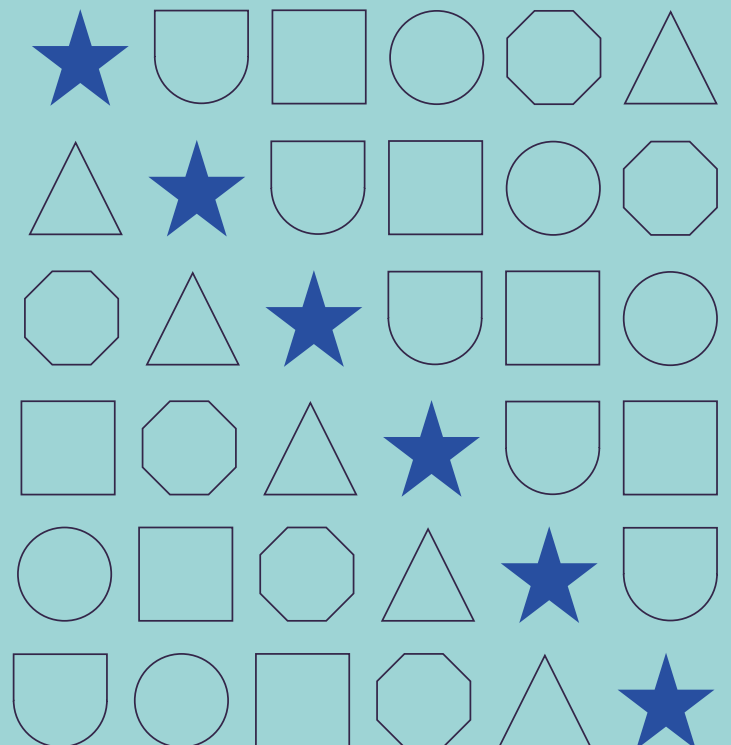


Economic Benefits of the Credit Union Tax Exemption to Consumers, Businesses, and the U.S. Economy

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Executive summary

Credit unions are member-owned, not-for-profit cooperative financial institutions that serve defined fields of membership. Democratically owned and operated, credit unions are organized without capital stock and governed under a “one member, one vote” principle—each member has one vote, regardless of the amount on deposit. While banks are operated with the purpose of maximizing profits for their shareholders, the purpose of credit unions is to return those benefits to their member-owners. As a result, credit unions in many markets offer interest rates which are superior to those of other competing financial institutions.

By virtue of their unique cooperative structure and mutual purpose, credit unions have been exempt from federal income tax since 1935. Those basic defining characteristics of a credit union, no matter the size, endure today as they did then. While competing financial institutions with different organizational structures have often challenged credit unions’ tax-exempt status, Congress has consistently affirmed the credit union tax exemption. The benefits of credit unions are vital to many communities, and the loss of the federal income tax exemption would have far-reaching consequences. Our analysis indicates that removing the credit union tax exemption would cost the federal government \$33 billion in lost income tax revenue over the next 10 years. GDP would be reduced by \$266 billion, and 822,000 jobs would be lost over the next decade as well.

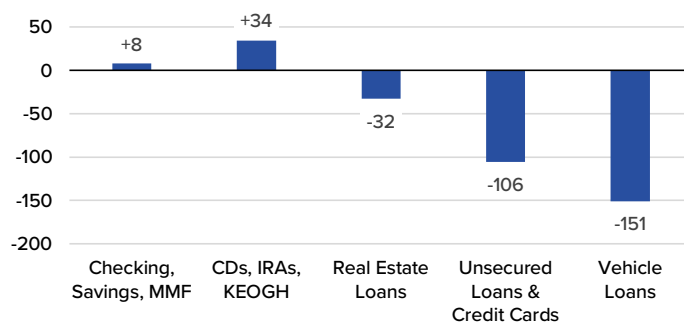
This study quantifies the benefits to all consumers – both credit union members and bank customers – of having a credit union presence in financial markets. Statistical analysis revealed the following estimates of the interest rate differential between U.S. banks and credit unions for the period 2014-2023 (Chart 1):

- Interest rates on savings, checking, and money market accounts were 8 basis points (66 percent) higher at credit unions.
- Interest rates on CDs, IRAs, and KEOGH accounts were 34 basis points (87 percent) higher at credit unions.
- Real estate loan rates were 32 basis points (7 percent) lower at credit unions.

Chart 1: Interest Rate Differences: Credit Unions minus Banks

2014-2023 average, in basis points

Source: Datatrac



- Credit card and unsecured loan rates were 106 basis points (9 percent) lower at credit unions.
- Credit union rates on new and used car loans were 151 basis points (32 percent) lower than bank rates, on average.

These rate differences are highly consequential to households, especially those living at the margins. For example, a borrower with a \$40,000, 60-month auto loan at the average credit union rate over the 2014-2023 period would save \$1,600 over the life of the loan versus the prevailing bank rate. The cumulative direct benefits to credit union members of these better loan and deposit rates were estimated to range from \$6.6 to \$14.3 billion annually over the past ten years (Chart 2). Total credit union member benefits over the period were estimated to be \$92.4 billion.

The benefit of better credit union loan and deposit rates extends to bank customers as well, due to increased competition. A 50 percent reduction in the credit union market share would cost bank customers an estimated \$11.9 billion to \$22.8 billion per year in higher loan rates and lower deposit rates. The total losses to bank customers due to less favorable rates totaled \$142.2 billion over the ten-year period examined. The total benefit to U.S. consumers from the significant presence of credit unions in financial markets was \$234.6 billion over the ten-year period of the study, or more than \$23 billion per year.

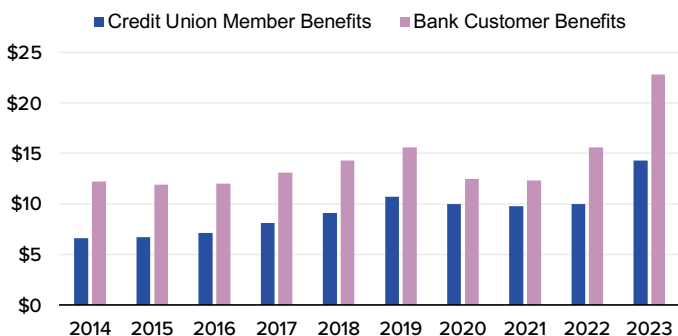
These conclusions align with the findings from previous studies of the impact of eliminating the credit union tax exemption in Canada and Australia, where the number of credit unions was severely

reduced following taxation. Reduced competition for consumer financial services led to higher interest rates on consumer loans and lower interest rates on deposits in both countries.

A very conservative estimate of \$13.8 billion per year reduction in personal income (50 percent of the average estimated annual loss to consumers, adjusted for inflation) resulting from higher loan rates and lower deposit rates due to a diminished credit union role in the economy would lead to an annual reduction in GDP of about \$26.6 billion and a loss of 82,000 jobs per year over the next decade.

Chart 2: Credit Union Member & Bank Customer Benefits

by year, in \$billions



These figures were estimated using Inforum’s macroeconomic forecasting model, which measures the total direct and indirect losses of personal income, consumption, and GDP resulting from the elimination of the credit union tax exemption. The reduction in personal income would lead to a loss of \$3.3 billion per year in federal income tax revenue.

Introduction

In 1934, Congress passed the Federal Credit Union Act (FCUA), which created the federal credit union charter. In 1935, the Commissioner of the Internal Revenue Service (IRS) ruled federal credit unions were exempt from paying federal income taxes. A 1937 amendment to the FCUA explicitly granted a federal income tax exemption for federal credit unions. Congress reaffirmed this tax exemption in 1998 as part of its “findings” for Public Law 105-219, The Credit Union Membership Access Act, noting that credit unions are exempt from federal taxes because they are member-owned, democratically operated, not-for-profit organizations. As a 2001 Treasury

Department study further explained, the rationale for this exemption is based on the fact that credit union member shares are their deposits and that they are cooperative organizations “operated entirely by and for their members” on a non-profit basis. Federally-insured state chartered credit unions are also exempt from federal income tax under Section 501(c)(14)(A) of the Internal Revenue Code.

In recent years, numerous researchers have provided evidence of the important role played by credit unions in local financial services markets. They have found that consumers benefit from the presence of credit unions in the financial services marketplace. These benefits are a direct result of the federal tax exemption, leveraged by the unique structure of credit unions. Consistent with basic microeconomic theory, increasing the number of firms in a market tends to lower prices offered by sellers; similarly, the increased availability of substitute goods provides competitive pressure. The presence of credit unions not only helps members get better rates, but also serves as a check on the interest rates banks offer their customers.

This report analyzes the likely impact on consumers of financial services and the wider economy if these competitive pressures were reduced significantly due to a change in the credit union federal income tax status. After reviewing recent academic and government literature on the importance of credit unions to the U.S. economy, this report quantifies the benefits to both credit union and bank loan and deposit consumers of having a significant credit union presence in local markets. These benefits spread further throughout the economy, and estimates of these larger impacts are analyzed and presented as well.

Data Analysis Demonstrates the Benefits of Credit Unions

To quantify benefits to the U.S. economy from the presence of credit unions, the most direct approach is to estimate the savings that credit union members have experienced from lower loan interest rates and higher interest on deposits, as compared to other financial institutions. In the absence of the federal tax exemption, it is likely that credit unions would be unable to offer these more attractive rates.

The difference between average mid-year (end of June) bank and credit union rates for several loan and deposit categories is used as the measure of savings to credit union customers, with the difference then expressed as a percentage of the bank rate. It should be noted that the difference between bank and credit union rates is likely to be a conservative estimate of the benefits to credit union customers, since in the absence of credit unions in the market we would expect bank rates to be less favorable to customers. In addition, we do not adjust for inflation over the past ten years –the aggregate savings to credit union customers expressed in current dollars would be still higher.

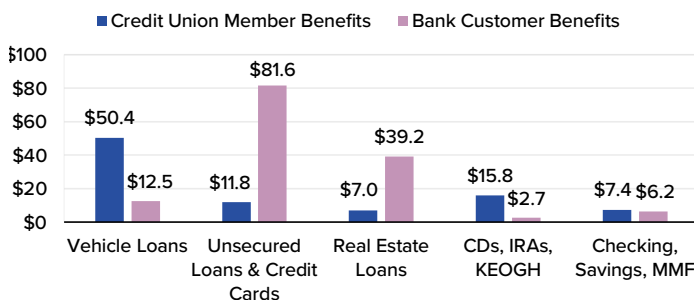
Credit unions offer better rates than banks

In the category of auto loans, utilizing data from credit unions and banks on 48- month new car loans and 36- month used car loans, credit union rates are found to be on average 32 percent lower than bank rates. Unsecured loans and credit card interest rates are estimated to be 9 percent lower than bank rates. Real estate loans (including home equity loans) were estimated to be 7 percent lower than equivalent bank rates. In the case of deposits, credit union CDs, IRAs, and KEOGH accounts were estimated to pay 87 percent higher rates than banks. Money market, savings, and interest-checking accounts were estimated to pay 66 percent higher rates at credit unions than equivalent bank products.

These credit union advantages (disaggregated by product and year) were multiplied by each year’s mid-year bank rate to obtain an annual interest rate benefit, which was then applied to the volume of credit union loans or deposits of a particular category to derive the benefit obtained from being a credit union member. The results are shown in Chart 3.

Chart 3: Credit Union Member & Bank Customer Benefits by Product

2014-2023 total, in \$billions



Clearly auto loans represent the largest source of gains to credit union members, with benefits of \$50.4 billion from 2014 to 2023. Benefits are observed for other types of loans as well. In terms of deposit accounts, credit union members gained \$15.8 billion due to more favorable rates on CDs, IRAs, and KEOGH accounts, and \$7.4 billion from better rates on savings, interest checking and money-market accounts. Across all deposit and loan products, credit union members gained a total of \$92.4 billion over the ten-year period of the study, 2014-2023.

Credit union market presence has a beneficial effect on bank rates

As noted above, the consumer benefits from the participation of credit unions in local financial services markets are not limited to credit union members. Several studies have shown that banks respond to credit unions (as they would to any potential substitute product) by making their loan and deposit rates more attractive. To estimate the magnitude of these effects, and especially their relation to the credit union tax exemption, this study analyzes the question: “What effect would a 50 percent reduction in the credit union market share have on bank loan and deposit rates (and the associated costs and benefits to bank consumers)?” This is a conservative approach, as eliminating the federal tax exemption might have an even larger impact on the presence of credit unions. As discussed in greater detail below, Gasbarro et al. (2007) found that the 1994 imposition of federal taxes on credit unions in Australia led to a dramatic decline in the number of credit unions there, from 833 in May 1973 (at the start of their tax exemption) to only 149 remaining in 2006.

For the purposes of this report, the estimated effects of changes in the local credit union market share on bank rates for two types of consumer loans are taken from recent research by Feinberg and Reynolds (2025), and from this, the impact of a 50 percent reduction in the credit union market share on bank loan rates for all non-credit card consumer loans is determined. This leads to an estimated increase in loan rates, which is then applied to the volume of outstanding bank loans of a similar type to yield an estimate of the annual savings to bank loan consumers from 2014-2023. A similar analysis is conducted for deposit rates, based on estimates produced by Hannan (2002) – still the only definitive

study of this effect – who studied the impact of credit unions on bank deposit rates for interest checking, money market deposit accounts, and CDs. The estimates in Feinberg and Reynolds (2025) were based on the 2010-2019 period, and Hannan’s 2002 estimates were based on 1998 data, so the assumption is made that the underlying relationships between a credit union presence in a local market and bank loan and deposit pricing have not changed since then. The fact that the estimates in Feinberg and Reynolds (2025) for loan rates are quite similar to those in the much earlier Feinberg (2003) study suggests both that local market structure still matters in consumer financial markets and that the Hannan estimates on the deposit rate side are likely to still be relevant.

Feinberg and Reynolds (2025) found, in their most conservative estimates, that every 1 percent change in credit union market share led to a 0.06 percent change (in the opposite direction) in bank home mortgage rates, and to a 0.11 percent change (in the opposite direction) in auto loan rates at banks. A 50 percent reduction in the credit union share would, therefore, yield a 3 percent increase in mortgage rates at banks and a 5.5 percent increase in vehicle loan rates at banks. In this report we apply a 3 percent increase to all bank real estate loans and a 5.5 percent increase to all other consumer bank loans.

The effect of a 50 percent reduction in credit union presence on bank auto loan rates is estimated to range from a 23- to 36-basis point increase per year over the 2014-2023 period. These figures were derived by averaging mid-year (end of June) rates for bank 48-month new car loans and 36-month used car loans from DataTrac data and then determining the impact of a 5.5 percent increase in these rates. These basis point increases were then applied to the volume of auto loans outstanding at banks. For real estate loans an increase of between 9 and 26 basis points resulted from applying the 3 percent estimated increase in rates to the annual mid-year bank rate, and these basis point increases were applied to the annual volumes of these bank loans. Given the higher rates for unsecured and credit card loans, a more sizeable increase of between 51 and 88 basis points resulted from applying an

estimated 5.5 percent increase in those bank rates, with these increases applied to the annual volumes of unsecured and credit card loans. The resulting change in borrowing costs to bank consumers is interpreted as the benefit from the existing credit union presence in local markets.

As for the impact on deposit rates offered by banks, Hannan (2002) estimated the separate impact of the credit union market share (his favored measure was the credit union membership in a local market as a share of the local adult population) on bank/thrift rates on money market deposit accounts, interest checking, and 3-month CDs. Based on the average credit union market shares in his data sample and bank rates at the time, the impact of reducing these ratios by 50 percent (as was the approach above for loan rates) would imply a 12 basis point decrease in money market rates, an 11 basis point reduction in interest checking rates, and a 9 basis point reduction in 3-month CD rates. These basis point differences amounted to a 4.4 percent, 6.9 percent, and 2.1 percent change in interest rates at the time, respectively.

Assuming these effects would apply more broadly, these percentage changes were also applied to mid-year bank deposit rates from 2014 to 2023, and then the resulting interest rate changes to annual volumes of bank deposits of money market accounts, transaction accounts, and all other savings and time deposit accounts, respectively. The estimated benefits received by bank customers total \$142.2 billion over the ten-year period of the study.

The total benefit to U.S. consumers from the presence of credit unions in local financial markets was obtained by adding together the benefits to credit union members and benefits to bank consumers. These benefits encompass both reduced loan interest payments and increased deposit interest received by both bank and credit union members. Consumer benefits totaled \$234.6 billion from 2014-2023, or approximately \$23 billion per year. This figure does not adjust for inflation over the ten-year period. In current dollars, the total consumer benefit would be \$276 billion, or \$27.6 billion per year.

Table 1. Estimated benefits to credit union members and bank customers by state, 2014-2023

In order to examine these effects on a state-level basis, these gains were apportioned on the basis of each state's share of total credit union and bank deposits in mid-year 2024.

Millions current \$	Consumer Benefits, 2014-23			Consumer Benefits, 2023			State pctg of bank deposits	State pctg of CU deposits
	CU Members	Bank Customers	Total	CU Members	Bank Customers	Total		
U.S.	\$92,370	\$142,249	\$234,619	\$14,287	\$22,825	\$37,112	100.0%	100.0%
Alabama	\$1,511	\$1,131	\$2,642	\$234	\$181	\$415	0.8%	1.6%
Alaska	\$379	\$131	\$510	\$59	\$21	\$80	0.1%	0.4%
Arizona	\$1,728	\$1,751	\$3,480	\$267	\$281	\$548	1.2%	1.9%
Arkansas	\$275	\$843	\$1,118	\$43	\$135	\$178	0.6%	0.3%
California	\$11,899	\$14,497	\$26,396	\$1,840	\$2,326	\$4,167	10.2%	12.9%
Colorado	\$2,089	\$1,508	\$3,597	\$323	\$242	\$565	1.1%	2.3%
Connecticut	\$748	\$1,382	\$2,130	\$116	\$222	\$337	1.0%	0.8%
Delaware	\$138	\$4,344	\$4,481	\$21	\$697	\$718	3.1%	0.1%
Dist. of Col.	\$769	\$527	\$1,296	\$119	\$85	\$204	0.4%	0.8%
Florida	\$5,687	\$6,851	\$12,537	\$880	\$1,099	\$1,979	4.8%	6.2%
Georgia	\$2,269	\$2,819	\$5,088	\$351	\$452	\$803	2.0%	2.5%
Hawaii	\$799	\$464	\$1,264	\$124	\$74	\$198	0.3%	0.9%
Idaho	\$1,060	\$316	\$1,376	\$164	\$51	\$215	0.2%	1.1%
Illinois	\$2,670	\$5,639	\$8,309	\$413	\$905	\$1,318	4.0%	2.9%
Indiana	\$1,588	\$1,725	\$3,313	\$246	\$277	\$522	1.2%	1.7%
Iowa	\$1,208	\$1,030	\$2,238	\$187	\$165	\$352	0.7%	1.3%
Kansas	\$629	\$822	\$1,451	\$97	\$132	\$229	0.6%	0.7%
Kentucky	\$761	\$953	\$1,714	\$118	\$153	\$271	0.7%	0.8%
Louisiana	\$798	\$1,084	\$1,881	\$123	\$174	\$297	0.8%	0.9%
Maine	\$560	\$364	\$924	\$87	\$58	\$145	0.3%	0.6%
Maryland	\$1,847	\$1,606	\$3,453	\$286	\$258	\$543	1.1%	2.0%
Massachusetts	\$2,093	\$4,634	\$6,727	\$324	\$743	\$1,067	3.3%	2.3%
Michigan	\$4,089	\$2,567	\$6,655	\$632	\$412	\$1,044	1.8%	4.4%
Minnesota	\$1,635	\$2,563	\$4,198	\$253	\$411	\$664	1.8%	1.8%
Mississippi	\$386	\$641	\$1,027	\$60	\$103	\$163	0.5%	0.4%
Missouri	\$889	\$2,079	\$2,968	\$137	\$334	\$471	1.5%	1.0%
Montana	\$334	\$292	\$626	\$52	\$47	\$98	0.2%	0.4%
Nebraska	\$418	\$748	\$1,166	\$65	\$120	\$185	0.5%	0.5%
Nevada	\$514	\$917	\$1,431	\$80	\$147	\$227	0.6%	0.6%
New Hamp.	\$559	\$393	\$952	\$86	\$63	\$150	0.3%	0.6%
New Jersey	\$865	\$3,556	\$4,421	\$134	\$571	\$704	2.5%	0.9%
New Mexico	\$823	\$360	\$1,184	\$127	\$58	\$185	0.3%	0.9%
New York	\$4,955	\$19,662	\$24,617	\$766	\$3,155	\$3,921	13.8%	5.4%
North Carolina	\$3,823	\$5,715	\$9,538	\$591	\$917	\$1,508	4.0%	4.1%
North Dakota	\$227	\$334	\$562	\$35	\$54	\$89	0.2%	0.2%
Ohio	\$1,745	\$4,429	\$6,174	\$270	\$711	\$981	3.1%	1.9%
Oklahoma	\$870	\$1,136	\$2,006	\$135	\$182	\$317	0.8%	0.9%
Oregon	\$1,852	\$850	\$2,702	\$286	\$136	\$423	0.6%	2.0%
Pennsylvania	\$3,267	\$4,624	\$7,891	\$505	\$742	\$1,247	3.3%	3.5%
Rhode Island	\$426	\$351	\$777	\$66	\$56	\$122	0.2%	0.5%
South Carolina	\$1,159	\$1,049	\$2,208	\$179	\$168	\$348	0.7%	1.3%
South Dakota	\$225	\$7,145	\$7,370	\$35	\$1,146	\$1,181	5.0%	0.2%
Tennessee	\$1,755	\$1,842	\$3,597	\$272	\$296	\$567	1.3%	1.9%
Texas	\$6,824	\$11,938	\$18,762	\$1,055	\$1,916	\$2,971	8.4%	7.4%
Utah	\$2,221	\$8,157	\$10,378	\$343	\$1,309	\$1,652	5.7%	2.4%
Vermont	\$267	\$152	\$419	\$41	\$24	\$66	0.1%	0.3%
Virginia	\$3,563	\$2,437	\$6,000	\$551	\$391	\$942	1.7%	3.9%
Washington	\$4,018	\$1,741	\$5,759	\$622	\$279	\$901	1.2%	4.4%
West Virginia	\$210	\$384	\$594	\$32	\$62	\$94	0.3%	0.2%
Wisconsin	\$2,759	\$1,594	\$4,353	\$427	\$256	\$683	1.1%	3.0%
Wyoming	\$186	\$171	\$357	\$29	\$27	\$56	0.1%	0.2%

Source: NCUA 5300 call report data and FDIC Summary of Deposits

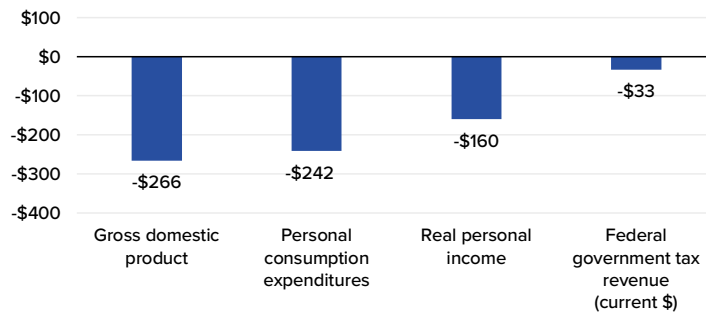
Broad economic impact from loss of the credit union tax exemption

Inforum's Long-term Interindustry Forecasting Tool (LIFT) model was used to estimate the broader economic impact of these consumer benefits. The LIFT model uses a "bottom-up" approach to macroeconomic modeling that works like the actual economy, building aggregate totals from details of industry activity for 121 productive sectors. The model describes how changes in individual industries, such as increasing productivity or changing international trade patterns, affect related sectors and the economy as a whole. Parameters in the behavioral equations differ among products, reflecting differences in consumer preferences, price elasticity, and industrial structure. The detailed level of disaggregation permits the modeling of prices by industry, allowing one to explore the causes and effects of relative price changes.

The model estimates the total direct and indirect losses of personal income and consumption resulting from the elimination of the credit union federal tax

Chart 4: Total economic impact from loss of credit union tax exemption

Forecasted impact from 2023-2032 (billions 2024\$)



Total employment losses from 2023-2032 = 822,000 job-years

exemption. A \$13.8 billion per year reduction in personal income would lead to a reduction in GDP of about \$26.6 billion per year and employment losses of approximately 82,000 jobs per year over the next decade (Table 2). This reduction in personal income also leads to a loss of \$3.3 billion per year in federal income tax revenue.

Table 2. LIFT Macroeconomic Results

	Reference Case			Alternate Case			Difference			
	2023	2032	2023-2032 Avg.	2023	2032	2023-2032 Avg.	2023	2032	2023-2032 Avg.	2023-2032 Total
<i>Billions of 2024 dollars</i>										
Gross domestic product	28,698	35,035	31,911	28,674	35,006	31,884	-23.8	-28.9	-26.6	-265.8
Personal consumption expend.	20,135	24,572	22,350	20,110	24,551	22,326	-25.6	-21.5	-24.2	-241.6
Gross private fixed investment	5,105	6,828	5,951	5,103	6,816	5,944	-1.7	-11.3	-6.5	-64.5
Real personal income	23,879	29,757	26,856	23,865	29,732	26,840	-14.0	-25.0	-16.0	-160.0
<i>Billions of current dollars</i>										
Personal interest income	2,081	3,486	2,739	2,074	3,472	2,731	-6.9	-13.8	-8.1	-81.2
Disposable income	20,494	30,229	25,133	20,480	30,205	25,122	-13.4	-23.1	-10.8	-108.3
Federal government receipts	4,740	7,487	6,204	4,741	7,478	6,201	1.4	-9.4	-3.3	-32.9
Total employment (000s of jobs)	168,898	176,967	173,424	168,832	176,882	173,342	-66.1	-85.2	-82.2	-821.7
Unemployment rate (percent)	3.63	4.15	4.08	3.67	4.20	4.12	0.04	0.05	0.05	

LIFT and STEMS are products of Interindustry Economic Research Fund, Inc., College Park, MD. More detail on Inforum's products and services can be found at www.inforumecon.com.

Overview of Prior Research on the Benefits of Credit Unions

Credit unions have been tax-exempt from federal income tax since their inception. Previous studies have pointed to the consumer and societal benefits of credit unions, and this report demonstrates these benefits empirically using the most recent data.

Credit unions' competitive effect on market loan rates

Feinberg (2001) presented a theoretical framework for understanding the impact that credit unions have on bank loan rates, and then examined data on small local markets in the U.S. to see how unsecured and new vehicle loan rates are affected. High state-level credit union membership rates were found to put downward pressure on both unsecured and new vehicle rates. Feinberg (2003) broadened the analysis to examine large and small local markets, finding unsecured and new vehicle loan rates to be reduced in response to greater local credit union market shares (with a high rate of state-level credit union membership also putting downward pressure on bank loan rates). Both Feinberg studies support the view that competition from credit unions leads to better rates being offered by banks, producing a direct benefit to consumers.

Combining the results of the two studies on market averages and individual bank pricing suggested that a one percent change in credit union market share was associated with a -0.05 percent and -0.10 percent decline, respectively, in unsecured and new vehicle loan rates. Based on this finding, a 50 percent reduction in the credit union share would imply a 2.5 percent and 5 percent increase in unsecured and new vehicle bank loan rates.

Better bank rates from market competition

In a similar study on the deposit side, Hannan (2002) applied three different proxy variables to determine the importance of credit unions in determining bank deposit interest rates in local geographic markets: (1) the share of total market deposits accounted for by credit unions; (2) the ratio of credit union members in a metropolitan area to the population in the area over the age of 18; and (3) the number of potential occupational credit union members in the area to the population over age 18. Hannan noted these alternative measures each have their advantages and disadvantages in measuring the influence of credit unions in a particular market.

Hannan's results indicate that credit union competition leads to banks offering better rates in all three instruments analyzed (money market deposit accounts, interest bearing checking accounts, and three-month CDs). Based on Hannan's findings, it is estimated that a 50 percent decline in the credit union market share would lead to a 4.4 percent decline in bank money-market deposit rates, a 6.9 percent decline in interest checking rates, and a 2.1 percent decline for three-month CDs.

Unique credit union structure provides broad benefits

Cooper (2003) offered a broader picture of credit union benefits. This study stressed not only the importance of a tax exemption for credit unions, but also how their unique organizational structure benefits consumers. Cooper reported that as of 2003 the benefits to credit union members due to lower loan and higher deposit rates were equivalent to a total of \$9 billion per year in consumer savings (the typical yearly average household savings was valued at \$250 per credit union member). Cooper also cited a 1997 Consumer Federation of America survey in which 70 percent of the respondents said that credit unions offer consumers better rates than banks.

A 2005 study by the Government Accountability Office (GAO) presented arguments for and against continuing the federal tax exemption for credit unions, without drawing any policy conclusions. It noted that an important rationale for the federal tax exemption is the view of credit unions as "member-owned, democratically operated, not-for-profit organizations." The GAO also pointed out that banks, especially small banks, are provided similar forms of tax relief through Subchapter S status, which today covers nearly one-third of banks, and acknowledged concerns about the capital raising ability of credit unions in the absence of the federal income tax exemption.

Credit unions consistently offer better rates than for-profit financial institutions

Feinberg and Rahman (2006) examined a combined sample of bank and credit union loan rates, from the mid-1990s, finding credit union new vehicle loan rates to be more than 10 percent lower than bank loan rates, after controlling for other factors (such as local market characteristics, and the financial institution's market share). While suggesting significant savings to credit union members, no calculation of the

magnitudes involved was performed. Jackson (2006) took a somewhat different approach to bank/credit union comparisons. Looking at the effect of asymmetric pricing behavior by banks and credit unions on the deposit and loan rates offered, he noted that on the loan side “credit unions lower rates faster when the market rates are falling than they raise the rates when market rates are rising, resulting in lower average loan rates over the interest cycle.”

Heinrich and Kashian (2008) analyzed cross-sectional data for 175 depository institutions, as of June 2005. The study compared the deposit and loan interest rates offered by credit unions with (a) all banking institutions, (b) credit unions recently converted to for-profit institutions, and (c) banking institutions that have never been credit unions. The results show that credit unions consistently offer lower loan rates and higher savings rates in comparison to other banking institutions (with the exception of interest-bearing checking accounts). The largest difference in rates between credit unions and former credit unions appeared to be on standard savings accounts, with credit unions providing a better rate. The authors did note that it is difficult to pin-point what accounts for the variation in rate other than institutional differences. While their findings are supportive of the credit union tax exemption, they could not rule out other factors leading to consumer benefits passed on by credit unions.

More recently, on the issue of credit union competition with banks, Lawrence et al (2024) find that credit unions offer higher deposit and lower loan rates than commercial banks – both C corporation and S corporation banks. To some extent this is an update of the Feinberg and Rahman (2006) study discussed above.

Sub-S institutions do not pass on their tax benefits to consumers

Depken, et al. (2010) examined whether the tax benefits provided to Sub-S banks are passed along to consumers in the form of more favorable interest rates. Given that Sub-S banks are not subject to corporate federal income taxes (the tax burden is passed through to shareholders) one might expect that Sub-S banks would pass these tax benefits on to consumers in the form of lower loan and higher deposit rates than traditional C-Corporation banks. As of June 2008,

Sub-S chartered banks were roughly 30 percent of U.S. banking institutions. The authors used OLS regression (though similar results are obtained with more sophisticated modeling) with variables for whether the institution is a Sub-S bank or not, whether the institution is a credit union or not, a regional dummy variable, and a dummy variable for the size of the institution. The results suggest that Sub-S institutions offer the same or lower deposit rates than traditional banking institutions, with no differences in loan rates. At the same time, Depken et al. found that credit unions offer lower loan rates, suggesting that although Sub-S institutions do not pass on their tax benefits to consumers, credit unions do.

Credit unions continue to be an important competitive influence in current markets

More recently, Chatterji et al. (2015) noted gains in credit union shares of consumer financial services markets after the financial crisis of the late 2000s. These gains were especially strong for those credit unions with distinct “non-bank” identities and suggest that credit unions provide an important competitive influence in these markets.

Similarly, Cororaton (2020) finds credit unions to have increased lending after the Great Recession, relative to commercial banks. She attributes this to more competitive loan pricing, due to “member-oriented firm objectives” by credit unions. And Van Rijn (2023) illustrates that growth in credit union membership, including via conversion to community charters, has increased credit union returns without any significant increase in risk.

Looking at the most recent literature, Chen et al (2024) suggest that the bulk of the credit union competitive impact on banks is their effect on small bank deposit and loan rates. And, finally, Feinberg and Reynolds (2025) – updating the older Feinberg (2001;2003) studies on credit union impacts on bank loan rates – finds that in the low-interest-rate environment of the 2010-2019 decade, local credit union market shares continue to provide competitive discipline on bank loan pricing decisions (despite the rise of internet banking).

Recent work confirms that credit unions pass the benefits of their tax exemption on to members

DeYoung, et al (2019), in a University of St. Andrews (Scotland) working paper, examine what they

call the relative inefficiencies of banks and credit unions, finding credit unions to be more inefficient. However, this is essentially a by-product of differing goals and organizational structures of the two types of financial institutions. Importantly, when they consider prices credit unions actually pay and charge for inputs and outputs they find that virtually all the benefits of the federal tax exemption are passed on to credit union members.

Furthermore, van Rijn et al (2021) examine individual data from the Federal Reserve's Survey of Consumer Finances from 2001 to 2019 to confirm that households receiving auto loans – on both new and used vehicles – from credit unions pay substantially less in interest than similar households receiving bank loans. They estimate the aggregated savings to credit union members on these loans alone is larger than the estimated value of the credit union corporate income tax exemption. But as they do not consider savings on other types of loans and benefits from higher deposit rates to credit union members – let alone competitive benefits to bank customers – they acknowledge that the benefits identified in their study are surely an underestimate of the true value to consumers of credit unions' presence in the market.

The previous literature outlined in this study documents clear savings to both credit union and bank consumers due to the presence of credit unions in local financial services markets. While it may not be possible to determine the exact degree

to which the federal tax exemption is responsible for consumer savings, it clearly plays a major role. This study provides an updated analysis of total consumer benefits and economic gains resulting from the credit union presence over the past decade.

Negative consequences of taxing credit unions in Canada and Australia

Burger (1991) examined how the federal income taxation of Savings & Loans in the 1950's and of Canadian credit unions in 1972 affected these institutions' operations. He noted that under federal income taxation the capital-to-asset ratios for S&Ls sharply declined. Similarly, the capital-to-asset ratio for Canadian credit unions declined from an average of 6 percent (1967-1971) to an average of 3.75 percent (1971-1976) after the change in tax policy. Reduced capital reserves severely restrict any financial institution's ability to lend. Both of these experiences are viewed by Burger as suggesting the vulnerability of U.S. credit unions to federal income tax.

More recently, Gasbarro et al. (2007) examined the effect of the 1994 imposition of federal income taxes on credit unions in Australia, in order to determine how federal income taxation might affect U.S. credit unions. There were 833 credit unions in Australia in May 1973 (beginning of tax exemption), about 400 in 1994, and only 149 remained in 2006. This reduction in the number of credit unions is believed to have been the direct result of a significant decrease in returns on equity, as returns on equity for the remaining credit unions fell dramatically after taxation.

Conclusions

Loss of the credit union tax-exemption would result in direct losses to consumers

Making very conservative assumptions, this report finds that in the absence of the credit union federal tax exemption, a significant reduction of the presence of credit unions in the U.S. economy would have resulted in a direct loss to consumers of \$234.6 billion over the ten-year period studied. These losses would be due to both increased loan interest payments and reduced deposit interest received by bank and credit union members alike.

A reduction in credit union market presence would hurt all consumers

The presence of credit unions in local consumer lending markets has a significant positive impact on both bank customers and credit union members for both loans and deposits. Consumers saved and earned approximately \$23 billion per year over the past decade in direct benefits thanks to the presence of credit unions in financial markets. These benefits are unlikely to occur without the federal tax exemption granted to the credit union industry.

It is worth noting that the simulated 50 percent reduction in credit union market share assumed in this study is a very conservative estimate of what would likely occur as a result of the elimination of the federal tax exemption, as the Australian case

demonstrates. Therefore, the effects simulated in this study also understate the true benefit of credit unions to bank loan consumers. Furthermore, the calculated benefits to credit union members presented above may underestimate their gains from the presence of credit unions in local markets, as bank rates would be less favorable (and the gap between actual credit union interest rates and bank rates would be even larger).

Loss of the credit union tax-exemption would have far-reaching consequences for the overall economy

There are even larger consequences to the overall economy when these credit union benefits are applied to Inforum's dynamic general equilibrium model. In the absence of the federal tax exemption, reduced purchasing power by bank and credit union members would lead to reduced consumer spending in other sectors of the economy. The reduced purchasing power in the U.S. economy resulting from a \$13.8 billion annual loss of personal income would reduce consumer spending by about \$24.2 billion per year over the next decade (in 2024 dollars). This would result in a reduction in GDP of approximately \$26.6 billion per year and employment losses of roughly 82,000 jobs per year. Model results incorporate the elimination of preferential loan and deposit rates for credit union members as well as the effect on bank consumers of reducing the market share of credit unions.

Notes

1. Some credit union/bank interest rate differences may not be lost without the federal income tax exemption. The volunteer nature of some credit union positions and donated office space received by some credit unions might allow slightly more attractive loan and deposit pricing to continue, but the much smaller average size of credit union institutions would likely continue to disadvantage them vis-à-vis larger banking firms.
2. The estimated effects on bank loan rates in Feinberg's 2003 study were determined only for unsecured non-credit card loan rates and for new vehicle loans; however, extrapolating these to other consumer loans is a reasonable approach.

3. Statistical estimates are generally most accurate for small changes, in this case for small changes in the credit union market share; however, there was substantial variation in the credit union share among the markets analyzed in the original published research, and a 50 percent change from the mean value certainly includes data points from the original sample of observations.

4. Hannan's (2002) estimates were expressed in terms of basis point changes due to changes in the credit union market share (rather than in percentage changes in loan rates); these basis point changes were transformed into estimated percentage changes from the 1998 bank deposit interest rates, and those percentage changes were then applied to mid-year average rates for each year.

References

- Bickley, James M., "Should Credit Unions Be Taxed?" Congressional Research Service, September 2010.
- Burger, Alfred E., "Taxation of Credit Unions," Filene Research Institute (1991).
- Chatterji, Aaron K, Jiao Luo, and Robert C. Seamans, "Competition between Organizational Forms: Banks vs. Credit Unions after the Financial Crisis," Academy of Management Proceedings, 2015.
- Depken II, Craig A., Harris Hollans, and Steve Swidler, "Do Tax Benefits Conferred to Sub-S Banks Affect Their Deposit or Loan Rates?" Finance Research Letters 7 (2010), 238-245.
- Chen, Jiakai, Teng Wang, and Tim Zhang, "Credit Union Expansion and Bifurcation in Local Bank Lending," Working Paper, August 2024.
- Cooper, Mark, Credit Unions in a 21st Century Financial Marketplace, Consumer Federation of America, October 2003.
- Cororaton, Anna, "Banking on the Firm Objective," SSRN Working Paper, February 2020.
- DeYoung, Robert, John Goddard, Donal McKillop, and John Wilson, "Who Consumes the Credit Union Tax Subsidy?" WP No. 19-018, Centre for Responsible Banking and Finance, University of St. Andrews, 2019.
- Feinberg, Robert M., "The Competitive Role of Credit Unions in Small Local Financial Services Markets," Review of Economics and Statistics, Vol. 83, August 2001, pp. 560-563
- Feinberg, Robert M., "The Determinants of Bank Rates in Local Consumer Lending Markets: Comparing Market- and Institution-Level Results," Southern Economic Journal 70 (2003), 144-156.
- Feinberg, Robert M. and Ataur Rahman, "Are Credit Unions Just Small Banks? Determinants of Loan Rates in Local Consumer Lending Markets," Eastern Economic Journal, Vol. 32, No. 4, Fall 2006, pp. 647-659.
- Feinberg, Robert M and Kara Reynolds, "The Impact of Credit Union Competition on Bank Loan Rates, 2010-2019," Southern Economic Journal, forthcoming 2025.
- Fullerton, T.M., Tokle, R.J., Jones, B., & Fullerton, S.L. (2023) Does Rocky Mountain Credit Union Competition still Affect Commercial Bank Interest Rates? Journal of Regional Economics, 2(1), 42–52.
- Gasbarro, Dominic, Phil Hancock, and J. Kenton Zumwalt, "Impact of Taxation on Credit Unions in Australia," Filene Research Institute, (2007).
- Hannan, Timothy H., "The Impact of Credit Unions on the Rates Offered for Retail Deposits by Banks and Thrift Institutions," Working Paper, Federal Reserve Board, September 2002.
- Heinrich, Jeff and Russ Kashian, "Credit Union to Mutual Conversion: Do Interest Rates Diverge?" Contemporary Economic Policy 26 (2008), 107-117.
- Jackson, W.E., "A Comparison of the Deposit and Loan Pricing Behavior of Credit Unions and Commercial Banks," Filene Research Institute, 2006.
- Lawrence, Edward R., Ca Nguyen, and Alejandro Pacheco. "Interest Rate Competition among C Banks, S Banks, and Credit Unions." Journal of Financial Services Research 65, no. 2 (2024): 219-242.
- Tokle , Robert J. (2005). "The Influence of Credit Unions on Bank CD Rate Payments in the U.S." New York Economic Review, 57-64.
- Tokle, Robert J. and Joanne G. Tokle, "The Influence of Credit Union and Savings and Loan Competition on Bank Deposit Rates in Idaho and Montana," Review of Industrial Organization 17 (2000), 427-439.
- U.S. Department of the Treasury, Comparing Credit Unions with Other Depository Institutions. Washington, DC, 2001.
- U.S. Government Accountability Office, Financial Institutions: Issues Regarding the Tax-Exempt Status of Credit Unions, 2005.
- Van Rijn, Jordan, The effects of membership expansion on credit union risk and returns, University of Wisconsin-Madison Working Paper, July 2023.
- van Rijn, Jordan, Shuwei Zeng, and Paul Hellman, "Financial Institution Objectives & Auto Loan Pricing: Evidence from the Survey of Consumer Finances," Journal of Consumer Affairs, Vol. 55, No. 3, September 2021, pp. 995-1039.
- Wilcox, James A., "The Increasing Importance of Credit Unions in Small Business Lending," Small Business Administration, September 2011

State estimates of employment losses due to reduction of credit union presence

	Reference Case (thousands of jobs)			Alternate Case (thousands of jobs)			Difference (number of jobs)			Difference (thousands)
	2023	2032	2023-2032 Average	2023	2032	2023-2032 Average	2023	2032	2023-2032 Average	2023-2032 Total
U.S.	168,898	176,967	173,424	168,832	176,882	173,342	-66,100	-85,200	-82,150	-821.5
Alabama	2,181	2,223	2,207	2,180	2,222	2,206	-939	-897	-919	-9.2
Alaska	348	363	357	348	363	357	-132	-186	-177	-1.8
Arizona	3,294	3,512	3,408	3,293	3,511	3,406	-1,411	-1,497	-1,481	-14.8
Arkansas	1,403	1,477	1,443	1,402	1,477	1,442	-443	-874	-807	-8.1
California	20,308	21,422	20,945	20,301	21,410	20,934	-7,001	-11,883	-11,040	-110.4
Colorado	3,127	3,356	3,249	3,126	3,354	3,247	-1,134	-1,869	-1,722	-17.2
Connecticut	1,894	1,983	1,949	1,893	1,982	1,948	-641	-1,055	-1,000	-10.0
Delaware	523	557	540	523	557	540	-231	-215	-219	-2.2
Dist. of Col.	872	926	901	872	925	900	-311	-507	-461	-4.6
Florida	10,553	11,428	11,007	10,549	11,421	11,001	-3,935	-6,865	-6,328	-63.3
Georgia	5,175	5,389	5,295	5,173	5,386	5,293	-2,237	-2,222	-2,230	-22.3
Hawaii	776	813	798	775	813	798	-295	-419	-401	-4.0
Idaho	856	914	887	856	914	887	-310	-513	-476	-4.8
Illinois	6,854	6,987	6,946	6,851	6,984	6,942	-2,722	-3,137	-3,135	-31.4
Indiana	3,500	3,576	3,546	3,498	3,575	3,545	-1,606	-1,255	-1,336	-13.4
Iowa	1,729	1,770	1,755	1,729	1,769	1,754	-689	-824	-810	-8.1
Kansas	1,548	1,578	1,568	1,547	1,577	1,567	-617	-728	-722	-7.2
Kentucky	2,175	2,227	2,204	2,174	2,226	2,203	-932	-857	-882	-8.8
Louisiana	2,205	2,300	2,259	2,204	2,299	2,258	-869	-1,038	-1,016	-10.2
Maine	683	703	694	683	702	694	-293	-287	-293	-2.9
Maryland	3,019	3,120	3,080	3,018	3,119	3,078	-1,247	-1,391	-1,377	-13.8
Massachusetts	4,288	4,546	4,434	4,287	4,544	4,432	-1,570	-2,307	-2,178	-21.8
Michigan	4,868	4,987	4,942	4,866	4,985	4,940	-2,021	-2,097	-2,118	-21.2
Minnesota	3,310	3,484	3,409	3,309	3,483	3,407	-1,293	-1,640	-1,587	-15.9
Mississippi	1,229	1,254	1,243	1,229	1,253	1,242	-533	-465	-484	-4.8
Missouri	3,186	3,288	3,245	3,184	3,287	3,244	-1,299	-1,429	-1,428	-14.3
Montana	525	555	541	525	555	541	-176	-337	-311	-3.1
Nebraska	1,114	1,144	1,133	1,113	1,143	1,133	-449	-533	-525	-5.3
Nevada	1,607	1,737	1,679	1,607	1,736	1,678	-608	-927	-869	-8.7
New Hamp.	753	776	767	753	776	767	-317	-323	-325	-3.2
New Jersey	4,606	4,809	4,728	4,604	4,807	4,726	-1,904	-2,010	-2,016	-20.2
New Mexico	887	916	903	886	916	903	-367	-408	-408	-4.1
New York	10,751	11,246	11,042	10,748	11,240	11,037	-3,638	-6,132	-5,738	-57.4
North Carolina	5,105	5,360	5,241	5,103	5,358	5,239	-2,154	-2,347	-2,316	-23.2
North Dakota	479	506	494	479	506	494	-159	-310	-281	-2.8
Ohio	6,126	6,255	6,207	6,124	6,253	6,204	-2,645	-2,403	-2,491	-24.9
Oklahoma	1,749	1,789	1,773	1,748	1,789	1,772	-714	-814	-807	-8.1
Oregon	2,210	2,346	2,283	2,209	2,345	2,282	-847	-1,188	-1,125	-11.3
Pennsylvania	6,895	7,137	7,037	6,892	7,134	7,034	-2,909	-2,879	-2,917	-29.2
Rhode Island	557	576	568	556	575	567	-239	-233	-237	-2.4
South Carolina	2,384	2,514	2,452	2,383	2,513	2,451	-979	-1,111	-1,087	-10.9
South Dakota	489	513	502	489	512	502	-173	-290	-272	-2.7
Tennessee	3,462	3,623	3,550	3,460	3,622	3,548	-1,603	-1,259	-1,317	-13.2
Texas	14,391	15,331	14,886	14,385	15,324	14,879	-5,878	-7,101	-6,774	-67.7
Utah	1,746	1,880	1,818	1,745	1,879	1,817	-607	-1,110	-1,004	-10.0
Vermont	351	363	358	351	363	358	-137	-172	-169	-1.7
Virginia	4,514	4,754	4,649	4,512	4,751	4,646	-1,780	-2,342	-2,254	-22.5
Washington	4,034	4,307	4,185	4,033	4,304	4,183	-1,356	-2,581	-2,346	-23.5
West Virginia	736	736	737	735	736	737	-333	-240	-262	-2.6
Wisconsin	3,243	3,321	3,292	3,242	3,319	3,291	-1,323	-1,489	-1,482	-14.8
Wyoming	282	287	286	282	287	286	-89	-202	-187	-1.9