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Bringing Together Voices:

Identifying Challenges and Opportunities for Expanding Small Dollar Lending for Immigrants

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UnidosUS's Policy and Advocacy component recognizes the need for a robust approach to education advocacy on behalf of the Latino community. Our federal policy work emphasizes the major civil rights laws governing and funding education, including the Every Student Succeeds Act (ESSA), formerly known as No Child Left Behind, and the Higher Education Act (HEA). We align our federal work with state-level advocacy and provide support and expertise to state and local leaders in implementing education policy crafted through an equity lens.

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The Center for Community Capital is a non-partisan, multi-disciplinary research center housed within the University of North Carolina at Chapel Hill and is a leading center for research and policy analysis on the power of capital to transform households and communities in the United States. It is part of the University of North Carolina at Chapel Hill's College of Arts and Sciences.

The center's in-depth analyses help policymakers, advocates, and the private sector build and amplify knowledge concerning economic inclusion and opportunity to improve markets, public policies, and community development practice.

For more information on the UNC Center for Community Capital, visit www.communitycapital.unc.edu or follow us on Facebook and Twitter.

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INTRODUCTION

To fully integrate into American society and achieve economic security, immigrants need access to high quality affordable financial products, including small dollar loans that serve as an entryway to credit. Unfortunately, immigrants to the United States face many barriers in accessing safe and affordable financial services. In addition to navigating the complex financial marketplace in the United States, immigrants must overcome challenges such as limited English proficiency, thin credit histories, and a lack of both familiarity and trust in financial institutions. As a result, research shows that immigrants tend to utilize alternative or non-bank financial services, which can be more expensive for managing day-to-day financial transactions and typically do not provide opportunities for longer-term wealth building.[1] Subprime credit services are a leading cause of poor credit scores among immigrants who have been in the country longer, which makes it difficult to secure new credit-building products to improve their financial standing. Without adequate product, immigrants are unable naturalize, start their financial journey and contribute fully to the United

"Increase and scale affordable small-dollar loans options for immigrants while making it profitable for providers."

States.

In July 2018, UnidosUS, working in partnership with JPMorgan Chase and the UNC Center for Community Capital (CCC), convened a group of stakeholders (see Appendix B), including financial, legal, and other direct service providers, along with researchers and members of the philanthropic community to discuss the needs, barriers, and solutions to expanding the small dollar credit market for immigrants. The goal of the roundtable was to clearly identify the challenges facing these varied stakeholders, then work across sectors and perspectives to brainstorm potential solutions and next steps for expanding access while maintaining profitability for providers. Using a facilitation approach aimed at highlighting diverse perspectives and generating new ideas, the meeting included small group discussions, large group activities, and presentations from experts across often siloed areas.[*]

This document provides a synthesis of the findings from the roundtable along with relevant research related to the topic of small dollar lending. It offers an overview of some of the most significant challenges and opportunities associated with the expansion of the small dollar credit market for immigrants, including capacity building, maintaining profitability, and increasing collaboration across sectors. The report then highlights areas for continued research and proposed next steps for creating scalable solutions.

[*] Liberating Structures are meeting facilitation techniques designed to get groups of individuals talking and engaging with one another and collaborating towards common goals. The approach creates meeting structures that are not too constrained or too loose and allow for participation from all of those involved. http://www.liberatingstructures.com/

BACKGROUND

Obtaining lawful status and eventually citizenship, is one way to expand immigrant opportunities for economic mobility and financial inclusion. For instance, immigrants who attain lawful status have substantially higher earnings than their undocumented counterparts.[2] Similarly, foreign-born individuals who become citizens are typically engaged in more stable employment resulting in increased earnings and are more likely to utilize a wider range of mainstream financial services.[3] However, the path to adjusting to temporary lawful status, for example through the Deferred Action for Childhood Arrivals (DACA) program, obtaining permanent legal status (i.e., "green card"), or becoming a naturalized citizen is complicated and expensive. Immigration costs range from a few hundred dollars to a few thousand dollars per person depending on the type of application and associated fees (See Chart 1).

Chart 1

Immigration Costs by Adjustment of Status

	Naturalization (N400)	DACA	Family Reunification Petition	Reentry Permit
Application(s) Fee*	**$725**	**$495**	**$1,760**	**$660**
Fee Waiver Available?	**YES**	**NO**	**NO**	**NO**
Frequency of Renewal	**n/a**	**2 years**	**Recipient must renew green card every 10 years**	**n/a**

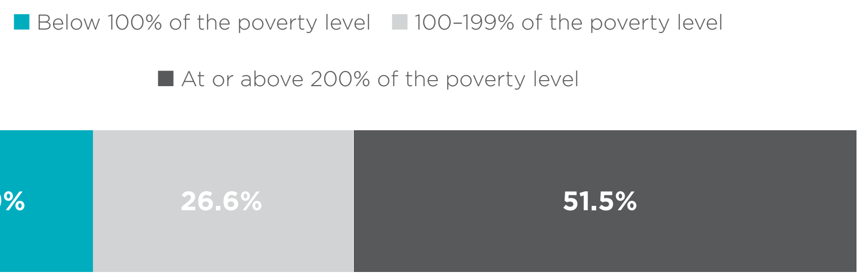
Source: United States Citizenship and Immigration Services. "Our Fees." October, 2018. https://www.uscis.gov/forms/our-fees

* Note that the fees outlined here are only for the application and biometric fee. It does not include other expenses related to filing.

For some low- and moderate-income (LMI) individuals, the costs of citizenship are out of reach. Full and partial fee waivers from U.S. Citizenship and Immigration Service (USCIS) are available to individuals and families with household income below 200 percent of the Federal Poverty Guidelines ($49,200 for a family of four), but roughly half of the 22 million immigrants in the country earn incomes that situate them above the threshold (See Figure 1). This number may even be higher when including the undocumented population. In addition to application fees, immigrants must also pay for legal assistance, which is often subject to the same federal poverty limit formulas. As such, many working class immigrant families, who are at or above 200% of the federal poverty level, are unable to receive a fee waiver and have trouble paying immigration fees. They need small dollar credit options to pay down the immigration expenses over time. Without safe, high-quality small dollar credit options, immigrants are forced to save and prolong their immigration process or turn to high-cost alternative lenders that are likely to leave them in a cycle of debt.

Figure 1

Immigrant Population by Federal Poverty Levels



Source: UnidosUS analysis of 2017 data from Census Bureau's Current Population Survey, Annual Social and Economic Supplement & Supplemental Poverty Measure public use files (Washington, DC: U.S. Census Bureau, 2017) https://www.census.gov/programs-surveys/cps.htm

Unfortunately, there is a critical disconnect in the supply and demand for safe, affordable small dollar credit products available to consumers. The financial sector has been slow to respond to the demand for small dollar loans because of the perceived risk and the reportedly high servicing costs associated with small dollar lending.[4] Small dollar consumers, including many immigrants, may be seen as "risky" borrowers because they tend to have thin-to-no credit profiles or compromised credit histories. Upon their arrival in the United States, immigrants must start anew in establishing a credit history. Consequently, they are shut out of many credit-building opportunities because underwriting criteria rely on credit scoring models that do not fully capture their credit worthiness.[5] Therefore, many financial institutions are reluctant to enter the small dollar market unless they have secured loan loss reserves to cover any defaults or charge-offs that may occur with borrowers whose credit worthiness is uncertain.[6]

Lenders are also discouraged from small dollar product offerings because of the difficulty in breaking even, let alone generating a profit. The acquisition, origination, and servicing costs (including credit pulls, income verification, payment collection) is nearly the same for small dollar lending as it is for larger lines of credit but with far less potential profit. Despite these challenges, some mainstream institutions —mainly credit unions and community banks—have begun offering small dollar loans at affordable rates. Still, more products are needed since many of these institutions have limited lending capacity and geographies and few locations in immigrant neighborhoods or rural areas.* (See Chart 2). U.S. Bank recently launched a small dollar loan product, "Simple Loan," up to $1,000 for existing customers—the first major institution to do so.[7]

Chart 2

Comparing Small Dollar Loans to Payday Loans

	Loan Amount	Length of Loan	Annual Percentage Rate (APR)	Monthly Payment	Total Interest Paid Over Life of Loan
Credit Union Loan	**$800**	**12 months**	**17%**	**$72.96**	**$136.00**
Community Development Financial Institution (CDFI) Loan	**$800**	**12 months**	**35%**	**$79.97**	**$159.64**
Payday Loan	**$800**	**Every 14 days, multiplied by eight**	**278%**	**$240 (fees only, no principal)**	**$840**

Source: Terry, Sabrina and Lindsay Daniels, "Small Dollar Loans for Big Change: Immigrant Financial Inclusion and Access to Credit", NCLR.

While there are innovative models for increasing immigrants' access to credit (See Appendix A), the larger market failure of affordable small dollar credit continues be a barrier. Without a market resolution, immigrants will continue to face credit challenges that will stifle, and even derail, their financial and immigration journey. This is not only a disservice to the growing community of immigrants in our country but a detriment to the local and state economies that can directly benefit from immigrant financial inclusion.

* An interest rate cap, also known as an interest rate ceiling, is the maximum interest rate a financial institution can charge a customer for a loan or line of credit. The interest rate is usually expressed as a percentage and is used to protect consumers from usurious costs for the loan. Military members are extended an interest rate cap of 36%, per the Military Lending Act, on most personal loans, credit cards, and deposit advances. The interest rate cap of 36% is viewed as an industry standard for most personal lines of credit extended to all consumers. For example, the highest credit card rate goes up to 36%, although many states have usury laws that cap them well below that rate. Federal credit unions have their own interest rate cap of 18% for most loans, and a payday alternative loan program cap of 28%.

ROUNDTABLE RESULTS: SECTOR CHALLENGES AND OPPORTUNITY

As a part of the roundtable, participants were asked to split up into three groups representing three crucial constituencies: lenders, community-based organizations, and governmental and philanthropic institutions. In each group, participants identified the biggest challenges they faced in expanding small dollar lending to immigrant communities. For lenders, the most pressing challenges had to do with making small dollar loans more profitable and inclusive to borrowers who may be perceived as risky. community-based organizations face limited capacity in promoting financial inclusion among their clients. Lastly, governmental and philanthropic institutions face challenges around bringing proven models to scale and creating supportive policies to encourage small dollar lending.

Once challenges were defined, groups spent time identifying opportunities that could lead to expanded lending for immigrants. The rest of this document reports on the group-centered discussion exploring nine promising opportunities across the represented sectors. (Chart 3)

Chart 3

Challenges and Opportunities to Expanding Small Dollar Lending to Immigrants

Challenges	Opportunities
For lenders: making small loans profitable and inclusive	1. Leverage technology to reduce costs and expand reach 2. Balance perceived risk reduction with inclusivity 3. Build infrastructure to generate volume
For community-based organizations: building capacity to promote financial inclusion among immigrants	4. Leverage presence in the community 5. Create trust through training 6. Promote partnerships
For government and philanthropic institutions: encouraging small dollar lending to immigrants	7. Create policy to encourage lenders 8. Increase funding for small dollar credit 9. Scale successes

1. Leverage technology to reduce costs and expand reach

Streamlining and automating the application and underwriting process can lower costs and reduce processing times. Faster processing times allow borrowers to know whether they are eligible for a loan sooner and to access funds more quickly.[8] Moreover, technology can reduce the number of in-person visits for borrowers, which is particularly important for immigrants who have limited discretionary time and may feel intimidated by the process.[9]

Upgrading systems and processes can be costly, particularly for community banks and credit unions. Through bundled or collective purchasing of technology platforms, smaller mainstream lenders can streamline processes and devote more resources to serving consumers. One example is the CU Impact Initiative, a shared banking platform specifically designed to help credit unions deliver affordable financial services to low-income consumers.[10] The platform allows credit unions to switch from a fragmented, high-cost processing systems to a flexible, shared cost system.[11] More investments like these are needed so mainstream financial institutions can compete with nontraditional lenders.

Supporting successful FinTech ventures that have an innovative lending model can increase access for immigrant consumers. A growing share of consumers, especially Latinos, engage with their finances through mobile technologies.[12] An array of mobile applications exists to help consumers with everything from tracking expenses to sending remittances and making payments. One example is Remitly, which allows users to send money abroad more quickly and at lower cost than traditional remittance companies like Western Union and Money Gram. As of 2018, the company handles $5 billion in annualized volume, with the potential to effectively disrupt a $574 billion industry.[13]

Many affordable FinTech lenders are searching for seed capital that can help scale their models but are struggling to find investors who are willing to provide low-cost equity or capital. More private sector attention, especially from social impact investors, to the credit needs of immigrant families can help FinTech and other lenders scale their models to address the market void of options. Companies like Remitly demonstrate that serving the unique needs of immigrant consumers can be both profitable and impactful.

Aggregating existing products and resources into a centralized database or clearinghouse will enable borrowers to choose the product that best suits their needs. This is particularly helpful for creating transparency and helping clients navigate the financial system. Existing tools like Fuente Credito and Nerdwallet provide consumers with valuable information about loan and credit products and allow lenders to connect more easily with immigrant consumers.

2. Balance risk reduction with inclusivity

Establishing a secondary market[*] for small dollar loans will not only attract capital, but also establish industry norms for small dollar lending to immigrant consumers and reduce the perceived risk associated with the loans. Financial institutions could be encouraged to originate loans if they had the ability to sell their assets in a secondary market to protect against risk.

Embracing new forms of identification is an important first step in reaching immigrant customers. Under the USA PATRIOT Act of 2001, institutions can accept consular IDs, foreign passports and other forms of identification to verify the identities of their customers but some institutions do not do so out of fear of regulatory scrutiny.[14] However, a growing number of financial institutions in geographic areas with immigrant clusters have begun accepting alternate forms of identification including the *matricula consular*, an identification card issued by the Mexican consulate, and Individual Taxpayer Identification Numbers (ITINS) for opening accounts and taking out loans. Broader bank acceptance of alternative forms of identification, particularly in rural areas and emerging gateway cities is needed to boost immigrants' financial access.

* Secondary markets, also known as aftermarkets, have applied to other credit products, mainly larger credit products such as mortgages and business loans.

Expanding definitions of "creditworthiness" to include factors other than FICO scores can help address the perceived lack of credit history for many consumers, including immigrants. Many lenders have implemented alternate ways of assessing credit histories that include verifying rent and utility payments, analyzing cashflow histories via checking and savings accounts, verifying repayments of informal loans from friends and families, and analyzing remittance payments.[15] For example, LexisNexis Risk Solutions has developed a RiskView score, drawing upon alternative data to develop a more granular understanding of borrower's risk profile.[16] Similar approaches, which can be tailored specifically to common immigrant profiles, such as newcomers' traditional aversion to debt, and non-traditional household arrangements, should be further developed and tested. More flexible underwriting standards can help immigrant customers take the first step toward building financial health without increasing risk.

3. Build infrastructure to generate volume

Creating remote kiosk branches at local institutions, such as health clinics, community colleges and post offices, can increase access to small dollar credit products in immigrant communities. A physical presence within local entities, should reduce origination and servicing costs over time for the lenders but cater to the banking preferences of immigrant consumers.

Building formal referral relationships with service providers can reduce the risk in small dollar lending. As demonstrated in the mortgage space, financial counseling reduces delinquency.[17] Applicants from community organizations that provide financial coaching will perform better because community partners ensure that applicants understand the product and terms. Therefore, lenders seeking partnerships with community organizations must be transparent about their rates and underwriting criteria to create meaningful partnerships. Since changes in processes are required, to overcome inertia lenders must also identify an internal champion within their institution to cultivate and maintain the relationship with their referral partner and troubleshoot any issues that may arise. Formal partnership development is essential to reducing risk and meeting immigrants where they are.

4. Leverage presence in the community

Integrating information about financial products into existing programs is one way to promote small dollar loans for immigration-related expenses. Many organizations already promote financial participation through coaching, education, and tax preparation among other services. Through the addition of more information about small dollar loan products, immigrants can learn about financial resources from a trusted source in a familiar setting, which can reduce their feelings of doubt or distrust they may have toward banks. For financial institutions that don't have a presence in immigrant neighborhoods, working with a community-based organization can boost their visibility in those communities.

Targeting clients early on in their immigration journeys can build a referral pipeline for lenders. Service providers often work with clients looking for ways to finance their immigration applications among other expenses. Through intake processes and program offerings, service providers at these organizations can identify applicants with financing needs and refer them to financial institutions. Capital Goodt Fund, an online CDFI providing immigration loans in four states, has found that building relationships with immigration attorneys has been a more productive outreach strategy than direct consumer advertising.

5. Create trust through training

Increasing awareness among service providers about how financial products can be used responsibly to improve immigrants' financial health is critical to building a robust referral pipeline. Service providers have good reason to be skeptical of non-traditional financial institutions because of their history of discriminatory lending and profit motives. They may be hesitant to encourage clients to take on additional financial burden in the form of loans. For service providers to feel comfortable and confident in recommending financial products, they need to receive adequate information on the existing market of small dollar loans and the products of potential lending partners.

6. Promote partnerships

Recognizing the role of community-based organizations in promoting financial inclusion can help lenders capture the immigrant market. Several organizations have partnered with local credit unions that offer small dollar loans for immigration. One example is CASA, an organization in Maryland that provides financial counseling for clients and referrals to the District Government Employees Credit Union, which offers immigration loans between $250 and $2500. While these partnerships are impactful at a local level, they rely heavily on funding from local government and private foundations which limit their scalability and sustainability. Increasing volume will make small dollar loans more viable and encourage lenders to enter the market.

7. Create policy to encourage lenders

Expanding the Community Reinvestment Act (CRA)* to be more inclusive of small dollar credit can generate more products available to immigrant consumers. If small dollar lending was weighted heavier in CRA examinations, more lenders would likely enter the small dollar lending market. Financial institutions can receive CRA credit for small dollar lending directly or through funding loan loss reserves at other institutions (such as credit unions) who supply small dollar loans. Furthermore, expanding CRA to cover all federally insured institutions, including credit unions and community development financial institutions (CDFI), could expand the types of institutions that could be encouraged to supply small dollar loans.

8. Increase funding for small dollar credit

Restoring funding to the Treasury Department's CDFI Fund† could restore a vital source of capital available to CDFIs to supply small dollar loans. The funding could stem from a small tax imposed on payday lenders that goes into a reserve for the CDFI fund. This could create more marketplace balance between exorbitant small-dollar loans and affordable small-dollar loans.

Investing in loan loss reserves for institutions making affordable small-dollar loans could increase supply of small-dollar credit. Philanthropic institutions can steer their investments into loan loss reserve programs, as opposed to grants, substantially leveraging the value of their funding. In addition, instead of giving directly only to financial institutions' loan loss reserve, the philanthropic community can also invest in immigrant serving institutions, empowering such organizations to create financial products that are tailored to their clientele needs and the flexibility of choosing a financial partner to handle the servicing of the loan. Organizations can be tasked with creating credit pricing that allows both their lenders, as well as, their own institutions to receive a rate of return required to sustain the program. This will help organizations to better understand the small-dollar lending space while creating a program that is "evergreen."

Providing reliable funding to support referral programs is crucial. Immigrant-serving institutions are often willing to assist their constituents' access to credit but have trouble creating a formal program due to the lack of funding. Without funding to support CBO's staff and operation costs, they cannot dedicate the time and effort needed to creating comprehensive referral programs and leveraging their prime position as a potential conduit between the immigrant community and the financial sector.

* CRA was created to increase access to banking and credit resources in underserved communities.

† The CDFI Fund has a history of awarding financial assistance to CDFIs to provide affordable financial products in economically distressed communities. CDFIs in turn use these funds to expand their product offerings on the state and local level.

9. Scale successes

Establishing a federal financial coaching program could create a network of organizations for immigrants to connect to financial coaching services. In addition to increasing the supply of small dollar credit, immigrants also need financial coaching to navigate the financial system and be successful with small dollar credit. A program structured similarly to the Volunteer Income Tax Assistance (VITA)* could enable existing immigrant-serving organizations to be certified by a federal entity to become designated centers for financial coaching and receive federal funds to support their work.

Creating a public funding stream to support affordable small-dollar lending akin to the existing CDFI Fund, initially on a pilot and demonstration basis eventually evolving into a permanent funding source as best practices are refined. Like the CDFI Fund, public funding would likely leverage substantial private financing.

Holding additional, cross-sector convenings of stakeholders to identify best practices and inform funding decisions. The government is in a prime position to convene foundations, regulators, bankers, consulates, and community organizations to discuss best practices and develop cross sector partnerships. The learnings from these ongoing convenings can help shape their regulations and maximize their resources. A similar effort was led by the Federal Deposit Insurance Corporation (FDIC) in Chicago when it created the New Alliance Task Force to address high-cost financial services in immigrant communities. In the absence of federal leadership, state-local governments, immigrant-serving institutions, lenders, and private philanthropy may be required to fill the gap.

* The VITA program offers free tax help to people who generally make $54,000 or less, persons with disabilities and limited English speaking taxpayers who need assistance in preparing their own tax returns. Organizations certify their staff with the Internal Revenue Service to become tax preparers and apply for matching federal funds to become a free tax preparation site.

AREAS FOR FURTHER RESEARCH

- **Expand research and investment in financial technology innovation targeted specifically toward the needs of immigrants**

Technological innovation has the potential to improve the viability of small dollar loans and expand immigrant access to financial services. More research and pilot tests of tech-based approaches are needed to better understand how technology can reduce costs over time and to establish a threshold for lenders to "break even."

- **Evaluate other programs that incorporate financial inclusion and immigration needs**

Programs like Volunteer Income Tax Assistance (VITA), which provides tax help for low-income people including immigrants, are already working at the intersection of financial inclusion and immigrant integration. Exploration of how best to integrate services into existing systems, like VITA, can help financial institutions and community-based organizations develop best practices for providing and promoting small dollar loans for immigration assistance.

- **Research how immigrants in states that ban payday lending are financing immigration applications**

Currently, payday lenders are an alternative provider of small-dollar credit, albeit at high interest rates. However, there are 12 states that ban payday lending.[18] Researching how immigrants in these states are financing immigration applications, as well as among those who may be deterred from applying, could shed light on the need for small-dollar credit. Moreover, understanding how the ban on payday lending impacts immigrant petitions and naturalization rates could build a case for high quality, small-dollar loan products.

- **Allow for controlled experimentation without regulatory risk**

Innovating in the small-dollar credit industry is an iterative process requiring experimentation and testing to generate evidence on what works. The current economic and regulatory landscape provides insufficient room for banks and fintech companies to experiment. Providing some leeway for financial players to design, pilot, and refine different products, in collaboration with immigrant serving institutions, could promote innovation.

CONCLUSION

The UnidosUS roundtable demonstrates that there are significant structural challenges contributing to a market void of small-dollar loan products available to immigrant consumers. Multi-sector interventions that target both financial institutions and immigrant-serving institutions will be needed to overcome those challenges. Policy changes along with technology investments are critical to achieving the efficiency and scale needed for lenders to profitably offer small-dollar loans. Similarly, policy interventions and capacity building funds, are essential to creating comprehensive credit coaching and referral programs led by immigrant-serving institutions.

Such innovations are essential to meeting the needs of the growing immigrant population whose financial future will continue to impact the economy. Without affordable entry-level products, immigrants will remain outside of the financial mainstream. Financial exclusion will stifle immigrants' contributions the U.S economic system as well as result in stagnant customer acquisition and loss of revenue for financial institutions. Furthermore, such investments are equally important for other low-income consumers and consumers of color who struggle with financial insecurity.

Small dollar loans are not just a stepping stone to a financial future for immigrant families but a positive step to a more inclusive financial system in the United States. Therefore, UnidosUS will continue to engage stakeholders, lead research and spearhead programs to create a financial system that enables immigrant families reach their American Dream.

APPENDIX A: EXISTING MODELS

Name	Type of model	Description of Model	Loan Amounts
FDIC: Small dollar loan pilot program www.fdic.gov/smalldollarloans/	Private sector	A two-year case study designed to illustrate how banks can profitably offer affordable small dollar loans	31 banks participated; Origination of a total of 16,000 loans with aggregate principal balance of $18.5 million
Pennsylvania Better Choice Program	Government	A payday lending alternative product where credit unions offer borrowers a 90-day loan with a $500 limit.	More than 87,000 Credit Union Better Choice loans totaling $37 million dollars have been issued to credit union members since the program launched in 2006
Capital Goods Fund https://capitalgoodfund.org/en/	FinTech	Nonprofit online CDFI offers small loans and financial coaching for families in FL, RI, MA, DE	Offer immigration loans between $700 to $20,000 at 15 – 24% APR
CASA https://wearecasa.org/	Nonprofit partnership	Maryland-based nonprofit offering an integrated program of financial literacy, naturalization, and legal services including financial counseling, workshops and access to micro-loans	Partnership with UnidosUS and DC credit union to offer loans between $250 to $2,500 at 10% APR
Fuente Credito https://www.fuentecredito.com/	Fintech	An online platform that helps immigration legal service providers connect their clients to safe and affordable loan products that help immigrants build credit and finance expenses associated with adjusting their immigration status	

APPENDIX B: ATTENDEES

Central American Resource Center

Capital Good Fund

JPMorgan Chase

Federation of Community Development Credit Unions

National Coalition for Asian Pacific American Community Development

Latin American Community Center

Bank of America

Credit Builders Alliance

The Financial Clinic

Mexican American Opportunity Foundation

Prosperity Now

Building Skills Partnership

Democracy Fund

eMoneyPool

Catholic Legal Immigration Network, Inc.

Center for Financial Services Innovation

CASA

New America

Gulf Coast Jewish Family & Community Services

Community Development Corporation of Brownsville

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