



## **PUBLIC DISCLOSURE**

Evaluation Period: January 1, 2025 – December 31, 2025

Examination Date: March 3, 2026

## **ILLINOIS COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

SIU Credit Union  
Charter Number: 60279  
1175 Main Street  
Carbondale, IL 62901

Illinois Department of Financial and Professional Regulation  
555 West Monroe Street, 5<sup>th</sup> Floor, Chicago, IL 60661

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**THIS ILLINOIS COMMUNITY REINVESTMENT ACT (ILCRA) EVALUATION IS  
AVAILABLE FOR PUBLIC REVIEW AND COMMENT.**

This evaluation reflects the Secretary's assessment pursuant to Section 35-10(b) of the Illinois Community Reinvestment Act [205 ILCS 735/35-10(b)] of the performance of this credit union in helping to meet the financial services needs of its local communities, including low- and moderate-income neighborhoods (LMI), consistent with the safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned herein does not represent an analysis, conclusion, or opinion of the Illinois Department of Financial and Professional Regulation, Division of Financial Institutions, concerning the safety and soundness of this financial institution.

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## INSTITUTION RATING

**INSTITUTION'S ILCRA RATING:** This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment field (or "AF"), including low- and moderate-income (or "LMI") individuals and geographies, consistent with its resources, capabilities, and performance context.

**The Lending Test <sup>1</sup> is rated **Satisfactory**.**

SIU Credit Union's (or "SIU" or the "Credit Union") ILCRA performance under the Lending Test is supported by the following:

- The loan-to-share ("LTS") ratio is reasonable (considering seasonal variations and taking into account lending-related activities), given the institution's size, financial condition, and AF credit needs.
- The Credit Union demonstrated reasonable responsiveness to credit needs within its AF.
- The distribution of loans by borrower income reflects reasonable penetration among individuals of different income levels.
- The geographic distribution of loans reflects reasonable dispersion throughout the AF.
- The institution did not receive any complaints related to its ILCRA performance during the evaluation period; therefore, this factor did not affect the rating.

**COMMUNITY DEVELOPMENT TEST: **Satisfactory**.**

SIU's performance under the Community Development Test is Satisfactory.

The Credit Union demonstrates adequate responsiveness to community development needs within its AF. Performance reflects consideration of the institution's capacity, available opportunities, and the needs of the communities served. As this represents the institution's first ILCRA evaluation, examiners also considered the Credit Union's initial efforts to identify and respond to community development needs.

### **Discriminatory or Other Illegal Credit Practices**

Examiners did not identify any evidence of discriminatory or other illegal credit practices; therefore, these factors did not affect the institution's ILCRA rating.

### **Assessment Factors**

Examiners reviewed the Credit Union's activities in its AF against the performance standards outlined in 38 Ill. Admin. Code 185.200 and did not find evidence that the Credit Union is not meeting the financial services needs of its members. Therefore, the Credit Union's ILCRA rating was not affected.

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<sup>1</sup> 38 Ill. Admin. Code 185.260.

## DESCRIPTION OF INSTITUTION

### **Background**

SIU Credit Union is an Illinois state-chartered credit union headquartered in Carbondale, Illinois. The credit union was organized in 1938 as Jackson County Teachers Credit Union and adopted its present name in 1984. SIU operates under community, occupational, and associational common bonds. Its field of membership includes individuals who live or work in 24 counties in Southern Illinois, as well as individuals eligible through select employee groups, associations, educational affiliations, and immediate family relationships.

For purposes of this evaluation, the Credit Union's assessment field consists of Jackson, Williamson, Massac, and Saline Counties in Southern Illinois.

As of December 31, 2025, SIU reported 45,875 members. The National Credit Union Administration ("NCUA") granted the credit union a Low-Income Designation on November 19, 2015. This is the Credit Union's first ILCRA performance evaluation.

No mergers or acquisitions occurred during the evaluation period.

### **Operations**

During the evaluation period, SIU operated six (6) branch offices within its AF: Carbondale East and Carbondale West in Jackson County; Marion West and Energy in Williamson County; Metropolis in Massac County; and Harrisburg in Saline County. The Credit Union therefore maintained a staffed office presence in each of the four counties comprising its AF.

The distribution of the Credit Union's offices by census tract income level was as follows: one office in a low-income census tract, two offices in moderate-income census tracts, one office in a middle-income census tract, and two offices in upper-income census tracts.

The Credit Union did not open or close any branch offices during the evaluation period. Construction commenced on an additional office in Marion, Illinois; however, the office was not operational during the evaluation period and therefore was not considered in this evaluation. Institution-provided information indicated that the office was expected to open in 2026.

Deposit products offered included share draft checking accounts, share savings accounts, money market accounts, individual retirement accounts, and share certificates. The Credit Union also offers Rebound Checking, a BankOn Illinois account intended to provide a safe and affordable option for members who may not qualify for a standard checking account. In 2025, SIU opened 114 BankOn Illinois Rebound Checking accounts. The Rebound Checking account was certified as a BankOn Illinois product in September 2021.

Loan products offered included vehicle loans, residential mortgage loans, personal loans, credit cards, commercial loans, student loans, small-dollar loans, and credit-building loans. Specialized consumer credit products included Fast Cash small-dollar loans, Credit Builder loans, Buy Now Pay Later, and Plan Your Purchase. The Credit Union also offered a conventional purchase mortgage requiring a 3.0 percent down payment for qualifying first-time homebuyers and utilized Member First Mortgage for FHA, VA, and USDA mortgage loans.

Alternative delivery systems included online and mobile banking, remote deposit capture, telephone banking, debit and credit cards, wire transfer services, surcharge-free access to automated teller machines, and shared branching.

### **Ability and Capacity**

As of December 31, 2025, the Credit Union reported total assets of approximately \$560.9 million, total loans of approximately \$387.9 million, and total shares of approximately \$492.2 million. The loan portfolio is concentrated in consumer lending. Consumer loans represented 79.1 percent of total loans by dollar volume and 99.4 percent by number. Residential real estate loans represented 15.0 percent of total loans by dollar volume and 0.5 percent by number, while commercial loans represented 5.9 percent by dollar volume and 0.1 percent by number.

The table below illustrates the loan portfolio.

| <b>SIU Loan Portfolio Distribution as of 12/31/2025</b>                                        |                |              |                    |              |
|------------------------------------------------------------------------------------------------|----------------|--------------|--------------------|--------------|
| <b>Loan Category</b>                                                                           | <b>#</b>       | <b>%</b>     | <b>\$</b>          | <b>%</b>     |
| Loans/Lines of Credit Secured by a First Lien on a single 1- to 4-Family Residential Property  | 577            | 0.4          | 48,615,396         | 12.5         |
| Loans/Lines of Credit Secured by a Junior Lien on a single 1- to 4-Family Residential Property | 271            | 0.2          | 9,689,665          | 2.5          |
| All Other Non-Commercial Real Estate Loans/Lines of Credit                                     | 0              | 0.0          | 0                  | 0.0          |
| <b>Total Real Estate Loans</b>                                                                 | <b>848</b>     | <b>0.5</b>   | <b>58,305,061</b>  | <b>15.0</b>  |
| Unsecured Credit Card Loans                                                                    | 6,792          | 4.3          | 17,875,585         | 4.6          |
| Non-Federally Guaranteed Student Loans                                                         | 1,297          | 0.8          | 1,178,027          | 0.3          |
| All Other Unsecured Loans/Lines of Credit                                                      | 5,239          | 3.3          | 18,506,911         | 4.8          |
| New Vehicle Loans                                                                              | 41,707         | 26.3         | 65,540,878         | 16.9         |
| Used Vehicle Loans                                                                             | 101,399        | 64.0         | 191,998,144        | 49.5         |
| All Other Secured Non-Real Estate Loans/Lines of Credit                                        | 1,004          | 0.6          | 11,594,146         | 3.0          |
| <b>Total Consumer Loans</b>                                                                    | <b>157,438</b> | <b>99.4</b>  | <b>306,693,691</b> | <b>79.1</b>  |
| Commercial Loans/Lines of Credit Real Estate Secured                                           | 107            | 0.1          | 18,717,359         | 4.8          |
| Commercial Loans/Lines of Credit Not Real Estate Secured                                       | 38             | 0.0          | 4,225,598          | 1.1          |
| <b>Total Commercial Loans/Lines of Credit</b>                                                  | <b>145</b>     | <b>0.1</b>   | <b>22,942,957</b>  | <b>5.9</b>   |
| <b>Total Loans</b>                                                                             | <b>158,431</b> | <b>100.0</b> | <b>387,941,709</b> | <b>100.0</b> |
| <i>Source: National Credit Union Administration Call Report Form 5300</i>                      |                |              |                    |              |

Examiners did not identify any financial, legal, or other impediments that affect the Credit Union's ability to meet the credit needs of its AF.

## DESCRIPTION OF ASSESSMENT FIELD

The ILCRA requires each covered credit union to delineate an AF within which its ILCRA performance will be evaluated. Pursuant to 38 Ill. Adm. Code 185.400(f), a credit union may delineate only those geographic areas containing members and persons eligible for membership under its community common bonds, or portions thereof, where the delineation is reasonable and consistent with a meaningful evaluation.

SIU delineated Jackson, Williamson, Massac, and Saline Counties in Illinois as its AF. The geographic analysis in this evaluation is limited to those four counties. Examiners determined that the delineated AF conforms to the requirements of 38 Ill. Admin. Code 185.400, does not reflect illegal discrimination, does not arbitrarily exclude any low- or moderate-income geography, and is reasonable and consistent with a meaningful ILCRA evaluation of the credit union.

### **Economic and Demographic Data**

Massac County is part of the Paducah, Kentucky-Illinois Metropolitan Statistical Area (“MSA”) 37140. Jackson, Williamson, and Saline Counties are nonmetropolitan and are evaluated using the applicable Illinois nonmetropolitan median family income. The regional economy includes higher education, health care, retail trade, manufacturing, government, services, and agricultural activity. Rural communities and agricultural activity are significant throughout portions of the AF. Southern Illinois University Carbondale, located in Jackson County, is a significant regional employer and contributes to economic activity in the Jackson County market.

The AF contains 48 census tracts: one (1) low-income tract, 17 moderate-income tracts, 19 middle-income tracts, eight (8) upper-income tracts, and three (3) tracts with no income classification assigned. LMI tracts represent 37.5 percent of the census tracts in the AF. Households in the AF are 42.5 percent LMI, consisting of 27.7 percent low-income households and 14.8 percent moderate-income households. Families in the AF are 42.0 percent LMI, consisting of 23.6 percent low-income families and 18.4 percent moderate-income families.

In addition, six (6) census tracts within the AF are designated as distressed or underserved. Three (3) of these tracts are located in Jackson County, and three (3) are located in Saline County. These designations affect the availability of community development opportunities within the AF. Under 38 Ill. Admin. Code 185.20, qualifying activities that revitalize or stabilize distressed or underserved nonmetropolitan middle-income geographies may receive community development consideration.

The AF contains 79,181 housing units: 55.2 percent are owner-occupied, 30.5 percent are occupied rental units, and 14.2 percent are vacant. Owner-occupied housing units are an important demographic consideration when evaluating the geographic distribution of home mortgage lending. Population is distributed by census tract income level as follows: 3.2 percent in low-income tracts, 30.8 percent in moderate-income tracts, 44.8 percent in middle-income tracts, 16.6 percent in upper-income tracts, and 4.5 percent in tracts without an income classification. Families below the poverty level represent 12.5 percent of families in the AF.

The following table illustrates select demographic characteristics of the AF.

| Demographic Information of the SIU AF                                                                                                                                            |         |               |                              |                  |                 |               |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|---------------|------------------------------|------------------|-----------------|---------------|
| Demographic Characteristics                                                                                                                                                      | #       | Low<br>% of # | Moderate<br>% of #           | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |
| Geographies (Census Tracts)                                                                                                                                                      | 48      | 2.1           | 35.4                         | 39.6             | 16.7            | 6.2           |
| Population by Geography                                                                                                                                                          | 158,064 | 3.2           | 30.8                         | 44.8             | 16.6            | 4.5           |
| Housing Units by Geography                                                                                                                                                       | 79,181  | 4.3           | 32.8                         | 41.8             | 15.2            | 5.9           |
| Owner-Occupied Units by Geography                                                                                                                                                | 43,773  | 0.9           | 30.3                         | 48.8             | 17.1            | 2.8           |
| Occupied Rental Units by Geography                                                                                                                                               | 24,131  | 8.4           | 37.3                         | 30.5             | 12.9            | 10.9          |
| Vacant Units by Geography                                                                                                                                                        | 11,277  | 8.8           | 33.0                         | 38.7             | 12.4            | 7.2           |
| Businesses by Geography                                                                                                                                                          | 12,792  | 4.0           | 29.6                         | 39.3             | 20.0            | 7.1           |
| Farms by Geography                                                                                                                                                               | 678     | 1.0           | 21.2                         | 57.8             | 15.8            | 4.1           |
| Family Distribution by Income Level                                                                                                                                              | 40,235  | 23.6          | 18.4                         | 18.4             | 39.5            | 0.0           |
| Household Distribution by Income Level                                                                                                                                           | 67,904  | 27.7          | 14.8                         | 16.5             | 41.0            | 0.0           |
| Median Family Income MSA - 37140 Paducah, KY-IL MSA                                                                                                                              |         | \$63,538      | Median Housing Value         |                  |                 | \$111,736     |
| Median Family Income Non-MSAs - IL                                                                                                                                               |         | \$67,835      | Median Gross Rent            |                  |                 | \$693         |
|                                                                                                                                                                                  |         |               | Families Below Poverty Level |                  |                 | 12.5%         |
| Source: 2020 ACS, 2025 D&B Data, and FFIEC Estimated Median Family Income;<br>(* ) The NA category consists of geographies that have not been assigned an income classification. |         |               |                              |                  |                 |               |

The Federal Financial Institutions Examination Council (“FFIEC”) estimated median family income for 2025 was \$88,300 for the Paducah, Kentucky-Illinois MSA and \$86,600 for Illinois nonmetropolitan areas. These estimates were used to categorize borrowers by income level for the home mortgage borrower profile analysis. The median family income figures in the demographic table above come from the 2020 American Community Survey and provide demographic context; they are not the figures used to categorize borrowers.

The following table presents the low-, moderate-, middle-, and upper-income categories.

| Median Family Income Ranges                            |             |                         |                        |                |
|--------------------------------------------------------|-------------|-------------------------|------------------------|----------------|
| Median Family Incomes                                  | Low<br><50% | Moderate<br>50% to <80% | Middle<br>80% to <120% | Upper<br>≥120% |
| <b>Paducah, KY-IL MSA Median Family Income (37140)</b> |             |                         |                        |                |
| 2025 (\$88,300)                                        | <\$44,150   | \$44,150 to <\$70,640   | \$70,640 to <\$105,960 | ≥\$105,960     |
| <b>IL NA Median Family Income (99999)</b>              |             |                         |                        |                |
| 2025 (\$86,600)                                        | <\$43,300   | \$43,300 to <\$69,280   | \$69,280 to <\$103,920 | ≥\$103,920     |
| Source: FFIEC                                          |             |                         |                        |                |

## **Competition**

The AF is a competitive financial services market. SIU competes with community and regional banks, other credit unions, mortgage companies, and non-depository lenders for shares, residential mortgage loans, vehicle loans, credit cards, and other consumer products. Competition is concentrated primarily in Jackson and Williamson Counties, where population, employment, and retail financial activity are greatest.

Federal Deposit Insurance Corporation (“FDIC”) Summary of Deposits data as of June 30, 2025, identified 71 bank offices in the AF holding approximately \$3.68 billion in deposits. The FDIC

Summary of Deposits survey includes FDIC-insured banks and savings institutions and excludes credit unions and non-depository financial institutions. Therefore, actual competition for financial services in the AF is greater than FDIC data alone indicate. NCUA directory data identified one (1) office operated by another credit union in the AF, compared with SIU's six offices.

### **Community Contacts**

As part of the examination, examiners conducted two community contacts to help identify and understand the AF's credit and community development needs and opportunities. The contacts represented organizations with knowledge of LMI households, rural communities, entrepreneurs, and small businesses in Southern Illinois.

One contact was conducted with a nonprofit community action organization that provides social service and assistance programs in seven (7) southern Illinois counties, including Massac County. Its programs include utility and energy assistance, weatherization, workforce services, and other assistance targeted primarily to low-income households. The contact described the service area as predominantly rural and identified continuing challenges involving transportation, utility costs, childcare, health care, and access to services.

The contact identified affordable housing as a significant need, citing high rents and an insufficient supply of affordable housing for LMI families. The contact also noted potential needs for home purchase, repair, rehabilitation, and down-payment financing and indicated that limited in-person access to financial services can create barriers in rural communities.

Financial education and counseling were also identified as significant needs. The contact cited the need for education regarding basic banking, savings, available financial products, and credit. Individuals with poor credit histories had greater difficulty accessing traditional financial services, and some clients found home mortgage credit particularly difficult to obtain. The contact also observed continued entrepreneurial activity and downtown and Main Street revitalization involving small local businesses in Southern Illinois, including Metropolis.

The second contact was conducted with a small business development organization affiliated with Southern Illinois University Carbondale. The organization serves multiple counties in Southern Illinois, including Jackson and Williamson Counties, and provides one-on-one business counseling, business-plan development, marketing assistance, financial analysis, assistance accessing financing programs, and entrepreneurship education.

The small business development contact identified financial education and access to small-dollar business financing as significant needs among entrepreneurs and microenterprises. The contact reported that smaller business loans are often difficult for clients to obtain and indicated that many financing requests are in the \$10,000 to \$25,000 range. The contact further emphasized relationship banking and opportunities for entrepreneurs to establish direct relationships with financial institution representatives. The contact estimated that a substantial portion of financing requests from entrepreneurs are for microloans within the \$10,000 to \$25,000 range.

Both community contacts indicated that local financial institutions are generally responsive to community needs and participate in community events. However, both emphasized continued

opportunities for financial education and greater interaction between financial institutions and community residents or small business owners.

### **Credit and Community Development Needs and Opportunities**

Based on community contacts and the AF's economic and demographic characteristics, examiners identified affordable housing, access to appropriate consumer and home mortgage credit, financial education and credit-building services, and small business and microenterprise financing as significant credit needs.

Affordable housing and housing rehabilitation represent important community development needs. Housing conditions vary throughout the AF, with Jackson County influenced by the Southern Illinois University Carbondale rental market and more rural portions of the AF characterized by lower household incomes and more limited access to services. Opportunities exist for financial institutions to support affordable homeownership, housing rehabilitation, and other qualifying affordable housing activities.

Financial education and credit-building are also significant needs. Opportunities include financial counseling, budgeting and savings education, credit education, youth financial literacy, credit-building products, and partnerships with organizations serving LMI individuals and families. Community contact information also indicates opportunities for financial institutions to improve awareness of available financial products and community resources and to strengthen personal interaction with residents who may be unfamiliar with traditional financial services.

Small business credit is another identified need. The AF contains 12,792 businesses, of which 33.6 percent are located in LMI census tracts. Community contact information indicates demand for small-dollar business and microenterprise financing, particularly among entrepreneurs requiring relatively modest amounts of credit. Opportunities exist for financial institutions to provide or support small business financing, technical assistance, financial education, and partnerships with organizations serving entrepreneurs and small businesses.

The six (6) distressed or underserved census tracts located in Jackson and Saline Counties provide additional community development context. Opportunities may exist for qualifying loans, investments, services, or other activities that revitalize or stabilize these geographies and address essential community needs. ILCRA specifically includes qualifying revitalization or stabilization activities in distressed or underserved nonmetropolitan middle-income geographies within the definition of community development.

Community development opportunities within the AF also include affordable housing development and rehabilitation, financial education and credit counseling, small business technical assistance and financing programs, and partnerships with organizations serving LMI individuals and communities. Opportunities may also exist to support qualifying infrastructure and community service initiatives benefiting LMI individuals and communities, including transportation, childcare, health services, broadband access, and community facilities, where the activity otherwise meets the definition of community development under 38 Ill. Admin. Code 185.20.

## **SCOPE OF EVALUATION**

### **General Information**

The Illinois Department of Financial and Professional Regulation (“IDFPR” or “Department”), Division of Financial Institutions, conducted this ILCRA examination, which covers the period from January 1, 2025, through December 31, 2025. Examiners used the ILCRA Intermediate Small Credit Union Examination Procedures to evaluate SIU's ILCRA performance. These procedures include the modified Lending Test and the Community Development Test. The criteria for these tests are detailed in the Appendices. The Credit Union's performance was evaluated under the intermediate small credit union performance standards at 38 Ill. Admin. Code 185.260, the applicable assessment factors at 38 Ill. Admin. Code 185.200, and the rating provisions at 38 Ill. Admin. Code 185.210, 185.280, and 185.APPENDIX A (“Ratings”).

The modified Lending Test considered the credit union's loan-to-share (“LTS”) ratio; its concentration of lending inside the AF; its record of lending to borrowers of different income levels and businesses of different sizes, where applicable data were available; the geographic distribution of lending in the context of the credit union's field of membership; its record of responding to written complaints regarding its ILCRA performance; and its performance with regard to fair lending policies and practices. Census tract income was used for geographic analysis and performance context and was not used as a substitute for borrower income.

An intermediate small credit union must receive a rating of at least Satisfactory on both the modified Lending Test and the Community Development Test to receive an overall rating of Satisfactory. Evidence of discriminatory or other illegal credit practices, or a negative evaluation of applicable assessment factors, may lower the overall ILCRA rating.

In accordance with 38 Ill. Admin. Code 185.200, examiners considered the Credit Union’s lack of prior experience with ILCRA examinations and the length of the implementation period at 38 Ill. Admin. Code 185.490 in assessing performance during this first ILCRA examination. Examiners also considered the Credit Union’s field of membership limitations and the lending and investment authority restrictions applicable to Illinois credit unions under 205 ILCS 305.

SIU received a Low-Income Designation from the National Credit Union Administration in 2015. In accordance with 38 Ill. Admin. Code 185.210(g), examiners considered the Credit Union's Low-Income Designation when evaluating its ILCRA performance. The designation was considered as part of the overall performance context and does not substitute for evaluation of the Credit Union's performance under the modified Lending Test and Community Development Test.

### **Activities Reviewed**

Examiners reviewed home mortgage, consumer, and business lending based on the Credit Union's business strategy and the number and dollar volume of loans originated during the evaluation period.

Examiners analyzed home mortgage lending reported on the Credit Union's 2025 Home Mortgage Disclosure Act (HMDA) Loan Application Register (“LAR”). SIU originated 115 home mortgage loans in 2025, of which 87 were located within the AF. Within the AF, HMDA data reflected 135

applications, including the 87 originations. Examiners used the 115 home mortgage originations to evaluate AF concentration and the 87 originations in the AF to evaluate borrower profile and geographic distribution.

Aggregate HMDA lending data for 2025 were not available at the time of the examination. Therefore, examiners used demographic data as the standard for comparing the home mortgage borrower profile and geographic distribution analyses. Examiners used the distribution of families by income level for the borrower profile analysis and the distribution of owner-occupied housing units by census tract income level for the geographic distribution analysis. Borrower income categories were determined using the applicable 2025 FFIEC median family income levels.

Examiners reviewed 9,463 consumer loan originations during the evaluation period, of which 5,957 were located within the AF. Examiners evaluated consumer lending for AF concentration and geographic distribution. Borrower income information was not available for consumer loans. Therefore, examiners did not perform a borrower profile analysis for consumer lending. The absence of borrower income information did not adversely affect the evaluation of the Credit Union's lending performance.

Examiners reviewed 72 business loan originations during the evaluation period, of which 55 were located within the AF and totaled approximately \$2.5 million. Examiners used the 72 business loan originations to evaluate AF concentration and the 55 originations in the AF to evaluate geographic distribution and lending to businesses of different sizes. Of the 55 business loans originated in the AF, 46, or 83.6 percent, were made to businesses with gross annual revenues of \$1 million or less.

Examiners also reviewed the Credit Union's community development activities under the Community Development Test. The review included charitable contributions, sponsorships, scholarships, and other in-kind or financial support the Credit Union identified. Accordingly, examiners' review focused on community development services and the Credit Union's responsiveness to identified community development needs.

# CONCLUSIONS ON INTERMEDIATE SMALL CREDIT UNION PERFORMANCE CRITERIA

## LENDING TEST

SIU demonstrated reasonable performance under the modified Lending Test. The conclusion is supported by a reasonable net LTS ratio, a majority of lending within the AF in each reviewed loan category, reasonable penetration among borrowers of different income levels and businesses of different sizes, and reasonable overall geographic distribution.

### Loan-to-Share Ratio

This performance criterion measures the percentage of the credit union's share base reinvested in loans and evaluates the appropriateness of that reinvestment given the institution's size, financial condition, and AF credit needs.

The Credit Union's net LTS ratio, as calculated from NCUA 5300 Quarterly Call Report data, averaged 75.1 percent over the 16 calendar quarters from March 31, 2022, through December 31, 2025. The ratio reached a high of 80.9 percent as of September 30, 2025, and was 78.8 percent as of December 31, 2025, consistent with approximately \$387.9 million in total loans and \$492.2 million in total shares.

The average LTS ratio reflects a consistent level of reinvestment of member shares in lending and is reasonable given the Credit Union's size, financial condition, and AF credit needs.

### Assessment Field Concentration

This criterion evaluates the extent to which the Credit Union originates loans inside its AF. Examiners considered both the number and the dollar volume of home mortgage, consumer, and small business originations.

The Credit Union originated a majority of loans inside the AF in each reviewed loan category. Home mortgage originations within the AF represented 75.7 percent by number and 77.0 percent by dollar volume. Small business originations within the AF represented 76.4 percent by number and 82.9 percent by dollar volume. Consumer originations within the AF represented 63.0 percent by number and 56.1 percent by dollar volume.

Considered collectively, the concentration of lending within the AF is reasonable.

The following table summarizes loan concentrations inside and outside of the AF.

| SIU Lending Inside and Outside of the AF                                                 |                 |      |         |      |            |                        |      |                   |      |                    |
|------------------------------------------------------------------------------------------|-----------------|------|---------|------|------------|------------------------|------|-------------------|------|--------------------|
| Loan Category                                                                            | Number of Loans |      |         |      | Total<br># | Dollar Amount of Loans |      |                   |      | Total              |
|                                                                                          | Inside          |      | Outside |      |            | Inside                 |      | Outside           |      |                    |
|                                                                                          | #               | %    | #       | %    |            | \$                     | %    | \$                | %    |                    |
| Home Mortgage                                                                            | 87              | 75.7 | 28      | 24.3 | 115        | 12,626,720.00          | 77.0 | 3,776,111.75      | 23.0 | 16,402,831.75      |
| Small Business                                                                           | 55              | 76.4 | 17      | 23.6 | 72         | 2,456,000.00           | 82.9 | 505,000.00        | 17.1 | 2,961,000.00       |
| Consumer                                                                                 | 5,957           | 63.0 | 3,506   | 37.0 | 9,463      | 78,045,210,940.00      | 56.1 | 61,070,644,910.00 | 43.9 | 139,115,855,850.00 |
| Source: Credit Union Data                                                                |                 |      |         |      |            |                        |      |                   |      |                    |
| Due to rounding, totals may not equal 100.0                                              |                 |      |         |      |            |                        |      |                   |      |                    |
| Dollar amounts for Small Business, Small Farm, and Consumer loans are multiplied by 1000 |                 |      |         |      |            |                        |      |                   |      |                    |

### **Borrower Profile**

This criterion evaluates the distribution of lending among borrowers of different income levels and businesses of different revenue sizes. This criterion did not evaluate consumer lending because borrower income data was unavailable.

The distribution of home mortgage loans reflects reasonable penetration across income levels. Of the 87 home mortgage loans originated within the AF, SIU originated 10 loans, or 11.5 percent, to low-income borrowers and 23 loans, or 26.4 percent, to moderate-income borrowers. Combined lending to LMI borrowers represented 37.9 percent of AF home mortgage originations, closely approximating the 42.0 percent of AF families that are LMI.

Lending to low-income borrowers, at 11.5 percent, was below the 23.6 percent of AF families that are low-income. Lending to moderate-income borrowers, at 26.4 percent, exceeded the 18.4 percent of AF families that are moderate-income. The distribution between the two LMI income categories, considered alongside AF demographics and housing conditions, supports a reasonable borrower-profile conclusion.

SIU also offers a conventional purchase mortgage requiring a 3.0 percent down payment for qualifying first-time homebuyers. During 2025, the Credit Union originated seven (7) loans under this product within the AF totaling \$816,584. Three (3) of the seven (7) loans, or 42.9 percent, were made to LMI borrowers: two (2) loans to low-income borrowers and one (1) loan to a moderate-income borrower. The product reduces the required upfront down payment for qualifying first-time homebuyers and provides additional context for the Credit Union's home mortgage borrower profile.

| <b>Distribution of Home Mortgage Loans by Borrower Income Level</b>  |                      |           |              |                 |              |
|----------------------------------------------------------------------|----------------------|-----------|--------------|-----------------|--------------|
| <b>SIU AF</b>                                                        |                      |           |              |                 |              |
| <b>Borrower Income Level</b>                                         | <b>% of Families</b> | <b>#</b>  | <b>%</b>     | <b>\$(000s)</b> | <b>%</b>     |
| Low                                                                  | 23.6                 | 10        | 11.5         | 651             | 5.2          |
| Moderate                                                             | 18.4                 | 23        | 26.4         | 2,429           | 19.2         |
| Middle                                                               | 18.4                 | 23        | 26.4         | 2,846           | 22.5         |
| Upper                                                                | 39.5                 | 29        | 33.3         | 6,398           | 50.7         |
| Not Available                                                        | 0.0                  | 2         | 2.3          | 303             | 2.4          |
| <b>Subtotal</b>                                                      | <b>100.0</b>         | <b>87</b> | <b>100.0</b> | <b>12,627</b>   | <b>100.0</b> |
| <i>Source: 2020 ACS; Credit Union Data, "--" data not available.</i> |                      |           |              |                 |              |
| <i>Due to rounding, totals may not equal 100.0%</i>                  |                      |           |              |                 |              |

The distribution of small business loans by gross annual revenue is reasonable. Of the 55 small business loans originated within the AF, 46 (83.6 percent), totaling approximately \$1.8 million, were made to businesses with gross annual revenues of \$1 million or less. This closely approximates the 83.2 percent of AF businesses reporting gross annual revenues of \$1 million or less.

| Distribution of Small Business Loans by Gross Annual Revenue Category<br>SIU AF                                    |                 |           |              |              |              |
|--------------------------------------------------------------------------------------------------------------------|-----------------|-----------|--------------|--------------|--------------|
| Business Revenue Level                                                                                             | % of Businesses | #         | %            | \$(000s)     | %            |
| <=\$1,000,000                                                                                                      | 83.2            | 46        | 83.6         | 1,779        | 72.4         |
| >\$1,000,000                                                                                                       | 3.7             | 9         | 16.4         | 677          | 27.6         |
| Revenue Not Available                                                                                              | 13.1            | 0         | 0.0          | 0            | 0.0          |
| <b>Total</b>                                                                                                       | <b>100.0</b>    | <b>55</b> | <b>100.0</b> | <b>2,456</b> | <b>100.0</b> |
| Source: 2025 D&B Data; Credit Union Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0% |                 |           |              |              |              |

Overall, the borrower profile reflects reasonable penetration across different income levels and business sizes.

### **Geographic Distribution**

The geographic distribution of home mortgage loans reflects reasonable distribution throughout the AF. The Credit Union originated five (5) loans (5.7 percent) in the AF's single low-income census tract, compared with 0.9 percent of total owner-occupied housing units located in the low-income census tract. The Credit Union originated 33 loans (37.9 percent) in moderate-income census tracts, compared with 30.3 percent of owner-occupied housing units located in those census tracts.

Home mortgage lending exceeded the demographic comparator in both LMI census tracts and supports the conclusion that the geographic distribution of home mortgage loans is reasonable.

| Geographic Distribution of Home Mortgage Loans<br>SIU AF                                                      |                                   |           |              |               |              |
|---------------------------------------------------------------------------------------------------------------|-----------------------------------|-----------|--------------|---------------|--------------|
| Tract Income Level                                                                                            | % of Owner-Occupied Housing Units | #         | %            | \$(000s)      | %            |
| Low                                                                                                           | 0.9                               | 5         | 5.7          | 696           | 5.5          |
| Moderate                                                                                                      | 30.3                              | 33        | 37.9         | 3,917         | 31.0         |
| Middle                                                                                                        | 48.8                              | 27        | 31.0         | 4,110         | 32.5         |
| Upper                                                                                                         | 17.1                              | 20        | 23.0         | 3,623         | 28.7         |
| Not Available                                                                                                 | 2.8                               | 2         | 2.3          | 280           | 2.2          |
| <b>Subtotal</b>                                                                                               | <b>100.0</b>                      | <b>87</b> | <b>100.0</b> | <b>12,627</b> | <b>100.0</b> |
| Source: 2020 ACS; Credit Union Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0% |                                   |           |              |               |              |

The geographic distribution of consumer loans reflects reasonable dispersion. SIU originated 176 loans, or 3.0 percent, in low-income census tracts, compared with 3.6 percent of AF households located in those tracts. The Credit Union originated 1,876 loans, or 31.5 percent, in moderate-income census tracts, compared with 32.8 percent of AF households. Combined consumer lending in LMI tracts represented 34.5 percent of originations, compared with 36.4 percent of AF households located in those tracts. Consumer lending therefore closely approximates the demographic distribution of households in LMI census tracts.

| Geographic Distribution of Consumer Loans                            |                 |              |              |                   |              |
|----------------------------------------------------------------------|-----------------|--------------|--------------|-------------------|--------------|
| SIU AF                                                               |                 |              |              |                   |              |
| Tract Income Level                                                   | % of Households | #            | %            | \$(000s)          | %            |
| Low                                                                  | 3.6             | 176          | 3.0          | 1,490,363         | 1.9          |
| Moderate                                                             | 32.8            | 1,876        | 31.5         | 21,624,911        | 27.7         |
| Middle                                                               | 42.3            | 2,659        | 44.6         | 38,852,666        | 49.8         |
| Upper                                                                | 15.6            | 1,072        | 18.0         | 14,330,595        | 18.4         |
| Not Available                                                        | 5.7             | 174          | 2.9          | 1,746,676         | 2.2          |
| <b>Subtotal</b>                                                      | <b>100.0</b>    | <b>5,957</b> | <b>100.0</b> | <b>78,045,211</b> | <b>100.0</b> |
| <i>Source: 2020 ACS; Credit Union Data, "--" data not available.</i> |                 |              |              |                   |              |
| <i>Due to rounding, totals may not equal 100.0%</i>                  |                 |              |              |                   |              |

The geographic distribution of small business loans is reasonable when considered in context, although lending in LMI census tracts was below the distribution of AF businesses. SIU originated no small business loans in the single low-income census tract, which contains 4.0 percent of AF businesses. The Credit Union originated 12 loans, or 21.8 percent, in moderate-income census tracts, compared with 29.6 percent of AF businesses located in those tracts.

| Geographic Distribution of Small Business Loans                               |                 |           |              |              |              |
|-------------------------------------------------------------------------------|-----------------|-----------|--------------|--------------|--------------|
| SIU AF                                                                        |                 |           |              |              |              |
| Tract Income Level                                                            | % of Businesses | #         | %            | \$(000s)     | %            |
| Low                                                                           | 4.0             | 0         | 0.0          | 0            | 0.0          |
| Moderate                                                                      | 29.6            | 12        | 21.8         | 731          | 29.8         |
| Middle                                                                        | 39.3            | 26        | 47.3         | 1,113        | 45.3         |
| Upper                                                                         | 20.0            | 16        | 29.1         | 576          | 23.5         |
| Not Available                                                                 | 7.1             | 1         | 1.8          | 36           | 1.5          |
| <b>Subtotal</b>                                                               | <b>100.0</b>    | <b>55</b> | <b>100.0</b> | <b>2,456</b> | <b>100.0</b> |
| <i>Source: 2025 D&amp;B Data; Credit Union Data, "--" data not available.</i> |                 |           |              |              |              |
| <i>Due to rounding, totals may not equal 100.0%</i>                           |                 |           |              |              |              |

### **Response to Complaints**

The Credit Union did not receive any complaints relating to its ILCRA performance during the evaluation period. This criterion did not affect the Lending Test rating.

## **COMMUNITY DEVELOPMENT TEST**

SIU demonstrated adequate responsiveness to the community development needs of its AF. Examiners considered the Credit Union's capacity, predominantly consumer-oriented business strategy, identified community development needs and opportunities within the AF, and the one-year evaluation period.

### **Community Development Lending**

The Credit Union is primarily a consumer lender. Consumer loans represent 99.4 percent of total loans by number, while commercial loans represent 0.1 percent. As a result, opportunities to originate loans eligible for separate consideration as community development loans are limited.

SIU is an approved Small Business Administration (“SBA”) lender and continued to service three SBA 7(a) loans originated before the evaluation period. No SBA loans were originated during 2025. The Credit Union also planned to participate in Advantage Illinois after the evaluation period. Advantage Illinois is a state-sponsored program that supports small business lending through loan participation and loan guarantees offered in partnership with participating financial institutions. As these activities did not result in community development loan originations during the evaluation period, they did not receive consideration under this criterion.

### **Community Development Investments**

Examiners considered donations, sponsorships, grants, and other financial or in-kind support that met a qualifying community development purpose and benefited the AF. SIU provided \$40,110 and 123 volunteer hours in donations, sponsorships, and grants during this evaluation period.

SIU provided \$37,110 to support Banzai financial literacy programming at schools throughout the AF. During 2025, 55 participating schools were located in Jackson, Williamson, Massac, and Saline Counties. Of these schools, 24 were located in LMI census tracts and collectively served approximately 8,653 students. Separately, participating schools where more than 50 percent of students were eligible for free or reduced-price lunch collectively served approximately 15,543 students. Because the geographic and student-income measures overlap, examiners did not combine the school or student totals. The Banzai sponsorship supported financial education for students in LMI communities and schools serving predominantly LMI student populations.

SIU also provided the University of Illinois Extension for the Plant a Row, Watch COPE Grow Food Donation Garden with rent-free use of credit union-owned property in Metropolis. The garden donates harvested produce to the COPE Food Pantry for distribution to LMI families in Massac County. The program also provides nutrition education, food-storage guidance, recipes, and gardening instruction. Examiners considered the rent-free use of the property as an in-kind community development investment.

### **Scholarships**

SIU awarded 10 scholarships during 2025. The scholarship selection process considers several factors, including academic achievement, financial need, essay responses, and community involvement. Three (3) recipients resided in LMI census tracts.

### **Community Development Services**

SIU provided community development services through financial expertise and financial education.

An assistant vice president of accounting provided approximately 112 hours of financial expertise to Jackson Union County Habitat for Humanity during 2025 while serving as treasurer, qualified loan officer, and committee member. Responsibilities included bookkeeping, account reconciliation, financial and tax reporting, mortgage preparation and servicing oversight, applicant review, homeowner financial counseling, and delinquency intervention. These activities supported an organization that provides affordable homeownership opportunities. Jackson Union County Habitat for Humanity serves Jackson and Union Counties, including Jackson County within the Credit Union's AF.

SIU also provided direct financial education within the AF. The Credit Union documented 11 financial education sessions in 2025, reaching 623 participants. Topics included fraud and scam awareness, budgeting and personal finance, and financial education simulations. Employees also participated in hands-on financial education programs, including Bite of Reality<sup>2</sup> events.

### **Responsiveness to Community Development Needs**

Community contacts and demographic information identified financial education and credit building, affordable housing and housing rehabilitation, small business financing, and services benefiting LMI households as significant community development needs within the AF.

SIU addressed identified community development needs through direct and school-based financial education, financial expertise supporting affordable homeownership, and financial and in-kind support for programs serving LMI individuals and families. These activities were consistent with the Credit Union's capacity, business strategy, and available community development opportunities within the AF

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<sup>2</sup> Bite of Reality provides a hands-on, app-based simulation that teaches teens how to make financial decisions and gives them a better understanding of the challenges of living on a budget

## **FAIR LENDING, DISCRIMINATORY, OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

Pursuant to its examination authority [205 ILCS 735/15], the IDFPR - Division of Financial Institutions examines an institution's compliance with applicable State and federal fair lending laws and provides comments regarding the institution's fair lending policies and procedures. Examiners found the Credit Union's record relative to fair lending policies and practices to be reasonable and did not identify any evidence of discriminatory or other illegal credit practices; therefore, the results did not affect the institution's overall ILCRA rating.

### **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

Pursuant to its examination authority under 205 ILCS 735/15, the Department examines an institution's compliance with applicable State and federal fair lending laws and regulations and provides comments regarding the institution's fair lending policies and procedures.

Evidence of discriminatory or other illegal credit practices may adversely affect the credit union's assigned rating in accordance with 38 Ill. Admin. Code 185.280. In determining the effect of evidence of such practices on the assigned rating, the Secretary considers the nature, extent, and strength of the evidence of the practices; the policies and procedures the credit union has in place to prevent the practices; any corrective action the credit union has taken or has committed to take, including voluntary corrective action resulting from self-assessment; and any other relevant information.

Examiners reviewed the Credit Union's fair lending policies and practices, the integrity of Home Mortgage Disclosure Act data, loan pricing, and the administration of loan exceptions. Examiners found the Credit Union's record relative to fair lending policies and practices to be reasonable and did not identify evidence of discriminatory lending practices, including discouragement of applications, in the transactions and policies reviewed.

## **APPENDICES**

### **INTERMEDIATE SMALL CREDIT UNION PERFORMANCE CRITERIA**

#### **Lending Test – Section 185.260(b)**

An intermediate small credit union's lending performance in home mortgage, small business, community development lending, consumer lending, or any other type of lending, as applicable, is evaluated pursuant to the following criteria:

1. the credit union's loan-to-share ratio, adjusted for seasonal variation and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
2. the credit union's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses of different sizes;
3. the geographic distribution of the credit union's loans in the context of its relevant field of membership;
4. the credit union's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment field and its performance with regard to fair lending policies and practices; and
5. the origination of loans to businesses with gross annual revenues of \$1,000,000 or less, particularly those in low-income and moderate-income neighborhoods. This subsection (b)(5) applies only to credit unions that make business loans.

#### **Community Development Test – Section 185.260(c)**

An intermediate small credit union's community development performance is also evaluated pursuant to the following criteria:

1. the number and amount of community development loans;
2. the extent to which the credit union provides community development services;
3. the credit union's responsiveness through such activities to community development lending, investment and service needs; and
4. at the election of the credit union, the number and amount of qualified investments.

## GLOSSARY

**"Affiliate"** means any company that controls, is controlled by, or is under common control with another company. The term "control" has the meaning given to that term in 12 U.S.C. 1841(a)(2), and a company is under common control with another company if both companies are directly or indirectly controlled by the same company.

**"Alternative financial products or services"** means financial products or services offered by persons other than an insured depository institution at a higher cost than comparable services offered by an insured depository institution.

**"Area median income"** means the median family income for the MSA/CBSA, if a person or geography is located in an MSA/CBSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA/CBSA.

**"Assessment field"** means the persons delineated in accordance with Section 400 as subject to the ILCRA evaluation.

**"Automated teller machine" or "ATM"** means an automated, unstaffed banking facility owned or operated by, or operated exclusively for, the credit union at which deposits are received, cash is dispensed, or money is lent.

**"Branch"** means a staffed facility established or acquired as a branch under Illinois law means a staffed facility established or acquired as a branch under Illinois law.

**"CBSA"** refers to a Core Based Statistical Area, as defined by the Director of the Office of Management and Budget.

**"Community development"** means:

Affordable housing (including multifamily rental housing) for low- and moderate-income individuals;

Community services targeted to low- and moderate-income individuals;

Activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or

Activities that revitalize or stabilize –

low- or moderate-income geographies;

designated disaster areas; or

distressed or underserved nonmetropolitan middle-income geographies designated by the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, and the Office of the Comptroller of the Currency, based on –

rates of poverty, unemployment, and population loss; or

population size, density, and dispersion. Activities revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals; or  
unbanked or underbanked geographies;

Activities targeted to directly and tangibly –

increase climate resilience in low- and moderate-income neighborhoods; or  
mitigate environmental harm in low-income to moderate-income neighborhoods;  
and

Any other such area as determined by the Secretary based on –

Rates of poverty, unemployment, and population loss; or

Population size, density, and dispersion. Activities revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

**“Community Development Financial Institutions (CDFIs)”** are private intermediaries (either for-profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to access the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet the following eligibility requirements:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

**“Community development loan”** is a loan that:

has as its primary purpose community development; and

except in the case of a wholesale or limited-purpose credit union:

has not been reported or collected by the credit union or an affiliate for consideration in the credit union’s assessment as a home mortgage or consumer has not been reported or collected by the credit union or an affiliate for consideration in the credit union's assessment as a home mortgage or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to 12 CFR 203, the Consumer Financial Protection Bureau's implementing regulations for the Home Mortgage Disclosure Act); and directly or indirectly benefits the credit union's assessment field.

**“Community development service”** means a service that:

has as its primary purpose community development;

is related to the provision of financial services; and

has not been considered in the evaluation of the credit union’s retail banking services under Section 185.240(d).

**“Community Reinvestment Act”** unless context indicates otherwise means the Illinois Community Reinvestment Act (“ILCRA”).

**“Consumer loan”** means a loan to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage or small business loan. Consumer loans include the following categories of loans:

Motor vehicle loan, a consumer loan extended for the purchase of and secured by a motor vehicle;

Credit card loan, a line of credit for household, family, or other personal expenditures that is accessed by a borrower's use of a "credit card", as this term is defined in 12 CFR 1026.2;

Other secured consumer loan, a secured consumer loan that is not included in one of the other categories of consumer loans; and

Other unsecured consumer loan, an unsecured consumer loan that is not included in one of the other categories of consumer loans.

**“Core Based Statistical Area (CBSA)”** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and

Metropolitan Statistical Areas are the two categories of CBSAs.

**“Credit union”** means a corporation chartered as a cooperative, non-profit association, incorporated under the Illinois Credit Union Act [205 ILCS 305].

**“Department”** means the Illinois Department of Financial and Professional Regulation.

**“Distressed middle-income nonmetropolitan geography”** means a nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5 years preceding the most recent census.

**“Family”** includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family. Other family is further classified into “male householder” (a family with a male householder and no wife present) or “female householder” (a family with a female householder and no husband present).

**“FDIC”** means the Federal Deposit Insurance Corporation.

**“Field of membership”** means the members or persons eligible to join a credit union consisting of members or persons:

within one or more of the following common bonds: association, occupation, or community as defined in 205 ILCS 305; and

as otherwise authorized under 205 ILCS 305.

**“Fiscal year”** means the fiscal year for the State of Illinois (starts July 1 and ends June 30).

**“Geography”** means a census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

**“Home Mortgage Disclosure Act (HMDA)”** is a statute that requires specific mortgage lenders doing business or having banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include data such as the applicant's race, gender, and income, the amount of the requested loan, and the disposition of the application (approved, denied, or withdrawn).

**“Home mortgage loan”** means a closed-end mortgage loan or an open-end line of credit, as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (10) and (13).

**“Housing unit”** includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**“Income level”** includes:

*Low-income*, an individual income that is less than 50% of the area median income, or a median family income that is less than 50%, in the case of a geography.

*Moderate-income*, an individual income that is at least 50% and less than 80% of the area median income, or a median family income that is at least 50% and less than 80%, in the case of a geography.

*Middle-income*, an individual income that is at least 80% and less than 120% of the area median income, or a median family income that is at least 80% and less than 120%, in the case of a geography.

*Upper-income*, an individual income that is 120% or more of the area median income, or a median family income that is 120% or more, in the case of a geography.

**“Institution”**, unless context indicates otherwise, means a credit union.

**“Limited purpose institution or limited purpose credit union”** means an institution that offers only a narrow product line (such as credit card or motor vehicle loans) to a regional or broader market and for which a designation as a limited purpose institution is in effect, in accordance with Section 185.250(b).

**“Loan location”** means a loan is located as follows:

a consumer loan is located in the geography where the borrower resides;

a home mortgage loan is located in the geography where the property to which the loan relates is located; and

a small business loan is located in the geography where the main business facility or farm is located or where the loan proceeds will otherwise be applied, as indicated by the borrower.

**“Loan production office”** means a staffed facility of a credit union, other than a branch, that is open to the public or members and that provides lending-related services, such as loan information and applications.

**“Median income”** divides the income distribution into two equal parts, one having incomes above the median and the other having incomes below the median.

**“Metropolitan division (MD)”** means a metropolitan division as defined by the United States Director of the Office of Management and Budget.

**“Metropolitan Statistical Area (MSA)”** means a metropolitan statistical area or a primary metropolitan statistical area as defined by the United States Director of the Office of Management and Budget.

**"Person"** means any individual, partnership, joint venture, trust, estate, firm, corporation, cooperative society or association, or any other form of business association or legal entity.

**"Public lobby"** means an area generally accessible to a credit union's members or some of a credit union's members, which allows for easy reading of notices in the place of business.

**“Qualified Investment”** means a lawful investment, deposit, membership share, or grant that has as its primary purpose community development, and lawful investments include the following:

*corporations* for the purpose of micro-lending in the area of small business and small farms;

*corporations* for the purpose of providing technical assistance to nonprofit housing corporations, small businesses, and farms for the purpose of establishing creditworthiness;

*contributions* to any private nonprofit organization organized for improving the social and economic conditions, such as community development and redevelopment programs, small business technical assistance, and educational institutions, in communities in which the credit union has an office; and

*contributions* for the purpose of relieving suffering or distress resulting from disaster or other calamity, such as hurricane or flood, occurring in any part of the State; and  
*contributions* to community development and redevelopment programs.

**“Rural area”** means territories, populations, and housing units that are not classified as urban.

**"Secretary"** means the Secretary or Acting Secretary of the Financial and Professional Regulation and his or her authorized representatives.

**“Small credit union”** means a credit union that, as of December 31 of either of the prior two calendar years, had total assets of less than \$412 million. "Intermediate small credit union" means a credit union with assets of at least \$412 million as of December 31 of both of the prior two calendar years and less than \$1.649 billion as of December 31 of either of the prior two calendar years. The asset-size thresholds (dollar figures) for small credit unions and intermediate small credit unions shall be automatically adjusted to remain consistent with the asset-size thresholds in effect for small banks and intermediate small banks as published by the Federal Deposit Insurance Corporation. The Secretary shall publish each adjustment of the asset-size thresholds for small credit unions and intermediate small credit unions on the Department's website. "Very Small

Credit Union" means a credit union that is eligible for the Very Small Credit Union Examination Procedures set forth in 185.Appendix D pursuant to Section 185.450.

**"Small Business Investment Company (SBIC)"** SBICs are privately-owned investment companies that are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms.

**"Small business loan"** means a loan to a business with gross annual revenues of \$1,000,000.00 or less. For purposes of this Part, small business loan includes small farm loans.

**"Special Credit Program"** means any credit program offered by a credit union to meet special social needs which is in conformity with and explicitly authorized by the Equal Credit Opportunity Act, 15 U.S.C. 1691(c) and Regulation B, 12 CFR 1002.8, and the Illinois Human Rights Act [775 ILCS 5/4-104(C)].

**"Substantial majority"** means a portion of the credit union's lending activity so significant by number and dollar volume of loans that the lending test evaluation would not meaningfully reflect its lending performance if consumer loans were excluded.

**"Unbanked person"** refers to an individual who does not have a checking or savings account with an insured bank, savings bank, or credit union.

**"Underbanked person"** means a person who has a checking or savings account with an insured depository institution but who has used alternative financial products or services in the past 12 months.

**"Underserved Middle-Income Nonmetropolitan Geographies"** means a nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion, indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

**"Wholesale credit union"** means a credit union that is not in the business of extending home mortgage, small business, small farm, or consumer loans to retail customers, and for which a designation as a wholesale credit union is in effect, in accordance with Section 185.250(b). means an individual that does not have a checking or savings account with an insured depository institution.