



March 25, 2026

Via email: Craig.Cellini@illinois.gov

Mr. Craig Cellini
Illinois Department of Financial and Professional Regulation
320 West Washington, 2nd Floor
Springfield, IL 62786

**Re: IDFPR Credit Union Community Reinvestment Proposed Amendments
50 Illinois Register, Pages 2029-2079
February 13, 2026
Code Citation: 38 Ill. Adm. Code 185**

Dear Mr. Cellini:

The Illinois Credit Union League (“League”) appreciates the opportunity to provide the following written comments to the Illinois Department of Financial and Professional Regulation (“IDFPR”), in response to its Notice of Proposed Amendments published on February 13, 2026. The proposed amendments were issued in relation to rulemaking the IDFPR is promulgating pursuant to the Illinois Community Reinvestment Act (ILCRA).

The League supports the following IDFPR proposed amendments:

- 1) Section 185.20 clarifying the definition of a “small business loan” by confirming that a loan to a business with gross annual revenues of \$1,000,000.00 or less will be considered a small business loan as it relates to the ILCRA examination;
- 2) Section 185.480 to establish the 2027 ILCRA Annual Fiscal Year fees, indicating no change from the 2026 ILCRA Annual Fiscal Year fees;
- 3) Section 185.APPENDIX A providing options for a small or intermediate small credit union to be assessed for ILCRA compliance based on the performance tests applicable to larger asset size credit unions; and
- 4) The creation of Section 185.APPENDIX E ILCRA Illustrative List of Qualifying Activities for Credit Unions to provide additional examples of activities that may meet the criteria for a community development qualifying activity under 38 Ill. Adm. Code 185.

The League also appreciates the specific acknowledgment of the Federal Home Loan Banks’ (FHLB) Affordable Housing Program within the newly created 185.APPENDIX E, as a program participating credit unions may receive consideration for as a community development qualifying activity during an ILCRA examination. We believe all applicable FHLB programs should be considered during the credit union’s ILCRA examination.

The League would like to take this opportunity to suggest additional edits within 38 Ill. Adm. Code 185 we believe would eliminate confusion expressed by the industry. We ask the IDFPR to consider the following amendments.



Section 185.200(a) Assessment Factors

This subsection provides the statutory assessment factors and explains that the factors will be used to determine whether a credit union is meeting the financial services needs of local communities. The League suggests amending this subsection by replacing “local communities” with “its assessment field” to provide clarity regarding the ILCRA compliance evaluation process. We suggest making the following edit to Section 185.200(a):

As used in this Part, “assessment factors” means the assessment of the following factors to determine whether a credit union is meeting the financial services needs of its assessment field ~~local communities~~:

For consistency, we also recommend amending subsection 185.200(a)(1) & (2) as follows:

1. Activities to ascertain the financial services needs of the assessment field ~~community~~, including communication with ~~community~~ members in the assessment field regarding the financial services provided;
2. Extent of marketing to make members in the assessment field ~~of the community~~ aware of the financial services provided;

Section 185.420(b)(1) ILCRA File: Credit unions other than small or intermediate small credit unions

There is no evaluation of consumer lending for large credit unions (unlike small and intermediate small credit unions), unless one of two pathways is activated. One pathway is controlled by the IDFPR and is activated if it is determined a “substantial majority” of the credit union’s business revolves around consumer lending (Section 185.220(a)(1) – the “IDFPR Option”). The other pathway is controlled by the credit union and is based on its election at its option to have one or more categories of consumer lending evaluated (Section 185.200(a)(1) – the “Credit Union Option”).

We interpret this section to mean, if consumer lending evaluation for a large credit union is activated under the “IDFPR Option” and the credit union generates the data required under Sections 185.410(c)(1) and 185.420(b)(1), then none of it is required to be included in the ILCRA file. We draw this conclusion because the credit union has not exercised the “Credit Union Option” to be evaluated on one or more categories of consumer lending pursuant to Section 185.220(a)(1). We believe the following language would help clarify this interpretation (also deleting the redundant typo “or a credit union”):

A credit union, except a small credit union or intermediate small credit union or a credit union ~~or a credit union~~ that was a small credit union or intermediate small credit union the prior calendar year, shall include in its ILCRA file the following information pertaining to the credit union and its affiliates, if applicable, for each of the prior two calendar years, but only if–If the credit union has elected to have one of more categories of its consumer loans considered under the lending test, for each of these categories, the number and amount of loans:



1. To low-, moderate-, middle-, and upper-income individuals;
2. Located in low-, moderate-, middle-, and upper-income census tracts; and
3. Located inside the credit union's assessment field and outside the credit union's assessment field."

Section 185.430/185.APPENDIX B ILCRA Notice

This section references credit unions with more than one assessment field and that is an affiliate of a holding company. Both references have created confusion, and the League suggests amending this section to remove both references. No credit union has more than one ILCRA assessment field. In addition, no credit union is an "affiliate of a holding company." This is commonly used as a banking organizational concept and is not applicable to credit unions. The suggested amendments to this section are as follows:

~~A credit union shall provide in the public lobby of its main office and each of its branches, if any, and on its website, the appropriate public notice set forth in 185.APPENDIX B. Only a branch of a credit union having more than one assessment field shall include the bracketed material in the notice for branch offices. Only a credit union that is an affiliate of a holding company shall include the second to the last sentence of the notices for its main office and website and the last two sentences of the notice for its branch offices and website. A credit union shall include the last sentence of the notices only if it is an affiliate of a holding company that is not prevented by statute from acquiring additional credit unions.~~

Section 185.APPENDIX B provides two notices identified as (a) and (b) and if the suggested amendments are made to section 185.430 to eliminate the reference to holding companies, corresponding edits to both notices deleting the bracketed sentences referring to holding companies should also be made.

This section also requires credit unions to post notice (a) in its main office and on its website, and notice (b) in its branch locations and on its website. The League confirmed with the IDFPR both notices (a) & (b) should be posted on the credit union's website but clarification would be helpful if this continues to be the requirement, especially in cases where the credit union does not have any branch locations.

The League would like to thank the IDFPR for the opportunity to comment on the proposed amendments to the ILCRA and offer its opinion on ways to tailor the rule to ensure credit unions understand all the requirements to fulfill its objectives.

The League is available to provide further information or address any questions the IDFPR may have in relation to the comments expressed in this letter.



Respectfully submitted,

A handwritten signature in black ink that reads "Shannon Basile". The signature is written in a cursive style with a large, looping initial "S".

Shannon Basile, Sr. Director, Compliance

ILLINOIS CREDIT UNION LEAGUE