

Constrained Coalitions with Distinct Priorities: How Consumer Advocacy Groups Approach Credit

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Abstract

Consumer credit abuses and their imperfect solutions are longstanding problems in the United States. In an attempt to curb consumers' growing indebtedness from the 1960s on, advocacy groups formed coalitions to promote stricter credit market regulation in the United States. However, it didn't work. Why did consumer advocacy groups continue to lobby for regulation that was (at best) of limited help to the groups they claimed to represent? I leverage over 280 archival documents from a range of consumer advocacy groups working in (in)formal coalitions to show that advocacy groups' strategic decision to form a coalition backfired by creating a fractured group that was constrained by design. Initially heterogeneous advocacy groups with distinct priorities and foci coalesced on a single solution, not necessarily because of an explicit decision to prioritize more advantaged subgroups, but because it was the one solution they all agreed on. As a result of their coalitional structure, these groups promoted policies which they acknowledged, at least internally, would fail to protect the most disadvantaged. While this article uses the case of consumer credit regulation to advance its argument, the link between coalitional design and unintended negative effects extends to other issue areas.

Introduction

Consumer credit abuses and their imperfect solutions are longstanding problems in the United States. Predatory financial products, like payday loans that carry an average annual interest rate of 400%, are easily accessible to borrowers despite state usury laws that cap the interest rate lenders can charge (Harvey, Robb, and Peterson 2024; Kantwill and Peterson 2018). Even when lenders cannot legally offer loans with interest rates above, for example, 50% annually, borrowers can take out a payday loan with triple-digit interest rates and end up in a debt trap (Montezemolo 2013).

Consumer advocates have tried to close this regulatory loophole by capping the interest rate on payday loans specifically—not just credit products in general. However, a large body of work shows that regulatory restrictions on payday loans are an imperfect solution to the problem of consumer debt (Bhutta, Goldin, & Homonoff 2016; Edmiston 2011; Kaufman 2013; Morgan, Strain & Seblani 2012; Ramirez 2017; Zinman 2010). Often, payday loan regulations have no discernible impact on or may even harm borrowers' economic outcomes. Despite this null effect, consumer advocates continue to expend significant effort to enact payday, and other, credit regulatory reforms.

These credit regulatory efforts have a long history in the United States. Virginia Knauer, Richard Nixon's special assistant for the Office of Consumer Affairs quoted in the opening epigraph, documented a wide range of consumer abuses ranging from deceptive debt collection practices and unequal credit access to litigious court issues. During her speech, she called for expanded protections for consumers, an action that had been called for decades earlier, she noted. Thirty-eight years later, consumer advocacy groups and think tanks, like the Pew Charitable Trusts, continued to echo her call to action all while noting that regulatory protections remain insufficient to protect consumers. These quotes, and the quantitative studies referenced above, illustrate that consumer credit regulations are insufficient

solutions for a range of consumer credit products and problems—ranging from payday loans to credit cards. Why do consumer advocacy groups continue to lobby for regulation that is (at best) of limited help to the very groups they claim to represent?

In this article I argue that consumer credit advocacy groups' use of broad coalitions with distinct priorities, in tandem with the issue complexity of consumer credit, resulted in 'one-size-fits-most' policy solutions that did not target the disadvantaged groups they originally set out to represent. Because groups were fractured across most of the specific credit topics, problems, and solutions they prioritized, when they did overlap meaningfully on a particular solution, they pursued it, while knowing its shortcomings. In short, I demonstrate how advocacy groups' strategic framework (the coalition) is linked with their resulting oversight of the most disadvantaged groups.

At first glance this is perhaps not surprising: Previous work found that when interest groups rely on broad coalitions they end up shortchanging disadvantaged subgroups and, as a result, can inadvertently increase inequality (e.g., Bateman 2018; Strolovitch 2006, 2008). For example, Bateman notes that lower-class whites were mobilized into politics while non-whites were disenfranchised because the political coalition was attuned to the demands of slaveholders. Similarly, Strolovitch notes that organizations do not actually allocate their advocacy efforts to benefit the greatest number of members but instead prioritize the most advantaged subgroup within their membership, for example, middle-income or white members.

While it may not be surprising that broad coalitions rarely prioritize solutions that would benefit the most disadvantaged of their members, in the consumer credit space it is notable that the undermining of policy reform is not done only by powerful opposition groups (e.g., financial institutions and their lobbyists), but unintentionally by the advocates themselves. The consumer credit space is also worth analyzing not only because it has been under researched relative to other advocacy organizations and issue areas (Woolley 2012), but because it is a site where both majority, advantaged, and disadvantaged subgroups have real stakes in the outcome of public policies; Consumer credit regulations impact both the highly advantaged member with a high-yield savings account, the majority member who holds multiple credit cards, and the disadvantaged members who use payday loans.

To develop my argument, I use the case of four consumer credit advocacy groups, supplemented with archival data on other smaller advocacy groups that worked in coalition with them, that were active from the 1960s-2010s to understand these groups' policy positions and organizational strategies around consumer credit. In total, I analyzed over 280 original documents, ranging from internal emails and conference notes to model legislation. Using qualitative coding software, I systematically coded over 600 excerpts from these documents.

My analysis of the archival material illustrates that consumer credit coalitions were amalgamations of fractured advocacy groups with distinct priorities who promoted marginal solutions to an array of credit problems. These fractured groups disagreed on what their primary policy focus should be and, partially

because of this disagreement, promoted the main solution where they had substantial overlapping priorities—that is, stricter regulatory policy.

Unfortunately, more stringent regulatory solutions did not solve the underlying issue at hand, that is, people's need for credit as a stopgap measure when the welfare state or labor market is insufficient. The archival analysis in this article reaffirms the importance of looking at the underlying structural conditions of economic inequality in the United States: the labor market, the welfare state, and the use of credit to fill the gap in between.

The results presented here imply that advocacy groups' promotion of public policies can end up overlooking disadvantaged groups not only because of individual organizations' decisions around framing (Brower 2024) and agenda areas (Strolovitch 2006), but because the institutional structure they are embedded in constrains them to the majority decision. This helps explain why organizations like the National Consumer Law Center, among others, is actively pursuing stricter regulation of Earned Wage Access products as opposed to, for example, lobbying for higher wages (Coalition Letter in Opposition to HR 9330, 2026).

The ability of a coalition to constrain interest groups is not unique to consumer credit. However, consumer credit is an example of a "most likely" or "typical" case (Seawright and Gerring 2008). Consumer credit is not a policy issue that is easy for consumers to mobilize around because it is seen as private rather than public (SoRelle 2020). As a result, interest groups working in this space pursued coalitions in part to reach more people (Brooker and Meyer 2018). Based on the results of this case, it is likely that issues areas that are difficult to mobilize around may similarly experience drawbacks from a coalitional model with respect to their most disadvantaged members, even while it benefits the most advantaged groups.

Consumer Credit Advocacy Groups in Coalition

'...and now that some real trust has been developed between hundreds of extraordinary groups, we can demand more meaningful change moving forward'.

A New Way Forward Planning Meeting (2010)

Andrews and Edwards (2004) define advocacy organizations as organizations that 'make public interest claims either promoting or resisting social change that, if implemented, would conflict with the social, cultural, political, or economic interests, or values of other constituencies and groups' (Andrews and Edwards 2004, 481). The number and type of advocacy organizations in the United States, including groups that advocated specifically for consumer safety, grew rapidly beginning in the 1960s (Berry 1993; Vogel and Nadel 1977). These organizations included the National Consumer Law Center, that was interested in protecting consumers in general, as well as organizations like Americans for Fairness in Lending (AFFIL) and Americans for Financial Reform (AFR), that were specifically focused on consumers' use of and access to credit. A New Way Forward, one of AFR's partners, expressed a

common sentiment among advocacy groups: with enough of them together, they could 'demand more meaningful change'. However, despite the growth of consumer-oriented advocacy groups, they have been ascribed only small successes.

Consumer credit organizations not only faced an uphill battle against wealthier and more politically connected adversaries, including financial institutions and their lobbyists, but they also opposed a political-economic system that favored creditors. Given this, even though their successes were few, they undoubtedly deserve recognition. For example, Kastner (2014) finds that consumer protection reforms like the creation of the Consumer Financial Protection Bureau (CFPB), improved upon the status quo somewhat (Kastner 2014, 1316, 1338; Woolley & Ziegler 2011). And while the efficacy of the Military Lending Act and the Dodd-Frank Act are contested, they mark an important departure from the existing regulatory structure (Kantwill & Peterson 2018; SoRelle 2020; Woolley & Ziegler 2011). I argue that these limited successes are a result not only of the political constraints that these groups faced, but also of their distinct priorities that fractured the coalition.

Existing work ties these groups' relative inefficacy to their lack of funding (Shanks and SoRelle 2021), their inability to catalyze consumers to demand political change (SoRelle 2020), or their minor role in financial regulation and credit compared to larger, better resourced actors (Berry 1993). While each of these factors play a role, I argue that part of the reason that consumer advocacy groups continued to promote insufficient solutions to consumer credit problems is because of their fractured nature which was emphasized by the coalitional structure.

A 'coalition' is a group of two or more advocacy organizations who are pursuing a similar public policy agenda (Heaney and Lorenz 2013). Coalitions offer interest groups more influence over the policy process by presenting a uniform message, pooling resources, and mobilizing a broader range of people (Brooker and Meyer 2018; Heaney and Lorenz 2013; Mahoney 2007). However, there are drawbacks to the coalitional design, including: disagreements between groups (Phillips and Dougherty 2024) and compromising groups' identities (Brooker and Meyer 2018).

By pursuing a broad coalition, these advocates created a group of organizations with distinct priorities who disagreed about what they should focus on, be it a specific credit product, credit problem, or target group. Partially because of their fractured nature, these groups pursued marginal or insufficient solutions, including disclosure regulations and financial education. These solutions were insufficient to solve consumers' underlying credit problems because they did not address necessary structural changes. That is, financial education, disclosures, and even stricter regulation of credit cards (for example), may have been helpful for some consumers in the short run, but they did not overcome disadvantaged borrowers' existing reliance on credit to make ends meet.

These groups' promotion of insufficient solutions is at least partially a result of the pivotal role of private credit markets in the American political economy. Consumer advocacy groups who work in the credit space operate between a rock and a hard place. On the one hand, they are presented with a variety of predatory credit products (e.g., life insurance, payday loans, auto loans, credit cards, and mortgages)

that cause real financial harm to their target population (borrowers generally, but especially lower-income groups). On the other hand, they face opposition from financial interest groups who are well-resourced and from politicians who are averse to strictly regulating products so central to the economy, as well as from other coalition partners whose members are either not reliant on predatory credit products or may not benefit from strict regulation.

The consumer credit advocacy groups were politically constrained and aware of the underlying power imbalance. For example, in pamphlets they distributed on college campuses in 2007, AFFIL noted that 'Banks donate more money to politicians than the oil industry. And none of the dozens of regulatory bills proposed in the last 20 years have made it to a Congressional hearing.' Beyond these structural and organizational constraints, advocacy groups also faced the very real issue of *how* to effectively regulate products. Because consumers who use predatory financial products often have few credit alternatives, strictly regulating those products can create unintended negative effects. Regulate payday loans too much, and lenders leave the market, forcing consumers to turn to other, higher-cost, products and leaving them worse off than they were before.

Archival Methods

This article is an exploration of how consumer advocacy groups attempted to navigate the challenges associated with regulating consumer credit. Following Kim (2022) and Lee (2022), I use archival methods for two main purposes: description and theory development. First, these archival materials can describe the scope of consumer problems and solutions across decades as perceived by different advocacy organizations. For example, advocates were concerned about increasing indebtedness among consumers particularly during the 1960s, 1980s and 1990s while they were more worried about financial institutions exploiting regulatory loopholes during the 1990s-2000s. Similarly, while solutions involving greater disclosure and transparency requirements had their heyday in the 1960s-1970s, policy solutions that focused on financial education and more stringent regulation were pervasive throughout the entire period.

Second, these advocacy groups' internal documents and external communication with other groups are integral in forming my theory about how the structure of a coalition raises the salience of groups' distinct priorities, amplifying the results of internal fractures, and in 'theorizing about why leaders make choices' (Kim 2022, 531). While archival research offers unique benefits, it also comes with potential shortcomings, including but not limited to unreliability of the material, selection bias, and cherry picking (Kim 2022; Lee 2022; Lustick 1996). I counteract these drawbacks by using explicit sampling procedures, using quasi-triangulation where possible, and having a consistent system for note taking and organization that is described further below.

I draw on archival documents from the Consumer Movement Archives at Kansas State University. This archive 'documents the history of the consumer movement in the U.S.' The archival documents contain letters, model legislation, amicus briefs, and internal notes that illustrate these groups' approaches to

credit regulation and, importantly, how those approaches changed over time and across different networks of advocacy groups. I draw on information from four major groups: Americans for Fairness in Lending (AFFIL), the Consumer Education Resource Network (CERN), the Consumer Federation of America (CFA), and the National Consumer Law Center (NCLC) in addition to the papers of Richard L.D. Morse, a prominent consumer credit activist, and other small collections.

There were hundreds of active consumer advocacy groups during the 1960s-1970s. The four listed here represent the advocacy organizations focused on consumer credit with the most extensive collections at the Consumer Movement Archives. This extensive collection is due, in part, to their coalitional framework and shared focus on a handful of important legislative proposals. Not only were these groups frequently referencing each other in internal and external documents, but they worked together on large efforts like the creation of the Consumer Financial Protection Bureau. While these four organizations may not be perfectly representative of all of the contemporary work on consumer credit advocacy, they were influential enough to warrant inclusion in the archive and at least some remain active to this day.

Perhaps more importantly, these groups represent a wide range of advocacy organizations dedicated to consumer credit, with different funding structures, goals, and partners (this range is illustrated in Table 1 below). Writing in 2012, Mayer noted that there were 'at least eight consumer organizations with annual revenues of \$2 million or more' (Mayer 2012, p. 173). This included the National Consumer Law Center and the Consumer Federation of America. The other major players he listed (including the US Public Interest Research Group and Consumers Union) frequently worked in coalition with the four main advocacy groups discussed in this article.

Before traveling to the archive, I identified a list of material to pull using the online finding guide and validated this list with the two lead archivists, Thomas Bell and Cliff Hight. I used three main strategies to create my initial coding scheme for the archival material. First, at the end of each of my three days in the archives, I took overarching notes on the material I scanned that day. This gave me a list of main themes to be on the lookout for. I complemented this macro-level strategy with a meso-level method: After scanning all of the archival documents, I skimmed through the material first by collection (i.e., within each advocacy group) and then chronologically. This allowed me to identify additional themes or secondary themes to my broader ones, as well as to see differences and similarities across groups and time. Finally, I skimmed through each individual document (my micro-level strategy) to identify its main purpose. These three strategies resulted in my preliminary coding scheme: a group of twelve primary ('parent') codes and fifty-four secondary ('child') codes. This coding scheme was centered around the critiques advocacy groups had of credit products (what I call the 'problems'), the policy solutions they developed for those problems, and the types of credit products, institutions, target groups, and levels of government they identified as central to their strategy. The coding scheme is detailed in Appendix A.

To ensure that these codes were comprehensive but parsimonious, I coded an initial batch of documents across a range of years and advocacy groups in Dedoose, a software program with a variety of qualitative data analysis tools. To code the archival material, I read each document in its entirety and

applied the relevant codes to the excerpts. I then made any necessary additions or changes to my codebook. The resulting database has 285 documents with 614 excerpts. The footnotes throughout this article denote the specific document (including the file, box, and collection) that I used to develop my theory and describe the scope of these groups.

The four groups listed in Table 1 below are nonprofit organizations who were (or are) active in the credit and financial regulation space, and were the primary, but not only, focus of my research in the archives. These groups had different organizational structures, tactics, and timespans. However, they each were involved in agenda setting, decision making, policy design and implementation, and changing the long-term priorities and resources of political institutions related to financial regulation and credit, each a key measure of organizational influence (Andrews & Edwards 2004).

Notably, each of the four groups had a variety of formal and informal coalition partners. These partners ranged from national or state-level advocacy organizations to local groups. Some groups signed on letters and policy proposals while others only communicated with the organizations via letters or at conferences. However, each partner had at least a small role in shaping the main advocacy groups' policy positions and advocacy decisions because they provided key information to groups in the coalition and contributed to the distinct (or overlapping) priorities under consideration.

[Table 1 Here]

Both the CFA and the NCLC are still active today and have continued to be key actors in the consumer credit sphere. One of CFA's most recent proposals is a permanent, nationwide cap of 36% on a variety of consumer credit products ranging from car-title loans to credit card fees (CFA 2026). Similarly, the NCLC (who joined CFA on the same rate cap initiative), recently published a report admonishing states for their weak protections against abusive debt collection practices (NCLC 2026). These initiatives are in line with what my theory would suggest: the structure of the coalition increases the salience of fractures across interest groups which the coalition overcomes by prioritizing the most common solution. Unfortunately, this most common solution often ends up advantaging some subgroups at the expense of more vulnerable ones.

These initiatives are not new themes for the organizations. Abusive debt collection practices have been targeted by these groups at least since the 1980s AFFIL, like the CFA and NCLC, also explicitly targeted consumer credit problems, although their goal was primarily advocacy (SoRelle 2020). While CERN was mostly focused on education and distributing information, I have included it in this group of four main consumer credit advocacy groups because it was a critical catalyst of policy learning between these, and other, groups by distributing information about credit products and problems in a relatively scarce information environment (Brooker and Meyer 2018). In addition, CERN was not a neutral conveyer of information but took a stance on the information it shared and even (occasionally) suggested solutions to consumers' credit problems.

The entire body of archival material analyzed here illustrates what advocacy related to consumer credit products looked like from the mid- to late-1900s and early-2000s. Among credit products, advocates highlighted payday loans, credit cards, and mortgages. When they discussed financial institutions, they overwhelmingly talked about banks rather than credit unions, payday lenders, or other financial institutions. The organizations preferred state-level, rather than federal, policy solutions, though they often discussed both levels. The credit problems that came up most often were related to 'bad' credit products (i.e., high-cost products that led to debt) and consumer abuse, while the most common solution was related to strengthening regulations to protect consumers, particularly lower-income groups (at least in theory if not in practice). In sum, these actors each promoted greater financial protection for consumers and borrowers. However, while these advocacy groups had similar goals, they had distinct priorities. By this I mean that they identified different credit products, target groups, institutions, and especially problems and solutions.

Fractured Groups with Distinct Priorities

'We say only congress can remedy the problem. Should we instead say only Congress can remedy the problem in a comprehensive way? I don't want to inadvertently slam the local efforts at regulating this stuff or have a statement like that come back to bite us if we are supporting a state bill or city ordinance'.

Email from Cathy Mansfield (AFFIL) to partners, 2005

'The main legislative work around rent-to-own would probably be to get it counted as a credit issue, so that usury caps and other laws could apply. But none of our Partners work on this issue, as far as I know'.

Internal notes from AFFIL, 2008

'She counseled us to emphasize consumer education over advocacy, because it is more likely to receive favor'.

Email from Will Ogburn (NCLC) to partners, 2005

The consumer credit advocacy groups discussed in this article had distinct priorities across a range of consumer credit topics, problems, and solutions. As the above quotes highlight, these distinct priorities helped shape their advocacy approach, at least partially. Groups were aware of potential negative repercussions if they came out too strongly on a specific issue (e.g., 'I don't want [this statement to] come back and bite us'). Individual groups talked with each other about what they should prioritize, (e.g. 'She counseled us to emphasize consumer education over advocacy') and were aware of distinct priorities across their coalition (e.g., 'none of our Partners work on this issue.'). This section explores just how distinct groups' priorities were and shows that there were only a few areas where groups' focus overlapped in a meaningful way.

To analyze what the consumer credit advocacy groups focused on, I used co-occurrence code and normalized code count tools in Dedoose. This allowed me to see how often specific child and parent

codes were connected with a particular organization, taking into account the different amounts of archival material each organization had. For example, I could see that the CFA (organization) discussed credit products (parent code) and specifically focused on fees (child code). Below, I document how often the different core organizations discussed specific credit products, target groups, credit institutions, and government levels. These categories reflect the 'nuts and bolts' issues that advocacy groups cared about. Figures 1, 2, and 3 below show the relative importance each advocacy group assigned to different issue areas.

The 'frequency' numbers reported below represent the percentage of the documents that discussed that specific item. For example, AFFIL prioritized refund anticipation loans (RAL), discussing them in over 60% of the documents I analyzed. In contrast, the CFA prioritized check cashing, which they discussed in over half of their material. Because the archival material includes both internal and external documents, the frequency with which they discussed various subjects is a fair representation not only of what they were discussing publicly, but also of their internal communications and deliberations with other groups. Appendix B includes the full data for the figures below.

[Figure 1 Here]

I identified nine main credit products discussed with some regularity in the archival documents: auto loans, credit cards, check cashing, fees, installment loans, insurance, mortgages, payday loans, and refund anticipation loans. As figure 1 illustrates, only two groups shared the same top priority credit product (the CFA and NCLC both prioritized check cashing). And while there were some overlapping priorities, none were unanimous. The top three credit products by frequency were refund anticipation loans, mortgages, and fees for AFFIL; check cashing, installment loans, and fees for the CFA; check cashing, refund anticipation loans, and mortgages for the NCLC, and insurance, mortgages, and auto loans for CERN. These credit products cover a range of borrowers. Disadvantaged borrowers are more likely to use refund anticipation loans, check cashing, installment and payday loans to cover necessary expenses. In contrast, advantaged borrowers are more likely to use mortgages, and the majority group of borrowers is likely to rely on or use fees and auto loans.

[Figure 2 Here]

Similarly, the four groups prioritized distinct institutions and levels in their communications. By institutions, I am referring to the type of financial institution the group identified. This could include banks, credit unions ('C. Unions'), unidentified financial institutions, or payday lenders. By levels, I am referring to the level of government advocacy groups specified when they discussed credit problems and solutions. This included: the county or city-level, the state-level, the federal-level, or multi-level. Again, the groups' distinct priorities are readily apparent. For example, AFFIL was more likely to prioritize the local level in their advocacy work, while the CFA was more likely to talk about payday lenders. Here again we see divergence across institutions that correspond to more or less advantaged subgroups of borrowers. While the majority are likely to interact with banks and credit unions, relatively fewer borrowers interact with payday lenders.

[Figure 3 Here]

Target population refers to the group of people referenced by the organizations when they discussed whom a credit problem (or potential solution) would impact. These included: borrowers (or consumers), military members and their dependents, minority groups (generally Black or Hispanic), the poor/low-income, seniors or the elderly, welfare recipients, or younger people/students. As before, the groups had distinct priorities. For example, NCLC focused on military members, while AFFIL and the CFA were equally likely to discuss students. The archival analysis uncovers some slippage between what the groups’ stated goals were (from Table 1) and which groups they actively discussed internally. While AFFIL, CERN, and the CFA took a majority framing approach in their public goals, their internal approach was more targeted. The analysis above shows that interest groups prioritized different credit products, institutions, levels, and target populations. Below I illustrate that the fractured nature of these groups extended from disagreements about what nuts and bolts issues to focus on to disagreements about what problems they could solve and how they should solve them.

My content analysis of the archival documents uncovered six main problems that the advocacy groups associated with credit and consumer protection more broadly. These problems include: 1) consumers’ access to 'bad' credit, 2) bankruptcy or other side effects of indebtedness, 3) consumer abuse including scams or fraud, 4) deregulation, 5) the power of industry to lobby, for example, and 6) insufficient or absent regulation. The most common consumer credit problems raised by advocacy groups that are not captured in these major codes are inflation or a lack of resources (i.e., a lack of savings or a bank account). Here again, the frequency represents the proportion of advocacy groups’ documents that discuss a specific problem. For example, 26.4% of AFFIL’s documents were related to ‘bad’ credit.

[Table 2 Here]

Each of the main consumer credit advocacy groups identified and discussed a variety of consumer credit problems. However, as with the 'nuts and bolts' items, they prioritized different problems. Top issues include consumer abuse for the NCLC, 'bad' credit or bankruptcy for the CFA, or deregulation for AFFIL. While the advocacy groups generally identified different priority problems to fix, there was slightly more consensus across two problems: 'bad' credit and consumer abuse. All four advocacy groups talked about these problems in their correspondence, read research reports about these problems, or drafted model legislation to correct these issues with relatively similar frequencies. The spread between the highest and lowest focus for 'bad' credit and consumer abuse is 20.3 and 14.8 respectively.

The cornerstone of the problems outlined above is consumer credit. In general, advocates seemed to believe the following: If consumers had enough information and if there was transparency in loan terms, they would be able to avoid predatory sources of debt. If existing regulations were sufficient (either at the state or federal level), consumers would be saved from predatory credit products and, as a result, would avoid more debt. If there was enough credit for consumers and they could access it efficiently, the market would not be segmented by risk, and borrowers could avoid more debt. Notably, none of these

potential solutions addressed the underlying reason for consumers’ credit problems, which was a reliance on private credit to make ends meet when the labor market and welfare state fell short.

However, there was not a unified approach to solutions *even when* advocacy groups agreed on the problem. The table below outlines a handful of the most-common consumer credit solutions and notes the main problem(s) they were intended to solve, the product(s) and group(s) they applied to, the main advocacy groups who considered each solution, and the intended effect of the solution with a model bill or act for reference where applicable.

Disclosure was a solution proposed to solve the problem of ‘bad’ debt, especially from credit cards, and applicable to all borrowers and championed by the NCLC and AFFIL. Regulation likewise was supposed to solve the problem of ‘bad’ debt, but in this case was aimed at payday loans as well as credit cards and targeted the poor in addition to borrowers in general. Financial education targeted credit cards and borrowers; ‘better’ credit applied to a range of credit products; and deregulation—while championed widely by CERN, had few specific products or target populations it was aimed at. Debt collection and litigation were poised to solve the problem of abuse (at least for mortgages and insurance) faced by the poor, while advocacy was meant to target borrowers in general. In short, the only solution that consumer advocates generally agreed on was regulation, and this solution was proposed for each main consumer credit problem.

[Table 3 Here]

The table above illustrates the range of solutions that advocacy organizations considered. Notably, most of the solutions listed above (e.g., litigation, improving debt collection practices, regulation, and disclosure) were associated with two main problems: consumer abuse and 'bad' credit. Each of these four solutions would regulate lenders’ actions or provide a 'stick' to incentivize lenders to refrain from predatory lending practices. The remaining solutions are associated with different problems: organizing is seen as an antidote to the corruptive power of industry. Deregulation offers a correction to inefficient regulations. Financial education and improved access to credit both offer solutions to 'other' problems associated with credit—namely, inflation and other economic concerns.

Notably, all the major solutions were correlated with two main groups of consumers: borrowers and the poor. This first association makes sense— 'borrowers' is a catch all group. However, the poor are highlighted across five solutions: litigation, debt collection practices, improved access to credit, regulation, and disclosure. That is, at face value, these coalitions are concerned with both majority members (the borrowers) as well as more vulnerable subgroups (the poor). Other targeted groups (including seniors, students, minority groups, etc.) are either not discussed or are rarely mentioned. Finally, different advocacy groups prioritized and highlighted different solutions to credit problems. This is discussed in more detail following the section on overall patterns of consumer regulation.

The figure below shows the correlation between solutions (the columns) and problems (the rows) across all archival material. As above, if we look at the rows for consumer abuse and bad debt, we see more

solutions 'pinging' for those problems. However, the most striking result from this figure is the dominance of regulation as a solution. Regulation is discussed as the most common solution for every consumer credit problem except for bankruptcy where it follows consumer education. Perhaps the most ironic result shown from this correlation plot is that regulation is proposed as a solution to inefficient/absent regulation.

[Figure 4 Here]

While regulation was the most common credit solution that the advocacy groups discussed both in internal and external documents, it does not follow that it was the most effective solution across these credit problems, or even that it would be a sufficient solution for the credit problems advocates discussed, especially for the most disadvantaged subgroups. The next section discusses why some of the consumer credit solutions that advocates proposed, and regulation, were insufficient solutions. Briefly, I argue that these solutions were insufficient because they did not address the underlying reason that consumers were turning to credit—the gap between the welfare state and the labor market. The focus on marginal, as opposed to transformative, solutions is partially a result of these groups' distinct priorities and the resulting fractured nature of the coalition.

Insufficient Solutions

'While helpful on a basic level, disclosure will never protect consumers against unfair lending products. Simply requiring greater disclosure of terms does not get at the underlying problem—predatory and dangerous loan products employed by the industry that keeps Americans trapped in a cycle of debt.'

Cathy Mansfield, 2007

'Current laws do not provide adequate protection. Just the reverse is the case: federal law too often is the excuse for the reduction in essential consumer protections.'

Margot Saunders and Alys Cohen, 2004

This article began with a quote from Virginia Knauer calling for action to solve a multitude of decades-old consumer credit problems...in 1971. If consumer activists were fed up with consumer credit problems fifty years ago, they were certainly not satisfied by the early 2000s. In a working paper for Harvard University's Joint Center for Housing Studies, Margot Saunders and Alys Cohen, both from the NCLC, noted that federal law remained insufficient to protect consumers.

The analysis above showed that consumer advocacy groups were interested in different consumer credit problems, solutions, target groups, and even credit products. However, regulation was presented as the most common solution to a range of problems. What explains why credit regulation (and other solutions) fell short? I argue that the main reason consumer credit solutions did not deliver on their promises was because they did not solve the underlying reason that consumers turned to private credit and overlooked consumers' (unequal) credit reliance. That is, their proposed solutions did not acknowledge that some

borrowers turned to credit to make ends meet and that this turn to credit differed across income, credit score, and other factors. Consumer advocacy groups realized that some of the solutions they proposed were insufficient and did not create transformative changes, but because regulation was the one solution each of the fractured groups agreed on, and was the strongest overlapping priority for the coalition, they pursued it.

While advocacy groups proposed solutions that they believed would alleviate individuals' consumer credit problems, they also recognized that some of their solutions would be constrained or insufficient. For example, while AFFIL championed state-level rate caps for payday loans, they also noted in internal documents that the rate caps would never be passed federally and that it was 'going no where [sic]'. Similarly, although TILA was hailed as a massive success, many consumer credit advocates also acknowledged that disclosure, by itself, would be insufficient to solve consumer credit problems. Occasionally, advocates even noted that the regulations they had a hand in proposing simply did not work. For example, AFFIL noted that federal rules to regulate overdraft fees would be inadequate because states could simply opt out.

Overall, these advocacy groups were doing the best they could to solve consumer credit problems in a constrained environment. While using broad coalitions resulted in some salient wins, it ultimately meant that the policy solutions they proposed or responded to were tailored to the most common borrower and overlooked the disadvantaged groups they originally set out to represent. These groups acknowledged that the solution they were promoting was insufficient and knew that regulation would not be an effective solution for indebtedness—and particularly for payday loan debt. However, this was the most salient and popular consumer credit solution across each of these fractured consumer advocacy groups.

Conclusion

'Politically, this is not a big enough problem to be legislatively attractive, so reform must come by working in amendments when other changes are being made'.

Richard L.D. Morse, 1980

'None of these proposals acknowledges the principal cause of escalating personal bankruptcies or proposes the most effective solution to that problem'.

Stephen Brobeck, 1997

The consumer advocacy groups discussed in this article pursued solutions that worked at the margins, rather than solutions that would transform Americans' credit reliance in a structural way. A large part of this decision to focus on piecemeal solutions was a direct result of the groups' coalitional structure. As Dr. Morse noted, reform would have to come in increments. Not only because the solutions were not 'legislatively attractive', but also because of the real financial, political, and ideational constraints (i.e., fractures) the consumer advocates faced.

In this article, I asserted that part of the reason the coalition pursued these marginal or misplaced solutions was because they had so few overlapping priorities. The four main consumer credit advocacy groups were fractured, that is, they had distinct priorities: both across 'nuts and bolts' issues and larger policy issues—including the main consumer credit problems and solutions they identified. As we might expect, consumer issues that impacted a broader swath of the population saw more support from coalition members. For example, there was broad support from groups ranging from the AARP, NAACP and US PIRG for the overdraft protection act. Similarly, the CFA and NCLC worked with groups including the SEIU to support various credit card bills. Notably, issues like overdraft and credit card fees impact a larger group of consumers than more 'fringe' issues like payday loans, a product used by the most disadvantaged borrowers. The decision to focus on these issues and to pursue regulatory solutions, as opposed to structural solutions, was strategic and not (necessarily) misguided. However, an unintended effect of this decision was to shortchange more vulnerable consumers, i.e., the disadvantaged subgroup.

Advocates, for the most part, were not laboring under the illusion that their work would solve problems of indebtedness in their entirety. Stephen Brobeck, the executive director of CFA, openly worried that the small legislative victories the CFA achieved were not sufficient to tackle the underlying issue at hand. Although the advocacy groups rightly perceived their broad coalition as politically powerful, they shied away from policies that would segment the coalition or shift the focus to smaller populations of interest.

As an earlier quote documented, in an email from August of 2005, Consumers Union strongly suggested that AFFIL emphasize consumer education over advocacy. More 'fringe' alliance partners continued to focus on divisive issues and suggested larger-scale changes, but other advocacy coalition members, like AFFIL, wanted to take a more moderate approach, and worried that 'our community scares off needed allies'. Their use of a coalition framework was strategic. AFFIL specifically used a coalition because it offered 'one consistent message, conduits to extended audiences, connections to many communities, more credibility as a group, [and] funding [that] is more than the sum of its parts.' When the fractured coalition agreed on one credit solution (regulation) across a range of credit products, problems, and target populations, it is no wonder they pursued it, despite acknowledging its insufficiency.

While this archival analysis offers insights into advocacy groups' deliberations around consumer credit regulations and policies it has some limitations. Notably, I do not distinguish here between policies which were a response to existing legislation and policies that were offering new solutions to credit problems. In addition, while these consumer advocacy groups were key players in policy proposals during this period, they may not be the only relevant consumer credit organizations. Despite these limitations, this analysis shows that constrained coalitions with distinct priorities are likely to promote a policy that the entire group agrees on even when they recognize its limitations individually.

In sum, interest groups may end up prioritizing the policies that benefit their most protected members not because they are deliberately overlooking the most disadvantaged but because the coalitional form they decided on came with drawbacks, not only benefits. While it offered these disparate groups more visibility, political efficacy, and a broader group of members, it compromised some individual groups'

goals and identities (Brooker and Meyer 2018). The NCLC did not set out to deprioritize 'low-income and other vulnerable people', but in coalition with groups who focused on 'the consumer interest' (CFA) and 'Americans' financial assets' (AFFIL), it is no wonder that the most vulnerable were the ones left with insufficient protection by groups' emphasis on regulation as a solution to consumer credit problems.

Declarations

Author Contribution

This article is solo-authored and so all contributions were made by the author.

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Data Availability

Archival data are from the Consumer Movement Archives at Kansas State University. <https://lib.k-state.edu/research-find/archives-and-special-collections/collections/consumer-movement/>

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Tables

Tables 1 to 3 are available in the Supplementary Files section.

Figures

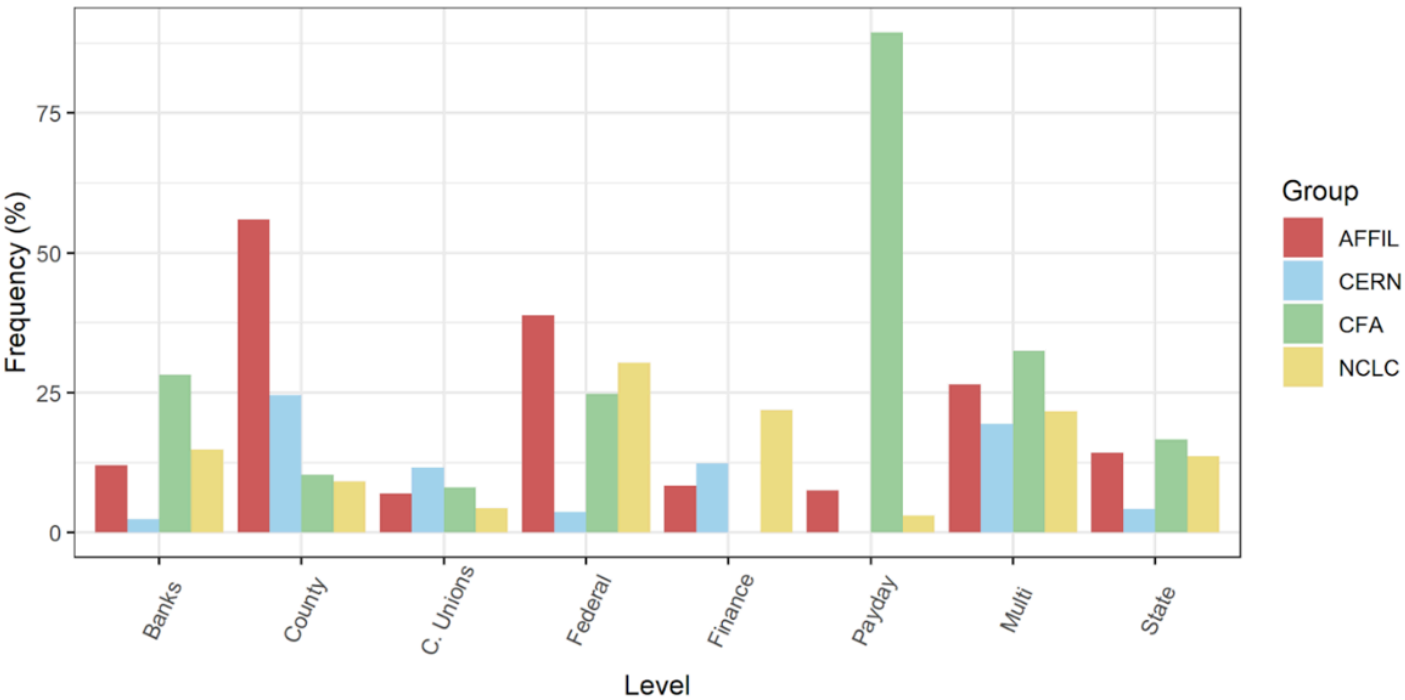


Figure 1

Credit Product Priorities

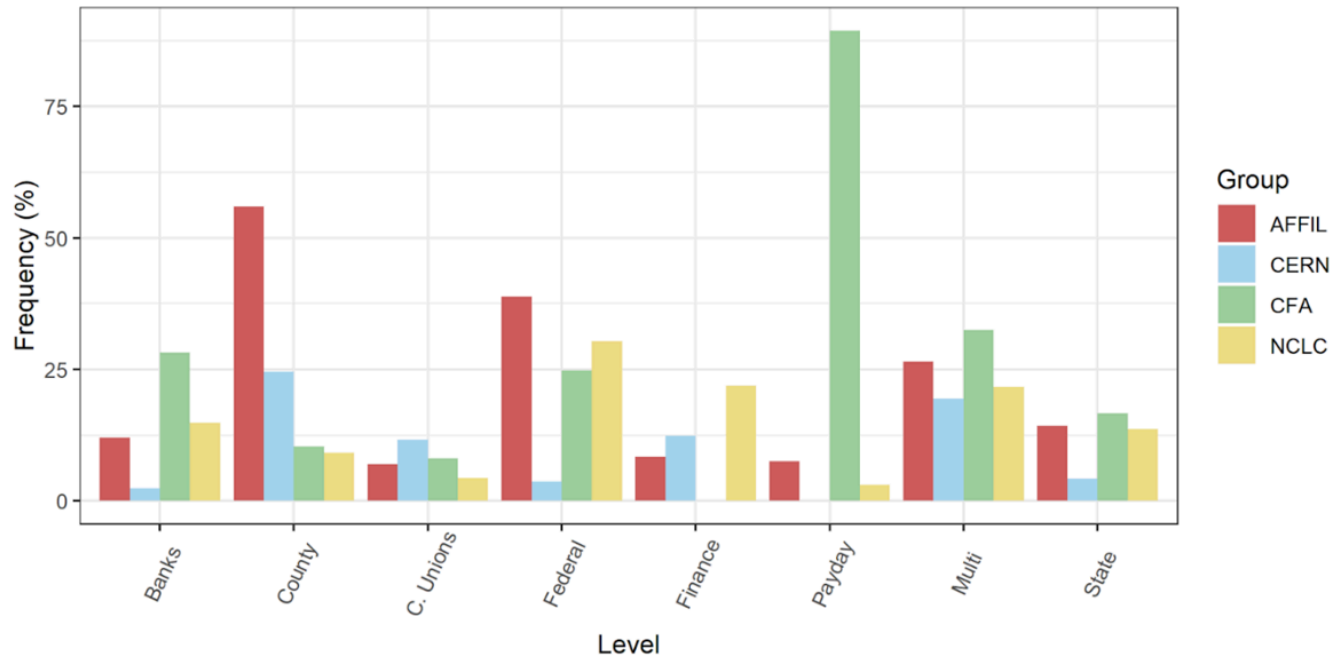


Figure 2

Levels and Institutions

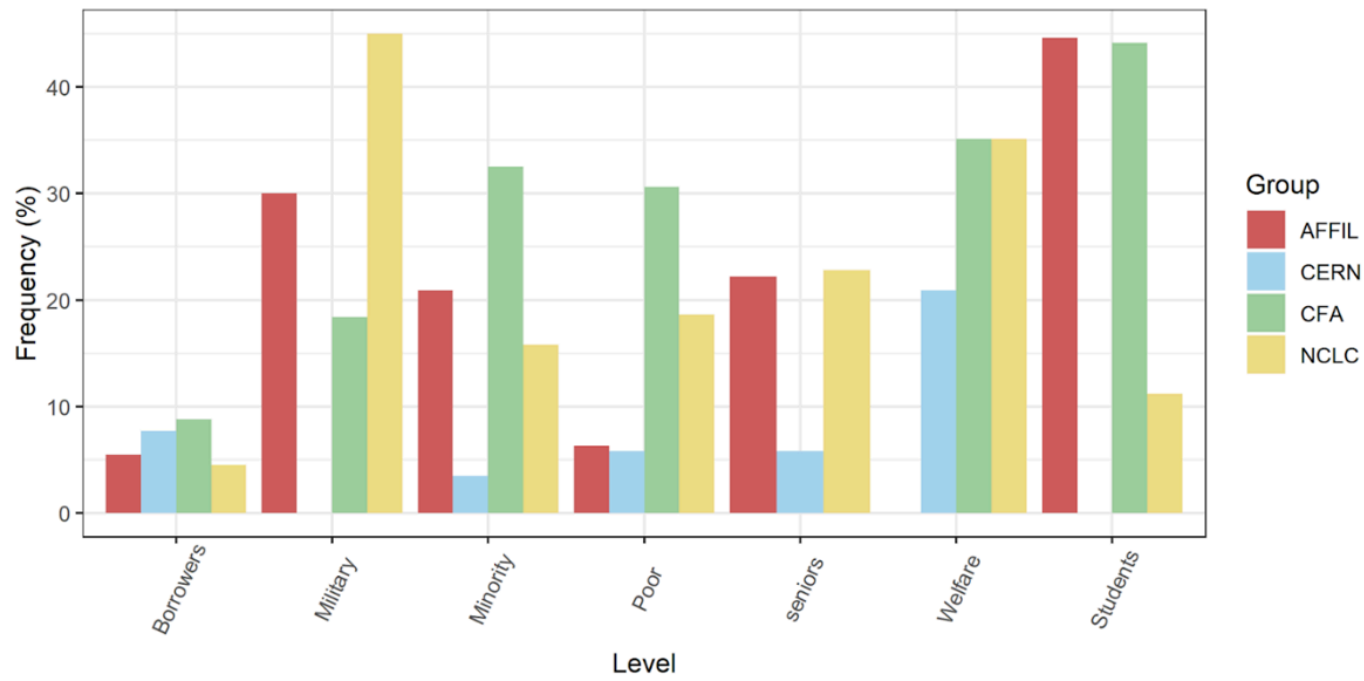


Figure 3

Target Populations



Figure 4

Consumer Credit Problems and Associated Solutions

Supplementary Files

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- [Table123.docx](#)
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