

Supporting Statement and Request for Clearance
Conflict of Interest Package for CDFI Fund Non-Federal Readers
OMB 1559-0011
Renewal

1. Circumstances necessitating collection of information

The Community Development Financial Institutions (CDFI) Fund provides financial and technical assistance to CDFIs and tax credit allocations to community development entities (CDEs) through an evaluation and selection process. As part of its initial substantive evaluation of applications, the CDFI Fund typically utilizes a peer review process comprised of Federal and non-Federal employee readers. The services of the non-Federal employees are acquired via contract. Consistent with the Federal Acquisition Regulation provisions on conflicts of interest, the CDFI Fund has applied, and will continue to apply, a conflict of interest policy with respect to its contract (non-Federal employee) readers that avoids a reader's participation in the evaluation or process of selection of applications where such participation creates a conflict of interest or an appearance of a conflict of interest. The conflict of interest review materials are used by the Fund to determine whether or not a contractor's financial interest, or that of the contractor's spouse, parent, dependent child, or member of household, may result in a conflict, or apparent conflict of interest with the individual's duties and responsibilities as a contractor evaluating applications. The completion of the package is mandatory for all contractors prior to their selection as readers.

2. Method of collection and use of data

The CDFI Fund's Office of Legal Counsel will collect the information from contractors to determine whether there are any real or apparent conflicts of interest that would disqualify a contractor from evaluating applications. The portion of the information in which the readers review the list of applicants is submitted electronically however, the Fund requires that the execution of certain forms be submitted by facsimile.

3. Use of Information Technology

A portion of the submissions of the required information are submitted electronically through a web-based system.

4. Efforts to identify duplication

These forms do not duplicate any other CDFI Fund efforts, and the information requested is required in order to identify and evaluate real or apparent conflicts of interest. In cases where the CDFI Fund has collected information from the same potential contractors in the past, the information previously collected may no longer be up-to-date or complete. Specifically, the CDFI Fund seeks to collect conflict of interest information from potential contractors regarding a specific pool of applicants listed by name on the "Conflict of Interest Report." This pool of applicants will change for each funding round and within each program, and information collected for a previous funding round (or program) will cover a different pool of applicants. To the extent that there is some overlap in pools of applicants between funding rounds or different programs, the conflict of interest information previously collected may no longer be up-to-date or current. A failure to collect up-to-date conflict of interest information from potential contractors could adversely affect the public's confidence in the integrity of the CDFI Fund's evaluation processes. No other CDFI Fund process or information source gathers the required information.

5. Impact on small entities

This collection of information has no significant impact on a substantial number of small entities, because all of the respondents are individuals.

6. Consequences of less frequent collection and obstacles to burden reduction

The CDFI Fund collects information from potential contractors on “an event” basis that is tied to the funding round for each program. Since each program funding round will have a different pool of applicants the Fund conducts a separate conflict of interest review every funding round for each program. A reader may evaluate applications submitted to different programs in the same funding year, however, since the applicant pool will be different, the readers would still be required to complete different sets of conflict of interest materials. Collecting information from potential contractors on “an event” basis maximizes the efficiency and integrity of the CDFI Fund’s evaluation processes by identifying real or apparent conflicts of interest with up-to-date information at an early stage of the procurement process.

7. Circumstances requiring special information collection

The CDFI Fund may require potential contractors to respond to the collection of information in fewer than 30 days after receipt. While the CDFI Fund intends to afford potential contractors at least 30 days to respond, a 30 day time frame might not always be practicable given the time available between the application submission due dates and when the applications must be reviewed.

8. Solicitation of comments on information collection

The CDFI Fund published in the Federal Register the notice required by 5 C.F.R. § 1320.8(d) on November 6, 2006. See 71 FR 65033 (copy attached). The CDFI Fund did not receive any comments.

9. Provision of payment to respondents

Not applicable. The only payments the CDFI Fund will provide are in the form of remuneration to contractors.

10. Assurance of confidentiality

Not applicable. The CDFI Fund does not provide potential contractors with any specific assurance of confidentiality other than the Privacy Act notice required by 5 U.S.C. § 552a(e)(3).

11. Justification of sensitive questions.

Not applicable. The CDFI Fund is not asking questions of a sensitive nature.

12. Estimate of the hour burden of information collection.

The Fund expects annual responses from 150 non-Federal respondents for all of its programs combined. The total hour burden of this information collection is estimated at 112.5 hours; 45 minutes per respondent.

13. Estimate of total annual cost burden to respondents

It is not expected that this information collection will impose any cost burdens on respondents. No purchases of equipment or services will need to be made by respondents for this information collection.

14. Estimate of annualized cost to the Government

The estimated cost to the Government is the CDFI Fund staff time related to in-take of the information, follow-up with respondents, and tabulating and evaluating the information collected for purposes of identifying real or apparent conflicts of interest.

15. Any program changes or adjustments

There are no program changes or adjustments.

16. Plans for information tabulation and publication

Not applicable. The information collected through these forms will not be published.

17. Reasons for not displaying expiration date of OMB approval

Not applicable. Information disseminated post-OMB approval will include the OMB control number.

18. Explanation of exceptions to certification statement

Not applicable. There are no exceptions to the certification statement.

A. Collections of Information Employing Statistical Methods

This section is not applicable. This collection of information does not involve statistical methods.