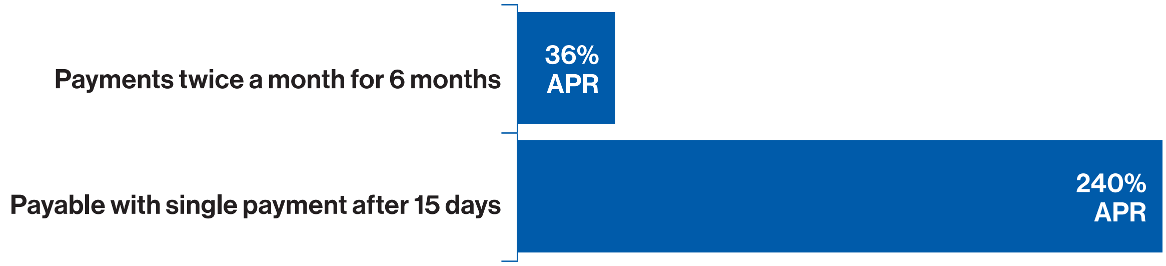
The APR is an accurate measuring stick of the cost of a loan because it includes both interest and loan fees, and takes into account the amount of time the borrower has to repay the loan.

One reason that the APR is an accurate measuring stick is that it includes not just periodic interest but also loan fees. In many cases, the fees dwarf the interest, so focusing just on the interest rate gives an entirely misleading impression of the cost of the loan.

In addition, the APR takes into account the amount of time that the borrower has to pay back the loan. For example, if the interest and fees for a $500 loan come to $50, the APR is 36% if the borrower can pay it back with payments twice a month for 6 months, but 240% if the whole $550 is due in 15 days. Obviously, repayment will be much more burdensome to the borrower if it is due in 15 days. And, if the 15-day loan is rolled over 12 times, with the borrower paying just the $50 fee twice a month and then repaying the amount borrowed with the twelfth payment—a common pattern with payday loans—that 240% APR means that the borrower will pay $600 in finance charges for the $500 loan.

CHART 1

APR for $500 Loan With $50 Finance Charge



In order to obscure the true cost of the loan, predatory lenders like to focus borrowers' attention on just the interest rate, or on the finance charge per $100, without taking the length of time to repay into account.

The APRs that the federal Truth in Lending Act[5] requires lenders to disclose for installment loans, like those in this report, also take both interest and fees into account.[6] (The Truth in Lending Act creates some loopholes for certain types of fees, but the loopholes are not generally relevant to the unsecured installment loans addressed in this report.)[7]

The Military Lending Act, which limits the APR to 36% for most credit extended to active-duty servicemembers and their families, takes an even more all-inclusive approach to the APR. It requires the calculation to include the cost of products like credit insurance that are added to the loan.[8] This report's calculations are based on the assumption that the lender has *not* charged the borrower for credit insurance, so the calculation of the APRs in this report is consistent with both the Truth in Lending Act and the Military Lending Act for the two sample loans.

HIGH-COST INSTALLMENT LENDING IN THE STATES: WHERE DO THE STATES STAND NOW?

Most states currently cap interest rates and loan fees (fees imposed as a condition of the extension of credit) for closed-end[9] consumer installment loans. However, the caps vary greatly from state to state, and a few states do not cap interest rates at all. States also vary considerably in the caps they impose for open-end credit such as credit cards. (See NCLC's 2017[10] and 2015[11] reports.)

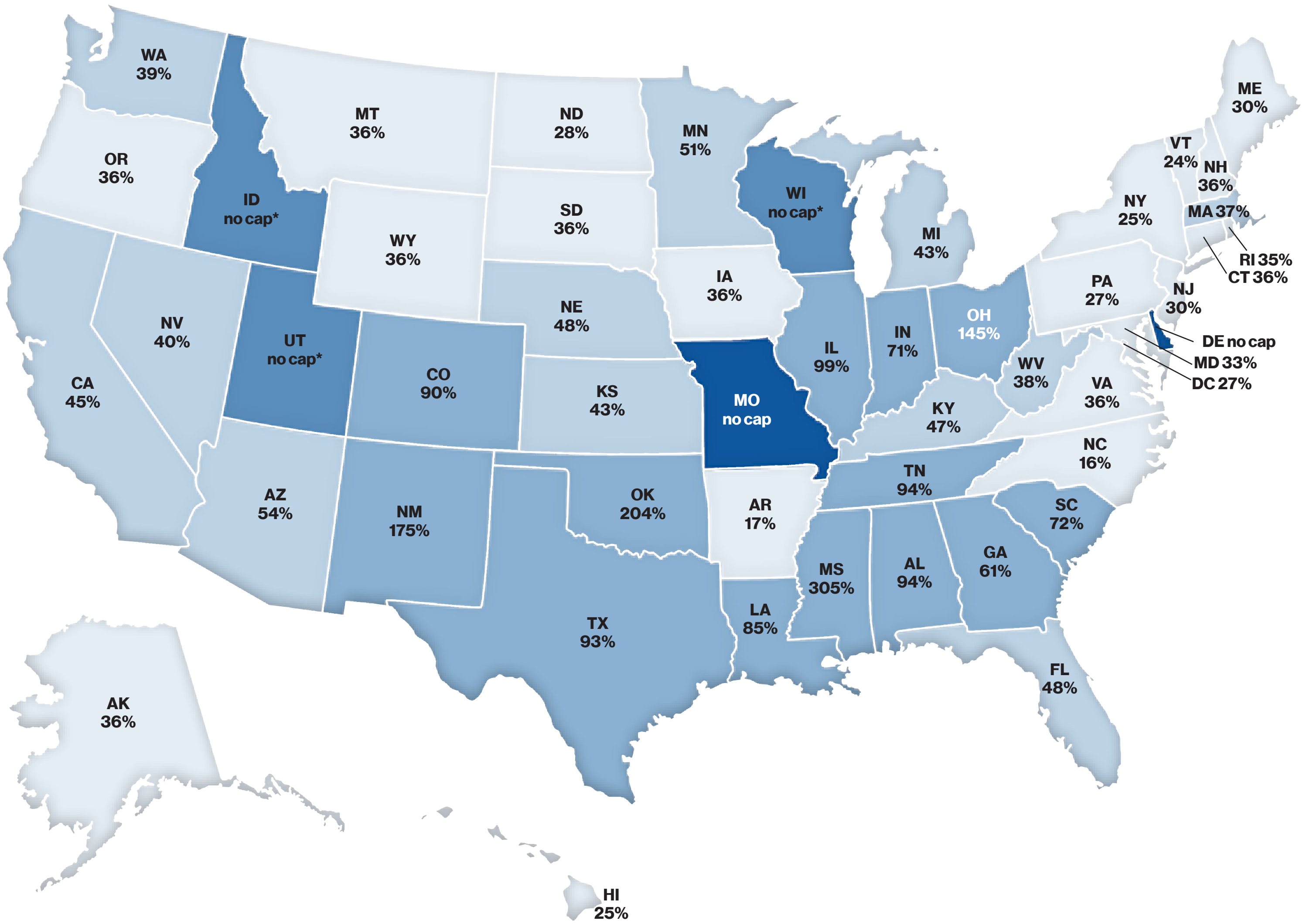
$500 six-month loan: As of early 2020, 45 states and the **District of Columbia** have rate caps for a $500, six-month installment loan (see chart on page 10). The median rate cap among those that cap rates is 38.5% APR. Of these jurisdictions, 20 states and the **District of Columbia** cap the APR for a $500 six-month loan at 36% or less. Twelve states impose a cap between 36% and 60%, and 13 states cap the APR for this loan at more than 60% APR.

The lending laws in two states—**Delaware** and **Missouri—**do not place any limit whatsoever on the cost of a $500 six-month loan. **Ohio** had formerly been in this category, but in 2017 it closed loopholes that had allowed lenders to evade its caps. In addition, three states—**Idaho, Utah,** and **Wisconsin**—do not impose any cap other than that the terms of the loan cannot be "unconscionable"—a legal principle that bans terms that shock the conscience. **New Mexico** had formerly been in this category, but it imposed a cap—albeit a very high one (175%)—in 2017.

MAP 1

Full APRs Allowed for Six-Month $500 Installment Loan

Notes regarding caveats and alternate statutes in certain states can be found in Appendix A to Predatory Installment Lending in 2017: States Battle to Restrain High-Cost Loans (Aug. 2017).



- No stated cap on finance charges (2 states)
- No cap other than unconscionability (no cap*) (3 states)
- Allowable full APR over 60% (13 states)
- Allowable full APR between 36% and 60% (12 states)
- Allowable full APR of 36% or less (20 states and DC)

MAP 2

Full APRs Allowed for Two-Year $2,000 Installment Loan

Notes regarding caveats and alternate statutes in certain states can be found in Appendix B to Predatory Installment Lending in 2017: States Battle to Restrain High-Cost Loans (Aug. 2017).

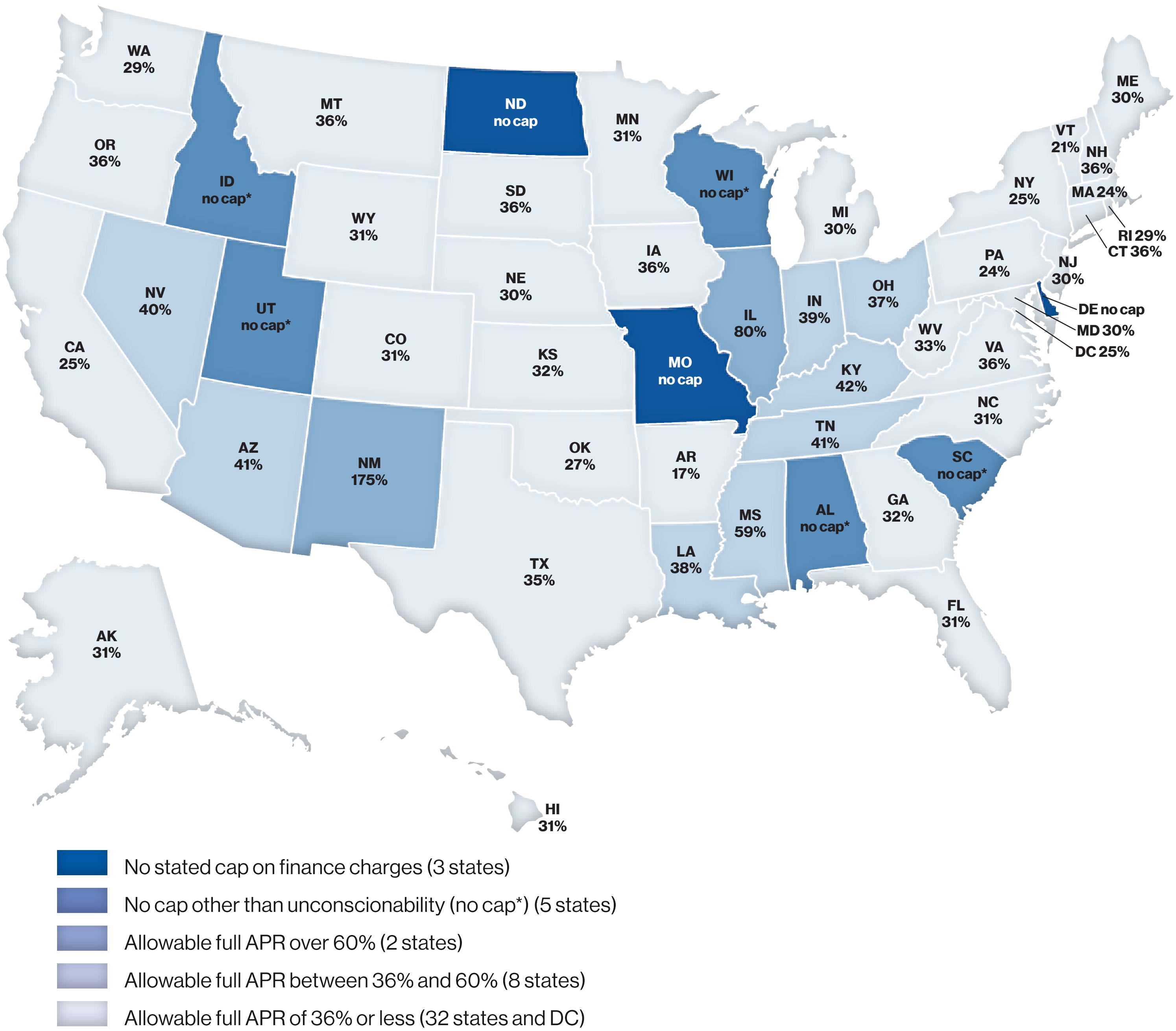
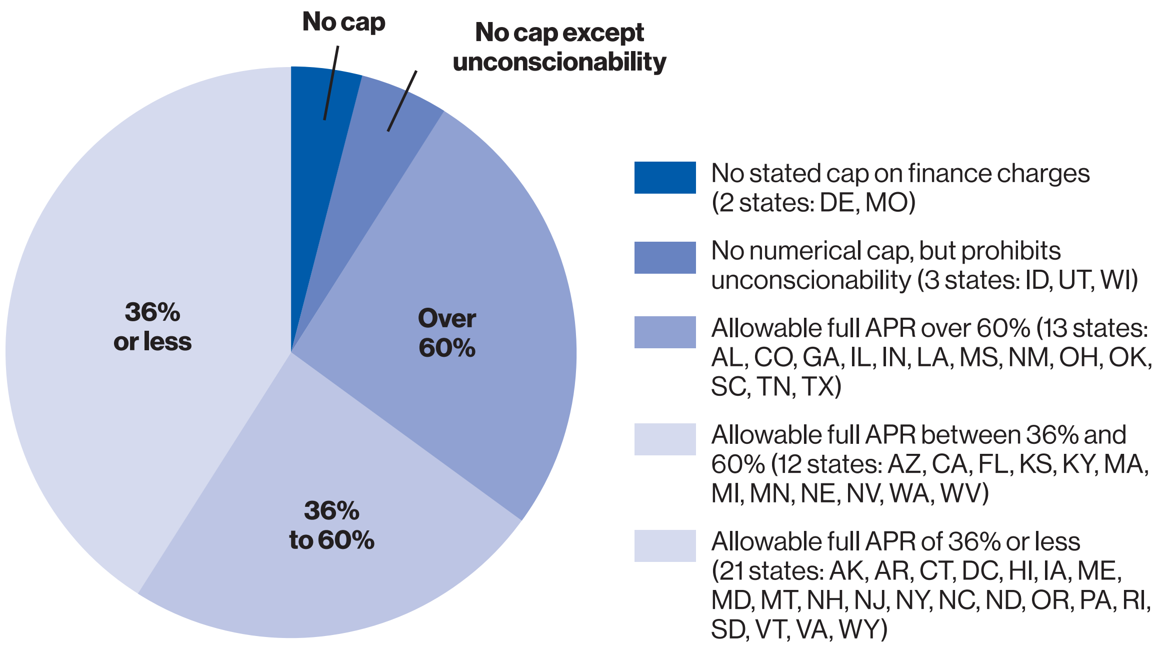


CHART 2

2020: Full APRs Allowed for a Six-Month $500 Loan

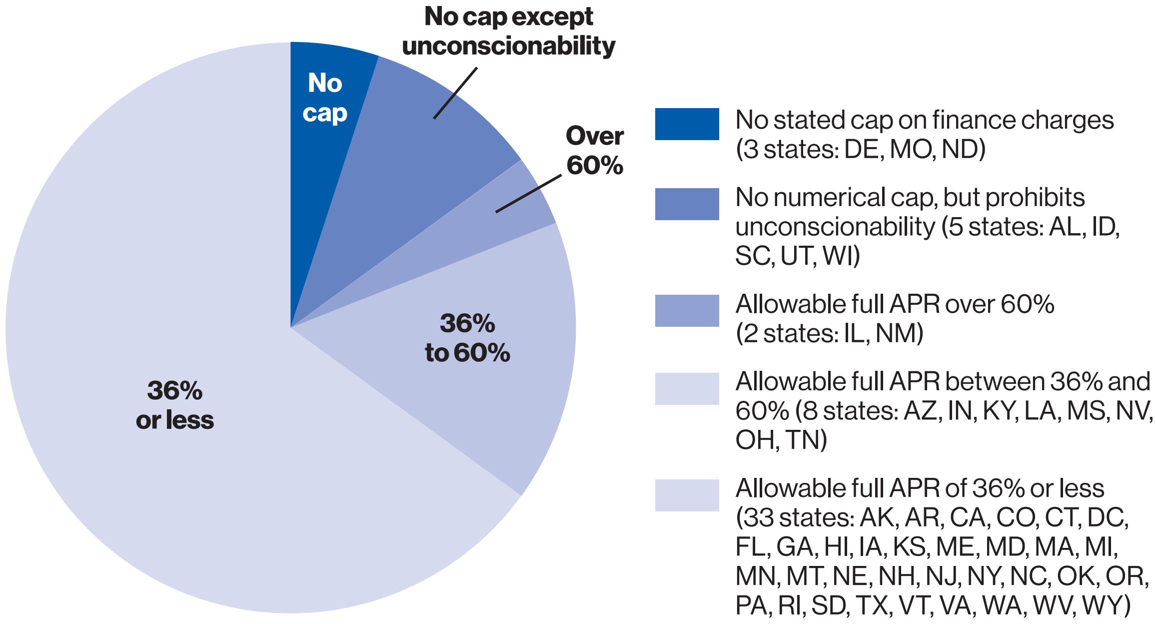


$2,000 two-year loan: As of early 2020, 42 states and the **District of Columbia** cap the APR on a $2,000, two-year installment loan, at a median of 31%. Of these, the great majority**—**32 states and the **District of Columbia—**cap the APR for this loan at 36% or less. Eight states cap it between 36% and 60% APR, and two states**—Illinois** and **New Mexico—**cap the APR for this loan at more than 60%.

The lending laws in three states—**Delaware, Missouri,** and **North Dakota**—do not place any cap on the cost of a $2,000 two-year loan. **Ohio** had been in this category until the 2017 amendments to its lending laws closed loopholes that had allowed lenders to evade the applicable cap. In addition, five states—**Alabama, Idaho, South Carolina, Utah**, and **Wisconsin**—do not impose any cap other than that the terms of the loan cannot be "unconscionable." **New Mexico** had formerly been in this category, but since its 2017 amendments went into effect it has imposed a 175% cap on this loan.

CHART 3

2020: Full APRs Allowed for a Two-Year $2,000 Loan



Significant Changes in the States

Since NCLC's 2017 update, three states have imposed APR caps on a wide range of loans that formerly were not capped. Until statutory amendments went into effect on January 1, 2020, **California's** consumer lending laws capped APRs only for loans of $2,500 or less. As a result, high-cost lenders steered consumers into loans just a bit above $2,500, and often charged APRs well over 100%.[12] As of January 1, 2020, for loans over $2,500 the interest rate is capped at 36% plus the Federal Funds Rate,[13] which is currently about 1.5%.[14] The law also allows the lender to charge a $75 up-front fee. For a two-year loan of $2,600, the result is an APR of about 41%—still high, but a great improvement for consumers. Since the maps and pie charts in this report deal just with loans of $500 and $2,000, they do not reflect the impact of the new law, which prevents a lender from evading the cap for a $2,000 loan by persuading the borrower to accept a $2,600 loan.

New Mexico formerly did not cap the APRs for consumer loans at all. In 2017, the state imposed a 175% APR cap on consumer loans of $5,000 or less, effective January 1, 2018.[15] This cap still allows abusively high loans—loans that consumers are unlikely to be able to repay, and that operate as long-term debt traps—but it represents a step in the right direction.

TABLE

Changes in the States (2018 to 2020)

	2018	2020
States that Improved		
California	Did not cap APRs for loans over $2,500	Caps APRs for larger loans; APR for loan of $2,600 is capped at 41%
Colorado	Allowed 180% APR for $500 payday installment loan	Caps the APR for payday installment loans at 36% (but still allows APR of 90% under a different law)
New Mexico	Did not cap APRs	Caps APRs for consumer loans of $5,000 or less at 175%
Ohio	Loopholes enabled lenders to evade caps	Closes loopholes, although still allows very high rates for loans of $1,000 or less
States that Regressed		
Iowa	Limited APR for $2,000 two-year loan to 31%	Allows 36% APR for $2,000 two-year loan
Oklahoma	Allowed 108% APR for $500 six-month loan	Allows 204% APR for $500 six-month loan

Ohio has struggled for over 10 years to bring high-cost lending under control. In 2008, the state legislature repealed a law that allowed high-cost short-term lending and replaced it with one that capped the APR for loans of $500 or less at 28%. The state's voters then overwhelmingly rejected a ballot initiative pushed by high-cost lenders that would have restored the original law.[16] But then high-cost lenders devised evasions—they started making payday loans under a state mortgage lending law, and also worked through credit services organizations, which charged sky-high fees for arranging loans that purported to charge interest at a low rate. In 2017, the state legislature overhauled the state's consumer lending laws[17] and closed these loopholes for the loan sizes analyzed in this report. However, the revised laws still allow very high-cost lending. For a $500 six-month loan a lender can charge an APR of 145%, though for a $2,000 two-year loan the allowable APR drops to 37%.

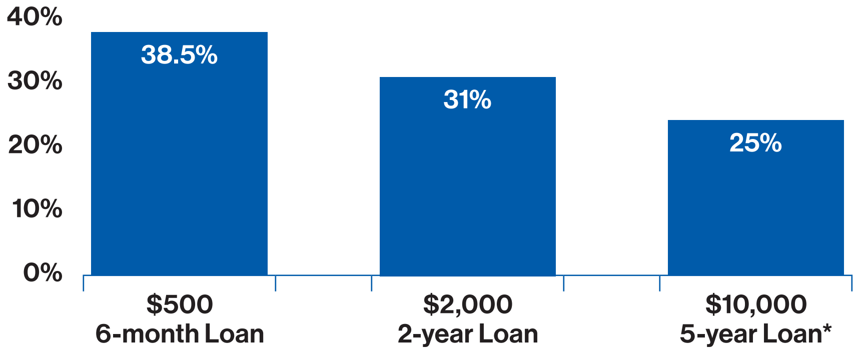
In contrast to the three states that have capped uncapped APRs, two other states moved in the opposite direction, revising their lending laws in ways that increase the allowable APRs for a $2,000 two-year loan or a $500 six-month loan. **Iowa** revised a regulation under its Regulated Loan Act in mid-2017 to allow a lender to charge 36% on the first $3,000 of the loan amount, instead of just the first $1,000.[18] As a result of this change, a lender can now charge an APR of 36% for a $2,000 two-year loan—up from 31%.

Oklahoma's change was far more serious: in 2019, it enacted the Oklahoma Small Lenders Act.[19] It allows a lender to charge 17% *per month* on a loan up to $1,500 that is payable over up to 12 months. This produces a jaw-dropping APR of 204% for a $500, six-month loan. Even before this predator-friendly law was enacted, Oklahoma allowed an APR of 108% for this loan. While this new law was part of a package that phases out the state's payday loan law,[20] it allows high-cost loans to be three times larger and eight times longer than the former payday loans, creating a larger and longer debt trap.

One other change is important to note. In 2018, **Colorado** voters overwhelmingly approved a ballot initiative that caps the APR at 36% for payday installment loans up to $500 that are made under the state's Deferred Deposit Loan Act.[21] The state's other lending laws still allow an APR of 90% for a $500 six-month loan—which is the rate we have included in this report—but this is a significant improvement over the former law, which allowed APRs of 180% or more.[22]

CHART 4

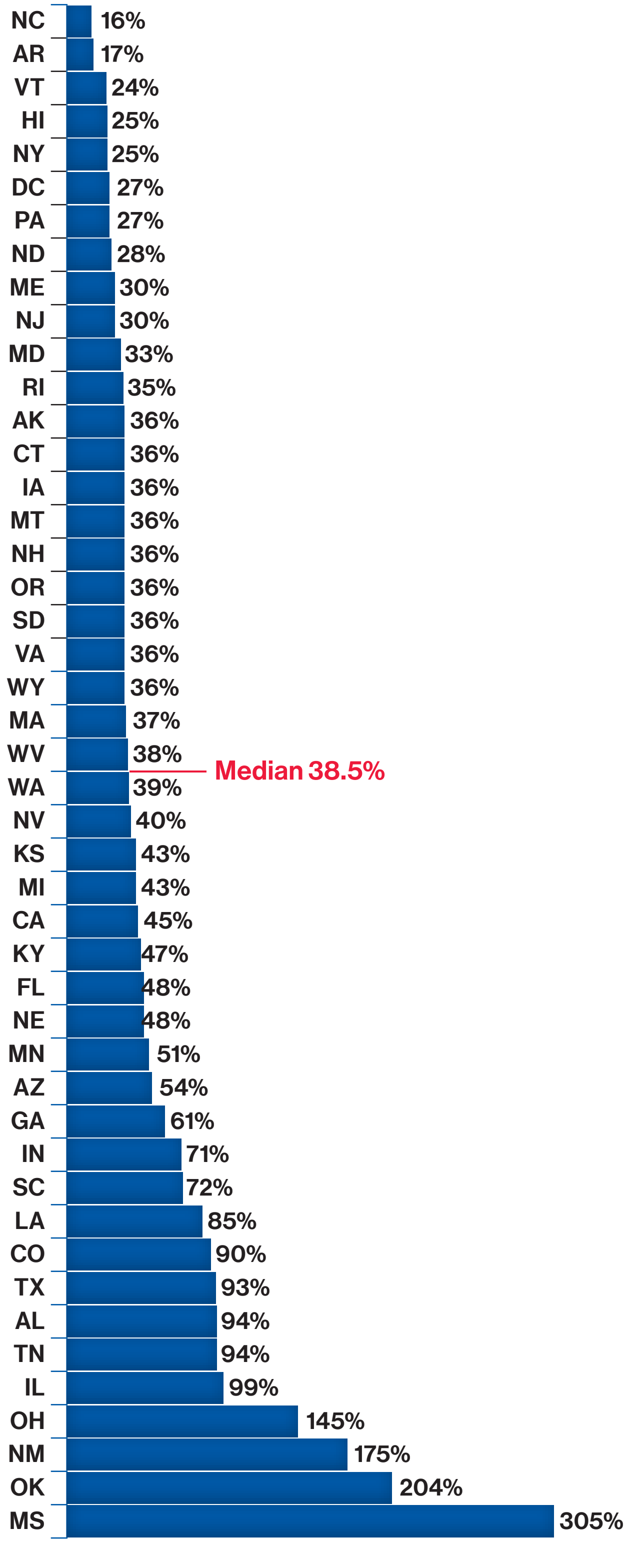
Median State APR Limit by Size of Loan in States that Cap Rates



*Median APR for $10,000 5-year loan is based on 2018 calculations.

CHART 5

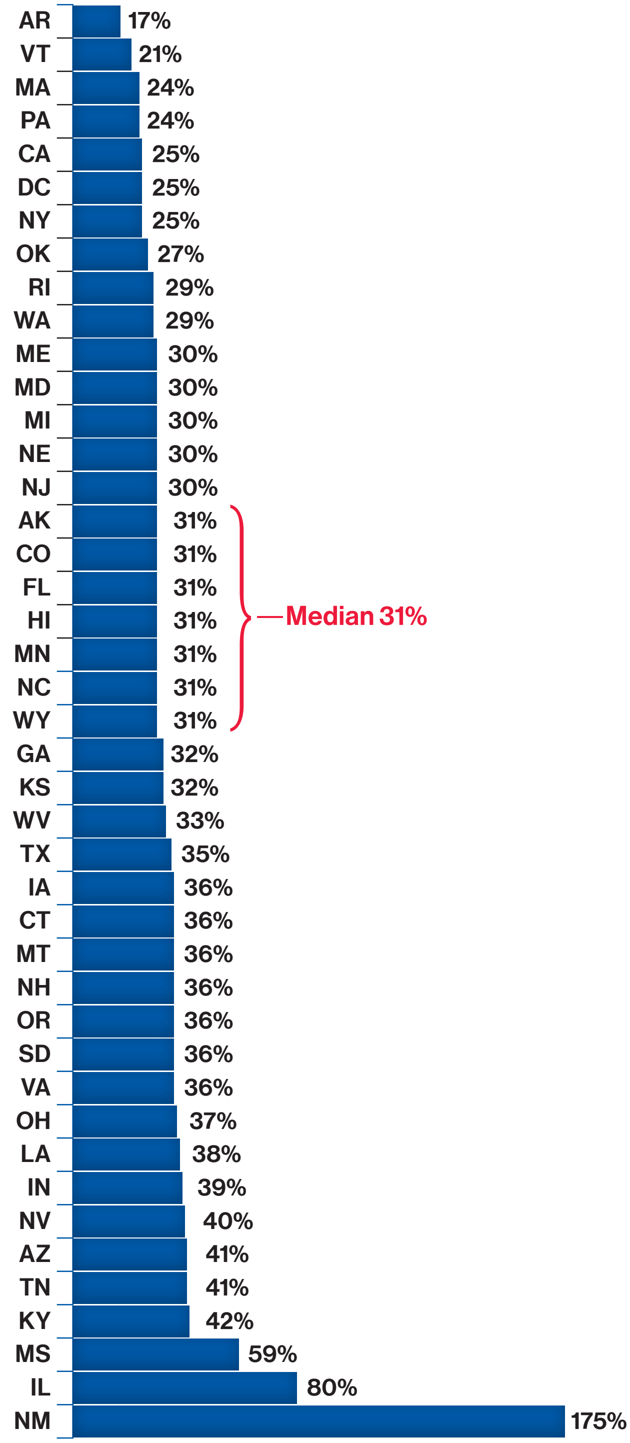
$500 Six-Month Loan Maximum APR in States with Cap
(45 states plus DC)



No cap except unconscionability: **ID, UT, WI**
No cap: **DE, MO**

CHART 6

$2,000 Two-Year Loan Maximum APR in States with Cap
(42 states plus DC)



No cap except unconscionability: **AL, ID, SC, UT, WI**
No cap: **DE, MO, ND**

Rates are for closed-end loans. Rates will differ for lines of credit and other open-end credit.

KEY RECOMMENDATIONS FOR STATES

States' protections against predatory installment loans continue to be under attack. Consumers, state policymakers, and advocates should remain vigilant to predatory lenders' attempts to bring high-cost lending to their states, especially for longer-term loans that, despite slightly lower APRs, can be an even bigger, deeper debt trap than traditional short-term payday loans.

The most important aspect of state loan laws is the cap they place on interest rates and fees. As NCLC's survey reveals, many states lower the rate cap as the size of the loan gets bigger. That only makes sense. The bigger the loan, the more interest that will be charged, and usually loan terms are longer too, so that interest will be paid over a longer period of time. Many states have tiered rate caps, which are reflected in the median rates among the states with caps: 38.5% APR for a $500, six-month loan and 31% APR for a $2,000 two-year loan. Similarly, our 2018 calculations showed a median APR of 25% for a $10,000, five-year loan.[23]

What States Should Do to Protect Consumers

States should:

- **Examine consumer lending bills carefully.** Predatory lenders often propose bills that obscure the true interest rate, for example by presenting it as 24% per year plus 7/10ths of a percent per day instead of 279%. Or the bill may list the per-month rate rather than the annual rate. Get a calculation of the full APR, including all interest, all fees, and all other charges, and reject the bill if it is over 36%.
- **Place clear, loophole-free caps on interest rates for both installment loans and open-end credit.** Rate caps on installment loans will be ineffective if lenders can evade them through open-end lines of credit with low interest rates but high fees.
- **Adopt a tiered rate with caps below 36% for large loans.** A maximum APR of 36% is appropriate for smaller loans, such as those of $1,000 or less, but states should consider a lower rate for larger loans.
- **Prohibit loan fees or strictly limit them** in order to prevent fees from being used to undermine the interest rate cap and acting as an incentive for loan flipping.
- **Ban the sale of credit insurance and other add-on products**, which primarily benefit the lender and increase the cost of credit.[24]

States should place clear, loophole-free caps on interest rates for both installment loans and open-end credit. A maximum APR of 36% is appropriate for smaller loans, with a lower rate for larger loans.

In addition, states should make sure that their loan laws address other potential abuses. States should:

- Require lenders to evaluate the borrower's ability to repay any credit that is extended.
- Prohibit mechanisms, such as security interests in household goods and post-dated checks, that coerce repayment of unaffordable loans.
- Require proportionate rebates of all up-front loan charges when loans are refinanced or paid off early.
- Limit balloon payments, interest-only payments, and excessively long loan terms. An outer limit of 24 months for a loan of $1,000 or less and 12 months for a loan of $500 or less might be appropriate, with shorter terms for higher-rate loans.
- Employ robust licensing and reporting requirements, including default and late payment rates, for lenders.
- Include strong enforcement mechanisms. Make unlicensed or unlawful loans void and uncollectable and provide a private right of action with attorney fees.
- Minimize differences between state installment loan laws and state open-end credit laws so that high-cost lenders do not simply transform their products into open-end credit.
- Tighten up other lending laws, including credit services organization laws, to prevent evasions.

NCLC's 2015 report[25] has more details on each of these recommendations.

In the absence of rate limits at the federal level, state interest and fee caps are the primary bulwark against predatory lending. By following these guidelines, states can ensure that their laws are effective at protecting consumers.

ENDNOTES

1. National Consumer Law Center, Predatory Installment Lending in 2017: States Battle to Restrain High-Cost Loans (Aug. 2017).
2. National Consumer Law Center, Misaligned Incentives: Why High-Rate Installment Lenders Want Borrowers Who Will Default (July 2016).
3. S. Ilan Guedj, Ph.D., Report Reviewing Research on Payday, Vehicle Title, and High-Cost Installment Loans 9 (May 14, 2019).
4. Id. at 27-28.
5. 15 U.S.C. §§ 1601-1666j. See National Consumer Law Center, *Truth in Lending* (10th ed. 2019).
6. 15 U.S.C. §§ 1605, 1606. See National Consumer Law Center, *Truth in Lending* § 1.1.1, Ch. 4 (10th ed. 2019); National Consumer Law Center, Consumer Credit Regulation § 5.4.1 (2d ed. 2015).
7. In contrast to the requirements for installment loans, federal regulations allow disclosure of just the interest rate as the APR for open-end credit such as credit cards. Regulation Z, 12 C.F.R. §§ 1026.6(b)(4)(A), 2016.7(b)(4), 1026.14(c). This loophole has enabled high-cost lenders to provide very misleading cost disclosures, and provides an incentive for them to recast their loans as open-end credit in order to obscure the true cost of the loan.
8. 10 U.S.C. § 987; 32 C.F.R. pt. 232 (implementing regulations). See National Consumer Law Center, *Consumer Credit Regulation* § 2.2.5 (2d ed. 2015).
9. For closed-end loans, the amount actually borrowed and the repayment period are set at the outset. With open-end credit, such as credit cards, there may be an overall cap on the amount that can be borrowed, but the amount actually borrowed is not set in advance, and the repayment period also depends on the timing of the borrower's use of the line of credit and the amounts actually borrowed.
10. National Consumer Law Center, Predatory Installment Lending in 2017: States Battle to Restrain High-Cost Loans (Aug. 2017).
11. National Consumer Law Center, Installment Loans: Will States Protect Borrowers from a New Wave of Predatory Lending? (July 2015).
12. See National Consumer Law Center, Misaligned Incentives: Why High-Rate Installment Lenders Want Borrowers Who Will Default 14-17 (July 2016) (documenting 135% 42-month loans of $2,600 made by one high cost lender in California).
13. Cal. Fin. Code §§ 22303, 22304.5. The amended statute provides caps for loans up to $10,000.
14. Federal Reserve Board, Statistical Release H.15 Selected Interest Rates (showing that Federal Funds Rate is 1.59% as of February 2020).
15. 2017 New Mexico Laws Ch. 110 (H.B. 347), amending N.M. Stat. Ann. §§ 58-7-7(D), 58-15-17(J)..
16. See Ohio Neighborhood Fin., Inc. v. Scott, 19 N.E.3d 1115 (Ohio 2014) (reciting this history); Ohio Payday Lender Interest Rate Cap, Referendum 5 (2008), (63% in favor of a 28% rate cap).
17. 2017 Ohio Laws File 36 (Sub. H.B. 199).
18. Iowa Admin. Code r. 187-15.13.
19. Okla. Stat. tit. 59, §§ 3150 to 3150.27.
20. 2019 Okla. Sess. Law Serv. Ch. 89 (S.B. 720) (West).
21. 2018 Colo. Legis. Serv. Init. Pet. 111, amending Colo. Rev. Stat. § 5-3.1-105. See Pat Ferrier, Fort Collins Coloradoan, "Colorado election: Proposition 111, capping interest on payday loans, passes" (Nov. 6, 2018) (77% of voters voted to approve a 36% rate cap).
22. See Lauren Saunders, National Consumer Law Center, "Op-Ed: Colorado Is No Model for a National Payday Rule (American Banker Dec. 2014).
23. A Larger and Longer Debt Trap?: Analysis of States' APR Caps for a $10,000 Five-Year Installment Loan (Oct. 2018).

24. See National Consumer Law Center, Installment Loans: Will States Protect Borrowers from a New Wave of Predatory Lending? 13-17 (July 2015).
25. National Consumer Law Center, Installment Loans: Will States Protect Borrowers from a New Wave of Predatory Lending? (July 2015).

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