

Collinsville Building and Loan Association and corresponding geographies:

701 Belt Line Road (Main) Collinsville, IL 62234	Census Tract: 4035.02
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Branches opened or closed in the current year or the two prior calendar years:

100 West Market Street (Troy Branch) Troy, IL 62294 - Closed April 14, 2023	Census Tract: 4035.01
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Collinsville Building and Loan Association hours of operation:

Monday, Tuesday, Wednesday, Thursday, Friday	8:30 am to 5:00 pm
Saturday	8:30 am to 12:00 pm

Collinsville Building and Loan Association products, services, and transaction/other fees.

Products	Services	Transaction/Other Fees
Statement Savings Accounts	Online Banking	CB&L Checking Min Bal Fee -
Jr. Savings Accounts	Online Bill Pay	\$5.00/month
CB&L Checking Accounts	Mobile Banking	MMDA Min Balance Fee-\$10.00/month
Free Checking	Mobile Deposit Capture	Garnishment/Levy-\$75.00
Senior Checking	Online Loan Payments	Reclamation-\$75.00
Loyalty (Rewards) Checking	Text Banking Options	Overdraft/NSF-\$30.00
Debit/ATM Cards	Overdraft Linked Accounts	Returned Deposit Item-\$12.00
MMDA Accounts	Swipe & Save (Automatic	OD Linked Account Transfer-\$10.00
Certificates of Deposit	Savings)	Stop Payment-\$30.00
IRA Accounts	eBill	Official Bank Check-\$5.00
1-2 Family Home Mortgages	eStatements (deposit accounts)	Domestic Wire Transfer-Outgoing-\$25.00
Consumer Construction Loans	Electronic Mortgage Applications	Domestic Wire Transfer-Incoming-\$10.00
Second Mortgages*	Online Deposit Account Opening	International Wire (All)-\$50.00
Home Improvement Loans*	Illinois License Plate Renewals	Returned/Undeliverable Mail-\$3.00
Share (deposit account) Loans	Property Tax Collections-	Duplicate Statement-\$5.00
Consumer Lot/Vacant Land	(Madison County, IL)	Check Copies-\$2.00 (\$2.00/mo to include
Church Loans	Notary Services (Noncustomers-	in statements)
	\$5.00)	History Printout-\$2.00
		Debit Card Replacement-\$15.00
		Debit Card PIN Reset-\$5.00
		Reopen Account-\$5.00
		Close Checking (w/in 90 days)-\$25.00
		Dormant Account-\$5.00/month
		Inactive Account-\$5.00/mo after 12mo
		inactivity
		Escheatment-\$50.00
		Negative Balance (7 or more days)-\$30.00
		Excessive Transactions-\$5.00/item
		Account Research (hr/min)-\$25.00
		Balancing Assistance (hr/min)-\$25.00
		IRA Outgoing Transfer-\$20.00
		Telephone Transfer-\$3.00
*CB&L must be in first lien position		

Listing of census tracts/geographies comprising Collinsville Building and Loan's Assessment Area:

Madison County	St. Clair County
4029.00, 4030.01, 4030.02, 4031.01, 4031.21, 4031.22, 4032.00, 4033.00, 4034.01, 4034.03, 4034.04, 4035.02, 4035.31, 4035.32, 4035.33, 4035.34, 4036.01, 4036.03, 4036.04, 4037.01, 4037.02	5034.04, 5034.11, 5034.12, 5034.13, 5034.14, 5034.15, 5034.16 5043.51, 5043.52, 5043.53, 5043.54, 5043.55, 5043.58, 5043.59

Community Reinvestment Act
Public Comments Received

<u>Year</u>	<u>Submitted by</u>	<u>Response</u>
<u>2024</u>	None to Date	N/A
2023	None	None
2022	None	None



PUBLIC DISCLOSURE

September 23, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Collinsville Building and Loan Association
Charter Number: 700904

701 Beltline Road
Collinsville, IL 62234-4412

Office of the Comptroller of the Currency

500 North Broadway, Suite 1700
St. Louis, MO 63102

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated **Outstanding**.

The Lending Test is rated: Outstanding.

The lending test is based on Collinsville Building and Loan Association’s, a Federal Savings Association (CBLA or FSA), performance in the state of Illinois. The major factors that support this rating include:

- The average loan-to-deposit (LTD) ratio is more than reasonable.
- A substantial majority of the home loans are inside its assessment area (AA).
- The geographic distribution of home loans reflects excellent dispersion throughout the AA.
- The overall distribution of loans to borrowers of different income levels is reasonable.
- There were no CRA-related complaints during the evaluation period.

Loan-to-Deposit Ratio

Considering the FSA’s size, financial condition, and credit needs of the AA, the FSA’s LTD ratio is more than reasonable. The FSA’s quarterly LTD ratio averaged 99.1 percent over the 20-quarter period ending December 31, 2023. Over the same period, the LTD ratio ranged from a low of 95.4 percent to a high of 104.2.

To assess the FSA’s performance, we compared CBLA’s average LTD ratio to local Federal Deposit Insurance Corporation (FDIC) insured financial institutions over the evaluation period, which included six similarly situated institutions serving Madison County and St. Clair County. The comparative institutions ranged in asset size from \$32.7 million to \$177.7 million with a combined average LTD ratio of 71.1 percent. The similarly situated institutions had average LTD ratios ranging from 51.9 percent to 89.5 percent. CBLA ranked first out of seven when comparing the average ratios. Other than one other institution, CBLA is the only comparative institution operating with a singular branch, giving competitors in the market a slight advantage.

Institution	Average Quarterly LTD Ratio	Total Assets (\$000s) as of 12/31/2023
Collinsville Building & Loan Association	99.1%	\$122,763
Bank of Belleville	89.5%	\$473,369
Bank of O'Fallon	84.2%	\$341,797
First Federal Savings Bank of Mascoutah, IL	81.2%	\$177,698
Citizens Community Bank	67.6%	\$502,686
Guardian Savings Bank	52.3%	\$32,682
State Bank of St. Jacob	51.9%	\$86,201

Source: Quarterly FFIEC Call Reports 01/01/2021 - 12/31/2023

Lending in Assessment Area

A substantial majority of the FSA's loans are inside its AA. The FSA originated 83.4 percent of its total loans inside its AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2021	105	82.0	23	18.0	128	18,167	82.2	3,934	17.8	22,101
2022	61	82.4	13	17.6	74	10,840	85.0	1,919	15.0	12,759
2023	40	85.1	7	14.9	47	5,703	84.2	1,070	15.8	6,773
Total	206	82.7	43	17.3	249	34,710	83.4	6,923	16.6	41,633
<i>Source: Evaluation Period: 01/01/2021-12/31/2023 FSA Data Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

CBLA is a \$123.7 million mutual savings association headquartered in Collinsville, Illinois. The Collinsville branch is the FSA's only location after the closure of the Troy, Illinois branch in April of 2023. The FSA has not opened any branches since the prior CRA evaluation. The FSA has no affiliates or subsidiaries.

CBLA's business strategy includes serving customers in Madison County and St. Clair County through its singular branch location. CBLA operates as a traditional thrift through the solicitation of deposits from the local community and the origination of home mortgage loans. The institution offers a wide range of deposit products including checking accounts, statement savings accounts, and certificates of deposit.

As of December 31, 2023, CBLA reported total assets of \$123.7 million, total deposits of \$89.2 million, and tier 1 capital \$34.3 million representing 27.3 percent of total assets. The FSA reported \$90.2 million in outstanding loans, with a net loan to total assets ratio of 72.9 percent. Home mortgage loans represent 99 percent of the loan portfolio.

For CRA purposes, CBLA has one AA in the state of Illinois, which consists of a portion of the St. Louis, MO-IL MSA #41180. The AA includes the southern portion of Madison County with 21 census tracts (CT) and the northern portion of St. Clair County with 14 CTs; the 35 CTs are contiguous. AA changes since the prior examination are solely due to three CT splits resulting from the 2020 U.S. Census (effective in 2022). CBLA operates the singular branch within the 4035.02 CT with no automated teller machines (ATM). The AA conforms to regulatory requirements and does not arbitrarily exclude any low- or moderate-income (LMI) geographies.

There were no legal, financial, or other factors impeding the FSA's ability to help meet the credit needs in its AA during the evaluation period. There have not been any major changes in CBLA's corporate structure, including merger or acquisition activities, during the evaluation period that would have affected the FSA's CRA performance or the OCC's analysis. Utilizing Small Bank performance criteria, the OCC concluded the FSA's performance was "Outstanding" at the prior CRA evaluation dated July 1, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The scope of this evaluation includes an assessment of CBLA under the Small Bank performance criteria, which consists of the Lending Test. The test evaluates CBLA's record of helping to meet the credit needs of its AA through its lending activities. The evaluation period for the Lending Test is January 1, 2021 through December 31, 2023. Examiners determined CBLA's primary loan products by reviewing the number and dollar volume of loan originations during the evaluation period. Home mortgage loans were the primary product. CLBA originated 249 home mortgage loans totaling \$41.6 million between January 1, 2021 and December 31, 2023.

Examiners relied on Home Mortgage Disclosure Act (HMDA) data to complete the analysis of home mortgages. We used demographic information from the 2015 American Community Survey (ACS) to analyst performance during the 2021 evaluation period and demographic information from the 2020 U.S. Census to analyze performance for the 2022-2023 evaluation period.

Selection of Areas for Full-Scope Review

In each state where the FSA has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, FSA delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, FSA delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The FSA's overall rating is based solely on its performance in the state of Illinois. The state of Illinois rating is derived from the FSA's performance under the CRA Small Bank Lending Test as well as related performance context information from the FSA's AA. With the exception of the LTD ratio (based on the FSA's entire lending portfolio), all weight for performance under the CRA Small Bank Lending Test was based on the FSA's lending performance in relation to its primary product of home mortgage loans.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Illinois

CRA rating for the State of Illinois: Outstanding.

The Lending Test is rated: Outstanding.

The major factors that support this rating include:

- The average LTD ratio is more than reasonable.
- A substantial majority of the home loans are inside its AA.
- The geographic distribution of home loans reflects excellent dispersion throughout the AA.
- The overall distribution of loans to borrowers of different income levels is reasonable.
- There were no CRA-related complaints during the evaluation period.

Description of Institution's Operations in Illinois

CBLA operates the singular, full-service branch within the 4035.02 CT in Madison County, with no ATMs. CBLA's primary business focus is originating home mortgage loans, serving Madison County and St. Clair County. The FSA only has one AA, which is located in Illinois; of the primary loan product analyzed during this review, 83 percent of home mortgage originations throughout the evaluation period are within the AA.

CBLA's AA consists of 35 contiguous CTs within a portion of the St. Louis, MO-IL MSA #41180. The AA includes the southern portion of Madison County (21 CTs) and the northern portion of St. Clair County (14 CTs). CT income level composition is the following: 0 low, 4 moderate, 14 middle, and 14 upper. The AA experienced four geographical income level changes from existing CTs from 2021 to 2022-2023 due to 2020 U.S. Census updates (effective in 2022). Of the geographical income level changes, two affected Madison County (4029.00 and 4035.02); CT 4029.00 made a significant shift from a moderate-income designation to an upper-income designation, and 4035.02 shifted from an upper-income designation to a middle-income designation. The remaining geographical income level changes affected two contiguous CTs within St. Clair County (5034.11 and 5034.12); CT 5034.11 shifted from a middle-income designation to a moderate-income designation, and CT 5034.12 shifted from a middle-income designation to an upper-income designation.

Additional AA changes stemmed from three CT splits resulting from 2020 U.S. Census updates, one affecting Madison County and two affecting St. Clair County. Madison County CT 4034.02 became 4034.03 and 4034.04. St. Clair County CT 5034.02 became 5034.15 and 5034.16; CT 5043.02 became 5043.58 and 5043.59. The four geographical income level changes from existing CTs, along with the addition of three CTs from the splits, resulted in an overall addition of two moderate-income CTs and one upper-income CT over the evaluation period. The closure of the Troy, IL branch (in CT 4035.31) did not affect the FSA's AA. The AA meets regulatory requirements and does not arbitrarily exclude LMI geographies.

Employment and Economic Factors

For the evaluation period, the population of the FSA's AA increased from 175,527 to 184,494 (5.1 percent). The AA experienced a shift away from middle-income geographies towards primarily upper-income geographies, with a slight shift toward moderate-income geographies. Despite a large percentage of the AA's population living in upper-income geographies, according to the 2020 U.S. Census, 24.7 percent of households living in upper-income CTs were of LMI status. The geographical income level changes resulted in LMI CTs increasing as a percentage of the AA from 12.5 percent to 17.1 percent; the increase was solely due to moderate-income CT increases, as there are no low-income CTs in the AA.

According to Bureau of Labor Statistics data, the unemployment rate in Madison County, St. Clair County, State of Illinois, and at the national level improved from 2021 to 2023.

Annual Unemployment Rates			
Area	2021	2022	2023
Madison County	5.0%	3.9%	4.1%
St. Clair County	6.2%	4.5%	4.6%
State of Illinois	6.1%	4.6%	4.5%
National	5.4%	3.6%	3.6%

*Source: U.S. Department of Labor: Bureau of Labor Statistics
Federal Reserve FRED economic data*

Based on information in the table below, low-income families in the AA earned less than \$42,350 (2021) and up to \$50,400 (2023). Moderate-income families' earnings ranged from \$42,350 (2021) to \$80,640 (2023).

Table B – Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
St. Louis, MO-IL MSA Median Family Income (41180)				
2021 (\$84,700)	<\$42,350	\$42,350 to <\$67,760	\$67,760 to <\$101,640	≥\$101,640
2022 (\$96,800)	<\$48,400	\$48,400 to <\$77,440	\$77,440 to <\$116,160	≥\$116,160
2023 (\$100,800)	<\$50,400	\$50,400 to <\$80,640	\$80,640 to <\$120,960	≥\$120,960

Source: FFIEC

The AA economy is diverse and not heavily dependent on one major industry. Based on 2020 U.S. Census business demographic data, the primary industries in the area are services (36.7 percent), non-classifiable establishments (21.2 percent), and finance/insurance/real estate (12.4 percent). According to the St. Louis Business Journal, major employers in Madison County and St. Clair County include Scott Airforce Base, Amazon, Southern Illinois University Edwardsville, and Hospital Sisters Health System.

Competition

The AA is a competitive banking environment. According to the June 30, 2023, FDIC Deposit Market Share Report, CBLA's deposits in the AA totaled \$93.7 million, representing 100 percent of the FSA's total deposits. CBLA had a 0.8 percent market share, making it the 25th largest deposit holder out of 37

financial institutions in the Madison County and St. Clair County market. CBLA's major competitors are Busey Bank, FCB Banks, Regions Bank, and U.S. Bank, N.A., comprising an aggregated 45 percent of the market share. Unlike its major competitors, CBLA only operates one branch with loan products being largely home mortgages, likely posing as obstacles towards reaching a broader customer base.

Competition for home mortgage loans in the AA was strong during the evaluation period. Based on aggregate peer HMDA data reported between January 1, 2021 and December 31, 2021, 335 lenders originated or purchased 12,557 home mortgages in the AA. The top five lenders accounted for 22.4 percent of the total loans originated or purchased, with CBLA ranking 32nd, originating 105 home mortgage loans with 0.8 percent market share by count. Based on aggregate peer HMDA data reported between January 1, 2023 and December 31, 2023, 266 lenders originated or purchased 4,787 home mortgages in the AA. The top five lenders accounted for 29.2 percent of the total loans originated or purchased, with CBLA ranking 31st, originating 40 home mortgage loans while maintaining 0.8 percent market share by count.

Housing Affordability Analysis

According to Table A, the median housing value of owner-occupied housing units for CBLA's AA was \$165,650 for 2021 and \$186,924 for 2022-2023, increasing 12.8 percent over the evaluation period. Based on data from the 2020 U.S. Census, low-income families earned less than \$3,532 and moderate-income families earned less than \$5,651 monthly. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of 30 percent of the applicant's monthly income, resulting in a maximum monthly mortgage payment of \$1,059 for low-income borrowers and \$1,695 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent fixed interest rate, and excluding a down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the St. Louis MSA AA's median housing value would have been \$1,003. Based on this data, we concluded that low-income families would not be able to afford a home mortgage based on the median family income and median home value in the St. Louis MSA AA in 2022 to 2023. Moderate-income borrowers would likely struggle as well. Based on data from the 2015 ACS, and assuming the same principal and interest payment, we concluded that low-income families could not afford a home mortgage based on the median family income and median home value in the St. Louis MSA AA in 2021. Moderate-income borrowers would likely struggle as well.

We considered the poverty level across the AA in evaluating lending performance. Families living below the state poverty threshold, identified as having difficulty meeting basic financial needs, are less likely to have adequate financial resources to qualify for a home loan compared to those above the poverty line. According to the 2020 U.S. Census, 4.5 percent of families in the St. Louis MSA AA had income below the federal poverty line (compared to 11.9 percent for Illinois).

Demographics

The following tables provide a summary of the demographics for the St. Louis MSA AA for both evaluation periods.

Table A – Demographic Information of the Assessment Area						2021
Assessment Area: St Louis MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	0.0	12.5	43.8	43.8	0.0
Population by Geography	175,527	0.0	10.0	43.4	46.7	0.0
Housing Units by Geography	72,847	0.0	12.2	46.0	41.8	0.0
Owner-Occupied Units by Geography	48,328	0.0	9.5	43.2	47.3	0.0
Occupied Rental Units by Geography	18,840	0.0	16.5	52.8	30.7	0.0
Vacant Units by Geography	5,679	0.0	20.3	47.5	32.2	0.0
Businesses by Geography	13,419	0.0	8.7	50.0	41.4	0.0
Farms by Geography	509	0.0	6.9	36.9	56.2	0.0
Family Distribution by Income Level	46,183	15.2	15.7	20.1	48.9	0.0
Household Distribution by Income Level	67,168	18.7	14.2	16.7	50.4	0.0
Median Family Income MSA - 41180 St. Louis, MO-IL MSA		\$70,718	Median Housing Value			\$165,650
			Median Gross Rent			\$887
			Families Below Poverty Level			5.9%

*Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0%
(* The NA category consists of geographies that have not been assigned an income classification.*

Table A – Demographic Information of the Assessment Area						2022-2023
Assessment Area: St Louis MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	35	0.0	17.1	40.0	42.9	0.0
Population by Geography	184,494	0.0	11.1	38.1	50.8	0.0
Housing Units by Geography	74,604	0.0	12.8	41.9	45.3	0.0
Owner-Occupied Units by Geography	50,168	0.0	11.0	37.5	51.4	0.0
Occupied Rental Units by Geography	18,992	0.0	17.1	50.8	32.1	0.0
Vacant Units by Geography	5,444	0.0	13.8	51.4	34.8	0.0
Businesses by Geography	16,875	0.0	8.6	48.2	43.2	0.0
Farms by Geography	621	0.0	7.6	34.5	58.0	0.0
Family Distribution by Income Level	46,955	14.5	16.3	21.3	47.9	0.0
Household Distribution by Income Level	69,160	19.0	13.9	18.7	48.4	0.0
Median Family Income MSA - 41180 St. Louis, MO-IL MSA		\$84,758	Median Housing Value			\$186,924
			Median Gross Rent			\$995
			Families Below Poverty Level			4.5%

*Source: 2020 U.S. Census and 2023 D&B Data
Due to rounding, totals may not equal 100.0%
(* The NA category consists of geographies that have not been assigned an income classification.*

Geographic Distribution of the Population

According to 2015 ACS data, the population in the AA was 175,527. Of the total AA population, 10 percent resided in moderate CTs, 43.4 percent in middle-income CTs, and 46.7 percent in upper-income CTs. The AA did not have any low-income CTs during this evaluation period. According to 2020 U.S. Census data, the population in the AA was 184,494. Of the total AA population, 11.1 percent resided in moderate CTs, 38.1 percent in middle-income CTs, and 50.8 percent in upper-income CTs. The AA did not have any low-income CTs during this evaluation period.

Household Distribution by Income Level

According to 2015 ACS data, there were 67,168 households in the AA. Approximately 12,560 (18.7 percent) of the households were low income, 9,538 (14.2 percent) were moderate income, 11,217 (16.7 percent) were middle income, and 33,853 (50.4 percent) were upper income. The percentage of households below the poverty level was 9.6 percent, totaling approximately 6,448 households. According to 2020 U.S. Census data, there were 69,160 households in the AA. Approximately 13,140 (19 percent) of the households were low income, 9,613 (13.9 percent) were moderate income, 12,933 (18.7 percent) were middle income, and 33,473 (48.4 percent) were upper income. The percentage of households below the poverty level was 8.3 percent, totaling approximately 5,740 households.

Community Contacts

As part of the evaluation process, we reviewed two community contacts to assist in identifying credit and community development needs in the AA; this information aids in determining the responsiveness of local financial institutions to credit needs and development opportunities in the community. The contacts serve the AA, with interviews completed during the evaluation period. Neither contact noted any discriminatory behavior by local financial institutions.

A contact from a community development organization provided insight on potential community needs, stating the community would benefit from additional financial assistance for homebuyers. The contact also stated the need for more affordable housing and updates to existing housing stock. The contact stated that local financial institutions are involved and connected with the community. A contact from a housing and reinvestment not-for-profit corporation identified several credit needs in the community, to include small business lending, affordable housing, and affordable alternatives to pay day lending.

Scope of Evaluation in Illinois

We performed a full-scope review of the St. Louis MSA, as it is the only AA in the state of Illinois. In evaluating performance under the lending test, we placed equal weight on the FSA's distribution of home mortgage loans in 2021 and 2022-2023, as home mortgage loan volume was comparable. Pertaining to the geographic distribution analysis, there are no low-income CTs in the AA; therefore, our analysis focused on lending in moderate-income CTs.

For the borrower distribution analysis, consideration was given to the impact that income and housing costs have on limiting homeownership opportunities for LMI borrowers in high-cost areas when comparing the distribution of home mortgage loans to the demographics. It is difficult for many LMI borrowers to afford a home as the area's median housing value is typically too high for conventional mortgage loan qualification. As such, more emphasis was placed on the bank's lending results to LMI borrowers related to the aggregate performance rather than the demographic data.

LENDING TEST

The FSA's performance under the Lending Test in Illinois is rated Outstanding.

Based on a full-scope review, the FSA's performance in the state of Illinois is excellent.

Distribution of Loans by Income Level of the Geography

The FSA exhibits excellent geographic distribution of loans in the AA.

Home Mortgage Loans

Refer to Table O in the state of Illinois section of Appendix D for the facts and data used to evaluate the geographic distribution of the FSA's home mortgage loan originations.

2021

The geographic distribution of home mortgage loans in the 2021 evaluation period is excellent. The proportion of FSA home mortgage loans in moderate-income CTs significantly exceeded the percentage of owner-occupied housing units and the aggregate industry distribution of home mortgage loans to those geographies. There were no low-income CTs in the evaluation period.

2022-2023

The geographic distribution of home mortgage loans in the 2022-2023 evaluation period is excellent. The proportion of FSA home mortgage loans in moderate-income CTs significantly exceeded the percentage of owner-occupied housing units and the aggregate industry distribution of home mortgage loans to those geographies. There were no low-income CTs in the evaluation period.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed the FSA's home mortgage lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The FSA exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the FSA.

Home Mortgage Loans

Refer to Table P in Appendix D for the facts and data used to evaluate the borrower distribution of the FSA's home mortgage loan originations.

2021

The FSA's borrower distribution of home mortgage loans in 2021 is reasonable. The percentage of loans to low-income borrowers was significantly below the percentage of low-income families and the aggregate industry distribution. However, the percentage of loans to moderate-income borrowers significantly exceeded the percentage of families and the aggregate industry distribution.

2022-2023

The FSA's borrower distribution of home mortgage loans in the 2022-2023 evaluation period is reasonable. The percentage of loans to low-income borrowers was below the percentage of low-income families but was in line with the aggregate industry distribution. The percentage of loans to moderate-income borrowers exceeded the percentage of families and the aggregate distribution.

Responses to Complaints

The FSA did not receive any CRA-related complaints during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/2021 to 12/31/2023	
FSA Products Reviewed:	Home Mortgage	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Illinois		
St. Louis, MO-IL MSA #41180	Full-Scope	<p>Madison County: 21 CTs 4029.00, 4030.01, 4030.02, 4031.01, 4031.21, 4031.22, 4032.00, 4033.00, 4034.01, ,4034.03, 4034.04, 4035.02, 4035.31, 4035.32, 4035.33, 4035.34, 4036.01, 4036.03, 4036.04, 4037.01, 4037.02</p> <p>St. Clair County: 14 CTs 5034.04, 5034.11, 5034.12, 5034.13, 5034.14, 5034.15, 5034.16, 5043.51, 5043.52, 5043.53, 5043.54, 5043.55, 5043.58, 5043.59</p>

Appendix B: Summary of MMSA and State Ratings

RATINGS		Collinsville Building and Loan Association	
Overall FSA:		Lending Test Rating:	
Collinsville Building and Loan Association		Outstanding	
State:			
Illinois		Outstanding	

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

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, which 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).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: 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 (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
St Louis MSA	105	18,167,083	100.0	12,452	0.0	0.0	0.0	9.5	12.4	8.3	43.2	31.4	36.7	47.3	56.2	55.0	0.0	0.0	0.0
Total	105	18,167,083	100.0	12,452	0.0	0.0	0.0	9.5	12.4	8.3	43.2	31.4	36.7	47.3	56.2	55.0	0.0	0.0	0.0

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-23
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
St Louis MSA	101	16,542,912	100.0	4,747	0.0	0.0	0.0	11.0	14.9	10.0	37.5	35.6	36.9	51.4	49.5	53.1	0.0	0.0	0.0
Total	101	16,542,912	100.0	4,747	0.0	0.0	0.0	11.0	14.9	10.0	37.5	35.6	36.9	51.4	49.5	53.1	0.0	0.0	0.0

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
St Louis MSA	105	18,167,083	100.0	12,452	15.2	3.8	6.6	15.7	19.0	15.3	20.1	23.8	21.0	48.9	53.3	32.3	0.0	0.0	24.8
Total	105	18,167,083	100.0	12,452	15.2	3.8	6.6	15.7	19.0	15.3	20.1	23.8	21.0	48.9	53.3	32.3	0.0	0.0	24.8

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-23
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
St Louis MSA	101	16,542,912	100.0	4,747	14.5	9.9	9.1	16.3	20.8	17.9	21.3	20.8	21.0	47.9	47.5	34.8	0.0	1.0	17.2
Total	101	16,542,912	100.0	4,747	14.5	9.9	9.1	16.3	20.8	17.9	21.3	20.8	21.0	47.9	47.5	34.8	0.0	1.0	17.2

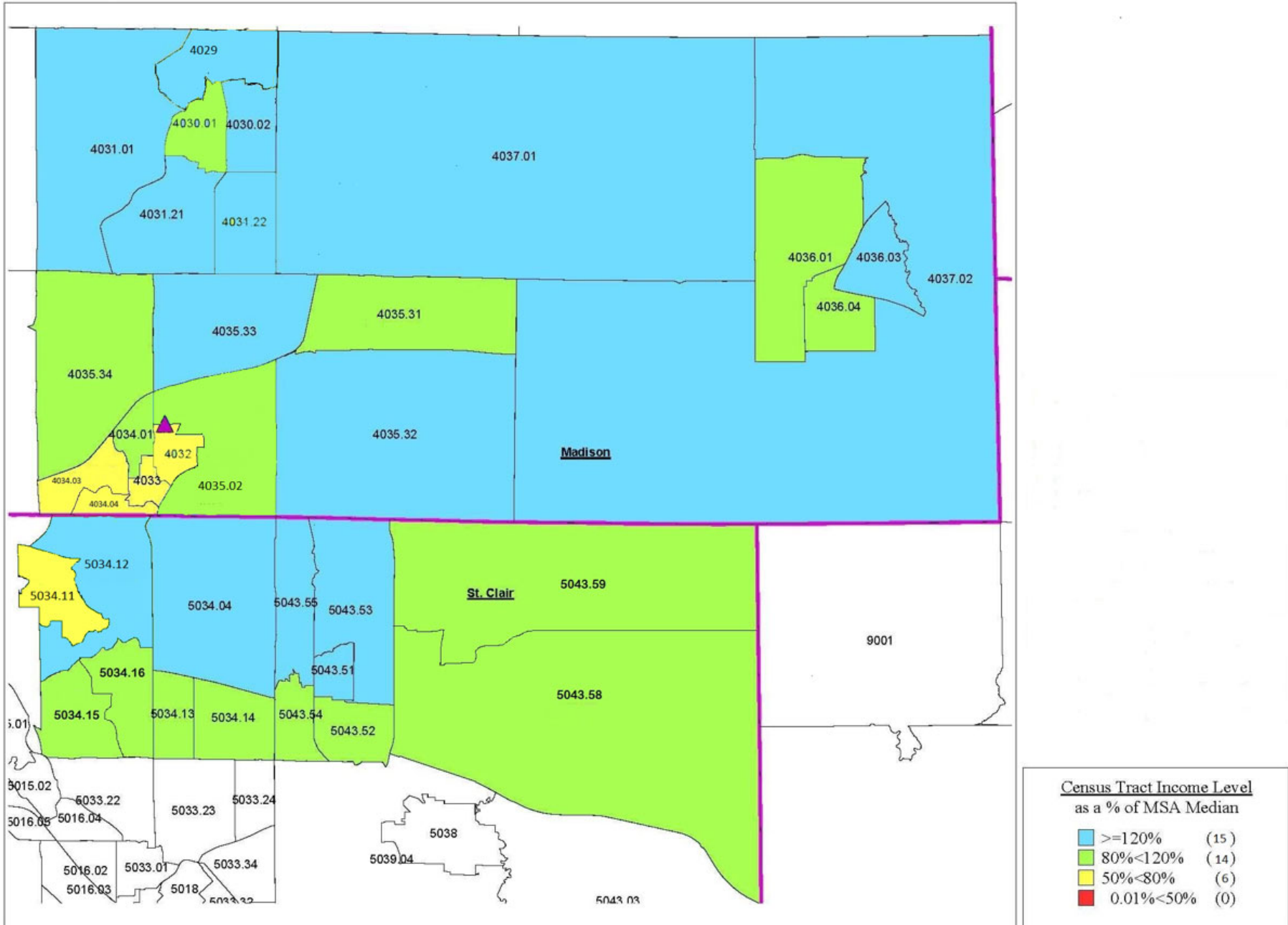
*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Collinsville Building & Loan Association
 CRA - Loan to Deposit Analysis
 SOURCE: Call Report

	12/30/2015	12/31/2016	12/31/2017	12/31/2018	12/31/2019
Deposits	89,933	89,165	87,855	84,575	89,306
Mortgage Loans	83,855	82,073	81,127	82,466	92,617
Loan to Deposit Ratio	93.2%	92.0%	92.3%	97.5%	103.7%
					Average
	3/31/2020	6/30/2020	9/30/2020	12/31/2020	2020
Deposits (RC 13.a)	89,617	92,066	93,343	94,437	369,463
Net Loans (RC 4.d)	93,404	94,925	94,098	93,030	375,457
Loan to Deposit Ratio	104.2%	103.1%	100.8%	98.5%	101.6%
					Average
	3/31/2021	6/30/2021	9/30/2021	12/31/2021	2021
Deposits (RC 13.a)	96,707	97,531	97,755	97,410	389,403
Net Loans (RC 4.d)	93,681	93,058	95,090	95,108	376,937
Loan to Deposit Ratio	96.9%	95.4%	97.3%	97.6%	96.8%
					Average
	3/31/2022	6/30/2022	9/30/2022	12/31/2022	2022
Deposits (RC 13.a)	96,398	95,175	94,295	95,322	381,190
Net Loans (RC 4.d)	94,694	94,197	93,305	93,730	375,926
Loan to Deposit Ratio	98.2%	99.0%	99.0%	98.3%	98.6%
					Average
	3/31/2023	6/30/2023	9/30/2023	12/31/2023	2023
Deposits (RC 13.a)	95,839	93,707	92,354	89,235	371,135
Net Loans (RC 4.d)	92,771	91,967	91,193	89,529	365,460
Loan to Deposit Ratio	96.8%	98.1%	98.7%	100.3%	98.5%
					Average
	3/31/2024	6/30/2024	9/30/2024	12/31/2024	2024
Deposits (RC 13.a)	88,660	88,303	84,983		261,946
Net Loans (RC 4.d)	88,562	88,123	86,800		263,485
Loan to Deposit Ratio	99.9%	99.8%	102.1%	0.0%	100.6%

Collinsville Building and Loan Association Assessment Area

Collinsville Building and Loan Association - AA based on 2020 Census



The annual disclosure for Collinsville Building and Loan Association required under the Home Mortgage Disclosure Act may be obtained on the Consumer Financial Protection Bureau's website at:

www.consumerfinance.gov/hmda