

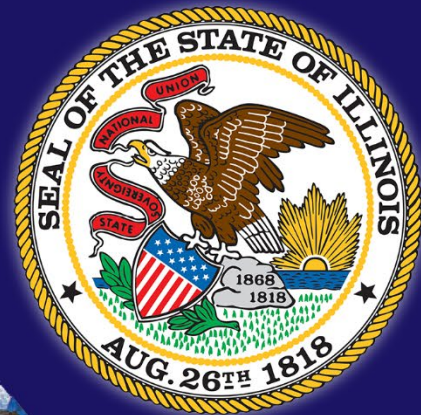


IDFPR

Illinois Department of
Financial and Professional Regulation

Anti-Predatory Lending Database Semi-Annual Summary Report

May 1, 2026



JB Pritzker
Governor

Mario Treto, Jr.
Secretary



IDFPR

Illinois Department of
Financial and Professional Regulation

Division of Banking

idfpr.illinois.gov

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Secretary

SUSANA SORIANO
Director

May 1, 2026

Governor JB Pritzker
207 State House
Springfield, IL 62706

Illinois General Assembly
State House
Springfield, IL 62706

Dear Governor Pritzker & Members of the General Assembly:

As required by Section 70(k) of the Residential Real Property Act, enclosed is the Department's semi-annual report detailing certain findings regarding the Anti-Predatory Lending Database Program. We are grateful for the opportunity to provide you with this report. If you have any questions, please do not hesitate to contact me at (217) 785-2165 or Mario.Treto@Illinois.gov.

Very truly yours,

Mario Treto, Jr.

idfpr.illinois.gov

Summary of Anti-Predatory Lending Database (APLD) Program

- As a result of the financial crises in 2008, in part due to predatory mortgage loans, the APLD was conceived. The APLD's purpose is to combat predatory lending practices by increasing the borrowers' understanding of the loans they are considering and thereby reduce the number of foreclosures resulting from inappropriate loans. The act does not prohibit any type of loan. It is solely the borrowers' decision whether to proceed. The APLD also collects important data to allow the Department to track mortgage lending trends and provides data to support other investigations.
- Loans that trigger the APLD's counseling requirement continue to be offered in the program area and represent approximately 0.7% of all loans entered into the APLD. Loans that trigger the counseling requirement include adjustable rate, interest-only and negative amortization loans, as well as loans with points and fees exceeding 5% of principal, and loans with prepayment penalties.
- Product offering trend data suggests the APLD's counseling requirement has deterred loan originators from offering loans with predatory or non-traditional characteristics. Since the program's inception, a total of 17,267 loans required borrower counseling. Of these, 4,070 (24%) loans were closed, and 13,197 (76%) were not closed. In comparison, for *all* loans registered with the APLD since inception the closing rate was 55%.
- On average, it takes 3.9 *fewer* days to close a loan *with* counseling than to close a loan *without* counseling (calculated since program inception on July 1, 2008). This differential has been steadily changing from a high point of 8 days *longer* in 2010.
- APLD data has supported investigations and disciplinary actions by enabling IDFPR to uncover fraudulent lending activity, unlicensed activity, unregistered loan originators, unreported branch offices and unreported changes of a licensee location.
- IDFPR examiners routinely access the database's reporting capabilities to analyze data in real time, which has enhanced examination capabilities. Reports from the APLD are required for all examinations and have been used to support findings and ratings.
- IDFPR has found no evidence that the APLD restricts responsible mortgage lending in the four-county program area of Cook, Will, Kane, and Peoria counties.
- This report is based on statistical information from the APLD pursuant to 765 ILCS 77/70. The APLD went into effect on July 1, 2008.

APLD FACTS AT A GLANCE¹

(Cumulative to date since program inception on July 1, 2008)

- Loans registered with the APLD: **2,365,126**
- Loans closed: **1,294,166**
- Borrowers requiring counseling: **22,130**
- Borrowers receiving counseling: **7,343**
- Borrowers requiring counseling by county: Cook (**17,713**); Kane (**1,166**); Peoria (**331**); Will (**2,095**); n/a (**825**)²
- Borrowers receiving counseling by county: Cook (**6,534**); Kane (**156**); Peoria (**21**); Will (**218**); n/a (**414**)³
- Loan types requiring counseling:⁴
 - Interest-Only Loans: **3,879**
 - Negative Amortization Loans: **2,130**
 - Loans with Points and Fees Exceeding 5%: **7,859**
 - Loans with Prepayment Penalty: **2,753**
 - Adjustable Rate Loans: **2,784**
- **42,634** loans triggered the counseling requirement as originally entered but were thereafter modified to no longer require counseling.
- Actively licensed mortgage brokers/loan originators who have entered loans into the APLD: **12,116**⁵

Investigations and Other Regulatory Actions Based on APLD Information

During the current reporting period, October 1, 2025, through March 31, 2026, IDFPR entered into one non-disciplinary agreement involving a title company's activity in the APLD. IDFPR opened five new investigations into title companies and mortgage banking companies for possible violations relating to the companies' APLD activity. Additionally, several investigations open during the last reporting period continued into the current reporting period. Finally, during the current reporting period, IDFPR has engaged in continued monitoring and follow-up

¹ Statistics for each county can be found in the table on page 9.

² Loans with invalid zip codes.

³ Loans with invalid zip codes.

⁴ The total number of loans reflected in this section does not match the total number of borrowers requiring counseling because individual mortgage loans often have more than one borrower, borrowers may have chosen not to attend counseling (and thus not proceeded with the loan), or the loan may have contained multiple counseling triggers.

⁵ Number reduced from previous reports to exclude brokers and originators who have not entered a loan into the APLD.

discussions with the mortgage banking companies that have quarterly auditing requirements from discipline completed in prior reporting periods.

Types of Non-Traditional Mortgage Products Being Offered and Lending Trends

During the current reporting period of October 1, 2025, through March 31, 2026, the overall number of loan applications registered in the APLD was similar to the number of applications registered in the APLD during the previous reporting period. 72,004 loan applications were registered in the APLD during the current reporting period, just 642 less than the previous reporting period—less than a 1% decrease. This is the first decrease in the number of loan applications since the reporting period ending March 31, 2024. After a few periods of growth in the overall amount of loan applications, the current reporting period remains steady with the previous reporting period.

While the overall number of loan applications held firm compared to the last reporting period, there was a significant shift in the types of loan applications registered in the APLD. For example, loan applications for refinance totaled 30,615 during the current reporting period. This is the largest amount of loan applications for refinance in a reporting period since the reporting period ending March 31, 2022. Loan applications for refinance for the reporting period ending March 31, 2022, totaled 46,328, still meaningfully higher than the current reporting period. Loan applications for refinance have been steadily increasing, however, over the last four reporting periods. Loan applications for refinance during the current reporting period increased by nearly 10,000 over the previous reporting period, a 56% increase.

Loan applications from borrowers purchasing homes and first time home buyers decreased significantly. Loan applications from borrowers purchasing homes decreased by 27%. This is the largest decrease in the number of loan applications from borrowers purchasing homes in the last four years. Loan applications from first time home buyers also decreased during the current reporting period by 22% over the previous reporting period. Despite this decrease, loan applications from first time home buyers during the current reporting period is still higher than loan applications from first time home buyers during the reporting period ending March 31, 2025.

Similar to the total number of loan applications registered in the APLD, the number of loan applications proceeding to closing during the current reporting period is almost the same as last reporting period, at 32,257 and 32,092, respectively. In both the current reporting period and the last reporting period, approximately 44% of the loan applications registered in the APLD proceeded to closing. The amount of loans proceeding to closing in the current reporting period, 32,257, is the largest number of loans proceeding to closing since the period ending September 30, 2022.

Loans registered in the APLD with predatory or nontraditional terms require that the borrower receive housing counseling before proceeding to closing. 0.6% of loans registered in the APLD required housing counseling during the current reporting period. There was a modest decrease in loans requiring housing counseling due to predatory or nontraditional terms compared to the previous reporting period. During the current reporting period, loans requiring housing

counseling decreased by approximately 5% from the previous reporting period. Almost 400 loan applications that initially required housing counseling during the current reporting period were modified to remove predatory or nontraditional terms from the borrowers' loan offers. The number of borrowers receiving counseling during the current reporting period is lower than the previous reporting period, which was the highest in the last five reporting periods.

During the current reporting period, there was an increase in two types of nontraditional or predatory terms: loans allowing interest only payments and loans with adjustable interest rates within the first three years of the loan term. Loans allowing interest only payments increased by 35% during the current reporting period over the previous reporting period. Loans with adjustable interest rates increased by 49% over the previous reporting period. While loans with points and fees exceeding 5% of the loan amount were still the largest number of loans requiring housing counseling, the number of such loans decreased by 19% during the current reporting period.

Nationwide data about mortgage loans is reported quarterly by certain financial institutions pursuant to the Home Mortgage Disclosure Act.⁶ The most recent loan data available, for the second quarter of 2025, shows an increase in loan applications for all loan types over the first quarter of 2025.⁷ Loan applications for conventional conforming loans increased by 24% from the first quarter of 2025 to the second quarter of 2025. Loan applications for refinance increased by 15% from the first quarter of 2025 to the second quarter of 2025, and loan applications for home purchase increased by 33%.⁸

The Home Mortgage Disclosure Act data also reports median total loan costs. Median total loan costs decreased slightly from the first quarter of 2025 to the second quarter of 2025 for every loan type.⁹ For example, for conventional non-conforming loans, median total loan costs decreased by 4%. Median total loan costs for all loan types have increased dramatically, however, since the first quarter of 2021.¹⁰ Median total loan costs for conventional non-conforming loans increased by 69% from the first quarter of 2021 to the second quarter of 2025.

Freddie Mac reports that housing price increases nationwide slowed in 2025, increasing by 0.7%.¹¹ In 2024, housing prices increased by 4.2%.¹² Additionally, Freddie Mac's Primary Mortgage Market Survey shows the weekly average interest rate is 6.37% for a 30-year fixed rate mortgage for the week ending April 9, 2026.¹³ The interest rate for the week ending April 9, 2026 is below the 52-week average of 6.42%.¹⁴ During the current reporting period, Freddie Mac

⁶ Financial Institutions that receive at least 60,000 loan applications and covered loans must report quarterly data. [HMDA Quarterly Graphs | HMDA Documentation](#)

⁷ [HMDA Data Browser](#)

⁸ [HMDA Data Browser](#); [HMDA Data Browser](#)

⁹ [HMDA Data Browser](#)

¹⁰ [HMDA Data Browser](#)

¹¹ [Transcript: Freddie Mac CFO Discusses Fourth Quarter and Full-Year 2025 Financial and Business Results - Freddie Mac](#)

¹² [Transcript: Freddie Mac CFO Discusses Fourth Quarter and Full-Year 2025 Financial and Business Results - Freddie Mac](#)

¹³ [Mortgage Rates - Freddie Mac](#)

¹⁴ [Mortgage Rates - Freddie Mac](#)

reported one week where the 30-year fixed rate mortgage average interest rate was below 6%.¹⁵ Specifically, the average interest rate for the week ending February 26, 2026 was 5.98%.¹⁶ Before the week ending February 26, 2026, Freddie Mac had not reported the 30-year fixed rate mortgage interest rate under 6% since September of 2022.¹⁷ Freddie Mac predicts that the lower interest rates and improved home inventory will drive buyers into the market in the spring of 2026.¹⁸ Freddie Mac further states that the housing market is improving compared to its performance last year.¹⁹ According to a statement in February 2026 by the Mortgage Bankers Association, home affordability continues to be challenging, but is showing modest improvement.²⁰

IDFPR receives notices of new residential foreclosure case filings in the APLD program area. During the current reporting period, an average of 677 new foreclosure cases were filed per month. This is lower than the monthly average for the prior reporting period, which averaged 883 new foreclosure cases filed per month.

Additionally, the Consumer Financial Protection Bureau samples residential mortgages to calculate the percentage of delinquencies nationwide and in each state.²¹ The Consumer Financial Protection Bureau's most recent data for Illinois is from March of 2025.²² In March of 2025, Illinois had a 2% statewide delinquency rate for early stage mortgage delinquencies, defined as 30-89 days delinquent.²³ Illinois' percentage of early stage delinquencies was slightly higher than the national percentage, which was 1.9% in March of 2025.²⁴ The Consumer Financial Protection Bureau also samples serious delinquency rates, which reflects residential mortgages that are more than 90 days delinquent.²⁵ Illinois again had a slightly higher percentage of mortgages in serious delinquency than the national percentage for March of 2025.²⁶ In Illinois, 1% of mortgages were seriously delinquent in March of 2025, while nationally 0.8% of mortgages were seriously delinquent.²⁷

The APLD program makes housing counseling available to borrowers who are offered predatory and nontraditional loan terms, thus providing essential consumer protection. With an increased number of borrowers being offered loans that allow for interest only payments and adjustable interest rates, counseling can provide borrowers with invaluable information. Moreover, throughout the history of the APLD program, many borrowers' loan offers that initially contained predatory and nontraditional terms were modified by lenders to remove those terms. The APLD program continues to offer meaningful and important benefits to borrowers.

¹⁵ [Mortgage Rates - Freddie Mac](#)

¹⁶ [Mortgage Rates - Freddie Mac](#)

¹⁷ [Mortgage Rates - Freddie Mac](#)

¹⁸ [Mortgage Rates Drop Below 6% for the First Time in 3.5 Years | Freddie Mac](#)

¹⁹ [Mortgage Rates Average 6.38% | Freddie Mac](#)

²⁰ [Mortgage Application Payments Decreased in February | MBA](#)

²¹ [Mortgages 30-89 days delinquent | Consumer Financial Protection Bureau](#)

²² [Mortgages 30-89 days delinquent | Consumer Financial Protection Bureau](#)

²³ [Mortgages 30-89 days delinquent | Consumer Financial Protection Bureau](#)

²⁴ [Mortgages 30-89 days delinquent | Consumer Financial Protection Bureau](#)

²⁵ [Mortgages 90 or more days delinquent | Consumer Financial Protection Bureau](#)

²⁶ [Mortgages 90 or more days delinquent | Consumer Financial Protection Bureau](#)

²⁷ [Mortgages 90 or more days delinquent | Consumer Financial Protection Bureau](#)

IDFPR Utilization of APLD Data to Combat Mortgage Fraud, Predatory Lending, and Other Questionable Practices

During the current reporting period, IDFPR's Division of Banking investigations unit utilized APLD data to assist in several investigations into licensed mortgage banking companies and mortgage loan originators. Furthermore, the Division of Banking's examination unit verifies APLD compliance during the exam process and coordinates with APLD staff when licensed mortgage banking companies fail to comply with the APLD's requirements. APLD staff continue to collaborate with the Division of Financial Institutions to address issues of noncompliance with the APLD involving title insurance companies and agents. Finally, during the current reporting period, IDFPR communicated with offices of county recorder of deeds in the APLD program area, who assist in ensuring compliance with the APLD's recording requirements.

STATISTICAL INFORMATION

Required Data Pursuant to Act:	April 2026 Reporting Period (10/01/25 - 03/31/26)	October 2025 Reporting Period (04/01/25 - 09/30/25)
Loans Registered with APLD²⁸	72,004	72,646
Refinancing Primary Residence	30,615	19,520
Purchasing Primary Residence	32,831	45,530
First Time Home Buyers	31,508	40,648
Loans Closed in APLD	32,257	32,092
Borrowers Requiring Counseling	546	575
Borrowers Receiving Counseling	13	22
Loans Requiring Counseling²⁹	452	478
Interest Only Loans	138	102
Negative Amortization Loans	1	3
Loans with Points and Fees Exceeding 5%	287	356
Loans with Prepayment Penalty	2	23
Adjustable Rate Loans	130	87
Loans Modified to No Longer Require Counseling	421	766
Loans Exempt from APLD	45,078	51,568

²⁸ The totals may include loans that are in process or have been abandoned.

²⁹ The number of loans requiring counseling is often less than the number of borrowers requiring counseling because there may be multiple borrowers per loan.

**April 2026
Reporting Period
(10/01/25 - 03/31/26)**

Required Data Pursuant to Act:	Cook County	Kane County	Peoria County	Will County
Loans Registered with APLD³⁰	53,503	6,705	1184	10,169
Refinancing Primary Residence	22,221	2952	459	4,783
Purchasing Primary Residence	24,144	3,239	658	4,630
First Time Home Buyers	23,927	2,942	581	3,933
Loans Closed in APLD	22,995	3,413	670	5,148
Borrowers Requiring Counseling	394	58	17	70
Borrowers Receiving Counseling	11	0	1	1
Loans Requiring Counseling³¹	331	41	15	58
Interest Only Loans	109	17	1	11
Negative Amortization Loans	0	0	0	1
Loans with Points and Fees Exceeding 5%	207	22	14	40
Loans with Prepayment Penalty	2	0	0	0
Adjustable Rate Loans	107	9	1	10
Loans Modified to No Longer Require Counseling	285	37	11	84
Loans Exempt from APLD	29,290	3,230	458	4,181

³⁰ The totals may include loans that are in process or have been abandoned.

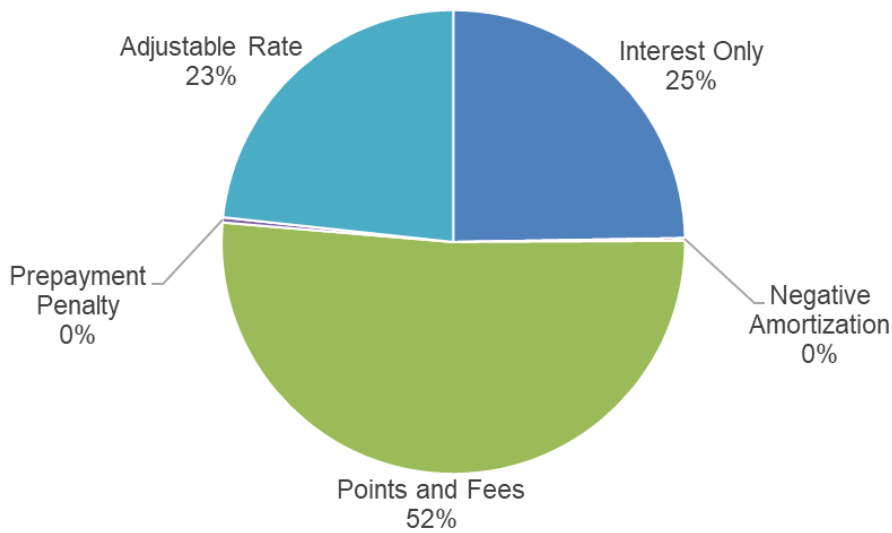
³¹ The number of loans requiring counseling is often less than the number of borrowers requiring counseling because there may be multiple borrowers per loan.

APLD Product Summary

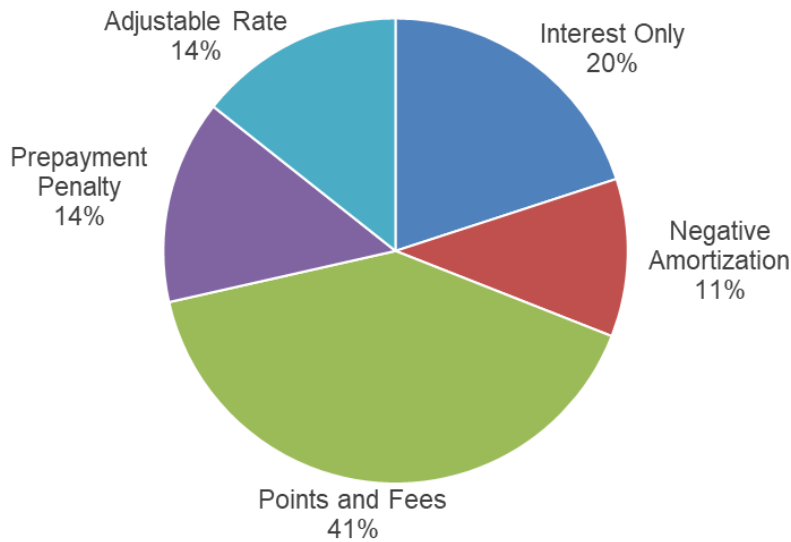
Types of Loans Triggering the Counseling Requirement

	Total	Interest Only	Negative Amortization	Points and Fees	Prepayment Penalty	Adjustable Rate
Inception to Date	17,267	3,879	2,130	7,859	2,753	2,784
Reporting Period	452	138	1	287	2	130

Reporting Period (10/1/2025 - 3/31/2026)



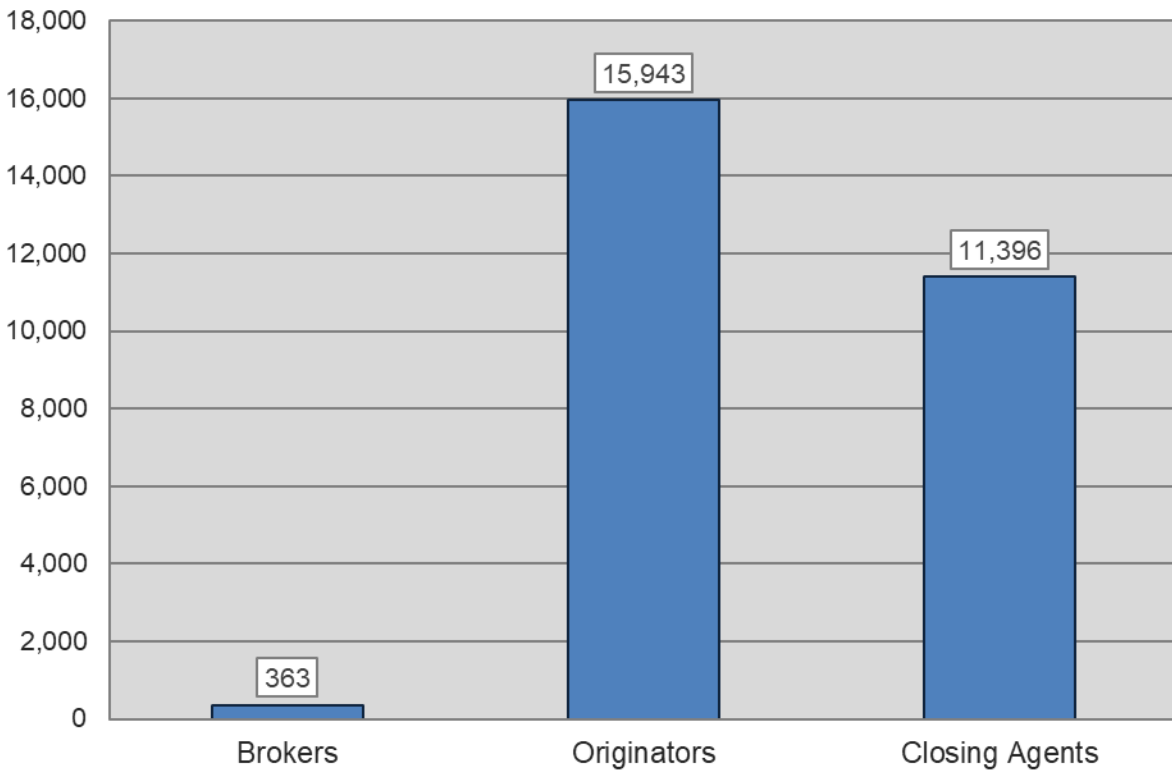
Since Inception



APLD User Summary

Number of Individual Brokers, Loan Originators, and Closing Agents with Access to the APLD in the Four County Program Area
(Since program inception)

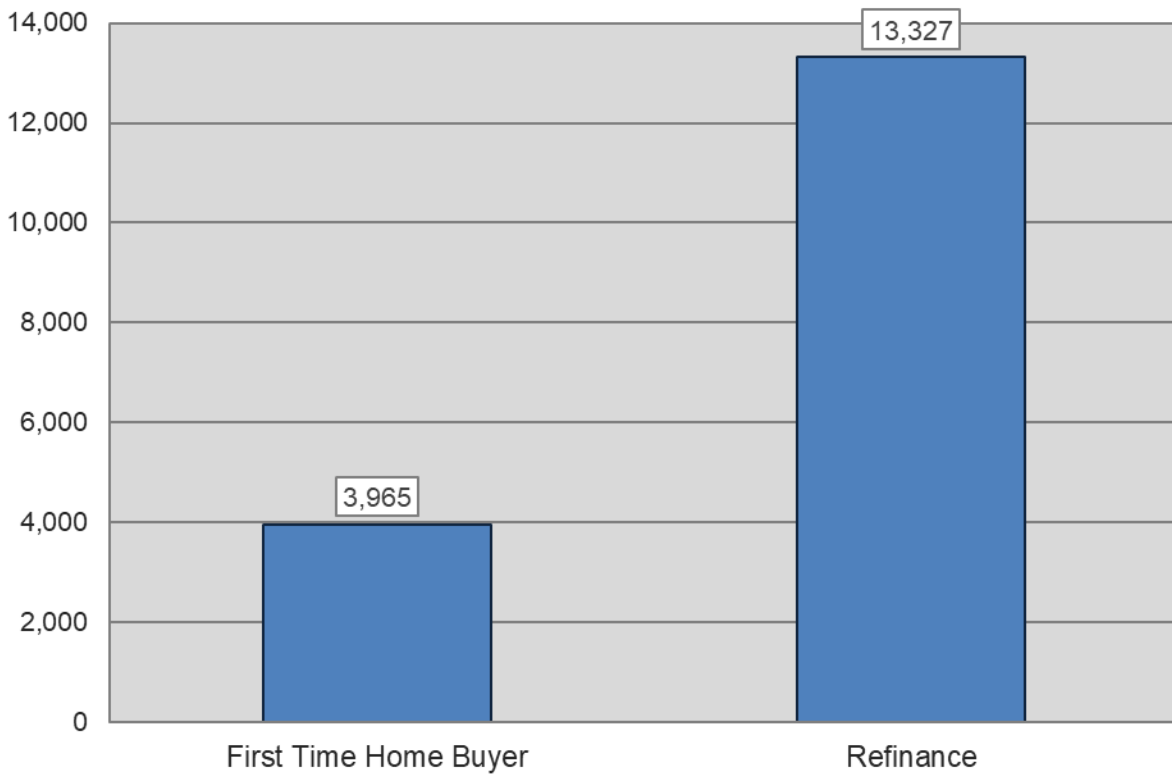
User Type	Users
Brokers	363
Originators	15,943
Closing Agents	11,396



APLD Loan Profile

The majority of loans requiring counseling are refinances of existing properties.
(Since program inception)

Loan Type	Loans
First Time Home Buyer	3,965
Refinance	13,327



Summary of Average Time to Closing

Counseling requirement decreased time to close by 3.9 days on average.
(Since program inception)

	# Days
Days to close loan without counseling	29.8
Days to close loan with counseling	26.0

