



# 2016 Financially Underserved Market Size Study

November 2016

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Leading the Nation in Consumer Financial Health

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# About the 2016 Financially Underserved Market Size Study

CFSI and Core Innovation Capital present this 6<sup>th</sup> annual market analysis to illustrate the size of the opportunity to address the needs of financially underserved consumers and identify significant trends driving marketplace evolution and growth.

The study presents a snapshot of:

- Interest and fees spent by underserved consumers to borrow, spend, save, and plan
- Volume of consumer usage generating revenue
- Current and projected revenue growth rates
- Key trends driving market developments

This report does not constitute a commentary on the appropriateness, safety, or quality of specific financial products for consumers. Market size and growth rates are not endorsements of market well-being for providers or financial health impact for consumers.

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## Thank You to our Funders

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**Morgan Stanley**



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# By the Numbers: Highlights of the \$141 Billion Market\*

Overall market revenue **grew by \$7.8 million** or 5.9% from 2014 to 2015.\*\*



## Fastest Growing Products

Marketplace Loans increased 210% and 64% for personal marketplace loans and small business marketplace loans, respectively.

The market is projected to **expand 2.1%** in 2016 to \$144 billion.



## Products in Sharpest Decline

Storefront and Online Payday Loans saw the sharpest declines, falling 23.4% and 22.5% respectively.

Consumers spent **\$141 billion** in fees and interest to use **\$1.61 trillion** in financial services.



## Largest Product Segments

Subprime Auto Loans constituted the largest product segment at \$24.6 billion in 2015, followed by Overdraft fees at \$24.0 billion.

The study includes **28 financial products** in 2015, including new ones: small business microloans and marketplace loans and auto insurance.



## Spotlight Product

Spending on Auto Insurance premiums by underserved consumers topped \$36.5 billion – this consumer pays an average of 26.5% more than fully served consumers on comparable vehicles.

\* All figures in this report are the result of original research and analysis by CFSI and Core Innovation Capital unless otherwise sourced. See appendix for list of sources.  
\*\* Updates reflect revised revenue estimates for previous report years. See New Additions and Changes to 2016 Market Sizing for full explanation.

# Key Trends in Context

## Major Findings in the 2016 Financially Underserved Market Size Study

### Consumers Seeking Small-Dollar Credit: What's on the Menu?

Changes in provider product offerings mean consumer spending continues to shift away from the single payment model of payday loans, including those offered online, and toward short term credit offered through installment loans and Subprime Credit Cards.



### Electronic Payments and the Cash Economy: Friends or Foes?

Spending on prepaid cards, checking accounts, and mobile payments innovations is growing, but products such as Check Cashing and Remittance aren't going away anytime soon, driven by the major role that cash continues to play in the financial lives of underserved consumers.

### Tapping Alternative Credit Sources: Is it Personal or Just Business?

Limited availability of bank microloans for underserved small businesses means that many have unmet credit needs, or seek credit from alternative sources, such as the quickly-growing Marketplace Loan segment or Merchant Cash Advances. Others turn to sources of credit intended for personal use, including installment loans and Subprime Credit Cards, to meet their needs.

### Pricing Auto Insurance for the Underserved: Premiums or Penalties?

Underserved consumers pay higher rates for auto insurance than the mass market due to characteristics tied to lower economic status. They spend nearly as much on premiums to drive their vehicles as consumers spend on fees and interest for Subprime Auto Loans and Leases.

# Defining the Market: Who are Underserved Consumers?

Underserved consumers struggle with one, two, or all three of these financial challenges.

Consumers that face barriers to using mainstream financial products effectively due to low-to-moderate incomes or income volatility, circumstances that impact approximately **91 million** and **54 million** U.S. adults, respectively.



Consumers struggling with LMI or volatile incomes

Credit-challenged consumers with thin-to-no credit file or a subprime score



Consumers that are credit-challenged have subprime credit scores below 600, or are unscorable due to a lack of sufficient credit file information. There are approximately **121 million** U.S. adults who are credit-challenged.

Consumers that struggle with access to mainstream financial products that meet their needs. This group is estimated at **67 million** adults by the FDIC.



Unbanked or underbanked consumers (FDIC designation)

Sources: Unbanked, Underbanked, and Income Volatility: "2015 FDIC National Survey of Unbanked and Underbanked Households," FDIC (2016); Credit: CFSI calculated unscorable consumers from FiveThirtyEight. "[FICO Wants to Create Credit Scores for People who Don't Have Them](#)," 2015, and added subprime consumers based on VantageScore. "[How Many Americans Have Bad Credit](#)," 2016. LMI: For this analysis, CFSI calculated LMI households not included in the income volatility category based on those with incomes at or below 200% of the federal poverty level as defined by the 2015 [US Department of health and Human Services](#), and 2015 household income data from the [United States Census Bureau](#).

# Defining the Market: Who are Underserved Consumers?

## The Nexus of Financially Underserved Consumers and Financial Health

Financial health challenges extend beyond the underserved market. CFSI research estimates that 57% of U.S. consumers, or approximately 138 million adults, are financially unhealthy.

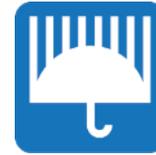
While all financially unhealthy Americans could benefit from higher-quality financial products and services, this annual report focuses specifically on the financially underserved. These are the consumers with the most acute need for financial products and practices that meet their needs.

In order to improve consumer financial health, especially for the underserved, the market must address consumer need for day-to-day financial systems that function well alongside products that increase the likelihood of resilience and the ability to pursue opportunity. This requires a robust and innovative financial services market.

### Financial Health Is...



Day-to-Day  
Management



Resilience



Opportunity

### The US Population is...

43%

Healthy

57%

Not Healthy



138 million people are struggling financially

CFSI's Consumer Financial Health Study (2014)

# Defining the Underserved Market

## Financial Product Criteria & Opportunity

This report examines **28 products** that underserved consumers use to spend, save, borrow, and plan in their financial lives. Two products--small business microloans offered by banks and small business marketplace loans—have been added to the analysis in 2016. Additionally, a first look at underserved consumers' spending on insurance focuses on auto insurance premiums.

Some products in this report, such as checking accounts or auto loans, are also used by consumers who are not traditionally defined as underserved. In these cases, measuring the underserved market size only focuses on usage volume and revenue generated by those who meet the criteria for financially underserved individuals. Accounting for market revenue in this way allows for a specific examination of spending on financial products and services by individuals who are more likely to be vulnerable to financial health challenges.

This methodology pinpoints the **opportunity** to improve the financial health of underserved consumers, which can be assessed by considering 8 key financial health indicators identified by CFSI.

## CFSI'S Indicators of Financial Health:



### SPEND

1. Spend less than income
2. Pay bills on time and in full



### SAVE

3. Have sufficient liquid savings
4. Have sufficient long-term savings or assets



### BORROW

5. Have a sustainable debt load
6. Have a prime credit score



### PLAN

7. Have appropriate insurance
8. Plan ahead for expenses

[CFSI's Eight Ways to Measure Financial Health](#) (2016)

# Product Category Revenue & Growth

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# U.S. Spending By Underserved Consumers Tops \$140.7 Billion

## Breakdown by Product Category Revenue and Growth

In 2015, underserved consumers spent **\$140.7 billion** on fees and interest across five financial product categories.

### Single Payment Credit

Loan products for which payment is due in one lump sum, typically with terms of one month or less.

### Short Term Credit

Loan products that function on an installment basis with terms from several months to 1-2 years or as a line of revolving credit.

### Long Term Credit

Loan products that function on an installment basis with typical terms longer than 2 years.

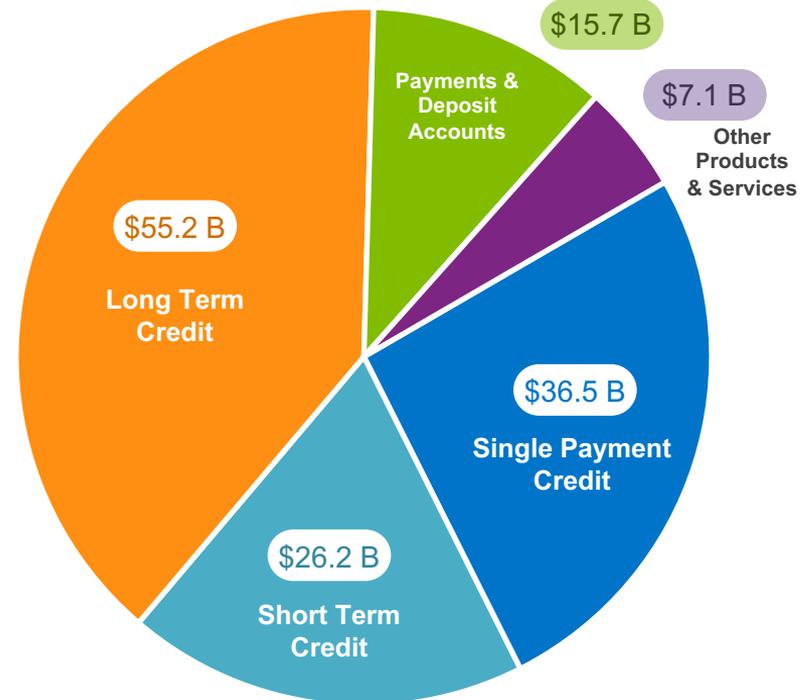
### Payments & Deposit Accounts

Products that enable consumers to transact, convert, send, receive, deposit, and hold funds.

### Other Products & Services

Other personal financial management products and services.

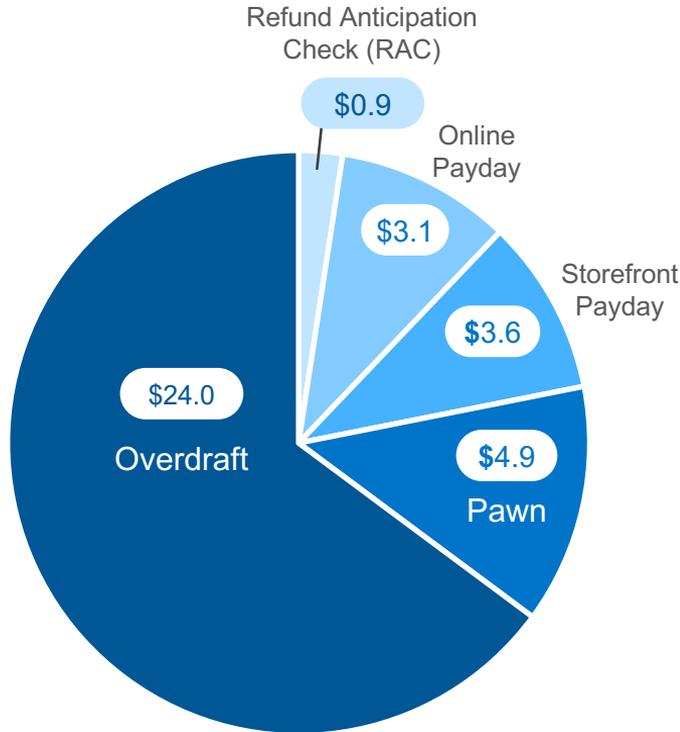
2015 Fee & Interest Revenue: \$140.7 Billion



# Single Payment Credit Slides to \$36.5 Billion

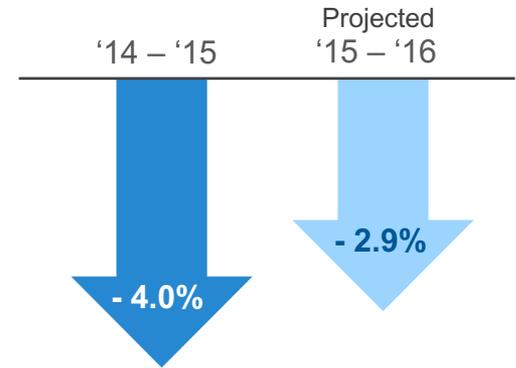


In 2015, underserved consumers spent **\$36.5 billion** on fees and interest for single payment loan products due in one lump sum, typically with terms of one month or less.



For complete definitions of products, see Appendix.

## Single Payment Credit Year-over-Year Growth

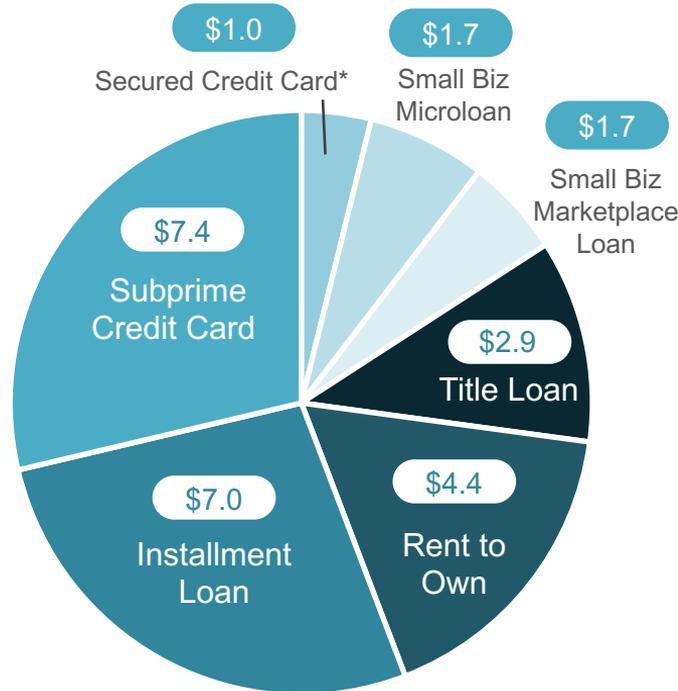


This represents a **4% decline** from the previous year. The downward trajectory is projected to continue with an **additional decrease of 2.9%** in 2016.

# Short Term Credit Grows to \$26.2 Billion



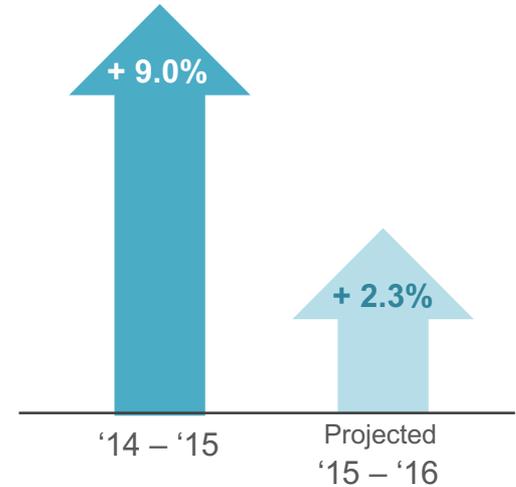
In 2015, underserved consumers spent **\$26.2 billion** on fees and interest for short term loan products that function on an installment basis with terms from several months to 2 years or as a line of revolving credit.



\* Note: More recent information about Secured Credit Card volume and revenue, published by the Federal Reserve in November 2016, is not reflected in this data.

For complete definitions of products, see Appendix.

## Short Term Credit Year-over-Year Growth

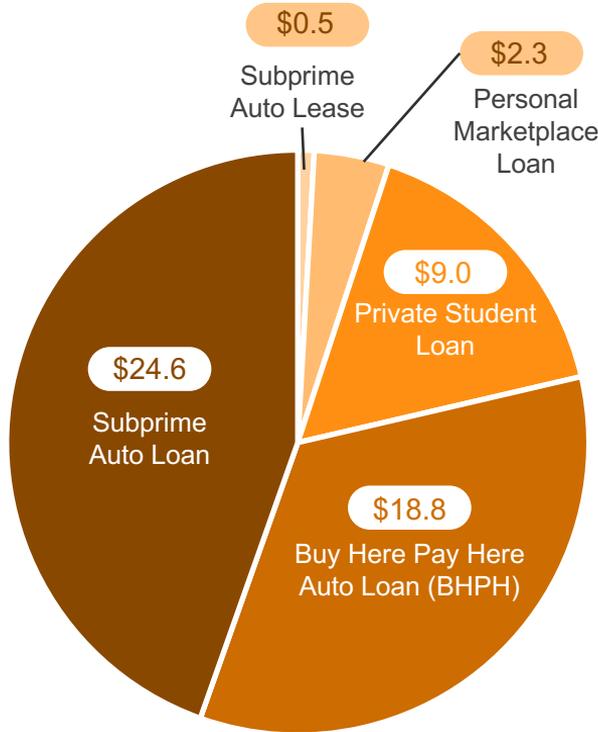


This represents a **9% annual growth rate** since the previous year. Growth is projected to continue with an additional, more moderate, **increase of 2.3%** in 2016.

# Long Term Credit Surges to \$55.2 Billion

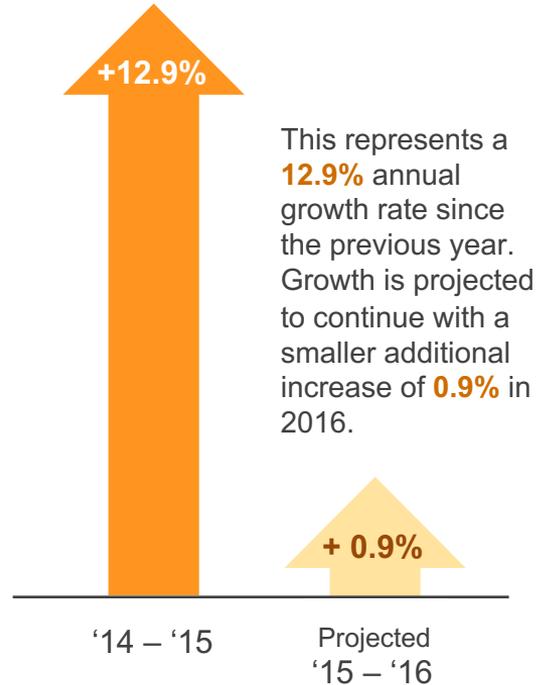


In 2015, underserved consumers spent **\$55.2 billion** on fees and interest for long term loan products that function on an installment basis with typical terms of 2 years or more.



For complete definitions of products, see Appendix.

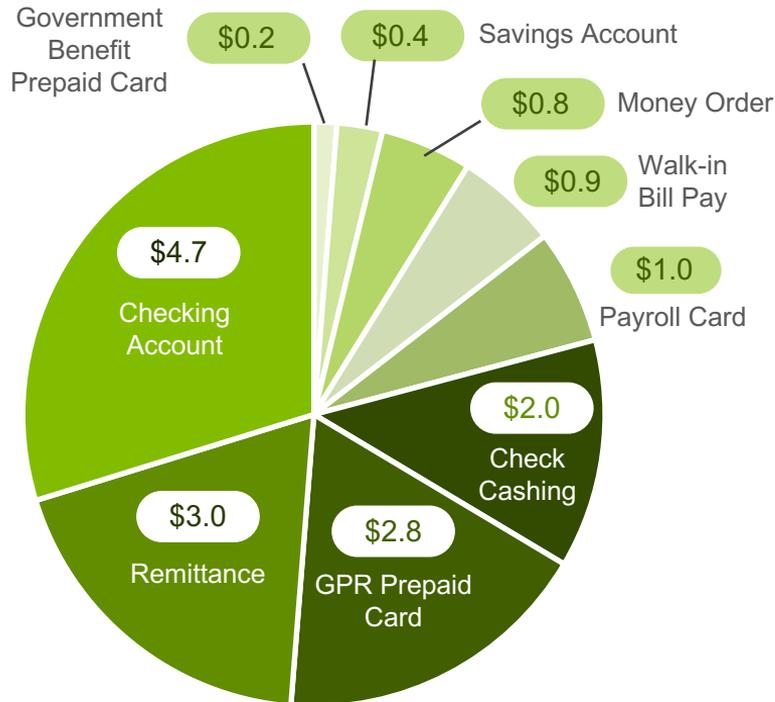
## Long Term Credit Year-over-Year Growth



# Payments & Deposit Accounts Grow to \$15.7 Billion

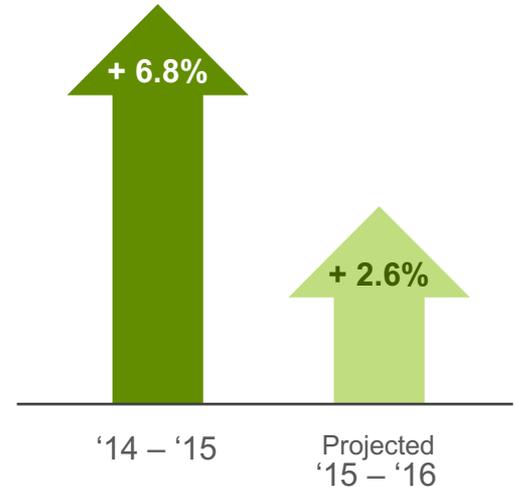


In 2015, underserved consumers spent **\$15.7 billion** on fees to transact, convert, send, receive, deposit, and hold funds.



For complete definitions of products, see Appendix.

## Payments & Deposit Accounts Year-over-Year Growth



This represents a **6.8%** annual growth rate since the previous year. Growth is projected to continue with a smaller additional increase of **2.6%** in 2016.

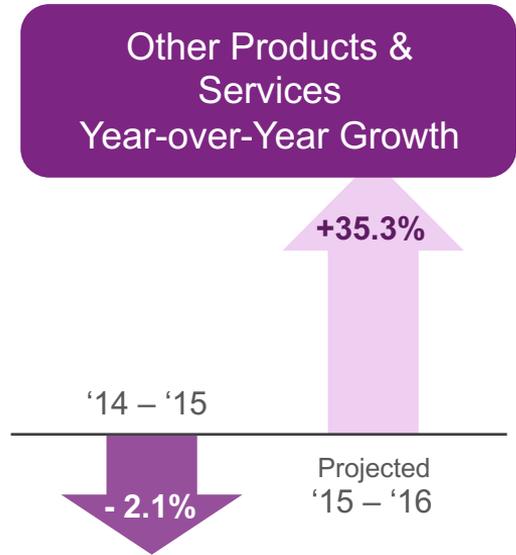
# Other Products & Services Retract to \$7.1 Billion



In 2015, underserved consumers spent **\$7.1 billion** on fees and penalties for financial services to prepare taxes and borrow or withdraw funds early from retirement accounts.



For complete definitions of products, see Appendix.



This represents a **decrease of 2.1%** compared to the previous year. The downward trajectory is projected to reverse, with **35.3% growth** estimated in 2016 due in large part to significant increases in tax preparation fees.

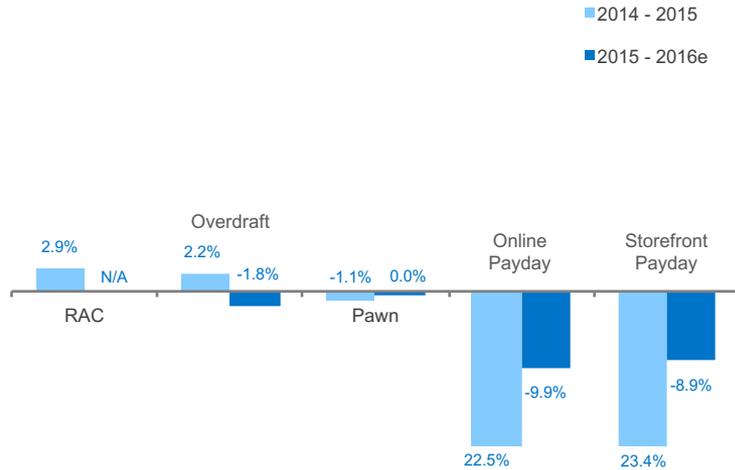
# Product Segment Growth and Growth Projections

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# Product Growth and Growth Projections

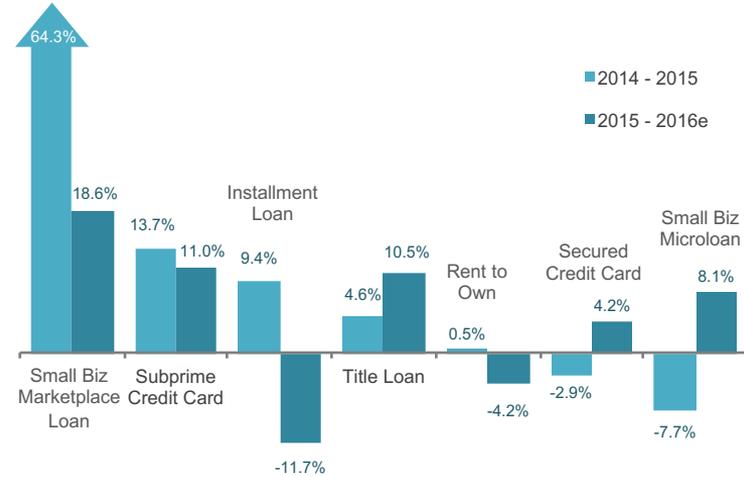
## Single Payment Credit

Online and Storefront Payday Loans both declined in 2015 and are projected to decline again in 2016, while other forms remain stagnant.



## Short Term Credit

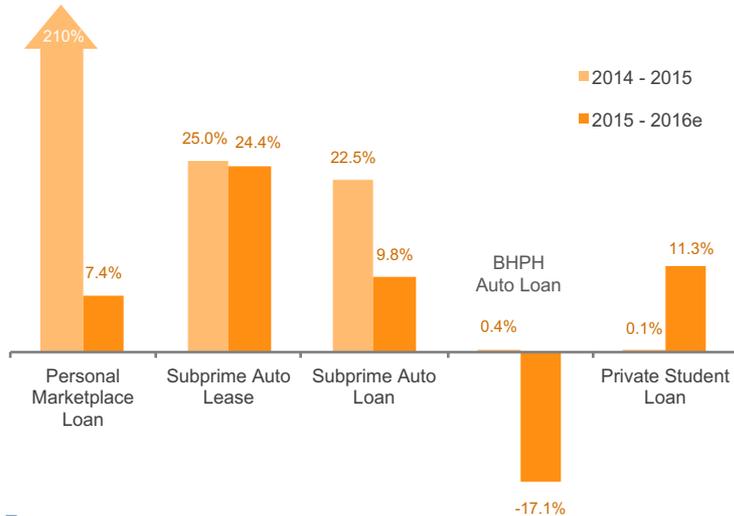
Small Business Marketplace Loans are growing quickly, although their total size is still relatively small, while Subprime Credit Cards, a larger segment, continues to grow steadily. Installment Loans are projected to temporarily decline in 2016 after continual growth through 2015.



# Product Growth Projections

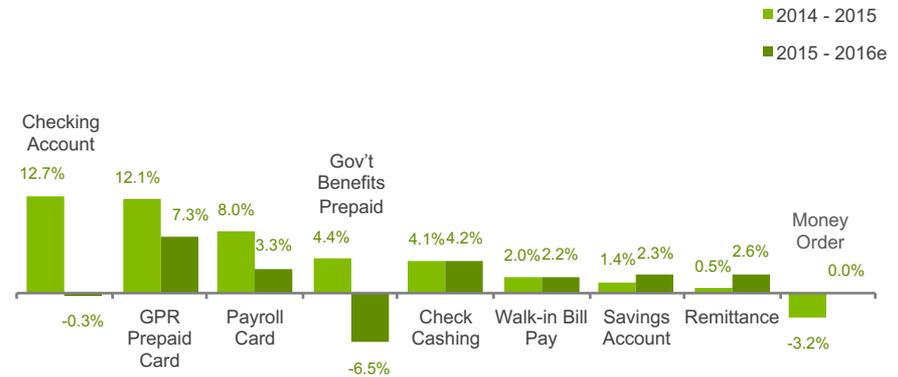
## Long Term Credit

Subprime Auto Loans continue to drive the largest growth in long-term credit, while BHPH Auto Loans are projected to declining substantially in 2016 after remaining flat in 2015. Personal Marketplace Loans grew substantially in 2015 but are projected to show more moderate growth in 2016 and remain a smaller part of the market.



## Payments & Deposit Accounts

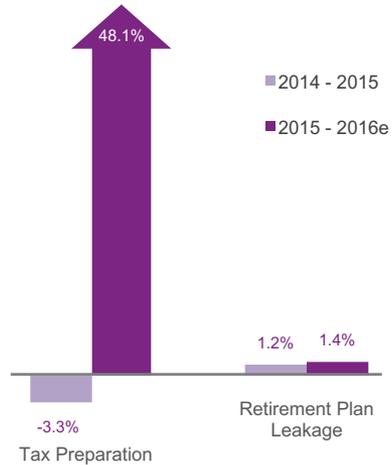
Checking Accounts increased substantially in 2015 due to increases in monthly fees, but are projected to level off in 2016. GPR and Payroll Cards continue to drive growth in this category.



# Product Growth Projections

## Other Products & Services

Large increases in fees charged for storefront Tax Preparation to underserved consumers are projected to drive significant growth in spending in 2016.





# Electronic Payments and the Cash Economy: Friends or Foes?

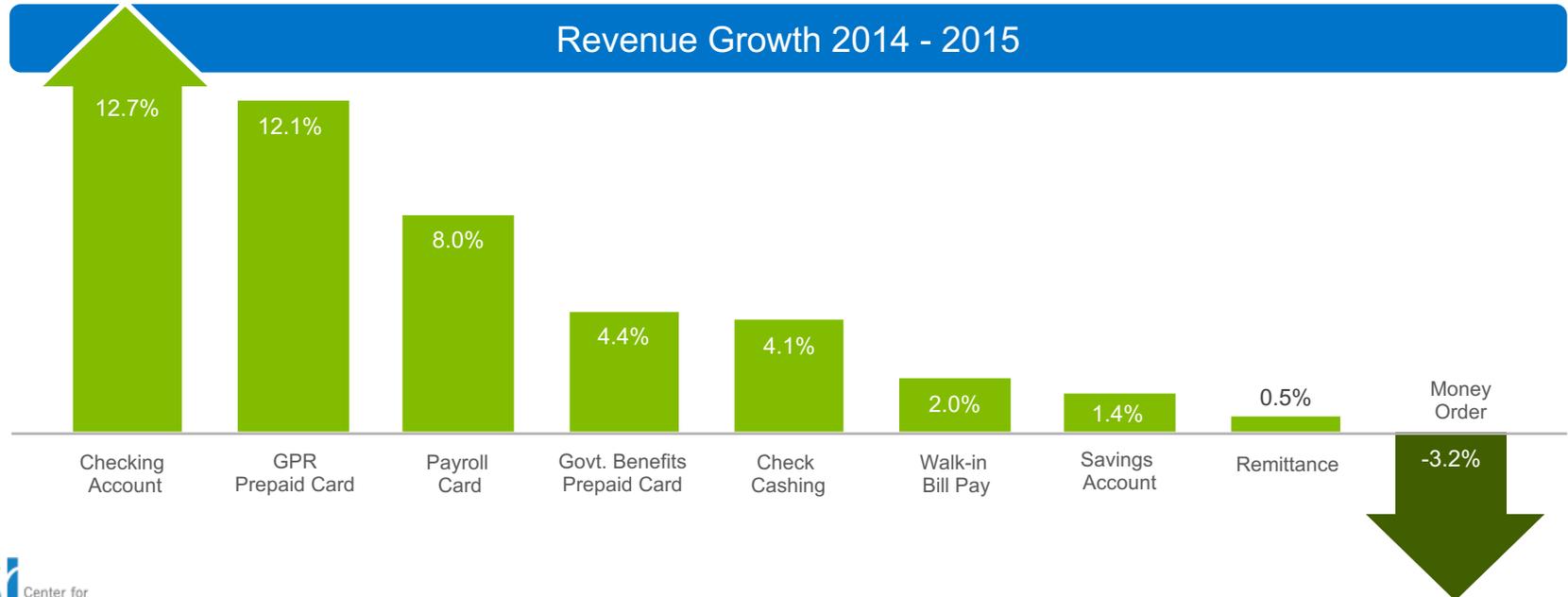
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# Payments & Deposit Accounts Revenue Growth by Product Type

Revenue continued to grow across nearly every payment and deposit account product from 2014 to 2015. The highest growth was seen for multi-use, account-based products including Checking Accounts, GPR Prepaid, and Payroll Cards. Yet most single-function, point-of-sale-based payments products grew as well, albeit at a slower pace, with the exception of Money Orders.

In effect, many underserved consumers still rely on these older payments product models, even as they simultaneously adopt modern transaction products and utilize traditional bank accounts.





# For Underserved Consumers Households Cash is Still Key

One reason that single-function payments products remain in regular usage among underserved consumers is their role in facilitating access to cash and cash conversion for sending funds or paying bills.

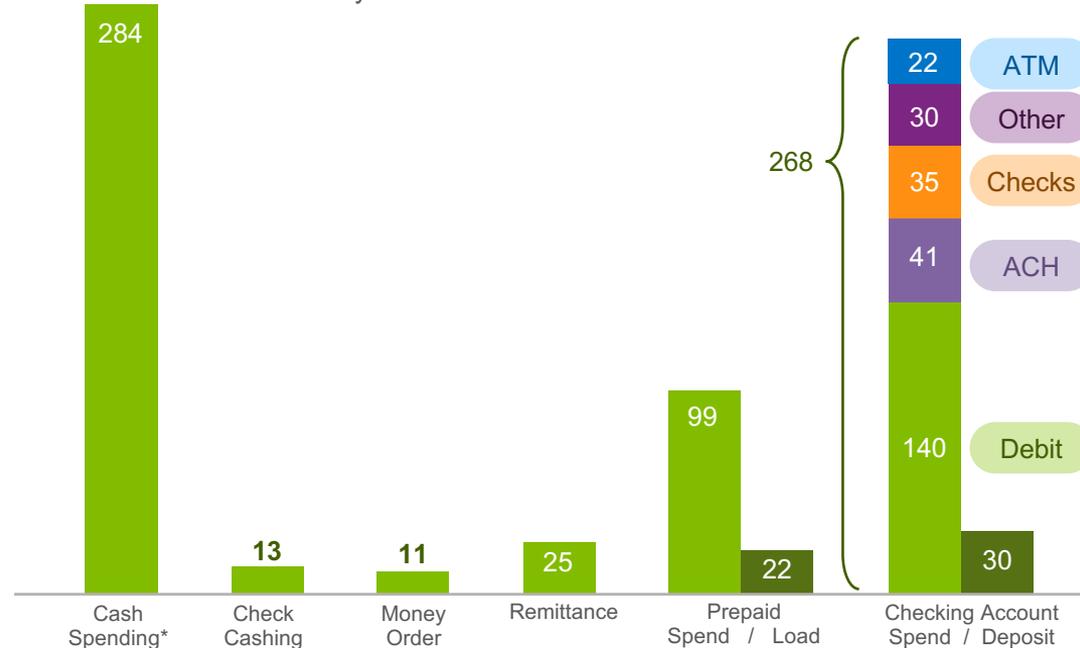
Two thirds of consumers reported using cash at least weekly in 2015,\* and underserved consumers are heavier cash users than other consumers who prefer to use cash. This means products such as Check Cashing, Money Orders, and Remittance remain key tools for cash-based consumers to move money into and out of the payments system for high-value or bill-pay transactions.

Yet due to the time and expense required to use these products, which require a point-of-sale visit each time, they are not typically used where cash will suffice, as evidenced by their relatively small number of annual transactions.

The higher frequency of annual transactions by Prepaid and Checking Account users signals the opportunity to incorporate more customers into account-based card or mobile payments solutions that smooth the way to increased usage frequency.

## Average Number of Transactions for Select Payments and Deposit Account Products

by Underserved Households in 2015



\* Sources: 2015 North America Consumer Digital Payments Survey, Accenture (2015); "Cash Continues to Play a Key Role in Consumer Spending: Evidence from the Diary of Consumer Payment Choice," Federal Reserve Bank of San Francisco (2014).



# Fintech Solutions to Payments Challenges

Fintech innovations that facilitate the conversion of cash into electronic or ACH-compatible forms of payment with greater speed and less friction continue to grow in conjunction with increasing access to mobile technology for underserved consumers. The proliferation of these payments solutions are congruent with observed reductions in spending on Money Orders (-3.2%) and slow growth in spending on Remittances (0.5%) and Walk-in Bill Pay (2%) in 2015.



15% in 2011

30% in 2015

Use of **mobile payments** by underbanked consumers doubled



69 million

In 2015 there were approximately 69 million **peer-to-peer payments**, and the number is expected to grow to 82 million in 2016.



23.2 million

There were 23.2 million **mobile wallet users** in 2015, and the number is expected to grow to 1 in 5 smartphone users in 2016

The variety of solutions for the reverse process of extracting cash from the banking system with greater speed for full accessibility of funds is currently less robust. There is great opportunity for innovation to meet this need, still currently satisfied primarily by check cashing services (for which spending increased 4.1% in 2015) and fee-per-service ATM models, or left unmet due to delays in full funds availability following deposits into checking accounts.

Sources: "Mobile Payments Will Triple in the US in 2016," eMarketer; "Consumers and Mobile Financial Services," Federal Reserve System (2012 - 2016)



## **Consumers Seeking Small-Dollar Credit: What's on the Menu?**

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# Consumer Spending on Single Payment and Short-Term Credit Is Converging

Revenue from single payment forms of credit, including Payday Loans, Pawn, Overdraft, and Refund Anticipation Checks, has stagnated and begun to decline in the past few years, due in large part reductions in usage rather than lower rates.

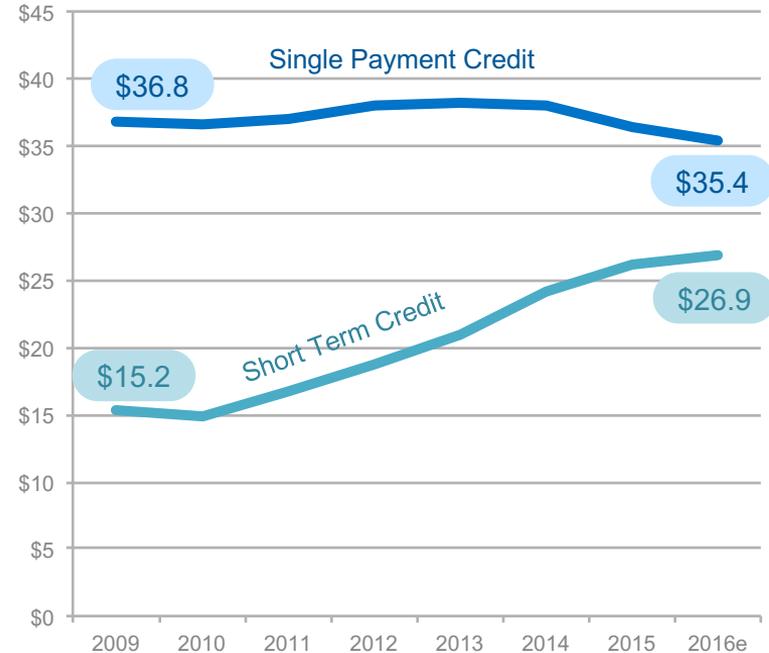
At the same time, short term credit offered as Installment Loans, Title Loans, Rent to Own agreements, or Small Business loans have grown more popular, as have the use of Subprime and Secured Credit Cards.

In many cases, this shift simply constitutes the promotion of different small-dollar credit structures by companies offering a range of secured and unsecured credit. One force driving this shift is anticipated changes in federal regulation from the Consumer Financial Protection Bureau, which released a proposed rule in 2016 impacting loan practices for “Payday, Vehicle Title, and Certain High-Cost Installment Loans.”

The shift is also supported by the increasing availability of Subprime Credit Card capital to those with lower credit scores.

## Single Payment and Short Term Credit Revenue

in \$Billions



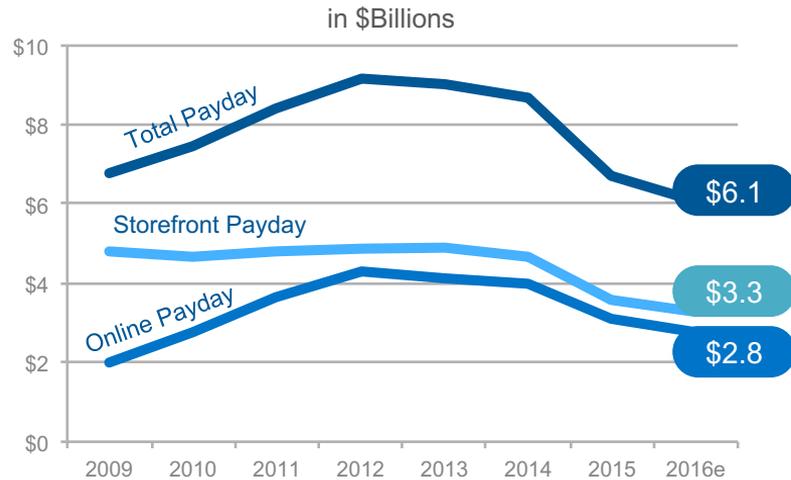


# Payday Lending Declines; Short Term Credit Fills the Need

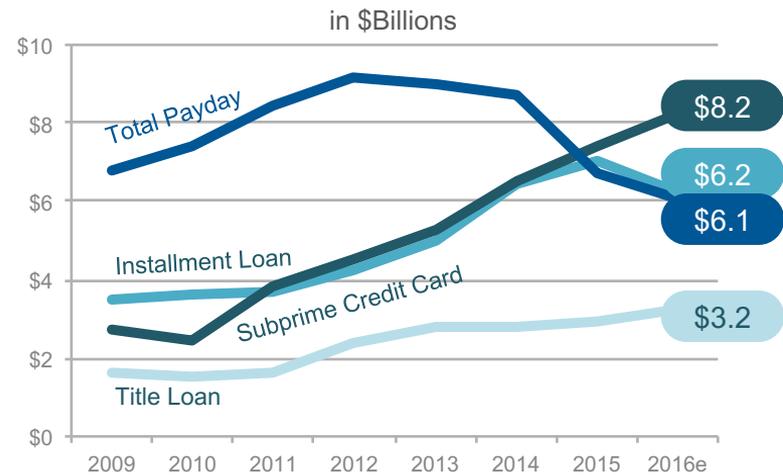
While Storefront Payday Loans had shown signs of stagnant or lower revenue for several years, the decline of Online Payday loan revenue in parallel with the less technology-reliant business model has developed since 2014.

In its place, spending on Installment Loans and Subprime Credit Cards has increased, surpassing all Payday Loan spending in 2015 and projected to continue this pattern in 2016, while Title Loan spending has also grown during this time period.

### Payday Loan Revenue



### Payday, Auto Title, Installment, and Subprime Credit Card Revenue



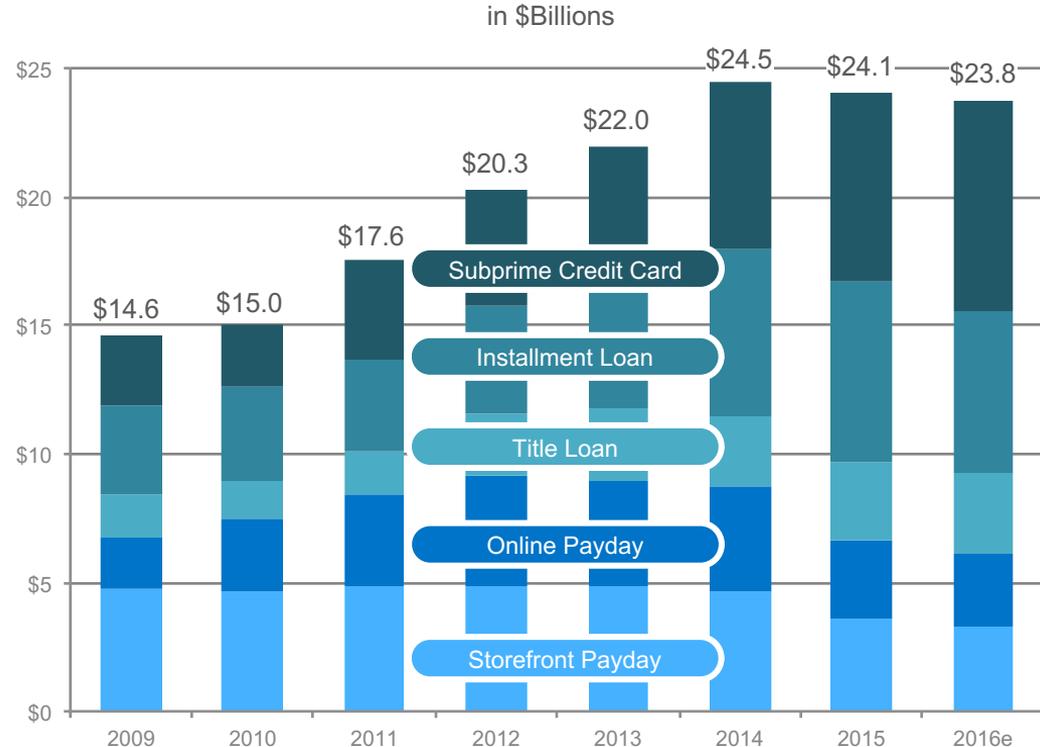


# Aggregate Spending on Sub-Prime Credit Remains Relatively Even Year-on-Year

While shifts in the types of loans drawing fee and interest revenue from underserved consumers continues, the overall amount spent by consumers on these products continued to grow following the financial crisis, then leveled off beginning in 2014 and projected through 2016.

This suggests that consumer demand for small-dollar credit, while moving more heavily to short term usage models, has not diminished overall.

## Payday, Auto Title, Installment, and Subprime Credit Card Revenue





# Tapping Alternative Credit Sources: Is it Personal or Just Business?

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# New in 2016: Ceiling for Microloan Approvals Means an Opportunity for Other Credit Models

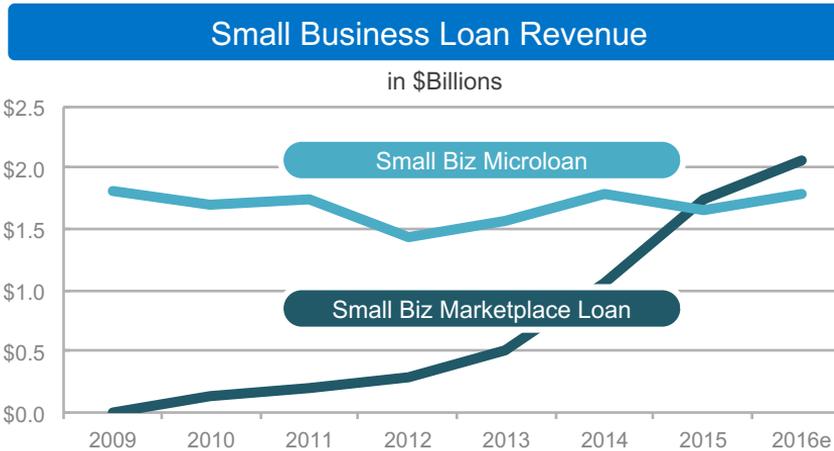
Underserved small businesses spent \$1.7 billion in 2015 on microloans, defined as bank or credit union loans of \$100,000 or less, with an average size of approximately \$15,000. The opportunity to address the need for small business credit is far greater.

Many small businesses experience difficulty getting approved for a loan, or are given less credit than they applied for. Alternatives to bank loans demonstrate the scale of demand. Marketplace Loans for small businesses have quickly grown – from \$0.1 billion in 2010 to \$1.7 billion in 2015 – and are projected to grow 19% to \$2.1 billion in 2016, overtaking the amount spent by small businesses on bank microloans. Some are structured in installments much like traditional bank loans, while others more closely resemble Merchant Cash Advance structures, which are repaid according to sales volume. The Merchant Cash Advance industry itself took in approximately three to five billion in revenue in 2015.

# 42%

of bank loan applicants denied credit or given less credit than sought.

2014 Independent Business Survey, Institute of Local Self-Reliance



# \$3 to \$5 billion

Estimate of small business capital extended by Merchant Cash Advance companies in 2015



# Consumer Credit Used to Fill the Small Business Credit Gap

When small business loans are not available, consumers often turn to personal forms of credit to satisfy these needs, pointing to a wider opportunity to directly address small business credit demand. Alternative forms of credit that often fund small businesses include Personal Marketplace Loans, Installment Loans, and Subprime Credit Cards.

## 49%

of small business owners use personal credit cards for business purposes.

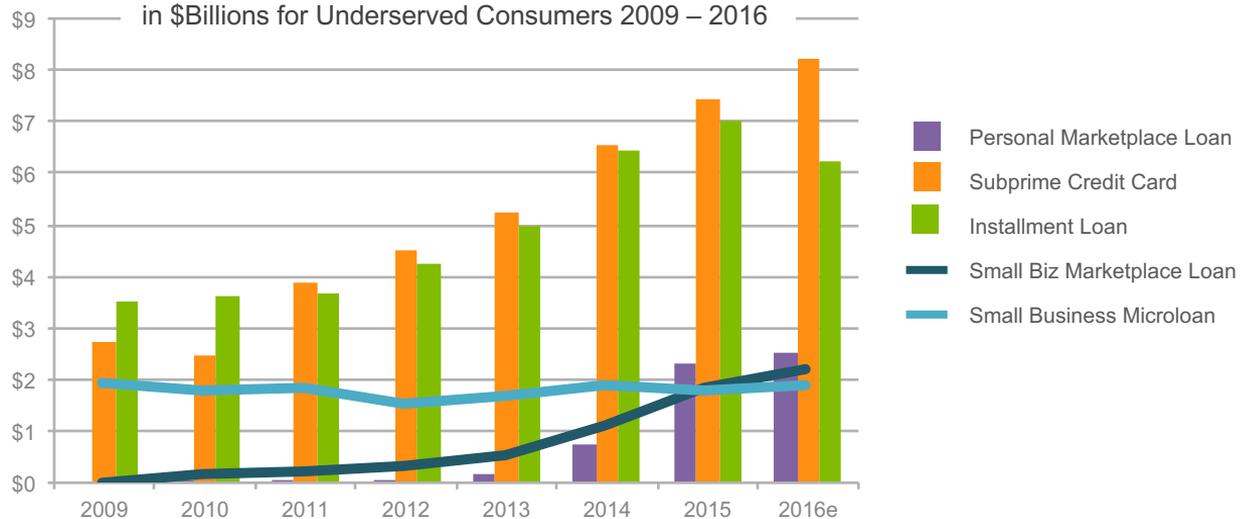
Small Business, Credit Access, and a Lingering Recession Small Business, Credit Access, and a Lingering Recession, NFIB, 2012

## 63%

of microbusinesses received less financing than amount sought.

2015 Small Business Credit Survey, Federal Reserve Banks, 2016

### Small Business Loan Product Revenue Compared with Select Personal Loan Product Revenue





# **Auto Loans in High Gear: New Routes to Growth?**

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# Buy Here Pay Here Auto Loan Usage Declines While Subprime Surges

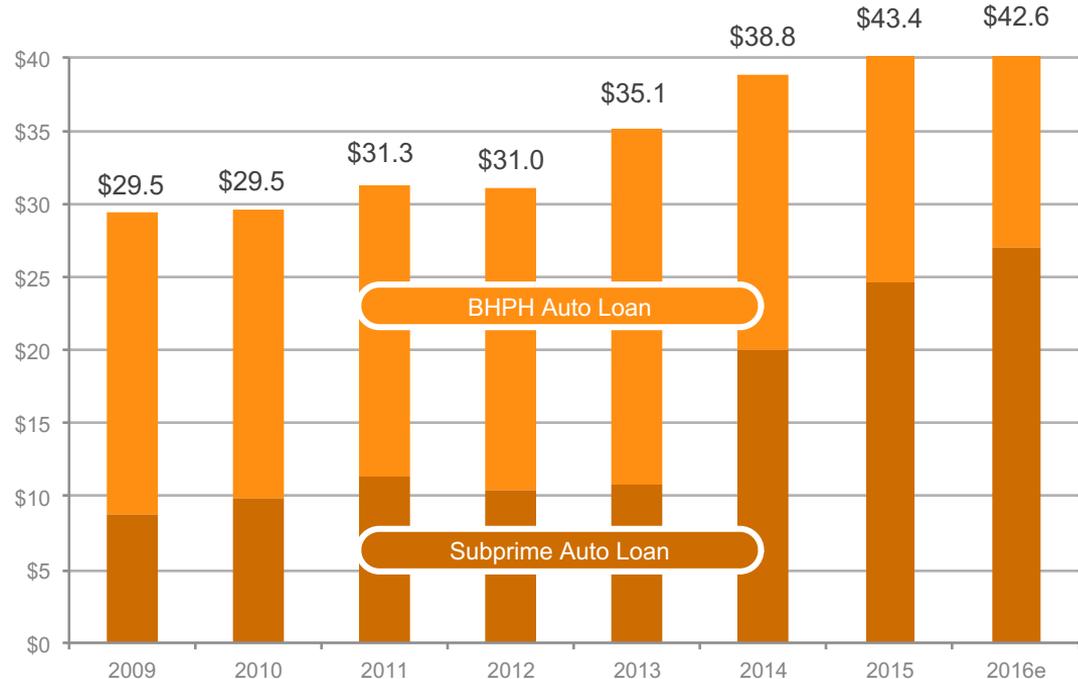
While underserved spending on auto loans has begun to level off following a burst of pent-up demand post recession, the Subprime Auto Loan portion of the market continues to increase, growing 22.5% in 2015 and projected to grow an additional 9.8% in 2016.

The growth of Subprime Auto Loans was offset by decreased spending on Buy Here Pay Here (BHPH) Auto Loans which typically carry higher interest rates.

Revenue from these loans remained flat, growing only 0.4% in 2015 and projected to decline 17.1% in 2016.

## Underserved Auto Loan and Lease Revenue

in \$Billions





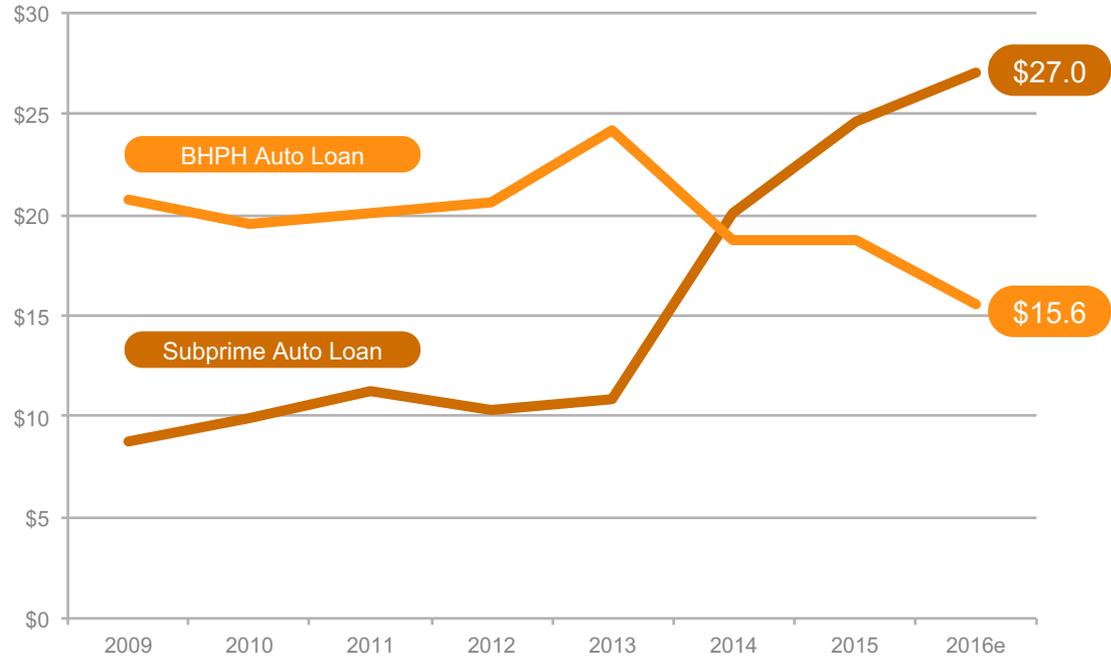
# Subprime Auto Loan Growth Outstrips Buy Here Pay Here

As recently as 2009, Buy Here Pay Here Auto Loans took in twice as much revenue as Subprime Auto Loans, but that ratio is now almost completely reversed.

After growing in parallel for much of the period from 2009 to 2013, a significant change in the dynamic, which shows Subprime Auto Loan revenue increasing rapidly (by 226% in just two years from 2013 to 2015) and BHPH Auto Loan revenue falling fast (126% in the same period), began in 2013 and is projected to continue into 2016.

## Underserved Auto Loan and Lease Revenue

in \$Billions





# Prime Rate Customers are Overlooked by Buy Here Pay Here Lenders

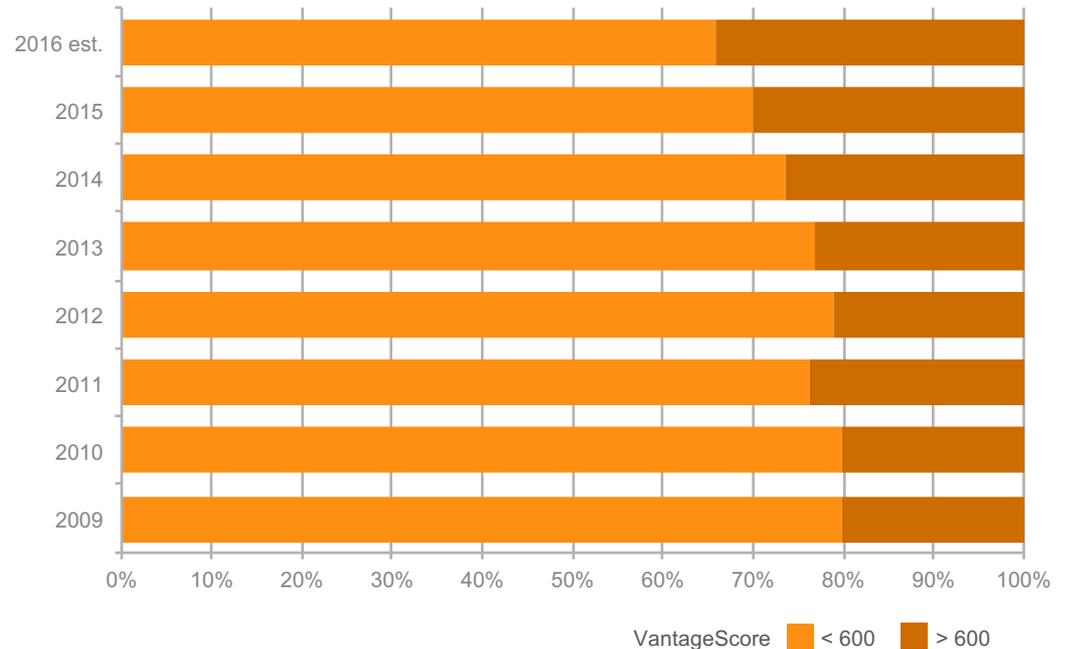
Yet while Buy Here Pay Here declines in usage, and more people are approved for Subprime Auto Loans instead, the proportion of borrowers with higher credit scores still using BHPH Auto Loans has actually increased over the years, from 20% in 2009 to 30% in 2015.

Among BHPH borrowers with a VantageScore above 600 in 2015, half had scores above 660 and one in ten had scores above 780.

This indicates that lower credit scores or lack of a credit file are not the only factors influencing choice of auto loan product. Other types of barriers, such as information disparities or geographic access constraints, may also impact choice, indicating opportunity for other auto loan providers to better understand the needs of these borrowers.

## Buy Here Pay Here (BHPH) Auto Loan Revenue

by Credit Risk





## **New in 2016: Pricing Auto Insurance for the Underserved: Premiums or Penalties?**

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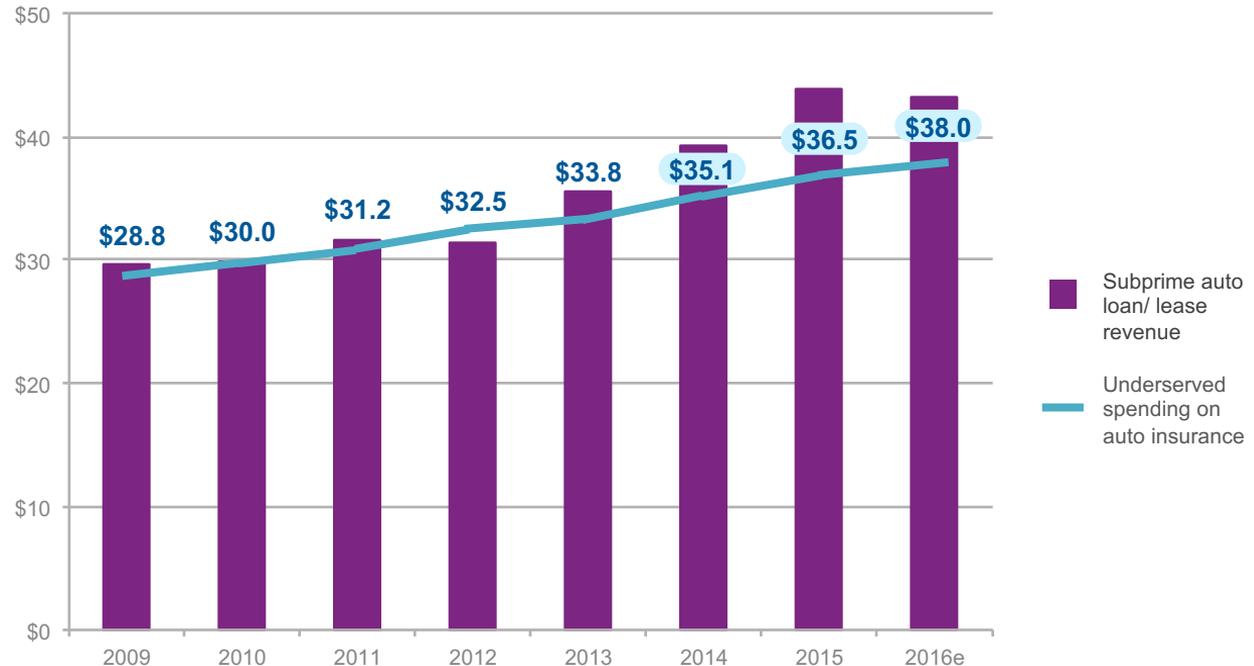
# New in 2016: Auto Insurance Spending by US Underserved Consumers Sees Solid Growth

There is substantial opportunity to address the needs of underserved consumers who pay higher rates for auto insurance premiums.

These consumers spend nearly as much on overall auto insurance annually as is spent in fees and interest on subprime auto loans, subprime auto leases, and Buy Here Pay Here auto loans combined.

## Underserved Auto Loan and Lease Revenue

in \$Billions





## New in 2016: Low-to-Moderate Income Americans Spend 25% More on Auto Liability Insurance

Beyond the \$141 billion market, a first look at insurance sizes financially underserved consumer spending on auto liability insurance.

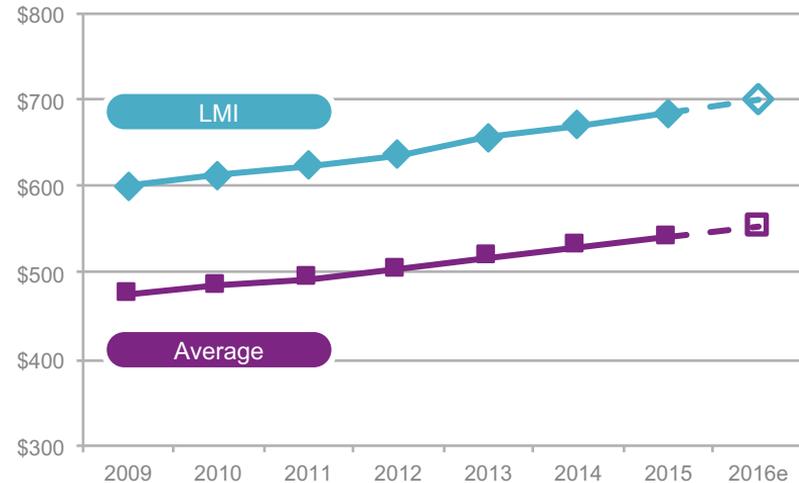
Underserved consumers spent \$36.5 billion on premiums in 2015, paying an average of 26.5% more than fully served consumers to insure vehicles of comparable value.

Consumers with lower economic status spent more on minimum auto liability insurance - required in all states except New Hampshire - than those without indications of low economic status.

Nationwide, this amounts to a penalty of 26.5% on underserved drivers based solely on their answers to five economic status-related questions, rather than driving history:

- Are you married?
- What is your occupation?
- What is your highest level of education?
- Do you currently have auto insurance?
- Do you own or rent your home?

### Average annual cost of auto liability insurance for low-to-moderate-income (LMI) consumers vs. average US consumers



Source: Consumer Federation of America study, NAIC auto liability insurance pricing, and NerdWallet Insurance market share. Note: Insurance premium costs differ state by state based on regulations and underwriting standards



# Case Study: California Regulation Prevents Pricing Tied to Income; Profits Remain Strong

## In 1988, Proposition 103 resulted in a highly-regulated auto insurance market in California.

Only California has a comprehensive system to ensure that rates are set fairly. Three auto rating factors are mandatory and must have the greatest impact on automobile insurance rates:

- (1) Driving record,
- (2) miles driven, and
- (3) years of driving experience.

Insurers can also propose other factors for approval. Credit scoring has not been approved for use as a factor for approval in California.

## Long-Range Results of California Proposition 103 since passage.

- Drivers saved more than \$100 billion from 1989 to 2011
- California insurer profits remained above the national average from 1989 to 2011 (11.9% compared to 8.5%)
- California rate of returns remained above the national average from 1989 to 2011 (8.8% compared to 6.8%)

California's experience demonstrates the opportunity for innovation around auto liability insurance underwriting and pricing practices to create risk assessments that can support the needs of underserved auto insurance buyers and contribute to consumer financial health.

What Works: A Review of Auto Insurance Rate Regulation in America and How Best Practices Save Billions of Dollars (2013)

# Appendix Charts and Data

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# Appendix: Product Data

## Market Size Analysis Methodology and Data

Market sizing analysis is an exercise of best estimation for a quantity that is frequently unknowable or has a range of recognized figures. This analysis relies on sources that are credible, consistent with other estimates, and continuous, providing historic figures for reference. In many cases, figures are extrapolated from a selection of data sources to arrive at a final estimate for a given product segment. Sources and key figures are summarized in the Appendix below, and we transparently disclose our level of confidence—high, medium, or low—in the accuracy of each product segment, based on the Confidence Level Criteria at right. We encourage readers with access to further information to share sources or figures that can continuously improve our analysis.

TOTAL MARKET REVENUE			TOTAL MARKET VOLUME		
Revenue Growth 2014-2015	2015 Revenue (\$B)	2016e Revenue (\$B)	Volume Growth 2014-2015	2015 Volume (\$B)	2016e Volume (\$B)
5.9%	140.7	143.7	4.3%	1,614.0	1,664.1

All revenue generated by consumer spending is sized in this report for products that constitute alternative financial services typically used by underserved consumers. For the nine product segments in this report that are used more widely across the consumer market, only the portion of revenue generated by underserved consumers or by subprime rate product offerings are sized. Savings and Checking accounts, Overdraft, Small Business Microloans, and Tax Preparation services, as well as prime rate Auto Lease, Auto Loan, Credit Card, and Auto Insurance products all generate revenue in this wider market, so spending on these products by consumers who have prime rates or are fully served is not included in this report.

Consumer usage volume refers to dollars borrowed, transacted, saved, or managed through the use of a financial service, exclusive of fees and interest paid to access these products and services. Measurements of volume vary depending on product category. Single Payment Credit products, Title Loans, and Rent to Own are sized according to annual dollars borrowed to reflect the usage of products often extended multiple times during one year; the other Short Term Credit products and all Long Term Credit products are sized by average outstanding volume to reflect loans paid in installments or on a revolving basis and balances carried over a longer period; Payments products are sized by annual load or transaction volume; Deposit Account products are sized by average annual balances held in accounts; and the volumes of other financial services, which often generate revenue and fees independent of volume, are sized according to the volume of funds addressed by the service. Auto Insurance is sized only in terms of revenue since the dollar value of insurance in terms of volume accessed is not well defined due to variability in claims and adjustments.

## Confidence Level

### HIGH

- » Based on surveys or company-specific information
- » Cited by industry leaders
- » Source methodology disclosed

### MEDIUM

- » Estimate derived from credible market data
- » Source discloses methodology, but with significant assumptions

### LOW

- » CFSI/Core estimate requiring significant

# Appendix: Single Payment Credit

PRODUCT SEGMENT	PRODUCT DEFINITION	REVENUE			VOLUME			CONFIDENCE LEVEL	SOURCES
		REVENUE GROWTH 2014-2015	REVENUE (\$B) 2015	REVENUE (\$B) 2016e	VOLUME GROWTH 2014-2015	VOLUME (\$B) 2015	VOLUME (\$B) 2016e		
Overdraft*	Extension for a checking account holder that enables spending beyond the available balance for a fee to be repaid from the same account.	2.2%	24.0	23.5	1.2%	29.5	29.6	High	CFSI/Core estimate based on portion of overdraft revenues (Moebs 2011 - 2016), and usage "Data Point: Checking account overdraft," CFPB (2014).
Pawn**	A short-term loan with amount set and secured based on the value of items provided by the borrower as collateral.	-1.1%	4.9	4.9	-4.3%	15.4	14.8	High	CFSI/Core estimate based on publicly traded industry leaders' annual and quarterly report data (2009-2016), market share data, and figures reported by the National Pawn Brokers Association.
Payday, Online**	Single-payment loan offered by nonbank lenders through online channels.	-22.5%	3.1	2.8	-8.1%	15.9	15.2	High	CFSI/Core estimate based on publicly traded industry leaders' annual and quarterly report data (2009-2016), data from "Alternative Financial Services: Innovating to Meet Customer Needs in an Evolving Regulatory Framework" by John Hecht, Stephens, Inc. 2014, and statements by John Hecht for Jefferies, Inc., 2015 - 2016. Rollovers counted as discrete volume.
Payday, Storefront**	Single-payment loan offered by nonbank lenders through brick and mortar storefronts.	-23.4%	3.6	3.3	-15.7%	23.6	21.8	High	CFSI/Core estimate based on publicly traded industry leaders' annual and quarterly report data (2009-2016), data from "Alternative Financial Services: Innovating to Meet Customer Needs in an Evolving Regulatory Framework," by John Hecht, Stephens, Inc. 2014, and statements by John Hecht for Jefferies, Inc., 2015 - 2016. Rollovers counted as discrete volume.
RAC (Refund Anticipation Check)	Fee-based service that allows tax preparation fees to be paid from expected tax refund rather than at the time of preparation.	2.9%	0.9	0.9	2.9%	3.7	3.7	Medium	National Consumer Law Center estimate based on tax return data (2014); industry typical fees (2015).
<b>ALL SINGLE PAYMENT CREDIT PRODUCTS</b>		<b>-4.0%</b>	<b>36.5</b>	<b>35.4</b>	<b>-6.4%</b>	<b>88.1</b>	<b>85.0</b>		

\* This report only sizes overdraft activity and spending by account holders who exhibit high frequency of usage—more than 10 times in one year—indicating that their need for short-term credit is chronically underserved.

\*\* The volume of rollovers cited for payday and pawn loans are reported on each discrete loan. Notice of rollover to revenue dollars does not offset payments costs paid by borrowers who enter a cycle of debt, commonly referred to as rolling over, stemming from one initial single payment loan.

# Appendix: Short Term Credit

PRODUCT SEGMENT	PRODUCT DEFINITION	REVENUE			VOLUME			CONFIDENCE LEVEL	SOURCES
		REVENUE GROWTH 2014-2015	REVENUE (\$B) 2015	REVENUE (\$B) 2016e	VOLUME GROWTH 2014-2015	VOLUME (\$B) 2015	VOLUME (\$B) 2016e		
Credit Card, Secured	Credit card that is backed by money deposited into the account and used as collateral for the credit available.	-2.9%	1.0	1.1	0.0%	5.2	5.2	Low	CFSI/Core estimate based on Philadelphia Federal Reserve Board report, "Millennials with Money: A New Look at Who Uses GPR Prepaid Cards" (2014), combined with census data and product structure and fees from 10 providers of secured cards (2009 - 2016).
Credit Card, Subprime	Revolving line of credit provided to consumers with Vantage Scores below 660.	13.7%	7.4	8.2	12.4%	23.8	26.4	Medium	CFSI/Core estimate based on data from Equifax (2014), American Bankers Association, CardHub reports, and typical product structure and fees of major subprime credit cards (2009 - 2015).
Installment Loan	A short-term loan repaid over time through a set number of scheduled payments.	9.4%	7.0	6.2	23.6%	18.3	8.3	Medium	CFSI/Core estimate based on publicly traded industry leaders' annual and quarterly report data (2009 - 2016) and data from "Alternative Financial Services: Innovating to Meet Customer Needs in an Evolving Regulatory Framework," John Hecht, Stephens, Inc. 2014.
Marketplace Loan, Small Business	Loans offered by online, nonbank institutions that match sources of capital with applicants for installment loans to fund small business needs, typically using a combination of traditional and alternative data, sometimes including sales volume, to determine risk, interest rates and loan amounts.	64.3%	1.7	2.1	0.0%	4.8	6.7	Medium	CFSI/Core estimate based on "Survey of Online Consumer and Small Business Financing Companies – 01/01/2010 through 06/30/2015," California Department of Business Oversight (2016); Michael J. Bologna, "States Mull Regulation of Online Commercial Lenders," Bloomberg News, June 13, 2016; and Bryant Park Capital/deBanked Small Business Financing CEO Survey data (2016) on Merchant Cash Advances.
Rent to Own	Service that allows for the purchase of furniture, appliances, and other big-ticket household items through payments due in regular installments over a period of time.	0.5%	4.4	4.2	37.9%	4.1	4.4	High	CFSI/Core estimate based on market share and gross margin data provided in quarterly and annual public reports from industry leaders Rent-A-Center and Aaron's, (2009 - 2016); market share information sourced from RTOHQ.com.
Small Business Microloan*	Loan made by an FDIC insured financial institution such as a commercial bank, community bank, or credit union, for an amount under \$100,000 to be repaid on an installment basis, typically at interest rates below 10% APR and repaid within one to two years.	-7.7%	1.7	1.8	5.2%	29.5	31.2	Medium	CFSI/Core estimate based on Federal Financial Institutions Examination Council (FFIEC) data on CRA loan activity to microbusinesses and census tracts by median income quintiles (2009-2015); "Community Banks, Small Business Credit, and Online Lending," Remarks by Governor Lael Brainard, The Third Annual Community Banking Research and Policy Conference, Sept 2015; Small Business Administration quarterly loan interest rate data (2009 - 2016); "Small Business Lending in the United States," U.S. SBA Office of Advocacy (2013).
Title Loan**	An loan secured with a vehicle in which the auto title is provided to the lender as collateral. While the majority of loan industry volume is based on auto title loans structured as installment loans, some are also structured as single payment loans.	4.6%	2.9	3.2	0.3%	4.7	5.1	Medium	CFSI/Core estimate based on state-specific title loan incidence, volume, and revenue data reported by regulatory agencies in CA, IL, NM, TN, TX, and VA (2009-2016 as available); footprint of auto title lending locations and proportion of states offering installment and single payment models for all states where the practice is legal sourced from "Driven to Disaster: Car-Title Lending and Its Impact on Consumers," Center for Responsible Lending (2013); additional data on proportional use of installment and single payment auto title from "Payday and Auto Title Lending in Texas, Market Overview and Trends 2012 - 2015," Texas Appleseed (2016). Rollovers counted as discrete volume.
<b>ALL SHORT TERM CREDIT PRODUCTS</b>		<b>9.0%</b>	<b>26.2</b>	<b>26.9</b>	<b>13.3%</b>	<b>90.4</b>	<b>87.3</b>		



\* This report sizes only microloans made to businesses based in communities with low and moderate incomes, identified as census tracts where median family income is below 80% of the median family income for the

# Appendix: Long Term Credit

PRODUCT SEGMENT	PRODUCT DEFINITION	REVENUE			VOLUME			CONFIDENCE LEVEL	SOURCES
		REVENUE GROWTH 2014-2015	REVENUE (\$B) 2015	REVENUE (\$B) 2016e	VOLUME GROWTH 2014-2015	VOLUME (\$B) 2015	VOLUME (\$B) 2016e		
Auto Lease, Subprime	Car lease provided to consumers with Vantage Scores less than 600.	25.0%	0.5	0.6	26.7%	1.3	2.2	Medium	CFSI/Core calculation based on risk segment and annual lease amount reported in "State of the Automotive Finance Market," Experian quarterly reports (2009-2016); Nada and Edmunds data on interest rates, new vehicle sales, percent leased (2009-2016).
Auto Loan, Subprime	Car loans provided to consumers with FICO credit scores less than 600, exclusive of Buy Here Pay Here auto loans.	22.5%	24.6	27.0	13.7%	193.6	222.6	High	CFSI/Core calculation based on risk segment, interest rate and loan volume data reported in "State of the Automotive Finance Market," Experian quarterly reports (2009-2016).
Buy Here Pay Here Auto Loan	Car loan with high interest rates and payments typically due at the place of sale, often utilized by consumers who lack viable credit scores.	0.4%	18.8	15.6	3.7%	65.5	60.2	High	CFSI/Core calculation based on risk segment, interest rate and loan volume data reported in "State of the Automotive Finance Market," Experian quarterly reports (2009-2016), and Leedom & Associates LLC (2013).
Marketplace Loan, Personal	Loans offered by online, nonbank institutions that match sources of capital with applicants for personal installment loans, typically using a combination of traditional and alternative data to determine risk and interest rates.	209.8%	2.3	2.5	223.4%	17.0	19.2	Medium	CFSI/Core estimate from Foundation Capital Report on Marketplace lending (2013) and Morgan Stanley data on Lending Club (2015), industry data aggregated by Lend Academy, and company-specific loan origination volume, outstanding volume, and interest rate information disclosed by Lending Club, Prosper, and SoFi (2009 - 2016).
Student Loan, Private	Private loans provided to individuals for the pursuit of higher education and related costs.	0.1%	9.0	10.1	-0.9%	91.0	102.0	High	CFSI/Core estimate based on CFPB white paper on Private Student Loans (2012), data from the New York Federal Reserve Board (2014), and Private Student Loan data from Measure One (2013 - 2016).

# Appendix: Payments & Deposit Accounts

PRODUCT SEGMENT	PRODUCT DEFINITION	REVENUE			VOLUME			CONFIDENCE LEVEL	SOURCES
		REVENUE GROWTH 2014-2015	REVENUE (\$B) 2015	REVENUE (\$B) 2016e	VOLUME GROWTH 2014-2015	VOLUME (\$B) 2015	VOLUME (\$B) 2016e		
Check Cashing	A service to quickly convert checks to cash or electronically available funds.	4.1%	2.0	2.1	4.1%	77.9	81.2	Low	CFSI/Core estimate based on average customer usage and fees charged by small providers and franchised or co-located providers sourced from company data and "2013 FDIC National Survey of Unbanked and Underbanked Households," FDIC (2014) and "2015 FDIC National Survey of Unbanked and Underbanked Households," FDIC (2016); and revenue estimates in "Check Cashing & Money Transfer Services: A Market Analysis," Marketdata Enterprises, Inc. (2013).
Deposit Account, Checking*	Basic Bank or Credit Union Checking Account, exclusive of Overdraft.	12.7%	4.7	4.7	3.3%	212.7	215.9	Medium	CFSI/Core estimate based on CFPB (2012), Bankrate account fee reports (2009 - 2015); "2015 FDIC National Survey of Unbanked and Underbanked Households," FDIC (2016); and "February 2012 Spending & Saving Tracker," prepared by Echo for American Express (2012), and consumer usage sourced from "Data Point: Checking account overdraft," CFPB (2014); CFPB checking account usage data; and Branton, Michael and Spaid, Tyler "The Profitability of the Average Checking Account," BankDirector.com, April 22, 2013.
Deposit Account, Savings*	Basic Bank Saving Account or equivalent Credit Union Share Account	1.4%	0.4	0.4	3.0%	28.7	29.6	Low	CFSI/Core estimate based on "2015 FDIC National Survey of Unbanked and Underbanked Households," FDIC (2016); typical fees from sample of banks, and account balance survey data from Consumer Federation of America data (2010) as reported in New America Foundation study "Beyond Barriers" (2011); and Low Income Designation Credit Union industry data.
Money Order	Service that converts cash to a paper check equivalent with stated amount of funds guaranteed by the issuing institution.	-3.2%	0.8	0.8	-0.6%	70.1	72.2	High	CFSI/Core estimate from USPS/Federal Reserve data (2009-2015). Volume estimate from FDIC National Survey of Underbanked Households (2013). Fee estimate based on USPS reported fees for average money orders and typical private market fees, proportional to customer usage of each channel. Consumer usage data sourced from "2015 FDIC National Survey of Unbanked and Underbanked Households," FDIC (2016).
Prepaid Card, GPR (General Purpose Reloadable)	An open-loop card that serves as an account for consumers to load, store, and spend funds electronically.	12.1%	2.8	3.0	10.0%	101.9	112.1	High	CFSI/Core calculation using "12th Annual US Market Prepaid Cards Market Forecast 2015 - 2018," Mercator Advisory Group (2015) and fee estimate based on NetSpend and Green Dot operating revenue and gross dollar volume reported in quarterly and annual public reports (2009 - 2016). Customer usage data sourced from "General Purpose Reloadable Prepaid Cards: Penetration, Use, Fees, and Fraud Risks," Kansas City Federal Reserve Bank (2014).
Prepaid Card, Government Benefit**	Prepaid card used to access federal government benefits including TANF, SNAP, Unemployment, Social Security, Disability, etc. for all recipients who do not receive benefits by direct deposit.**	4.4%	0.2	0.2	1.4%	150.0	140.3	High	CFSI/Core estimate based on Federal Reserve Board "Report to the Congress on Government Administered, General-Use Prepaid Cards," (2011 -2016) and "12th Annual US Market Prepaid Cards Market Forecast 2015-2018," Mercator Advisory Group (2015).
Prepaid Card, Payroll	An open-loop card that serves as an account for employers to deposit employee salaries, wages, or other compensation on a regular basis for employees to store and spend electronically.	8.0%	1.0	1.0	6.0%	35.5	37.6	High	CFSI/Core calculation sourced from "12th Annual US Market Prepaid Cards Market Forecast 2015 - 2018," Mercator Advisory Group (2015); fee estimate based on NetSpend and Green Dot operating revenue and gross dollar volume in quarterly and annual public reports (2009 - 2016). 45
Remittance	Service that transfers funds from sender in U.S. to	0.5%	3.0	3.1	-0.6%	56.0	55.7	High	World Bank estimate of remittance inflows, outflows and fee percent (2009 - 2015); usage by type of provider sourced from "2015 FDIC National Survey of Unbanked and Underbanked Households,"

# Appendix: Other Products & Services

PRODUCT SEGMENT	PRODUCT DEFINITION	REVENUE			VOLUME			CONFIDENCE LEVEL	SOURCES
		REVENUE GROWTH 2014-2015	REVENUE (\$B) 2015	REVENUE (\$B) 2016e	VOLUME GROWTH 2014-2015	VOLUME (\$B) 2015	VOLUME (\$B) 2016e		
Retirement Plan Leakage*	Fees charged to release funds previously dedicated to a retirement plan as a loan to the account holder, and tax penalties and marginal rates paid for funds withdrawn from retirement accounts early for hardships or when account is not rolled over after a job change.	1.2%	1.9	2.0	-0.3%	226.6	232.3	Medium	CFSI/Core estimate based on data from TIAACREF Survey on Americans taking loans from their retirement plan savings (2014); Department of Labor Statistics; Pension Research Council white paper, TransAmerica Center for Retirement Studies "16th Annual Transamerica Retirement Survey," (2015); Emily Brandon, "Fewer People Pay IRA Early Withdrawal Penalty," U.S. News and World Report, August 28, 2015; "Defined Contribution Plan Participants' Activities, 2015," Investment Company Institute (2015); "Leakage of Participants' DC Assets: How Loans, Withdrawals, and Cashouts Are Eroding Retirement Income," Aon Hewitt (2011); Betterment industry data (2016).
Tax Preparation**	Service that prepares and files personal income taxes for a fee, exclusive of Refund Anticipation Check fees (RAC).	-3.3%	5.1	7.6	1.7%	58.8	58.6	Medium	CFSI/Core estimate based on IRS data on EITC eligibility and claims filed (2009 - 2015), combined with New Haven EITC leakage study (2008). Arlington EITC study (2010) and industry estimates of volume and typical fees (2010 - 2016). Estimates exclusive of RAC volume and revenue (2009 - 2016), however new forms of RACs (Refund Anticipation Checks) incorporate costs into standard pricing rather than a separate fee.
<b>ALL OTHER PRODUCTS AND SERVICES</b>		<b>-2.1%</b>	<b>7.1</b>	<b>9.6</b>	<b>0.1%</b>	<b>285.4</b>	<b>291.0</b>		

\* Interest payments made on funds borrowed from retirement account are paid back to the account itself and result in no net loss to the consumer. This report measures only the additional fees paid by the consumer to

access this loan option, and taxes paid (both at the marginal rate and in penalties) for early retirement fund withdrawals.

\*\* This report cites only the portion of tax preparation revenue reported by consumers eligible for the Earned Income Tax Credit (EITC)

# Appendix: Insurance

PRODUCT SEGMENT	PRODUCT DEFINITION	REVENUE			VOLUME			CONFIDENCE LEVEL	SOURCES
		REVENUE GROWTH 2014-2015	REVENUE (\$B) 2015	REVENUE (\$B) 2016e	VOLUME GROWTH 2014-2015	VOLUME (\$B) 2015	VOLUME (\$B) 2016e		
Auto Insurance*	The premium paid for insuring cars, trucks, and other vehicles	4.0%	36.5	38.0	Not applicable**			Medium	CFSI/Core estimate based on 2015 Bureau of Labor Statistics Consumer Expenditure Study; LMI Liability Spending based on 2009-2015 NAIC and 2013 Consumer Federation of America data.

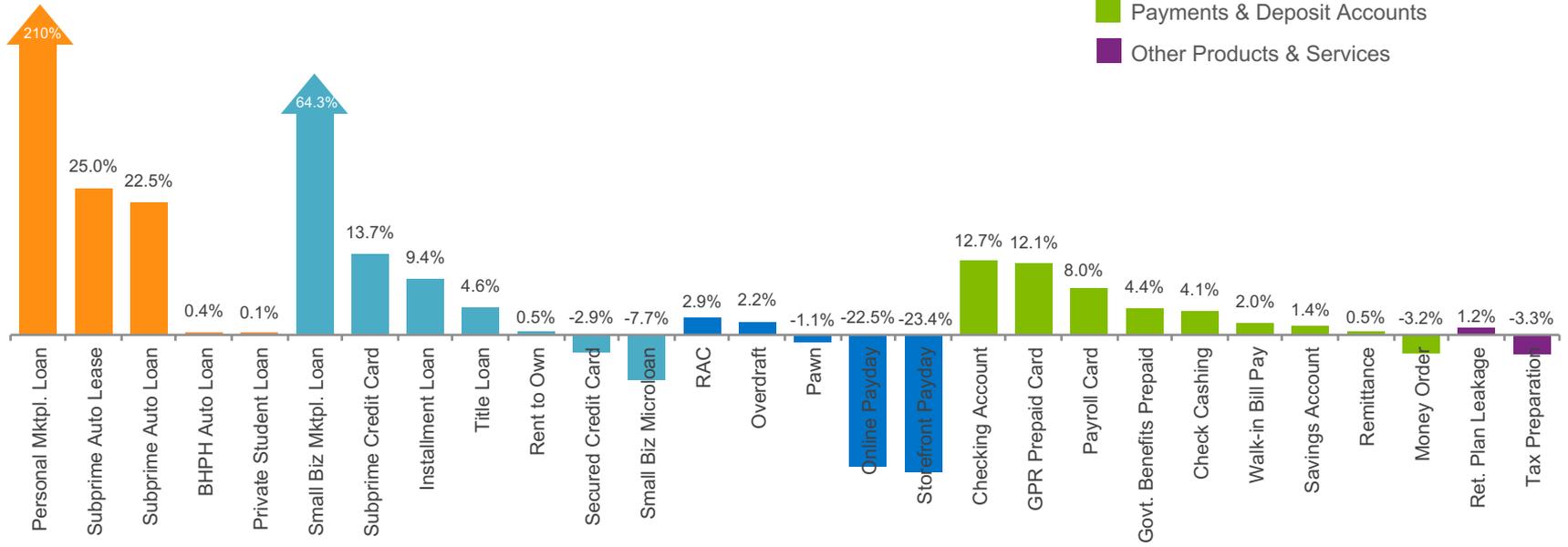
\*This report sizes only auto insurance expenditures for consumers with annual income less than \$50,000, who represent drivers more likely to pay annual premiums that are on average 26.5% higher than for customers earning above \$50,000 annually when other factors are held constant.

\*\* Auto Insurance is sized only in terms of revenue since the dollar value of insurance in terms of volume accessed is not well defined due to variability in claims and adjustments.

# Appendix: Product Growth

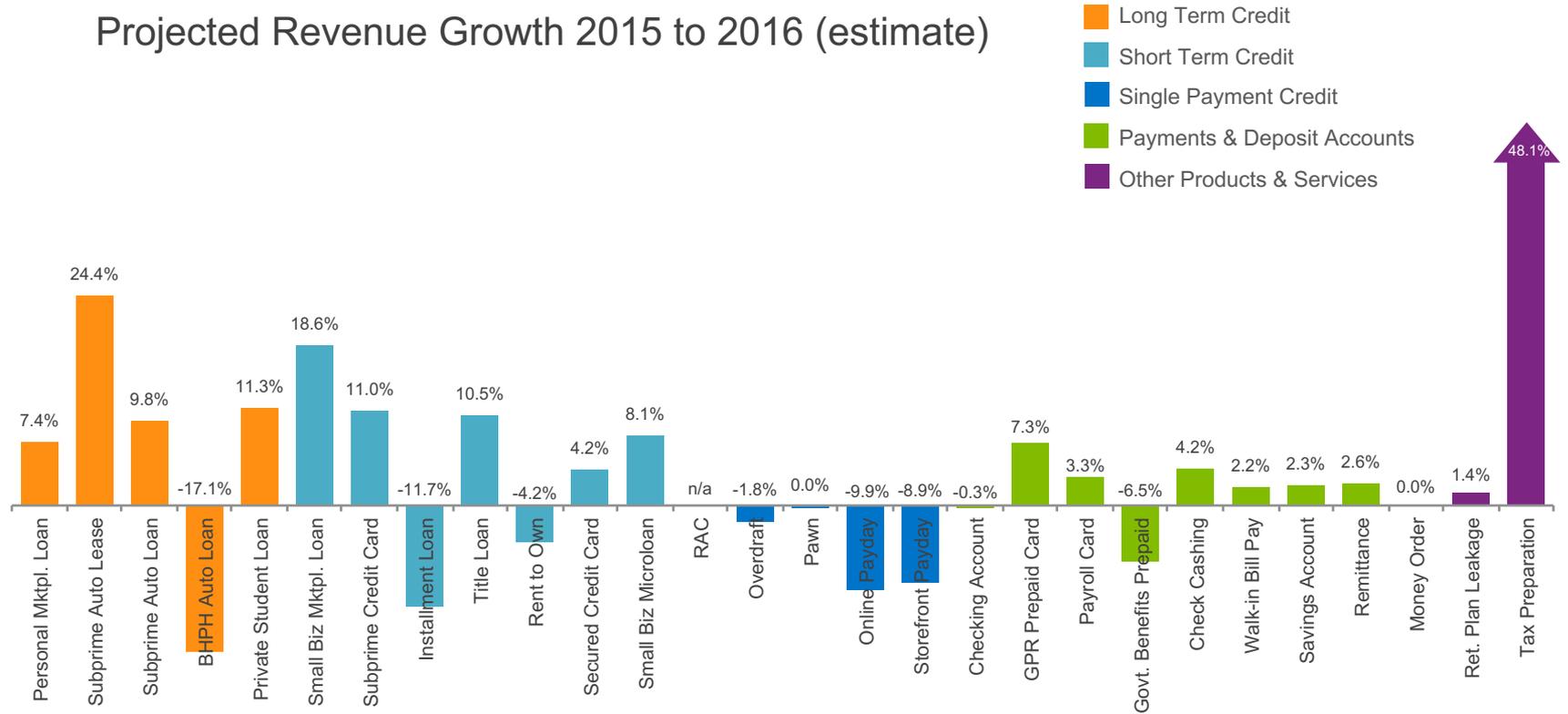
## Revenue Growth 2014 to 2015

- Long Term Credit
- Short Term Credit
- Single Payment Credit
- Payments & Deposit Accounts
- Other Products & Services



# Appendix: Product Growth Projections

## Projected Revenue Growth 2015 to 2016 (estimate)



# New Additions and Changes to 2016 Market Sizing

Each annual Market Size Study reflects the evolving array of products and product usage behaviors that impact the financially underserved marketplace. To ensure that changes in methodology and product inclusion or exclusion do not influence the measurement of growth rates, these changes are retroactively applied to the sizing of products for the complete data set from 2009 to present.

All year-over-year growth rates reflect revised figures for past years to ensure that annual changes are directly comparable. For reference, the chart below displays the market size identified at the time of publication for previous reports in this annual series and the size of the market for the same year sized according to current methodology.

<b>Report Year Covered</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016 Estimate</b>
Published Market Revenue (B)	\$45.2	\$77.6	\$88.7	\$102.6	\$137.7	--	--
Updated Market Revenue (B) (per current product inclusions, exclusions & methodologies)	\$104.5	\$111.1	\$116.1	\$122.7	\$133.0	\$140.7	\$143.7

*Note: Previously published reports reflected a smaller collection of products, differences in the scope of consumers defined as underserved, and previous information available to inform methodologies and calculations. For more information on past methodologies, please consult the previous Underserved Market Sizing Study reports in this series.*

# New Additions and Changes to 2016 Market Sizing

## New Product Additions

**Small Business Marketplace Loan:** Added for the first time to the 2016 study, in recognition of the gap between small business credit needs and credit availability that often plays a role in the financial lives of underserved consumers who are small business owners, and the growing use of Marketplace Loans to serve unmet credit needs through alternative risk and pricing models.

**Small Business Microloan:** Added for the first time to the 2016 study, in recognition of the gap between small business credit needs and credit availability that often plays a role in the financial lives of underserved consumers who are small business owners, and the significant volume of bank and credit union loans for very small amounts—by definition under \$100,000, but typically averaging approximately \$15,000—loaned to small businesses operating in low-to-moderate income communities which typically face higher barriers to credit access.

**Auto Insurance:** Added for the first time in the 2016 study as an initial exploration into the magnitude of spending on insurance products in the financial lives of underserved consumers, in particular when spending is in close conjunction with spending on financial products already sized in this report, in this case as demonstrated by spending on subprime auto loans and leases that by definition necessitate the purchase of auto insurance (required in 49 states and Washington, D.C.) to operate the vehicle.

**Considering Insurance as a Product Category:** Auto Insurance is included in the 2016 Market Size report for the first time and sized retroactively to 2009. Note that it is not included in the overall market size totals because insurance presents an entirely new area of inquiry that stands apart, as an industry, from other financial services included in this report both in terms of payment structures and usage. Furthermore, Auto Insurance is sized only in terms of revenue, as defined by premiums paid by underserved consumers, since the dollar value of insurance in terms of volume accessed is not well defined due to variability in claims, adjustments as well as lack of a standard definition of what constitutes usage volume for a product which by definition is used actively by only a small portion of those insured in any given year.

## Changes in Category Methodologies

Sizing has been updated to reflect a shift of Checking Account and Savings Account products from a previous “Deposits and Other” category classification to a combined category with Payments products, retroactively and for present and future estimates, into one category now titled “Payments & Deposit Accounts,” in order to better track the related uses of deposit accounts, prepaid accounts, and single-function payments products by underserved consumers. The “Deposits and Other” category has been renamed “Other Products and Services” to reflect the products remaining in this classification.

# New Additions and Changes to 2016 Market Sizing

## Changes in Product Methodologies

**Rent to Own:** Sizing has been updated, retroactively and for present and future year estimates, to reflect a change in methodology that defines Rent to Own volume of usage as only the portion of rental installment fees which can be attributed to the market value of the items rented.

**Title Loan:** Sizing has been updated, retroactively and for present and future year estimates, to reflect a change in methodology that employs volume and revenue figures for select states that provide detailed annual figures through regulatory agencies to impute national industry activity, including a proportional estimate of the share of Title Loan volume and revenue attributed to a single payment loan model and to an installment loan model per the pricing and model characteristics demonstrated by reported figures for states that allow one or both of these title loan product structures.

**Checking Account:** Sizing has been updated, retroactively and for present and future year estimates, to reflect a change in methodology that scales statistics tracking underserved households with checking accounts to an estimate of unique account ownership in these households by accounting for the proportion of households containing two or more adults who own a joint account rather than maintaining separate accounts.

**Savings Account:** Sizing has been updated, retroactively and for present and future year estimates, to reflect a change in methodology that scales statistics tracking underserved households with savings accounts to an estimate of unique account ownership in these households by accounting for the proportion of households containing two or more adults who own a joint account rather than maintaining separate accounts.

**Remittance:** Sizing has been updated, retroactively and for present and future estimates, to return to the practice (used in all but last year's report) of sizing all Remittance spending, regardless of whether these payments are sent through bank or non-bank providers, in light of significant fees charged for this service across provider types which indicates wide opportunity for financial technology innovations to address unmet need and inefficiencies in the remittance industry.

**Retirement Plan Leakage:** Sizing has been updated, retroactively and for present and future estimates, to incorporate not only fees paid to borrow from a retirement account (previously sized), but also tax penalties and additional income tax paid at the marginal rate for early withdrawals or "cash-outs" of funds.

**A Word About Refund Anticipation Loans (RALs):** This product ceased to be sized in this report after 2011 due to the vanishingly small level of RAL activity following changes in IRS information accessibility for preparers that made predicting refunds too risky. Beginning in 2015, RALs have made a comeback at many tax preparation providers, but under the new structure used by these providers. RALs are offered as a courtesy and marketing tool, with all costs to the provider incorporated into overall tax preparation charges rather than offered at a separate price. As such, any return to consumer spending on RALs can be considered to be accounted for in the size of spending on Tax Preparation.

# Thank You

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