State-by-State Action on Payday Loan Apps

The states included in this chart have either enacted laws that have eliminated payday lending, or taken action on payday loan apps, or both. States in gray passed laws pushed by app-based payday lenders exempting themselves from existing state credit laws and providing for a regulatory scheme that does not effectively protect consumers and provide transparency.

Center for Responsible Lending

	Cost Limitations			Enforcement & Oversight				Data Reporting & Transparency		
State	Strong Small-Dollar Loan Rate Cap (e.g., 36%)	Per-Transaction Fee Limit	Monthly Aggregate Fee Cap or Limit	Establishes Registration/ Licensing Structure Unique to Payday Loan Apps	Effort to Require Compliance with Small dollar Lending Statute	State UDAP/ UDAAP Authority[1]	Federal UDAAP Authority	Lender Reporting Required	Periodic Public Reporting Required	Authority to Impose Transaction Reporting System
Arizona	x					x	x			
California				x[2]		xx	x	x		
Colorado	x					x	x			
District of Columbia	x				x	x	x			
Georgia	x					x	x			
Hawaii	x					x	x			
Illinois	x					x	x			
Massachusetts	x					x	x			
Minnesota	x					x	x			
Montana	x					x	x			
Nebraska	x					x	x			
New Hampshire	x					x	x			
New Jersey	x					x	x			
New York	x				x	xx[3]	x			
North Carolina	x					x	x			
Ohio	x					x	x			
Oregon	x					x	x			
Pennsylvania	x					x	x			
Rhode Island	x[4]					x	x			

Footnotes

[1] States marked with "XX" have expanded UDAAP protections. Arkansas, Nevada, South Dakota, and West Virginia have UDAP protections that only prohibit deceptive or unconscionable acts.

[2] California enacted, via regulation, a registration regime that will expire in February 2029, four years after it went into effect.

[3] New York's FAIR Act, amending the state's UDAAP statute, has passed the legislature and is awaiting the governor's signature.

State-by-State Action on Payday Loan Apps (Appendix Continued)

	Cost Limitations			Enforcement & Oversight				Data Reporting & Transparency		
State	Strong Small-Dollar Loan Rate Cap (e.g., 36%)	Per-Transaction Fee Limit	Monthly Aggregate Fee Cap or Limit	Establishes Registration/ Licensing Structure Unique to Payday Loan Apps	Effort to Require Compliance with Small dollar Lending Statute	State UDAP/ UDAAP Authority	Federal UDAAP Authority	Lender Reporting Required	Periodic Public Reporting Required	Authority to Impose Transaction Reporting System
South Dakota	x					x	x			
Vermont	x					x	x			
Virginia	x					x	x			
Washington						x	x			x[5]
West Virginia	x					x	x			
Arkansas	x[6]					x	x			
Connecticut	x	x[7]	x[8]			x	x			x[9]
Indiana		x		x		xx	x			
Kansas				x		x	x			
Louisiana						x	x	x	x[10]	
Maryland	x	x				xx	x			x[11]
Missouri				x		x	x			
Nevada				x		x	x	x		
South Carolina				x		x	x			
Utah				x		x	x			
Wisconsin				x		x	x	x		

[4] The 36% rate cap on all small dollar loans in Rhode Island goes into effect on January 1, 2027.

[5] Washington law requires all payday lenders to report loans to a third-party tracking database and prohibits consumers from taking out more than eight of these loans total per year. The definitions of loan and payday loan under Washington law encompass payday loan app loans, and to the extent there is any uncertainty, the state financial regulator should issue guidance on this issue.

[6] Arkansas has a constitutional prohibition on usury that would trump a conflicting statute and that has, in the past, invalidated legislative attempts to create carve-outs from the usury prohibition.

[7] The per-transaction fee limit is inclusive of all fees collected, including tips.

[8] The monthly fee limit per lender is inclusive of all fees collected, including tips.

[9] The Connecticut law empowers the Connecticut Banking Commission to set rules to prevent borrowers from borrowing against the same wages from multiple providers.

[10] Lenders must submit annual reports that disclose, among other things, the total number of unique customers, total amount of tips and donations received, and total revenue attributable to payday loan app transactions. Annual reports will be published with information presented in aggregate form.

[11] Maryland's Commissioner of Financial Regulation has authority to collect necessary data from payday loan app companies and should implement regulations that include transaction reporting and periodic public reporting.