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**SENATE FINANCE COMMITTEE  
TESTIMONY OF MARYLAND VOLUNTEER LAWYERS SERVICE  
IN SUPPORT WITH REVISIONS OF SB 0094: COMMERCIAL LAW EARNED  
WAGE ACCESS - REVISIONS  
THURSDAY, JANUARY 29, 2026**

Chair Beidle and distinguished members of the Committee, thank you for the opportunity to testify in support with revisions of Senate Bill 94.

My name is Sean Russell, and I am a Consumer and Housing Staff Attorney at Maryland Volunteer Lawyers Service (MVLS). MVLS is the oldest and largest provider of pro bono civil legal services to low-income Marylanders. Since MVLS’ founding in 1981, our statewide panel of over 1,700 volunteers has provided free legal services to over 100,000 Marylanders in a wide range of civil legal matters.

MVLS assists Marylanders facing debt in several ways, including a weekly courthouse clinic in Baltimore City as well as representing Marylanders statewide with bankruptcy and other debt collection relief. Since 1999, we have assisted over 12,872 Marylanders to get consumer assistance and in an average year we assist more than 400 people facing debt collection at our courthouse clinic in Baltimore City. From the data collected, the average consumer seen at these clinics is an African American woman earning less than half the Maryland median income. She is in her early 40s, does not have a college degree, and she cares for at least one child or parent at home. For the reasons explained below, we respectfully request a favorable report with amendments to Senate Bill 94.

As drafted, Senate Bill 94 is an important step toward preventing app-based earned wage access (EWA) providers from operating as payday lenders, including steering workers into so-called “tips” to access their own earned wages. Recent statewide data shows that EWA products are used frequently and often habitually, with many users paying expedited fees and usage concentrated in lower-income communities, underscoring the need for stronger consumer protections. However, without stronger protections, EWA products can still trap low-wage workers in cycles of repeat borrowing, where each new advance is used in part to cover fees from the last. MVLS regularly sees the downstream effects of these practices, including missed rent, utility shutoffs, and increased risk of eviction and homelessness. These harms are not theoretical but are real and recurring for



**JUSTICE FOR ALL**

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many Marylanders like Ms. T., a client from MLVS’ weekly court clinics, who, like many Marylanders, is trying to manage multiple debts. Ms. T came to our clinic because she was being sued by two different debt buyers. Ms. T.’s income is largely consumed by debt collection, leaving her with few options to meet basic expenses and no realistic path out of debt other than bankruptcy. A stronger Senate Bill 94 will directly assist Marylanders like Ms. T by placing more safeguards to prevent earned wage lenders from extorting low and moderate income consumers with unreasonable fees and interest.

MVLS has been fighting to level the playing field for low-income Marylanders for decades, and we know that poor Marylanders are the most vulnerable to predatory lending practices. For these reasons, MVLS supports Senate Bill 94 with amendments to strengthen consumer protections by providing necessary guardrails to protect low-wage workers and struggling families from unaffordable credit. We urge the Committee to cap the total monthly cost of EWA products at \$10, inclusive of all fees and subscriptions; ensure meaningful, timely access to fee-free options; limit repeated attempts to debit consumers’ bank accounts; simplify cancellation and repayment processes; and require annual public reporting on costs and usage.

Chair and members of the Committee, thank you again for the opportunity to testify.