Payday Lenders and the Military: A Study of Hampton Roads, Virginia

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Introduction

Payday Lenders have long been identified as targeting military populations

Area of concern to leadership due to security risks

- Hampton Roads has unique military and civilian makeup, making it an ideal area to study
 - Large Military Population: Army, Navy, Air Force, and Coast Guard (arguably the most militarized region in the US)

Varied Civilian Population: income, rural/urban, ethnic groups

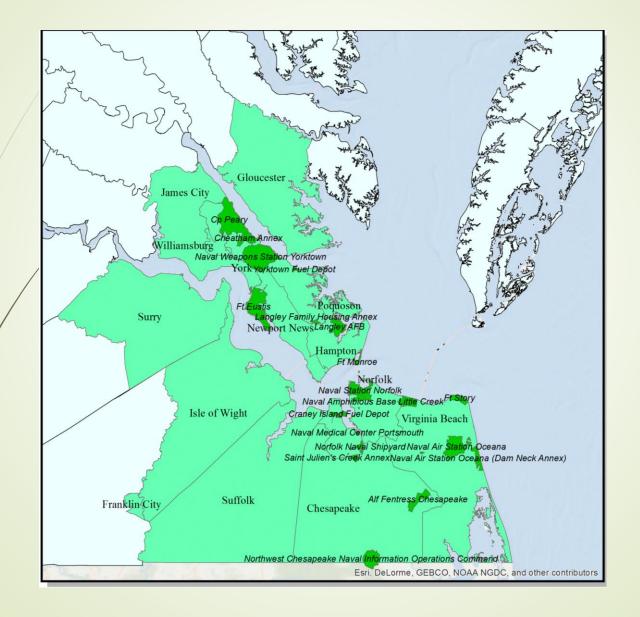
Background

- Payday Lenders charge extremely high interest rates and have historically preyed on junior service members
- 2005 Graves and Peterson "Predatory Lending and the Military: The Law and Geography of 'Payday' Loans in Military Towns"
 - Looked at 20 states, 109 military installations, and 15,000 payday lenders
 - Found greater concentrations of payday lenders per capita near military installations

Federal & State Measures

- Congress passes Military Lending Act in 2006
 - Caps interest rate at 36%
 - Requires rights disclosure
 - Prohibits arbitration
 - Can't waive Service member's Civil Relief Act (2015)
- Service Response
 - Varies by Service
- Virginia (2009)
 - Restricted loans to one at a time per borrower
 - Established tracking database to determine eligibility
 - Created mandatory longer repayment times
 - Capped interest rate at 36%
 - Limited fees to 20% of loan
 - May not make loans to military members, spouses or dependents
 - \$1,000 fine per violation
 - 29.41% decrease in Payday Lenders in 2009

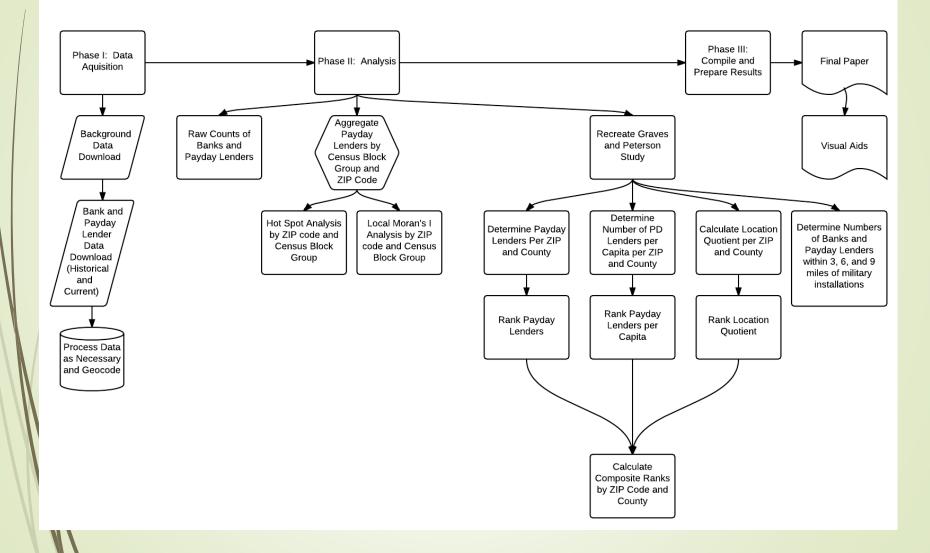
Hampton Roads



Goals and Objectives

- Determine if numbers of payday lenders have decreased since 2005
- Determine if Military has continued to be a target

Methodology



Methodology: Phase I

Obtained Data Background data US Census Bureau TIGER US Geological Survey ESRI ArcGIS Online Payday Lenders/Banks **American Factfinder** (historical numbers) Virginia State Corporation Commission Geocode FDIC

Methodology: Phase II

Compared Raw Counts

- Compare historical numbers and current numbers of payday lenders and banks
- Accomplished by ZIP code & county
- Overlay 3, 6, 9 mile buffers from military installations
 - Why? Payday lending industry wants locations w/in 3 miles of the populations they serve
 - Counts of payday lenders, people, and banks in the zones

Raw count county result

	<u>3 Miles</u>	<u>6 Miles</u>	<u>9 Miles</u>
Banks	216	312	326
PayDay Lenders	26	37	39

2016

County/City	Number Banks	Number PD	County/City	Number Banks	Change	Number PD	Change
Chesapeake	50	18	Chesapeake	47	-3	4	-14
Franklin	15	2	Franklin	4	-11	1	-1
Gloucester	15	2	Gloucester	12	-3	1	-1
Hampton	29	16	Hampton	23	-6	4	-12
Isle of Wight	6	4	Isle of Wight	8	2	1	-3
James City	20	0	James City	21	1	0	0
Newport News	38	21	Newport News	31	-7	6	-15
Norfolk	77	30	Norfolk	48	-29	12	-18
Poquoson	1	1	Poquoson	2	1	0	-1
Portsmouth	19	14	Portsmouth	14	-5	5	-9
Suffolk	15	5	Suffolk	21	6	3	-2
Surry	2	0	Surry	1	-1	0	0
Virginia Beach	91	51	Virginia Beach	91	0	6	-45
Williamsburg	14	1	Williamsburg	10	-4	0	-1
York	13	3	York	15	2	0	-3
	405	168		348	-57	43	-125

-14% -74%

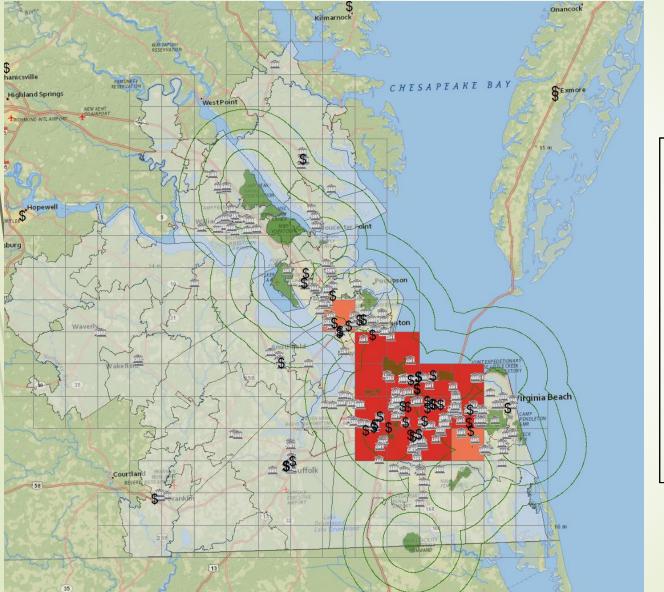
Source Data: FDIC, U.S. Census Bureau 2005 Business Pattern Survey, and Virginia State Corporation Commission

Phase II: Complete Hot Spot Analysis

- Aggregated current point data by census block group & ZIP code
 - ZIP Code Analysis Inconclusive, created a fish net instead
- Identified statistically significant clusters of high and low values of payday lenders

Overlaid 3, 6, 9 mile buffers from military installations

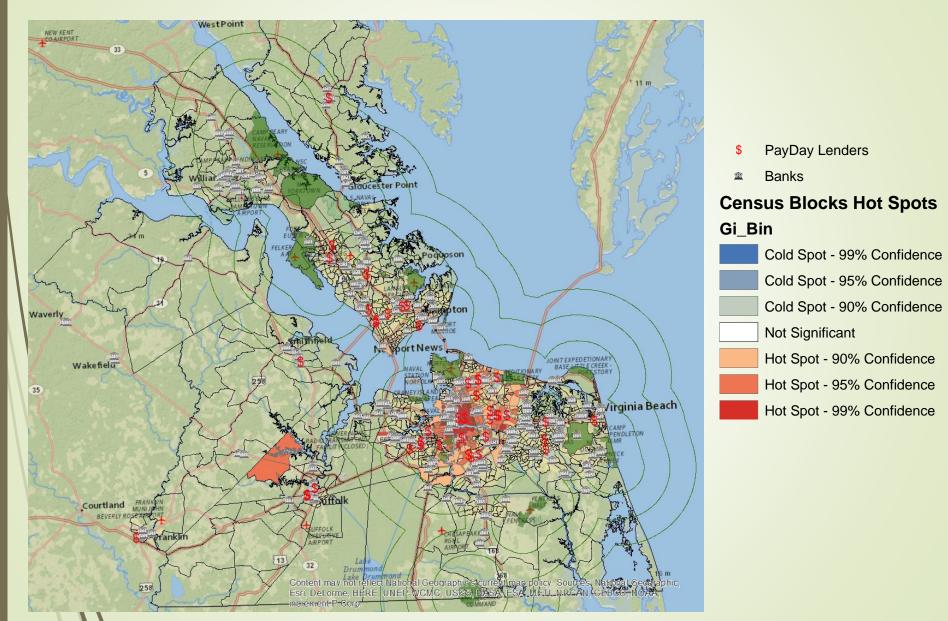
Fish Net Hot Spot Results



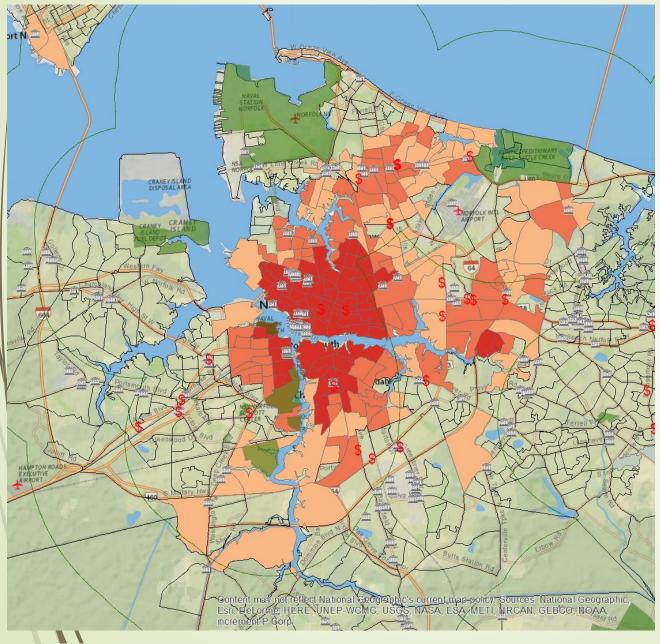
Moontent may not reflect National Geographic's current map policy. Sources National Geographic, Esti, DeLorme, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp.



Census Block Group Hot Spot Results

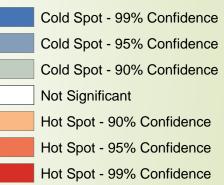


Census Block Group Hot Spot Results



- \$ PayDay Lenders
- Banks

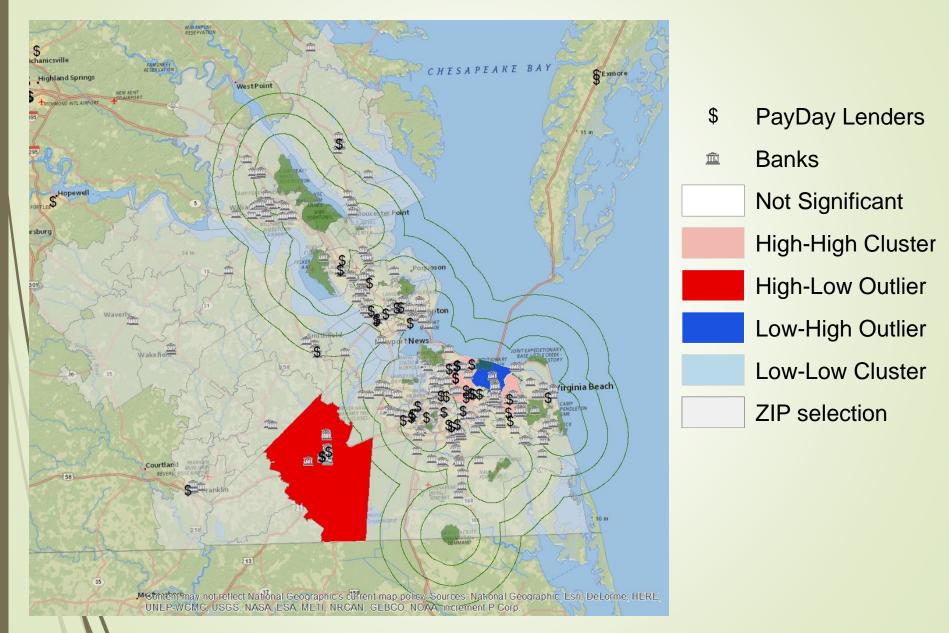
Census Blocks Hot Spots Gi_Bin



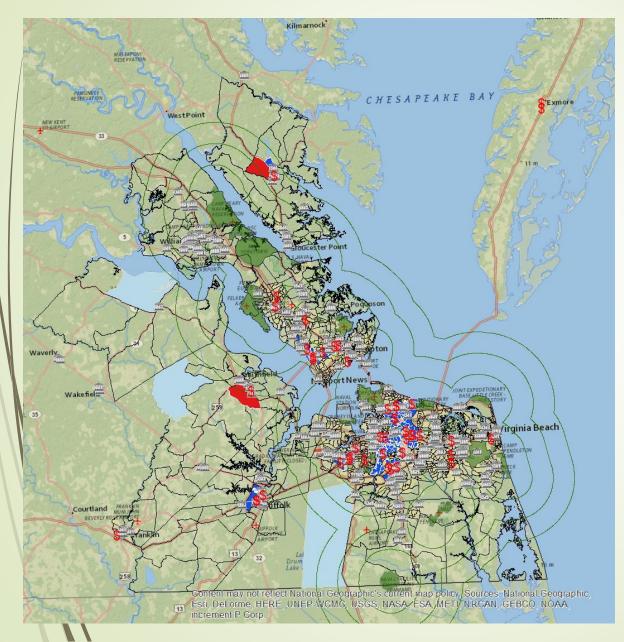
Phase II: Complete Anselin Local Moran's I Analysis

- Aggregated current point data by census block group & ZIP code
- Identified any spatial clusters of features with high or low values
- Only tool that identified statistically significant outliers
- Overlay 3, 6, 9 mile buffers from military installations

ZIP Anselin Local Moran's I Results

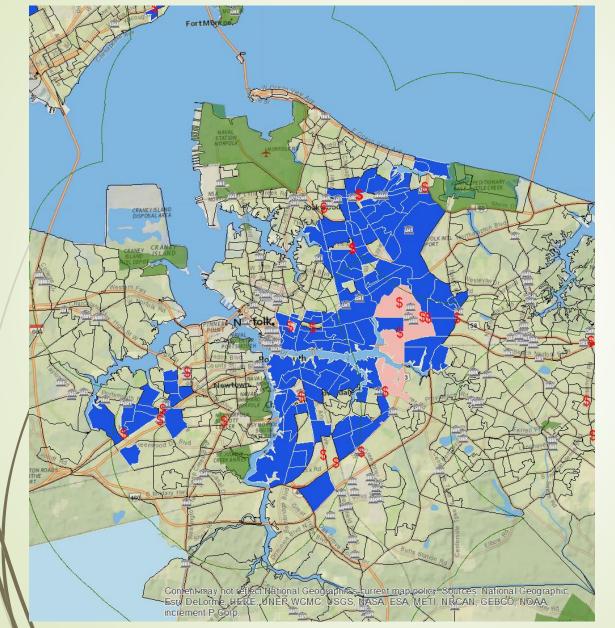


Census Block Anselin Moran's I Results





Census Block Anselin Moran's I Norfolk





Recreate Graves and Peterson Study

- Calculate Statewide Average of Payday Lenders Per 100K people
 - Enables prediction of payday lenders per unit (county or ZIP code)
 - Allows comparison of predicted numbers vs. actual numbers in any given area
- Data presented by ZIP Codes and Counties
 - Rank Payday Lenders
 - Rank Payday Lenders Per Capita

Recreate Graves and Peterson Study

Calculate Location Quotient

$$\operatorname{ZIP}\operatorname{Code} LQ = \left[\frac{X}{(X+Y) \times 100}\right] + (X-Y)$$

County
$$LQ = \left[\frac{X}{Y}\right] x \ 100$$

LQ= Location Quotient, X and Y = Banks and Payday Lenders Not standard LQ formula but ones developed by Graves and Peterson

Recreate Graves and Peterson Study

Calculated Composite Index

- Average of Rank of Payday Lenders, Payday Lenders per Capita Rank, and Location Quotient for each county and ZIP code
- This creates a method for showing proximity of payday lenders to bases with a single number
- Created 3, 6, 9 mile buffer zones around military installations
 - Ranked results by County and ZIP code

Results by County

Nearest Base	County/City	Pop Banks	PD Lenders	PD/100K Po	р Ехр Рі	ο ια	Rank LQ	Rank PD	Rank PC	Sum of Ranks	Compos Rank	Previous site Statewic Rank	
Multiple Sites	Norfolk	242,803	48	12	4.94	6.31	25.00	2	1	2	5	1	7
Multiple Sites Ft. Eustis,	Portsmouth Newport	95,535	14	5	5.21	2.16	35.71	1	3	1	5	1	3
Langely AFB	News	180,719	31	6	3.31	4.08	19.35	3	2	4	9	3	5
	Suffolk	84,585	21	3	3.52	1.91	14.29	5	5	3 :	13	4	
Langley AFB	Hampton	167,463	23	4	2.4	3.78	17.39	4	4	7	15	5	7
	Franklin	56,159	4	1	1.78	1.27	25.00	2	6	9 2	17	6	
	Isle of Wight	35,270	8	1	2.86	0.80	12.50	6	6	5 2	17	6	
Multiple Sites	Chesapeake	222,209	47	4	1.8	5.02	8.51	7	4	8	19	8	19
	Gloucester	36,858	12	1	2.7	0.83	8.33	8	6	6 2	20	9	
NAS Oceania, Ft Story, Others	Virginia Beach	437,994	91	6	1.37	9.90	6.59	9	2	10 2	21	10	14
Cp Peary	James City	67,009	21	0	0	1.51	0.00	10	7	11 2	28	11	
Langley AFB	Poquoson	12,150	2	0	0	0.27	0.00	10	7	11 2	28	11	
	Surry	7,058	1	0	0	0.16	0.00	10	7	11 2	28	11	
Cp Peary	Williamsburg	14,068	10	0	0	0.32	0.00	10	7	11 2	28	11	
Multiple Sites	York	64,464	15	0	0	1.46	0.00	10	7	11 2	28	11	

Top Ten Results by ZIP Code

											<u>Composite</u>	<u>Previc</u> <u>Statev</u>	
<u>Nearby Base</u>	<u>ZIP</u>	<u>Town</u> P or CityL	<u>enders</u> Pop	<u>Ex</u>	<u>p PD</u> Bar	<u>ıks PD,</u>	/100K LQ Ranl	Ran PD PC	<u>«</u> Rank	<u>Sum</u> LQ Rani		<u>Rank</u>	
	23324	Chesap eake	3	22,851	0.52	1	13.13 2.01	2	2	1	5	1	21
Naval Base													
Amphibious													
Base Little													
Creek	23502	Norfolk	4	20,678	0.47	9	19.35 -5.00	1	1	8	10	2	6
	23701	Portsm outh	3	25,161	0.57	6	11.92 -3.00	2	3	6	11	3	9
Multiple	23702	Portsm outh	1	11,424	0.26	0	8.75 1.01	4	5	2	11	3	4
	23504	Norfolk	2	23,483	0.53	1	8.52 1.01	3	6	2	11	3	
Naval Base													
Amphibious													
Base Little													
Creek	23518	Norfolk	3	28,095	0.63	6	10.68 -3.00	2	4	6	12	6	10
		Newpor t											
	23605	News/H ampton	2	13,854	0.31	1	7.22 1.01	3	8	2	13	7	1
	23513	Norfolk	2	29,595	0.67	0	6.76 2.01	3	10	1	14	7	
	23851	Franklin City	1	13,715	0.31	4	7.29 -3.00	4	7	6	17	9	11
	23707	Portsm outh	1	14,236	0.32	3	7.02 -2.00	4	9	5	18	10	29

Overall Findings: Is This Still True?

Google Maps Newport News, Virginia

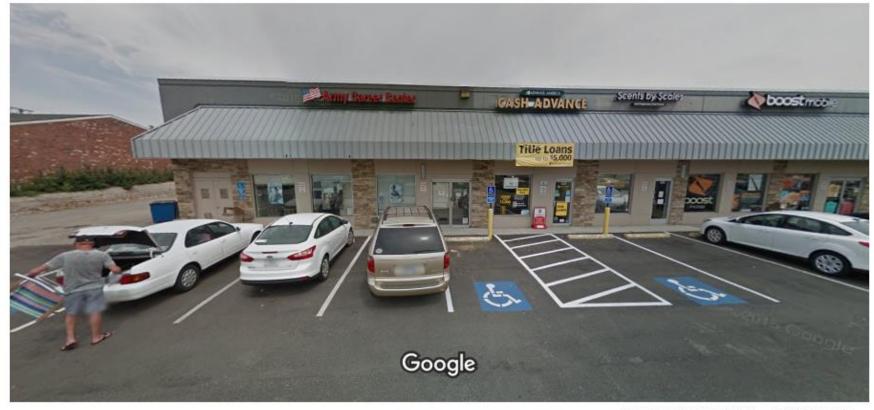


Image capture: Aug 2015 © 2016 Google

Street View - Aug 2015

Sources

10 VAC-200. "Payday Lending (Final Regulation)". The Virginia Register, 1 June 2012. Web. 15 November 2015.

ArcGIS Online. "USA Counties". Esri, TomTom, U.S. Department of Commerce, U.S. Census Bureau. 28 November 2015.

ArcGIS Online. "World Ocean Base". Esri, GEBCO, NOAA, DeLorme, HERE and other contributors. 28 November 2015.

ArcGIS Online. "National Geographic". National Geographic, ESRI, DeLormre, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P. Corp. 27 March 2015.

"Department of Defense Issues Final Military Lending Act Rule". U.S. Department of Defense Press Release No: NR-289-15: 21 July, 2015. Web. 11 October 2015.

Graves, Steven M. and Peterson, Christopher L. "Predatory Lending and the Military: The Law and Geography of 'Payday' Loans in Military Towns." *Ohio State Law Journal* vol. 66, no. 4 (2005): 653-832. Web. 11 October 2015.

Institution Directory". Federal Deposit Insurance Corporation. Web. 15 May 2016.

"Notice to Virginia Payday Loan Customers". Commonwealth of Virginia State Corporation Commission. Web. 15 November 2015.

U.S. Census Bureau, 2010 Census. American Factfinder. U.S. Census Bureau, n.d. Web. 22 November 2015.

U.S. Census Bureau, 2009-2013 5-Year American Community Survey. *American Factfinder*. U.S. Census Bureau, n.d. Web. 22 November 2015.

U.S. Census Bureau, Geography Division. "Military Installations". TIGER/Line Shapefiles 2015. Web. 28 November 2105.

U.S. Census Bureau, Geography Division. "Military Installations". TIGER/Line Shapefiles 2015. Web. 28 November 2105.

Vertiec Solutions, LLC, on behalf of the Bureau of Financial Institutions State Corporation Commission, "Report on Virginia Payday Lending Activity For the Year Ending December 31, 2009". Web. 17 November 2015.